

IN THE SUPREME COURT OF THE STATE OF NEVADA

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT,

Appellant,

vs.

LAS VEGAS REVIEW-JOURNAL,

Respondent.

Case No.: 78967 Electronically Filed
Oct 28 2019 04:02 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appeal from the Eighth Judicial District
Court, The Honorable Joe Hardy
Presiding.

APPELLANT, LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S,
APPENDIX, VOLUME 17
(Bates Nos. 3814-3956)

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SCOPE II User Guide – Query & View

- Moniker²⁵¹
- VIN
- LIC PLT/LIC State
- Parameters that can be queried with or without the Last Name, however, the candidate list return rules are different:
 - SOC only (will return all candidates with that SOC, including those records with the SOC as primary and those with the SOC listed as an additional)
 - SOC with other query parameters (will return all candidates with that SOC first, then candidates with a match on the name and other identifiers)
- You may also use a **wildcard search** which provides the ability to query using partial data. The asterisk (*) is used as the wild card search character. The wild card can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Wild cards will be allowed on the following field parameters:
 - Name
 - Moniker
 - License Plate Number
 - VIN

7.5.2 Additional Citizens Report Query Parameters

- **Reason Code** and **Attention** are optional fields. If used, both fields must be filled in. Correct usage of these fields will be determined by the administrator of each agency.
- There are two **checkmark boxes** that give you further control over your search:
 - ✓ SOUNDEX: Check this box if you are unsure of the spelling of the name and want a soundex search to provide you a candidate list of similar sounding names. The soundex will search both first and last names (if included in the search). Ex., "Pati Peters" will search Pati, Patty, Patricia, Pete, etc. for the first name and Peters, Peterson, Petersen, etc. for the last name. You may also run a soundex search on just the last name or just the first name.
 - ✓ INCLUDE HISTORY: The following items are moved to History:
 - PBR
 - Address
 - Phone
 - E-Mail

²⁵¹ Feature 19361 – March 2017

SCOPE II User Guide – Query & View

- CPSOR
 - Address
 - Vehicle
- Missing Persons
 - Person
 - Vehicle
- ATL
 - Person
 - Vehicle
- CCW Permits

To view the history you will need to click on the **INCLUDE HISTORY** and **FULL RECORD RESPONSE** checkboxes. History is only viewable in Full Record mode.

You will only be able to see history in the modules you are authorized to view.

7.6 Responses

7.6.1 Full Response

After you send your query you will receive a response containing all of the data that you are authorized to view. The response will contain high lighted and low lighted data. This allows you to view the entire response, including the information which will be removed from the printed report. Below is an example showing what you may receive after hitting SEND.

RESPONSE					
CITIZENS DIS QUERY: ID=1234567					
CONV PERS	CRIM HIST	ALERTS [4]	WRK CRD/BUS LIC	WEAPONS	
ID #: 1234567					
LEGACY SID: 1329561		LEGACY ID #: CS-1234567			
NAM: ZTEST, ZIGGY ZION		DOB: 7/7/1929	SOC: [REDACTED]		
SEX: M	RAC: W	HGT: 510	WGT: 185	HAIR: BLD	EYE: BLU
AGE: 34					
ADR: RS	5678 SUNSET RD, LVN		EFFECTIVE DATE: 12/6/1988		
SPC #: SPC	AGY: LAS VEGAS METRO PD		DATE: 5/15/1988		

Citizens Report - Primary Data (partial screenshot with Low Lighted data)

SCOPE II User Guide – Query & View

TYPE	DESCRIPTION	EXPIRES	AGY	ENTRY DATE	
NOTICE	DISMISSED IS ALIEN PER A/C #410345578**		LAS VEGAS METRO PD	3/22/2001	
CONTACT	**CONTACT 4LT SENT 0393-2223**		HENDERSON PD	3/27/2007	
FINGERPRINT ORDINANCE	CON RES		NORTH LAS VEGAS PD	1/5/2013	
AKA [5]					
NAME			AGY	ENTRY DATE	
ZTEST, ZIGGY ZION			LAS VEGAS METRO PD	6/15/1988	
TEST, RECORD ONE			NORTH LAS VEGAS MUNI COURT	6/15/1988	
TEST, RECORD OLD			LAS VEGAS METRO PD	6/15/1988	
TEST, RECORD TWO			LAS VEGAS METRO PD	6/15/1988	
SMITH, JUSTIN			LAS VEGAS METRO PD	6/15/1988	
PHONICKERS [3]					
NAME			AGY	ENTRY DATE	
GIGILO			NORTH LAS VEGAS PD	6/15/1988	
ZIGZAG			LAS VEGAS METRO PD	6/15/1988	
ADDITIONAL DOB [1]					
DOB			AGY	ENTRY DATE	
7/7/1929			LAS VEGAS METRO PD	6/15/1988	
PHOTO [1]					
PHOTO			AGY	ENTRY DATE	
[REDACTED]			LAS VEGAS METRO PD	6/15/1988	
MARKS [1]					
MARK	MARK DESCRIPTION		AGY	ENTRY DATE	
SCAR L BUTTOCK			NORTH LAS VEGAS PD	2/2/2006	
RESIDENCE [2]					
TYPE	ADDRESS	PRIMARY	VERIFIED	AGY	EFFECTIVE DATE
RESIDENCE	5678 SUNSET RD, LVN	YES		LAS VEGAS METRO PD	12/5/1999
RESIDENCE	5678 SUNSET RD, LVN	YES		NORTH LAS VEGAS PD	12/5/1999
OTHER [3]					
TYPE	NUMBER		AGY	ENTRY DATE	
OTHER	88-P-0000		LAS VEGAS METRO PD	1/5/2013	
OTHER	88- [REDACTED]		NORTH LAS VEGAS PD	1/5/2013	
OTHER	88- [REDACTED]		NORTH LAS VEGAS PD	1/5/2013	
NOTES [3]					
TYPE	DESCRIPTION		AGY	ENTRY DATE	
BP	JABBERWOCKY, MN		NLPD		
WC	CO EMP		NLPD		
NC	NON-CRIMINAL DATA PURGED		LVN	6/15/1999	

Citizens Report - Additional PBR Information (partial screenshot with Low Lighted data)

SCOPE II User Guide – Query & View

REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
5/15/1988	MUST REGISTER	99999	SEXUAL ABUSE - MUST REG	1988	NV	
TIER LEVEL:		VERIFICATION DATE:				
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 05/15/1988 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
5/4/1988	SEX OFFER REG	99999	RAPE - SEX	1988	NV	
TIER LEVEL:		VERIFICATION DATE:				
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 09/04/1988 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
5/16/1988	REGISTERED	99999	CON BURG - GROSS MIS	1988	NV	
TIER LEVEL:		VERIFICATION DATE:				
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 08/15/1988 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
5/16/1988	REGISTERED	99999	CCW - MISD	1988	NV	
TIER LEVEL:		VERIFICATION DATE:				
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 05/15/1988 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
6/10/1988	REGISTERED	99999	DWI CONT SUB - MISD NARC	1988	NV	
TIER LEVEL:		VERIFICATION DATE:				
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 05/16/1991 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
9/2/1988	REGISTERED	99999	BURG - FELONY	1988	NV	
TIER LEVEL:		VERIFICATION DATE:				
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 09/02/1986 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						

TYPE:	AGY:	EFFECTIVE DATE:	VERIFICATION DATE:	PRIMARY:
PS	LAS VEGAS METRO PD	12/8/1988		YES
ADDRESS:	CITY:			
[REDACTED] LVN		STATE:		
		ZIP CODE:		

ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 05/16/1988 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:52:16						
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Citizens Report - CPSOR (partial screenshot with Low Lighted data)

SCOPE II User Guide – Query & View

EVENT REPORTS (5)					
TYPE	ASSOCIATION	AGY	REPORTED	ENTERED	EVENT#
OTHER	UNKNOWN	LAS VEGAS METRO PD	01/01/2007 00:00:00	01/01/2007 00:00:00	111111-1111
COMMENT (1)					
COMMENT: AGY: LAS VEGAS METRO PD COMMENT DATE: 01/06/2013 21:46:04 TEST RECORD TWO STEWART/LVS S					
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:45:23 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:46:04					
TYPE	ASSOCIATION	AGY	REPORTED	ENTERED	EVENT#
OTHER	VICTIM	LAS VEGAS METRO PD	03/26/1998 00:00:00	03/26/1998 00:00:00	88-000001
COMMENT (1)					
COMMENT: AGY: LAS VEGAS METRO PD COMMENT DATE: 01/06/2013 21:46:04 FOUND PROP -N-					
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:45:23 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:46:04					

Citizens Report - Incidents Module (partial screenshot)

STATUS:		COMMENT:	
NON-COMPLIANT		NON-COMPLIANT COMMENT	
SUPERVISING AGY:		EXPIRATION DATE:	CASE#:
LAS VEGAS ALT SENT DIV		1/12/2013	8145166
CONTACT:		PHONE:	TIME FRAME:
NAME		(123) 456-7890	1-10
OFFENSE		AGENCY	ENTRY DATE
50000 OPEN MURDER		HENDERSON PD	01/24/2013 08:57:14
CONDITION		DESCRIPTION	ENTRY DATE
HOUSE ARREST FROM TOP		155-689	01/24/2013 08:57:14
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: ONC 01/24/2013 08:57:14 LAST MODIFIED BY:			

Citizens Report – Probation/House Arrest Module (partial screenshot with Low Lighted data)

CRIMINAL HISTORY				ARR (8) CIT (0) SUM (0)			
ARREST DATE: 1/3/2007		AGY: LAS VEGAS METRO PD		PCN#: 11111155		BK#:	
RN#: 32	CHARGE: 1	TYPE: UNK	FAIL TO:	OFF: 99999 OTHER () ROBB	COUNTS: 1	EVT#: 070103-3021	
CCN: 4444444 UNKNOWN		STATUS: CONTINUED SEQ#: 000		CREATED: 01/03/2007 00:00:00	UPDATED: 01/05/2013 22:10:37	JUV/CERT/ADULT: ADULT	
DISPO DATE: 1/3/2007		FINAL OFF: 99999 OTHER () ROBB		DISPO: UNKNOWN		SENTENCED:	
CCN: 4444444				FACILITY:			
FINE EXCUSE RESTITUTION SCHOOL COUNSELING SPECIAL CONDITIONS							
\$		\$		\$			
MIN YRS MOS DAYS HRS				MIN YRS MOS DAYS HRS			
TERM OF SENTENCE		-1	-1	-1	-1	SUSPENDED	
CREDIT TIME SERVED		-1	-1	-1	-1	COMMUNITY SERVICE	
LEGACY DISPO: PCN 11111155				NO		PROBATION	
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 01/03/2007 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 22:22:35							

Citizens Report - Criminal History (partial screenshot)

SCOPE II User Guide – Query & View

WORK CARD/BUSINESS LICENSE – ACTIVE (1)			
TYPE: WORKCARD	DESCRIPTION: UNKNOWN	JURISDICTION: UNKNOWN	
STATUS: APPROVED	ISSUE DATE: 10/7/1996	EXPIRATION DATE: 1/1/2076	
CN #:	BL #:	PRINTS TAKEN DATE:	FINGERPRINTING AGENCY:
PROOF OF CITIZENSHIP:			
COMMENTS: CAESAR'S PALACE-BUS PERSON			
ENTERING AGENCY: LVM CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07			

Citizens Report - Work Card Module (partial screenshot with Low Lighted data)

GUN REGISTRATION REQUIRED IN CLARK COUNTY ONLY												
#	FAA	MOD	CRI	SERIAL#	OTHER#	BARREL LENGTH	CN	TYPE	STATUS	REC DATE	ENTRY DATE	AGY
1	440	123	1204	RUGER, REMINGTON, SAVAGE	554554	4554	15	BLACK SHOTGUN, PUMP-ACTION	ACTIVE	1/23/2013	1/23/2013	LAS VEGAS METRO PD
COMMENT: COMMENT FOR 1234567										AGY: LAS VEGAS METRO PD COMMENT DATE: 1/23/2013		
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: DMD 01/23/2013 08:25:10 LAST MODIFIED BY: DMD 01/24/2013 09:46:42												
CONCEALED WEAPONS PERMIT HISTORY – APPLICATION [] TEMPORARY []												
UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY. LAS VEGAS METRO PD [REDACTED] 02/04/2013 09:48:59												
RELEASE TO: [REDACTED] PRINT PREVIEW												
ENTERING AGENCY: UNKNOWN CREATED BY: MIGRATION FROM LEGACY SCOPE 06/15/1988 00:00:00 LAST MODIFIED BY: DMD 01/23/2013 08:25:10												

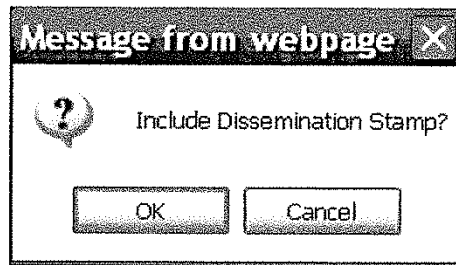
Citizens Report - Weapons Module (partial screenshot, with Low Lighted data and Dissemination Stamp)

After you review the response you will have an opportunity to initiate a printable report. When you are ready to print, enter the name of the person who will be receiving the report.

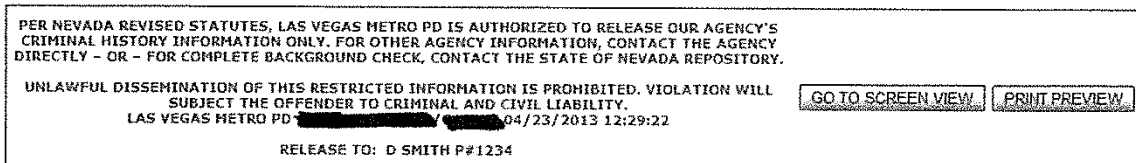
UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY. LAS VEGAS METRO PD [REDACTED] 04/23/2013 12:23:58		GO TO PRINT VIEW	PRINT PREVIEW
<input type="text" value="D Smith P=1234"/>			

Click on the GO TO PRINT VIEW button to view the report. The following pop-up box will appear:

SCOPE II User Guide – Query & View



To include the Dissemination Stamp, click on OK. If you would like to receive the report without the stamp, click on Cancel.



The screen will refresh, update the Dissemination Stamp and display a Print Preview button.

Click the PRINT PREVIEW button and a window will pop up with the document. Either right click on the document or press Ctrl + P on your keyboard.

You will then see the response in a printable report. Each page of the report will include the Dissemination Stamp.²⁵²

²⁵² (Feature 14934 - September 2015)



SCOPE II User Guide – Query & View

7.6.2 Data Fields

Attention	Enter the name and badge/personnel number of the person requesting the inquiry. If used, must also fill out Reason Code field.
Date of Birth (DOB)	Search as exact match or a range. To query a range, select a number from the drop-down menu. <ul style="list-style-type: none"> • MM: 01-12 • DD: 01-31 • YYYY: 4-digit year
Event Number / Department Record Number (EVT / DR#)	Enter the event number or Department Record number. Must be exact match to receive a response. Query with hyphen (i.e., 130128-1234 or 94-12345). Maximum of 20 alphabetic, numeric and special characters.
Height (HGT)	Enter a value of 0-9 in the FT field. Inches (IN) may be entered as one or two numbers (i.e., 1 or 01), with a maximum of 11. To query a range, select a number from the drop-down menu.
ID#	A system generated number within SCOPE. Maximum 9 numeric characters.
Legacy ID#	Enter ID number from SCOPE Legacy. Must be queried with prefix CS-. Maximum 15 numeric characters.
Legacy SID#	Enter SCOPE Legacy system Identification number. (Note this is not the Legacy ID# or State ID#) Maximum 8 numeric characters
License Plate # (LIC)	Enter a license plate number. May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Maximum of 20 alphabetic and numeric characters. No spaces or special characters (hyphens or symbols) are allowed. <i>The License Plate field will allow for the entry of special characters (i.e., -, *, #, ?, /, \, @, +, #, etc.).²⁵³</i>

²⁵³ (Feature 16404 - June 2015)

SCOPE II User Guide – Query & View

License State (LIS)	Select from the drop-down menu the state that corresponds with the license plate number field.
Moniker	<p>Enter a nickname or alias of the subject.</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 50 alphanumeric and spaces. Will not accept hyphens or special characters.²⁵⁴</p>
Name (Last, First & Middle)	<p>Enter the name of the subject (last, first and middle initial or name).</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 30 alphabetic characters, apostrophe and hyphen.</p>
Name Suffix	Select from the drop-down menu. A name denoting seniority, titles or degrees (i.e., JR, SR, III, MD).
Race	Select from the drop-down menu. ²⁵⁵
Reason Code	<p>Select the reason for the inquiry from the drop-down menu. Codes mirror those in JLINK III query.²⁵⁶</p> <p>If used, must also fill out Attention field.</p>
Sex	Select from the drop-down menu.
SOC#	Enter as 9 consecutive digits with no punctuation. For example: SOC  would be entered as 
VIN #	<p>Enter the vehicle's identification number.</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 20 alphabetic and numeric characters.</p>
Weight (WGT)	Enter a value of 1 to 999. To query a range, select a number from the drop-down menu.

²⁵⁴ Feature 18945 (March 2017)

²⁵⁵ (Feature 14701- January 2016)

²⁵⁶ (Feature 17374- January 2016)

SCOPE II User Guide – Query & View

7.7 Media

MEDIA REPORT			
REASON CODE	<input type="text"/>	ATTENTION	<input type="text"/>
ID#	<input type="text"/>	LEGACY ID#	<input type="text"/>
LEGACY SID#	<input type="text"/>	EVT/DR#*	<input type="text"/>
EMPLOYEE ID#	<input type="text"/>		
SOC#	<input type="text" value="(NO DASHES)"/>		
SUFFIX	<input type="text"/>	<input type="checkbox"/> SOUNDEX	<input type="checkbox"/> INCLUDE HISTORY
NAM*	<input type="text" value="(LAST NAME)"/>	<input type="text" value="(FIRST NAME)"/>	<input type="text" value="(MI)"/>
MONIKER*	<input type="text"/>		
DOB	<input type="text"/> / <input type="text"/> / <input type="text"/>	<input type="text" value="3"/> +/- YEARS	
RAC	<input type="text" value="ANY"/>	SEX	<input type="text" value="ANY"/>
HGT	<input type="text"/> FT. <input type="text"/> IN. <input type="text" value="0"/> +/- IN.		
WGT	<input type="text"/> LB. <input type="text" value="0"/> +/- LB.		
LIC PLT*	<input type="text"/>	LIC STATE	<input type="text" value="ANY"/>
VIN*	<input type="text"/>		
<input type="button" value="Clear All"/> <input type="button" value="Print Preview"/> <input type="button" value="Print"/> <input type="button" value="Send"/>			

Media Report Query Screen

7.7.1 Media Report Query Parameters

- Parameters requiring a Last Name to query (other identifiers may also be included in your search):
 - First Name
 - Middle Name
 - Suffix
 - DOB
 - Race
 - Sex
 - HGT
 - WGT
- Parameters that may be queried on their own (other identifiers may also be included in your search):
 - Last Name
 - ID#
 - Legacy SID#
 - Employee ID#
 - Legacy ID#
 - Evt/DR#²⁵⁷
- Parameters that can be queried with or without a Last Name (other identifiers may also be included in your search):

²⁵⁷ Feature 18712 (November 2016)

SCOPE II User Guide – Query & View

- Moniker²⁵⁸
- VIN
- LIC PLT/LIC State
- Parameters that can be queried with or without the Last Name, however, the candidate list return rules are different:
 - SOC only (will return all candidates with that SOC, including those records with the SOC as primary and those with the SOC listed as an additional)
 - SOC with other query parameters (will return all candidates with that SOC first, then candidates with a match on the name and other identifiers)
- You may also use a **wildcard search** which provides the ability to query using partial data. The asterisk (*) is used as the wild card search character. The wild card can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Wild cards will be allowed on the following field parameters:
 - Name
 - Moniker
 - License Plate Number
 - VIN

7.7.2 Additional Media Report Query Parameters

- **Reason Code** and **Attention** are optional fields. If used, both fields must be filled in. Correct usage of these fields will be determined by the administrator of each agency.
- There are two **checkmark boxes** that give you further control over your search:
 - ✓ SOUNDEX: Check this box if you are unsure of the spelling of the name and want a soundex search to provide you a candidate list of similar sounding names. The soundex will search both first and last names (if included in the search). Ex., "Pati Peters" will search Pati, Patty, Patricia, Pete, etc. for the first name and Peters, Peterson, Petersen, etc. for the last name. You may also run a soundex search on just the last name or just the first name.
 - ✓ INCLUDE HISTORY: The following items are moved to History:
 - PBR

²⁵⁸ Feature 19361 – March 2017

SCOPE II User Guide – Query & View

- Address
- Phone
- E-Mail
- CPSOR
 - Address
 - Vehicle
- Missing Persons
 - Person
 - Vehicle
- ATL
 - Person
 - Vehicle
- CCW Permits

To view the history you will need to **click on the INCLUDE HISTORY and FULL RECORD RESPONSE checkboxes**. History is only viewable in Full Record mode.


You will only be able to see history in the modules you are authorized to view.

7.8 Responses

7.8.1 Full Response

After you send your query you will receive a response containing all of the data that you are authorized to view. Below is an example showing what you may receive after hitting SEND.

SCOPE II User Guide – Query & View

RESPONSE	
MEDIA DIS QUERY: ID=1234567	
CONV PERS	CRIM HIST
ALERTS [4]	
WRK CRD/BUS LIC	
WEAPONS	
	
ID #: 1234567	
LEGACY SID: 1229561	LEGACY ID #: CS-1234567
NAME: ZYEST, ZIGGY ZION	DOB: 07/15/59 SOC: [REDACTED]
SEX: M	RACE: W
AGE: 64	HGT: 510
WGT: 185	HAIR: BLD
ADR: RS	EYE: BLU
SPC #: SPC	AGY: LAS VEGAS METRO PD
EFFECTIVE DATE: 12/31/99	
DATE: 6/18/1999	

Media Report - Primary Information (with Low Lighted data)

SCOPE II User Guide – Query & View

TYPE	DESCRIPTION	EXPIRES	AGY	ENTRY DATE	
NOTICE	INS**SUBJ IS ALIEN PER A/C #A123456789**		LAS VEGAS METRO PD	9/22/2001	
CONTACT	**CONTACT ALT SENT 0155-1232**		HENDERSON PD	8/27/2007	
FINGERPRINT ORDINANCE	CON REG		NORTH LAS VEGAS PD	1/8/2013	
AKA [5]					
NAME			AGY	ENTRY DATE	
ZTEST, ZIGGY ZION			LAS VEGAS METRO PD	6/15/1988	
TEST, RECORD ONE			NORTH LAS VEGAS MUNI COURT	6/15/1988	
TEST, RECORD OLD			LAS VEGAS METRO PD	6/15/1988	
TEST, RECORD TWO			LAS VEGAS METRO PD	6/15/1988	
SMITH, JUSTIN			LAS VEGAS METRO PD	6/15/1988	
ALIENS [2]					
NAME			AGY	ENTRY DATE	
GIGILO			NORTH LAS VEGAS PD	6/15/1988	
ZIGZAG			LAS VEGAS METRO PD	6/15/1988	
VEHICLES [1]					
PLATE	YEAR	MAKE	AGY	ENTRY DATE	
7/7/1929			LAS VEGAS METRO PD	6/15/1988	
VEHICLES [1]					
PLATE	YEAR	MAKE	AGY	ENTRY DATE	
[REDACTED]			LAS VEGAS METRO PD	6/15/1988	
VEHICLES [1]					
PLATE	YEAR	MAKE	AGY	ENTRY DATE	
SCAR L BUTOCK			NORTH LAS VEGAS PD	2/8/2004	
RESIDENCE [2]					
TYPE	ADDRESS	PRIMARY	VERIFIED	AGY	EFFECTIVE DATE
RESIDENCE	[REDACTED]	YES		LAS VEGAS METRO PD	12/6/1989
RESIDENCE	[REDACTED]	YES		NORTH LAS VEGAS PD	12/6/1989
OTHER [3]					
TYPE	ADDRESS	PRIMARY	VERIFIED	AGY	EFFECTIVE DATE
OTHER	95-P-0000			LAS VEGAS METRO PD	1/6/2013
OTHER	95-P-0000			NORTH LAS VEGAS PD	1/6/2013
OTHER	95-P-0000			NORTH LAS VEGAS PD	1/6/2013
OTHER [3]					
TYPE	ADDRESS	PRIMARY	VERIFIED	AGY	EFFECTIVE DATE
EF	JACOB WOCKY, MN			NLFD	
WC	CD EMP			NLFD	
NC	NON-CRIMINAL DATA FORGED			NLFD	6/15/1988

Media Report - Additional PBR Data (partial screenshot with Low Lighted data)

SCOPE II User Guide – Query & View

REGISTERED: 6/15/1982	STATUS: MUST REGISTER	OFFENSE: 99999	OFFENSE DESCRIPTION: SEXUAL ABUSE - MUST REG	YEAR: 1980	STATE: NV	TEMP. REG. EXP.:
TIER LEVEL:	VERIFICATION DATE:					
ENTERING AGENCY: LAS VEGAS METRO PD - CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
REGISTERED: 9/4/1980	STATUS: SEX OFFNR REG	OFFENSE: 99999	OFFENSE DESCRIPTION: RAPE - SEX	YEAR: 1980	STATE: NV	TEMP. REG. EXP.:
TIER LEVEL:	VERIFICATION DATE:					
ENTERING AGENCY: LAS VEGAS METRO PD - CREATED BY: MIGRATION FROM LEGACY SCOPE 09/04/1980 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						

Media Report - CPSOR (partial screenshot with Low Lighted data)

TYPE: RS	AGY: LAS VEGAS METRO PD	EFFECTIVE DATE: 12/6/1999	VERIFICATION DATE:	PRIMARY: YES
ADDRESS: 5678 SUNSET RD. LVN	CITY:	STATE:	ZIP CODE:	
ENTERING AGENCY: LAS VEGAS METRO PD - CREATED BY: MIGRATION FROM LEGACY SCOPE 06/16/1999 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:52:16				

Media Report - Continuation of CPSOR (with Low Lighted data)

COMPLAINT TYPE	DESCRIPTION	AGY	REPORTED	ENTERED	EVENT#	CASE#	COMPLAINT DATE
JUVENILE	RUNAWAY	HENDERSON PD	06/24/2010 00:00:00	06/24/2010 00:00:00	60-98765	06/24/2010 00:00:00	06/24/2010 00:00:00
TYPE	ASSIGNED TO	AGY	REPORTED	ENTERED	EVENT#		
OTHER	UNKNOWN	LAS VEGAS METRO PD	01/01/2007 00:00:00	01/01/2007 00:00:00	111111-1111		
COMMENT: AGY: LAS VEGAS METRO PD - COMMENT DATE: 01/06/2013 21:46:04 TEST RECORD T/C STEWART/LVE S							
ENTERING AGENCY: LAS VEGAS METRO PD - CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:46:04 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:46:04							
TYPE	ASSIGNED TO	AGY	REPORTED	ENTERED	EVENT#		
OTHER	VICTIM	LAS VEGAS METRO PD	03/26/1995 00:00:00	03/26/1995 00:00:00	99-000001		
COMMENT: AGY: LAS VEGAS METRO PD - COMMENT DATE: 01/06/2013 21:46:04 FOUND PROP W/							
ENTERING AGENCY: LAS VEGAS METRO PD - CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:46:04 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:46:04							

Media Report - Incidents Module (partial screenshot with Low Lighted data)

SCOPE II User Guide – Query & View

PROBATION			
STATUS:		COMMENT:	
NON-COMPLIANT		NON-COMPLIANT COMMENT	
SUPERVISING AGY:		EXPIRATION DATE:	CASE#:
LAS VEGAS ALT SENT DIV		1/12/2013	5165146
CONTACT:		PHONE:	TIME FRAME:
NAME		(123) 456-7890	1-10
EMAIL:			
OFFENSE:	AGENCY:	ENTRY DATE:	
59000 OPEN MURDER	HENDERSON PD	01/24/2013 08:57:14	
CONVICTION:	DESCRIPTION:	AGENCY:	ENTRY DATE:
HOUSE ARREST FROM TO	1654639	HENDERSON PD	01/24/2013 08:57:14
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: DMD 01/24/2013 08:57:14 LAST MODIFIED BY:			

Media Report – Probation/House Arrest Module (partial screenshot with Low Lighted data)

CRIMINAL HISTORY																																																	
ARR [8] CIT [0] SUM [0]																																																	
ARREST DATE: 1/3/2007																																																	
RN#:	CHARGE:	TYPE:	FAIL TO:	OFF:	COUNTS:	EVT#:																																											
32	1	UNK		99999 OTHER () ROBB	1	070103-3021																																											
CCN:	4444444 UNKNOWN		STATUS:	SEQ#:	CREATED:	UPDATED:	JUV/CERT/ADULT:																																										
			CONTINUED	500	01/03/2007 00:00:00	01/06/2013 22:10:37	ADULT																																										
DISPO DATE:		FINAL OFF:		DISPO:		SENTENCED:																																											
1/3/2007		99999 OTHER () ROBB		UNKNOWN																																													
CCN:		4444444		FACILITY:																																													
				UNKNOWN																																													
FINE EXCUSE RESTITUTION SCHOOL COUNSELING SPECIAL CONDITIONS																																																	
<table border="1"> <thead> <tr> <th></th> <th>\$</th> <th>\$</th> <th>\$</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> </tr> <tr> <th></th> <th>MIN</th> <th>YRS</th> <th>MOS</th> <th>DAYS</th> <th>HRS</th> <th></th> <th>MIN</th> <th>YRS</th> <th>MOS</th> </tr> </thead> <tbody> <tr> <td>TERM OF SENTENCE</td> <td>-1</td> <td>-1</td> <td>-1</td> <td>-1</td> <td></td> <td>SUSPENDED</td> <td>COMMUNITY SERVICE</td> <td>-1</td> <td>-1</td> </tr> <tr> <td>CREDIT TIME SERVED</td> <td>-1</td> <td>-1</td> <td>-1</td> <td>-1</td> <td></td> <td>NO</td> <td>PROBATION</td> <td>-1</td> <td>-1</td> </tr> </tbody> </table>											\$	\$	\$								MIN	YRS	MOS	DAYS	HRS		MIN	YRS	MOS	TERM OF SENTENCE	-1	-1	-1	-1		SUSPENDED	COMMUNITY SERVICE	-1	-1	CREDIT TIME SERVED	-1	-1	-1	-1		NO	PROBATION	-1	-1
	\$	\$	\$																																														
	MIN	YRS	MOS	DAYS	HRS		MIN	YRS	MOS																																								
TERM OF SENTENCE	-1	-1	-1	-1		SUSPENDED	COMMUNITY SERVICE	-1	-1																																								
CREDIT TIME SERVED	-1	-1	-1	-1		NO	PROBATION	-1	-1																																								
LEGACY DISPO: PCN 11111155																																																	
ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 01/03/2007 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 22:22:35																																																	

Media Report – Criminal History (partial screenshot)

WORKCARD			
TYPE:	DESCRIPTION:	JURISDICTION:	
WORKCARD	UNKNOWN	UNKNOWN	
STATUS:	ISSUE DATE:	EXPIRATION DATE:	
APPROVED	10/7/1996	1/1/2076	
CN #:	BL #:	PRINTS TAKEN DATE:	FINGERPRINTING AGENCY:
PROOF OF CITIZENSHIP:			
COMMENTS: CAESAR'S PALACE-BUS PERSON			
ENTERING AGENCY: LVH CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07			

Media Report – Work Card Module (partial screenshot with Low Lighted data)

SCOPE II User Guide – Query & View

SCOPE II

STATUS: ☐ ACTIVE ☐ INACTIVE ☐ []

GUN REGISTRATION REQUIRED IN CLARK COUNTY ONLY

SR	MAX	NOG	VAL	SERIAL #	OTHER #	MARKET	CAL	TYPE	STATUS	REG DATE	ENTRY DATE	AGY
1	100	123	204	RUGER, REMINGTON SAVAGE	954564	4564	15	BLACK SHOTSHELL PUMP ACTION	ACTIVE	1/23/2013	1/23/2013	LAS VEGAS METRO PD

COMMENT: COMMENT FOR 1234567 AGY: LAS VEGAS METRO PD COMMENT DATE: 1/23/2013

ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: DMD 01/23/2013 09:25:10 LAST MODIFIED BY: DMD 01/24/2013 09:46:42

CONCEALED WEAPONS PERMIT HISTORY – APPLICATION [] TEMPORARY []

HR-218 CARD: YES TYPE: REVOLVER EXPIRATION DATE: 1/24/2013

COMMENTS: CHECK EXPIRATION

ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: DMD 01/24/2013 09:46:42 LAST MODIFIED BY:

UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.

LAS VEGAS METRO PD [REDACTED] 02/04/2013 10:32:46

RELEASE TO: [REDACTED] [PRINT PREVIEW](#)

ENTERING AGENCY: UNKNOWN CREATED BY: MIGRATION FROM LEGACY SCOPE 06/15/1988 00:00:00 LAST MODIFIED BY: DMD 01/23/2013 08:25:10

Media Report – Weapons Module (partial screenshot with Low Lighted data and Dissemination Stamp)

After you review the response you will have an opportunity to initiate a printable report. When you are ready to print, enter the name of the person who will be receiving the report.

UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.

LAS VEGAS METRO PD [REDACTED] 04/23/2013 12:23:59

[GO TO PRINT VIEW](#) [PRINT PREVIEW](#)

D Smith P=1234

Click on the GO TO PRINT VIEW button to view the report. The following pop-up box will appear:

Message from webpage X

? Include Dissemination Stamp?

OK Cancel

SCOPE II User Guide – Query & View

To include the Dissemination Stamp, click on OK. If you would like to receive the report without the stamp, click on Cancel.

PER NEVADA REVISED STATUTES, LAS VEGAS METRO PD IS AUTHORIZED TO RELEASE OUR AGENCY'S CRIMINAL HISTORY INFORMATION ONLY. FOR OTHER AGENCY INFORMATION, CONTACT THE AGENCY DIRECTLY – OR – FOR COMPLETE BACKGROUND CHECK, CONTACT THE STATE OF NEVADA REPOSITORY.	
UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY. LAS VEGAS METRO PD [REDACTED] 04/23/2013 12:29:22	GO TO SCREEN VIEW PRINT PREVIEW
RELEASE TO: D SMITH P#1234	

The screen will refresh, update the Dissemination Stamp and display a Print Preview button.

Click the PRINT PREVIEW button and a window will pop up with the document. Either right click on the document or press Ctrl + P on your keyboard.

You will then see the response in a printable report. Each page of the report will include the Dissemination Stamp.²⁵⁹

²⁵⁹ (Feature 14934 - September 2015)



SCOPE II User Guide – Query & View

7.9 Data Fields

Attention	Enter the name and badge/personnel number of the person requesting the inquiry. If used, must also fill out Reason Code field.
Date of Birth (DOB)	Search as exact match or a range. To query a range, select a number from the drop-down menu. <ul style="list-style-type: none"> • MM: 01-12 • DD: 01-31 • YYYY: 4-digit year
Event Number / Department Record Number (EVT / DR#)	Enter the event number or Department Record number. Must be exact match to receive a response. Query with hyphen (i.e., 130128-1234 or 94-12345). Maximum of 20 alphabetic, numeric and special characters.
Height (HGT)	Enter a value of 0-9 in the FT field. Inches (IN) may be entered as one or two numbers (i.e., 1 or 01), with a maximum of 11. To query a range, select a number from the drop-down menu.
ID#	A system generated number within SCOPE. Maximum 9 numeric characters.
Legacy ID#	Enter ID number from SCOPE Legacy. Must be queried with prefix CS-. Maximum 15 numeric characters.
Legacy SID#	Enter SCOPE Legacy system Identification number. (Note this is not the Legacy ID# or State ID#) Maximum 8 numeric characters
License Plate # (LIC)	Enter a license plate number. May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Maximum of 20 alphabetic and numeric characters. No spaces or special characters (hyphens or symbols) are allowed. <i>The License Plate field will allow for the entry of special characters (i.e., -, *, #, ?, /, \, @, +, #, etc.).²⁶⁰</i>
License State (LIS)	Select from the drop-down menu the state that corresponds with the license plate number field.
Moniker	Enter a nickname or alias of the subject. May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).

²⁶⁰ (Feature 16404 - June 2015)

SCOPE II User Guide – Query & View

	Maximum of 50 alphabetic and spaces. Will not accept hyphens, special characters or numbers.
Name (Last, First & Middle)	Enter the name of the subject (last, first and middle initial or name). May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Maximum of 30 alphabetic characters, apostrophe and hyphen.
Name Suffix	Select from the drop-down menu. A name denoting seniority, titles or degrees (i.e., JR, SR, III, MD).
Race	Select from the drop-down menu. ²⁶¹
Reason Code	Select the reason for the inquiry from the drop-down menu. Codes mirror those in JLINK III query. ²⁶² If used, must also fill out Attention field.
Sex	Select from the drop-down menu.
SOC#	Enter as 9 consecutive digits with no punctuation. For example: SOC  would be entered as 
VIN #	Enter the vehicle's identification number. May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Maximum of 20 alphabetic and numeric characters.
Weight (WGT)	Enter a value of 1 to 999. To query a range, select a number from the drop-down menu.

²⁶¹ (Feature 14701- January 2016)

²⁶² (Feature 17374- January 2016)

SCOPE II User Guide – Query & View

7.10 CASI

CASI

REASON CODE	<input type="text"/>	ATTENTION	<input type="text"/>
ID#	<input type="text"/>	LEGACY ID#	<input type="text"/>
LEGACY SID#	<input type="text"/>	EVT/DR# ²⁶³	<input type="text"/>
EMPLOYEE ID#	<input type="text"/>		
SOC#	<input type="text" value="(NO DASHES)"/>		
SUFFIX	<input type="text"/>	<input type="checkbox"/> SOUNDEX	<input type="checkbox"/> INCLUDE HISTORY
NAM*	<input type="text" value="(LAST NAME)"/>	<input type="text" value="(FIRST NAME)"/>	<input type="text" value="(MI)"/>
MONIKER*	<input type="text"/>		
DOB	<input type="text"/> / <input type="text"/> / <input type="text"/>	<input type="text" value="3"/> +/- YEARS	
RAC	<input type="text" value="ANY"/>	SEX	<input type="text" value="ANY"/>
HGT	<input type="text"/> FT. <input type="text"/> IN. <input type="text" value="0"/> +/- IN.		
WGT	<input type="text"/> LB. <input type="text" value="0"/> +/- LB.		

CASI Report Query Screen

7.10.1 CASI Report Query Parameters

- Parameters requiring a Last Name to query (other identifiers may also be included in your search):
 - First Name
 - Middle Name
 - Suffix
 - DOB
 - Race
 - Sex
 - HGT
 - WGT
- Parameters that may be queried on their own (other identifiers may also be included in your search):
 - Last Name
 - ID#
 - Legacy SID#
 - Employee ID#
 - Legacy ID#
 - Evt/DR#²⁶³
- Parameters that can be queried with or without a Last Name (other identifiers may also be included in your search):
 - Moniker²⁶⁴
- Parameters that can be queried with or without the Last Name, however, the candidate list return rules are different:

²⁶³ Feature 18712 - November 2016

²⁶⁴ Feature 19361 – March 2017

SCOPE II User Guide – Query & View

- SOC only (will return all candidates with that SOC, including those records with the SOC as primary and those with the SOC listed as an additional)
- SOC with other query parameters (will return all candidates with that SOC first, then candidates with a match on the name and other identifiers)
- You may also use a **wildcard search** which provides the ability to query using partial data. The asterisk (*) is used as the wild card search character. The wild card can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Wild cards will be allowed on the following field parameters:
 - Name
 - Moniker

7.10.2 Additional CASI Report Query Parameters

- **Reason Code** and **Attention** are optional fields. If used, both fields must be filled in. Correct usage of these fields will be determined by the administrator of each agency.
- There are two **checkmark boxes** that give you further control over your search:
 - ✓ SOUNDEX: Check this box if you are unsure of the spelling of the name and want a soundex search to provide you a candidate list of similar sounding names. The soundex will search both first and last names (if included in the search). Ex., "Pati Peters" will search Pati, Patty, Patricia, Pete, etc. for the first name and Peters, Peterson, Petersen, etc. for the last name. You may also run a soundex search on just the last name or just the first name.
 - ✓ INCLUDE HISTORY: The following items are moved to History:
 - PBR
 - Address
 - Phone
 - E-Mail
 - CPSOR
 - Address
 - Vehicle
 - Missing Persons
 - Person
 - Vehicle
 - ATL
 - Person
 - Vehicle

SCOPE II User Guide – Query & View

- CCW Permits

To view the history you will need to **click on the INCLUDE HISTORY and FULL RECORD RESPONSE checkboxes**. History is only viewable in Full Record mode.

You will only be able to see history in the modules you are authorized to view.

7.11 Responses

7.11.1 Full Response

After you send your query you will receive a response containing all of the data that you are authorized to view. Below is an example showing what you may receive after hitting SEND.

RESPONSE						
CASI DIS QUERY: ID=1234567						
ID #: 1234567						
LEGACY SID: 1329561		LEGACY ID #: CS-1234567				
NAM: ZTEST, ZIGGY ZION		DOB: 7/7/1929				
SEX: M	RAC: W	HGT: 510	WGT: 185	HAIR: BLD	EYE: BLU	
SPC #: SPC						

CASI Report – Primary Data

AKA [5]		
NAME	AGY	ENTRY DATE
ZTEST, ZIGGY ZION	LAS VEGAS METRO PD	6/15/1988
TEST, RECORD ONE	NORTH LAS VEGAS MUNI COURT	6/15/1988
TEST, RECORD OLD	LAS VEGAS METRO PD	6/15/1988
TEST, RECORD TWO	LAS VEGAS METRO PD	6/15/1988
SMITH, JUSTIN	LAS VEGAS METRO PD	6/15/1988
NOMINATORS [2]		
NAME	AGY	ENTRY DATE
GIGILO	NORTH LAS VEGAS PD	6/15/1988
ZIGZAG	LAS VEGAS METRO PD	6/15/1988
ADDITIONAL DOB [1]		
DOB	AGY	ENTRY DATE
7/7/1929	LAS VEGAS METRO PD	6/15/1988

CASI Report – Additional PBR Data

SCOPE II User Guide – Query & View

CONVICTED PERSON / SOR						
REGISTRATION (LAS VEGAS METRO PD) [6]						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
6/16/1988	MUST REGISTER	99999	SEXUAL ASSLT #C123456 - MUST REG	1900	NV	
TIER LEVEL:	VERIFICATION DATE:					
ENTERING AGENCY: LAS VEGAS METRO PD FROM LEGACY SCOPE 01/06/2013 21:51:53						
CREATED BY: MIGRATION FROM LEGACY SCOPE 06/16/1988 00:00:00						
LAST MODIFIED BY: MIGRATION						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
9/4/1980	SEX OFNR REG	99999	RAPE - SEX	1980	NV	
TIER LEVEL:	VERIFICATION DATE:					
ENTERING AGENCY: LAS VEGAS METRO PD FROM LEGACY SCOPE 01/06/2013 21:51:53						
CREATED BY: MIGRATION FROM LEGACY SCOPE 09/04/1980 00:00:00						
LAST MODIFIED BY: MIGRATION						
REGISTERED:	STATUS:	OFFENSE:	OFFENSE DESCRIPTION:	YEAR:	STATE:	TEMP. REG. EXP.:
6/16/1988	REGISTERED	99999	CON BURG - GROSS MIS	1985	NV	
TIER LEVEL:	VERIFICATION DATE:					
ENTERING AGENCY: LAS VEGAS METRO PD FROM LEGACY SCOPE 01/06/2013 21:51:53						
CREATED BY: MIGRATION FROM LEGACY SCOPE 06/16/1988 00:00:00						
LAST MODIFIED BY: MIGRATION						

CASI Report – CPSOR Module

ARREST DATE: 1/3/2007				PCN#: 11111155																																						
TYPE: UNK	FAIL TO:	OFF: 99999 OTHER () ROBB		COUNTS: 1	JUV/CERT/ADULT: ADULT																																					
STATUS: CONTINUED																																										
DISPO DATE:	FINAL OFF:	DISPO:		SENTENCED:																																						
1/3/2007	99999 OTHER () ROBB	UNKNOWN																																								
		FACILITY:																																								
<table border="1"> <thead> <tr> <th>MIN</th> <th>YRS</th> <th>MOS</th> <th>DAYS</th> <th>HRS</th> </tr> </thead> <tbody> <tr> <td>TERM OF SENTENCE</td> <td>-1</td> <td>-1</td> <td>-1</td> <td>-1</td> </tr> <tr> <td>CREDIT TIME SERVED</td> <td>-1</td> <td>-1</td> <td>-1</td> <td>-1</td> </tr> </tbody> </table>				MIN	YRS	MOS	DAYS	HRS	TERM OF SENTENCE	-1	-1	-1	-1	CREDIT TIME SERVED	-1	-1	-1	-1	<table border="1"> <thead> <tr> <th>MIN</th> <th>YRS</th> <th>MOS</th> <th>DAYS</th> <th>HRS</th> </tr> </thead> <tbody> <tr> <td>SUSPENDED</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>COMMUNITY SERVICE</td> <td>-1</td> <td>-1</td> <td>-1</td> <td>-1</td> </tr> <tr> <td>PROBATION</td> <td>-1</td> <td>-1</td> <td>-1</td> <td>-1</td> </tr> </tbody> </table>				MIN	YRS	MOS	DAYS	HRS	SUSPENDED					COMMUNITY SERVICE	-1	-1	-1	-1	PROBATION	-1	-1	-1	-1
MIN	YRS	MOS	DAYS	HRS																																						
TERM OF SENTENCE	-1	-1	-1	-1																																						
CREDIT TIME SERVED	-1	-1	-1	-1																																						
MIN	YRS	MOS	DAYS	HRS																																						
SUSPENDED																																										
COMMUNITY SERVICE	-1	-1	-1	-1																																						
PROBATION	-1	-1	-1	-1																																						
LEGACY DISPO: PCN 11111155																																										

CASI Report – Criminal History

WORK CARD/BUSINESS LICENSE - ACTIVE [1] INACTIVE [3]		
TYPE:	DESCRIPTION:	JURISDICTION:
WORKCARD	UNKNOWN	UNKNOWN
STATUS:	ISSUE DATE:	EXPIRATION DATE:
APPROVED	10/7/1996	1/1/2076
PRINTS TAKEN DATE:		
COMMENTS: CAESAR'S PALACE-BUS PERSON		
ENTERING AGENCY: LVM FROM LEGACY SCOPE 01/06/2013 21:47:07		
CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07		
LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07		
PRINT PREVIEW		
ENTERING AGENCY: UNKNOWN FROM LEGACY SCOPE 06/16/1988 00:00:00		
CREATED BY: MIGRATION FROM LEGACY SCOPE 06/16/1988 00:00:00		
LAST MODIFIED BY: DMD 01/23/2013 08:25:10		

CASI Report – Work Card Module (end of report)

After you review the response you will have an opportunity to initiate a printable report. When you are ready to print, click on PRINT PREVIEW.

The screen will refresh and display a Print Preview button.



SCOPE II User Guide – Query & View

Click the PRINT PREVIEW button and a window will pop up with the document. Either right click on the document or press Ctrl + P on your keyboard.

7.12 Data Fields

Attention	Enter the name and badge/personnel number of the person requesting the inquiry. If used, must also fill out Reason Code field.
Date of Birth (DOB)	Search as exact match or a range. To query a range, select a number from the drop-down menu. <ul style="list-style-type: none">• MM: 01-12• DD: 01-31• YYYY: 4-digit year
Event Number / Department Record Number (EVT / DR#)	Enter the event number or Department Record number. Must be exact match to receive a response. Query with hyphen (i.e., 130128-1234 or 94-12345). Maximum of 20 alphabetic, numeric and special characters.
Height (HGT)	Enter a value of 0-9 in the FT field. Inches (IN) may be entered as one or two numbers (i.e., 1 or 01), with a maximum of 11. To query a range, select a number from the drop-down menu.
ID#	A system generated number within SCOPE. Maximum 9 numeric characters.
Legacy ID#	Enter ID number from SCOPE Legacy. Must be queried with prefix CS-. Maximum 15 numeric characters.
Legacy SID#	Enter SCOPE Legacy system Identification number. (Note this is not the Legacy ID# or State ID#). Maximum 8 numeric characters
Moniker	Enter a nickname or alias of the subject. May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Maximum of 50 alphabetic and spaces. Will not accept hyphens, special characters or numbers.
Name (Last, First & Middle)	Enter the name of the subject (last, first and middle initial or name). May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Maximum of 30 alphabetic characters, apostrophe and hyphen.

SCOPE II User Guide – Query & View

Name Suffix	Select from the drop-down menu. A name denoting seniority, titles or degrees (i.e., JR, SR, III, MD).
Race	Select from the drop-down menu. ²⁶⁵
Reason Code	Select the reason for the inquiry from the drop-down menu. Codes mirror those in JLINK III query. ²⁶⁶ If used, must also fill out Attention field.
Sex	Select from the drop-down menu.
SOC#	Enter as 9 consecutive digits with no punctuation. For example: SOC  would be entered as 
Weight (WGT)	Enter a value of 1 to 999. To query a range, select a number from the drop-down menu.

²⁶⁵ (Feature 14701- January 2016)

²⁶⁶ (Feature 17374- January 2016)

SCOPE II User Guide – Query & View

7.13 Public Defender

PUBLIC DEFENDER REPORT			
REASON CODE	<input type="text"/>	ATTENTION	<input type="text"/>
ID#	<input type="text"/>	LEGACY ID#	<input type="text"/>
LEGACY SID#	<input type="text"/>	EVT/DR#*	<input type="text"/>
EMPLOYEE ID#	<input type="text"/>		
SOC#	<input type="text" value="(NO DASHES)"/>		
SUFFIX	<input type="text"/>	<input type="checkbox"/> SOUNDEX	<input type="checkbox"/> INCLUDE HISTORY
NAM*	<input type="text" value="(LAST NAME)"/>	<input type="text" value="(FIRST NAME)"/>	<input type="text" value="(MI)"/>
MONIKER*	<input type="text"/>		
DOB	<input type="text"/> / <input type="text"/> / <input type="text"/>	<input type="text" value="3"/> +/- YEARS	
RAC	<input type="text" value="ANY"/>	SEX	<input type="text" value="ANY"/>
HGT	<input type="text"/> FT. <input type="text"/> IN. <input type="text" value="0"/> +/- IN.		
WGT	<input type="text"/> LB. <input type="text" value="0"/> +/- LB.		
<input type="button" value="Clear All"/> <input type="button" value="Print Preview"/> <input type="button" value="Print"/> <input type="button" value="Send"/>			

Public Defender Report Query Screen

7.13.1 Public Defender Report Query Parameters

- Parameters requiring a Last Name to query (other identifiers may also be included in your search):
 - First Name
 - Middle Name
 - Suffix
 - DOB
 - Race
 - Sex
 - HGT
 - WGT
- Parameters that may be queried on their own (other identifiers may also be included in your search):
 - Last Name
 - ID#
 - Legacy SID#
 - Employee ID#
 - Legacy ID#
 - Evt/DR#²⁶⁷
- Parameters that can be queried with or without a Last Name (other identifiers may also be included in your search):
 - Moniker²⁶⁸
- Parameters that can be queried with or without the Last Name, however, the candidate list return rules are different:

²⁶⁷ Feature 18712 - November 2016

²⁶⁸ Feature 19361 – March 2017

SCOPE II User Guide – Query & View

- SOC only (will return all candidates with that SOC, including those records with the SOC as primary and those with the SOC listed as an additional)
- SOC with other query parameters (will return all candidates with that SOC first, then candidates with a match on the name and other identifiers)
- You may also use a **wildcard search** which provides the ability to query using partial data. The asterisk (*) is used as the wild card search character. The wild card can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Wild cards will be allowed on the following field parameters:
 - Name
 - Moniker

7.13.2 Additional Public Defender Report Query Parameters

- **Reason Code** and **Attention** are optional fields. If used, both fields must be filled in. Correct usage of these fields will be determined by the administrator of each agency.
- There are two **checkmark boxes** that give you further control over your search:
 - ✓ SOUNDEX: Check this box if you are unsure of the spelling of the name and want a soundex search to provide you a candidate list of similar sounding names. The soundex will search both first and last names (if included in the search). Ex., "Pati Peters" will search Pati, Patty, Patricia, Pete, etc. for the first name and Peters, Peterson, Petersen, etc. for the last name. You may also run a soundex search on just the last name or just the first name.
 - ✓ INCLUDE HISTORY: The following items are moved to History:
 - PBR
 - Address
 - Phone
 - E-Mail
 - CPSOR
 - Address
 - Vehicle
 - Missing Persons
 - Person
 - Vehicle
 - ATL
 - Person
 - Vehicle

SCOPE II User Guide – Query & View

- CCW Permits

To view the history you will need to click on the **INCLUDE HISTORY** and **FULL RECORD RESPONSE** checkboxes. History is only viewable in Full Record mode.

You will only be able to see history in the modules you are authorized to view.

7.14 Responses

7.14.1 Full Response

After you send your query you will receive a response containing all of the data you are authorized to view. Below is an example showing what you may receive after hitting SEND.

RESPONSE					
PUB DEFEND DIS QUERY: ID=1234567					
ID #: 1234567					
NAM: ZTEST, ZIGGY ZION		DOB: 7/7/1929			
SEX: M	RAC: W	HGT: 510	WGT: 185	HAIR: BLD	EYE: BLU
ADR: RS	[REDACTED] LVN				

Public Defender Report – Primary Data

AKA [5]		
NAME	AGY	ENTRY DATE
ZTEST, ZIGGY ZION	LAS VEGAS METRO PD	6/15/1988
TEST, RECORD ONE	NORTH LAS VEGAS MUNI COURT	6/15/1988
TEST, RECORD OLD	LAS VEGAS METRO PD	6/15/1988
TEST, RECORD TWO	LAS VEGAS METRO PD	6/15/1988
SMITH, JUSTIN	LAS VEGAS METRO PD	6/15/1988
MONIKERS [2]		
NAME	AGY	ENTRY DATE
GIGILO	NORTH LAS VEGAS PD	6/15/1988
ZIGZAG	LAS VEGAS METRO PD	6/15/1988
ADDITIONAL DOD [1]		
DOR	AGY	ENTRY DATE
7/7/1929	LAS VEGAS METRO PD	6/15/1988

Public Defender Report – Additional PBR Data

SCOPE II User Guide – Query & View

EVENT REPORTS [5]					
TYPE	ASSOCIATION	AGY	REPORTED	ENTERED	EVENT#
OTHER	UNKNOWN	LAS VEGAS METRO PD	01/01/2007 00:00:00	01/01/2007 00:00:00	111111-1111
ENTERING AGENCY: LAS VEGAS METRO PD FROM LEGACY SCOPE 01/06/2013 21:46:04 CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:45:23 LAST MODIFIED BY: MIGRATION					
TYPE	ASSOCIATION	AGY	REPORTED	ENTERED	EVENT#
OTHER	VICTIM	LAS VEGAS METRO PD	03/26/1998 00:00:00	03/26/1998 00:00:00	88-000001
ENTERING AGENCY: LAS VEGAS METRO PD FROM LEGACY SCOPE 01/06/2013 21:46:04 CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:45:23 LAST MODIFIED BY: MIGRATION					
TYPE	ASSOCIATION	AGY	REPORTED	ENTERED	EVENT#
OTHER	VICTIM	LAS VEGAS METRO PD	03/03/1990 00:00:00	03/03/1990 00:00:00	90-130300
ENTERING AGENCY: LAS VEGAS METRO PD FROM LEGACY SCOPE 01/06/2013 21:46:04 CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:45:23 LAST MODIFIED BY: MIGRATION					

Public Defender Report – Incidents Module

CRIMINAL HISTORY				ARR [17] CIT [0] SUM [0]									
ARREST DATE: 5/31/2008				AGY: HENDERSON PD		PCN#:		BK#:					
RN#:	CHARGE:	TYPE:	FAIL TO:	OFF: 99999 OTHER () BATT DOMESTIC VIOL		COUNTS: 1		EVT#: 08-00112					
37	1	UNK											
CCN: 08CR UNKNOWN			STATUS: CONTINUED	CREATED: 05/31/2008 00:00:00		UPDATED: 01/06/2013 22:10:37		JUV/CERT/ADULT: ADULT					
DISPO DATE:		FINAL OFF:		DISPO:		SENTENCED:							
5/31/2008		99999 OTHER () BATT DOMESTIC VIOL		UNKNOWN									
CCN: 08CR				FACILITY:									
FINE EXCUSE RESTITUTION SCHOOL COUNSELING SPECIAL CONDITIONS													
\$ \$ \$													
MIN YRS MOS DAYS HRS					MIN YRS MOS DAYS HRS								
TERM OF SENTENCE		-1	-1	-1	-1	SUSPENDED		COMMUNITY SERVICE		-1	-1	-1	-1
CREDIT TIME SERVED		-1	-1	-1	-1	NO		PROBATION		-1	-1	-1	-1
LEGACY DISPO: NO CONT W VIC/NO ALC/NFA/SCRAM													
ENTERING AGENCY: HENDERSON PD CREATED BY: MIGRATION FROM LEGACY SCOPE 05/31/2008 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 22:22:35													

Public Defender Report – Criminal History (partial screenshot)

SCOPE II User Guide – Query & View

WORK CARD/BUSINESS LICENSE – ACTIVE [5]		
TYPE: WORKCARD	DESCRIPTION: UNKNOWN	JURISDICTION: UNKNOWN
STATUS: APPROVED	ISSUE DATE: 10/7/1996	EXPIRATION DATE: 1/1/2076
PRINTS TAKEN DATE:		
COMMENTS: CAESAR'S PALACE-BUS PERSON		
ENTERING AGENCY: LVM CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07		
TYPE: WORKCARD	DESCRIPTION: UNKNOWN	JURISDICTION: UNKNOWN
STATUS: APPROVED	ISSUE DATE: 6/12/1990	EXPIRATION DATE: 1/1/2076
PRINTS TAKEN DATE:		
COMMENTS: ZION METH CHURCH - CHILD CARE - FBI CX 1996		
ENTERING AGENCY: NLPD CREATED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:47:07		
TYPE: BUSINESS LICENSE	DESCRIPTION: UNKNOWN	JURISDICTION: UNKNOWN
STATUS: APPROVED	ISSUE DATE: 7/23/1981	EXPIRATION DATE: 1/1/2076
PRINTS TAKEN DATE:		

Public Defender Report – Work Card Module (partial screenshot)

UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.	
LAS VEGAS METRO PD [REDACTED]	02/04/2013 11:49:35
RELEASE TO: [REDACTED]	
ENTERING AGENCY: UNKNOWN CREATED BY: MIGRATION FROM LEGACY SCOPE 06/15/1988 00:00:00 LAST MODIFIED BY: DMD 01/23/2013 08:25:10	
PRINT PREVIEW	

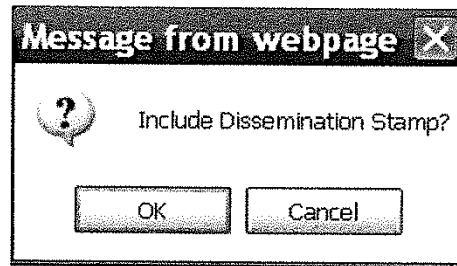
Public Defender Report – End of Report with Dissemination Stamp

After you review the response you will have an opportunity to initiate a printable report. When you are ready to print, enter the name of the person who will be receiving the report.

UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.	
LAS VEGAS METRO PD [REDACTED]	04/23/2013 12:23:58
GO TO PRINT VIEW PRINT PREVIEW	
<input type="text" value="D Smith P=1234"/>	

Click on the GO TO PRINT VIEW button to view the report. The following pop-up box will appear:

SCOPE II User Guide – Query & View



To include the Dissemination Stamp, click on OK. If you would like to receive the report without the stamp, click on Cancel.

<small>PER NEVADA REVISED STATUTES, LAS VEGAS METRO PD IS AUTHORIZED TO RELEASE OUR AGENCY'S CRIMINAL HISTORY INFORMATION ONLY. FOR OTHER AGENCY INFORMATION, CONTACT THE AGENCY DIRECTLY – OR – FOR COMPLETE BACKGROUND CHECK, CONTACT THE STATE OF NEVADA REPOSITORY.</small>	
<small>UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.</small>	
<small>LAS VEGAS METRO PD [REDACTED]</small>	<small>04/23/2013 12:29:22</small>
<small>RELEASE TO: D SMITH P#1234</small>	
<small>GO TO SCREEN VIEW</small>	<small>PRINT PREVIEW</small>

The screen will refresh, update the Dissemination Stamp and display a Print Preview button.

Click the PRINT PREVIEW button and a window will pop up with the document. Either right click on the document or press Ctrl + P on your keyboard.

You will then see the entire response in a printable report. Each page of the report will include the Dissemination Stamp. ²⁶⁹

7.14.2 Data Fields

Attention	Enter the name and badge/personnel number of the person requesting the inquiry. If used, must also fill out Reason Code field.
Date of Birth (DOB)	Search as exact match or a range. To query a range, select a number from the drop-down menu. <ul style="list-style-type: none">• MM: 01-12• DD: 01-31• YYYY: 4-digit year

²⁶⁹ (Feature 14934 - September 2015)

SCOPE II User Guide – Query & View

Event Number / Department Record Number (EVT / DR#)	<p>Enter the event number or Department Record number. Must be exact match to receive a response.</p> <p>Query with hyphen (i.e., 130128-1234 or 94-12345).</p> <p>Maximum of 20 alphabetic, numeric and special characters.</p>
Height (HGT)	<p>Enter a value of 0-9 in the FT field. Inches (IN) may be entered as one or two numbers (i.e., 1 or 01), with a maximum of 11.</p> <p>To query a range, select a number from the drop-down menu.</p>
ID#	<p>A system generated number within SCOPE.</p> <p>Maximum 9 numeric characters.</p>
Legacy ID#	<p>Enter ID number from SCOPE Legacy. Must be queried with prefix CS-.</p> <p>Maximum 15 numeric characters.</p>
Legacy SID#	<p>Enter SCOPE Legacy system Identification number. (Note this is not the Legacy ID# or State ID#).</p> <p>Maximum 8 numeric characters</p>
Moniker	<p>Enter a nickname or alias of the subject.</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 50 alphabetic and spaces. Will not accept hyphens, special characters or numbers.</p>
Name (Last, First & Middle)	<p>Enter the name of the subject (last, first and middle initial or name).</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 30 alphabetic characters, apostrophe and hyphen.</p>
Name Suffix	Select from the drop-down menu. A name denoting seniority, titles or degrees (i.e., JR, SR, III, MD).
Race	Select from the drop-down menu. ²⁷⁰
Reason Code	<p>Select the reason for the inquiry from the drop-down menu. Codes mirror those in JLINK III query.²⁷¹</p> <p>If used, must also fill out Attention field.</p>
Sex	Select from the drop-down menu.
SOC#	<p>Enter as 9 consecutive digits with no punctuation. For example: SOC</p> <p>██████████ would be entered as ██████████.</p>

²⁷⁰ (Feature 14701- January 2016)

²⁷¹ (Feature 17374- January 2016)

SCOPE II User Guide – Query & View

Weight (WGT)	Enter a value of 1 to 999. To query a range, select a number from the drop-down menu.
--------------	---

SCOPE II User Guide – Query & View

7.15 Custom Report

CUSTOM REPORT

REASON CODE: ANY

ID#:

LEGACY SID#:

EMPLOYEE ID#:

SOC#: (NO DASHES)

SUFFIX: ☐ SOUNDEX ☐ INCLUDE HISTORY

NAM: (LAST NAME) (FIRST NAME) (MI)

MONIKER:

DOB: / / 0 +/- YEARS

RAC: ANY SEX: ANY

HGT: FT. IN. 0 +/- IN.

WGT: LB. 0 +/- LB.

LIC PLT:

VIN:

LIC STATE: ANY

ATTENTION:

LEGACY ID#:

EVT/DR#:

Clear All Print Report Send

Custom Report Query Screen

7.15.1 Custom Report Query Parameters

- Parameters requiring a Last Name to query (other identifiers may also be included in your search):
 - First Name
 - Middle Name
 - Suffix
 - DOB
 - Race
 - Sex
 - HGT
 - WGT
- Parameters that may be queried on their own (other identifiers may also be included in your search):
 - Last Name
 - ID#
 - Legacy SID#
 - Employee ID#
 - Legacy ID#
 - Evt/DR#
- Parameters that can be queried with or without a Last Name (other identifiers may also be included in your search):
 - Moniker²⁷²

²⁷² Feature 19361 – March 2017

SCOPE II User Guide – Query & View

- VIN
 - LIC PLT/LIC State
- Parameters that can be queried with or without the Last Name, however, the candidate list return rules are different:
- SOC only (will return all candidates with that SOC, including those records with the SOC as primary and those with the SOC listed as an additional)
 - SOC with other query parameters (will return all candidates with that SOC first, then candidates with a match on the name and other identifiers)
- You may also use a **wildcard search** which provides the ability to query using partial data. The asterisk (*) is used as the wild card search character. The wild card can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N). Wild cards will be allowed on the following field parameters:
- Name
 - Moniker
 - License Plate Number
 - VIN

7.15.2 Additional Custom Report Query Parameters

- **Reason Code** and **Attention** are optional fields. If used, both fields must be filled in. Correct usage of these fields will be determined by the administrator of each agency.
- There are two **checkmark boxes** that give you further control over your search:
- ✓ **SOUNDEX**: Check this box if you are unsure of the spelling of the name and want a soundex search to provide you a candidate list of similar sounding names. The soundex will search both first and last names (if included in the search). Ex., “Pati Peters” will search Pati, Patty, Patricia, Pete, etc. for the first name and Peters, Peterson, Petersen, etc. for the last name. You may also run a soundex search on just the last name or just the first name.
 - ✓ **INCLUDE HISTORY**: The following items are moved to History:
 - PBR
 - Address
 - Phone
 - E-Mail

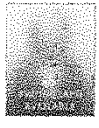
SCOPE II User Guide – Query & View

- CPSOR
 - Address
 - Vehicle
- Missing Persons
 - Person
 - Vehicle
- ATL
 - Person
 - Vehicle
- CCW Permits

To view the history you will need to click on the **INCLUDE HISTORY** and **FULL RECORD RESPONSE** checkboxes. History is only viewable in Full Record mode.

You will only be able to see history in the modules you are authorized to view.

7.16 Response

RESPONSE			
CUSTOM DIS QUERY: ID=1234567			
<input type="checkbox"/> CONV PERS	<input type="checkbox"/> CRIM HIST	<input type="checkbox"/> ALERTS [4]	<input type="checkbox"/> WRK CRD/BUS LIC
		<input type="checkbox"/> WEAPONS	
			
<input type="checkbox"/> ID #: 1234567			
<input checked="" type="checkbox"/> LEGACY SID: 1329561		<input checked="" type="checkbox"/> LEGACY ID #: CS-1234567	
<input type="checkbox"/> NAM: ZTEST, ZIGGY ZION		<input type="checkbox"/> DOB: 7/7/1929	<input type="checkbox"/> SOC: [REDACTED]
<input type="checkbox"/> SEX: M	<input type="checkbox"/> RAC: W	<input type="checkbox"/> HGT: 510	<input type="checkbox"/> WGT: 185
<input type="checkbox"/> AGE: 84		<input type="checkbox"/> HAIR: BLD	<input type="checkbox"/> EYE: BLU
<input checked="" type="checkbox"/> ADR: RS [REDACTED] LVN		AGY: LAS VEGAS METRO PD	
<input checked="" type="checkbox"/> SPC #: SPC		<input checked="" type="checkbox"/> AGY: LAS VEGAS METRO PD	EFFECTIVE DATE: 12/5/1988
		<input checked="" type="checkbox"/> DATE: 6/15/1988	

Custom Report – Primary Data

SCOPE II User Guide – Query & View

The Custom Report provides you with the ability to decide which fields to include in the report. To remove fields check on the applicable box. In the above example the Legacy SID#, Legacy ID#, Address, Special Palm Card data, Agency and Date fields were checked.

Following is an example of what the response looked like after these fields were checked and the SEND button was clicked.

SCOPE	
ALERTS [5]	
CONV PERS *** PROBATION *** CRIM HIST *** WRK CRD/BUS LIC *** WEAPONS	
ID#: 1234567	
NAME: ZTEST,ZIGGY ZION	DOB: 07/07/1929 SOC: [REDACTED]
SEX: M RAC: W HGT: 510 WGT: 185 HAIR: BLD EYE: BLU	
AGE: 84	

NOTE: Notice that the Alert boxes were not checked and appear in the response above.

You may remove an entire section of information by clicking on the checkbox on the main gray bar of that section. Clicking on this will remove all associated data; such as, vehicles and comments.

<input checked="" type="checkbox"/> CONVICTED PERSON / SOR						
<input type="checkbox"/> REGISTRATION (LAS VEGAS METRO PD) [6]						
<input type="checkbox"/> REGISTERED:	<input type="checkbox"/> STATUS:	<input type="checkbox"/> OFFENSE:	<input type="checkbox"/> OFFENSE DESCRIPTION:	<input type="checkbox"/> YEAR:	<input type="checkbox"/> STATE:	<input type="checkbox"/> TEMP. REG. EXP.:
6/16/1988	MUST REGISTER	99999	SEXUAL ASSLT #C123456 - MUST REG	1900	NV	
<input type="checkbox"/> TIER LEVEL:	<input type="checkbox"/> VERIFICATION DATE:					
<input type="checkbox"/> ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: MIGRATION FROM LEGACY SCOPE 06/16/1988 00:00:00 LAST MODIFIED BY: MIGRATION FROM LEGACY SCOPE 01/06/2013 21:51:53						
<input type="checkbox"/> REGISTERED:	<input type="checkbox"/> STATUS:	<input type="checkbox"/> OFFENSE:	<input type="checkbox"/> OFFENSE DESCRIPTION:	<input type="checkbox"/> YEAR:	<input type="checkbox"/> STATE:	<input type="checkbox"/> TEMP. REG. EXP.:
9/4/1980	SEX OFNDR REG	99999	RAPE - SEX	1980	NV	
<input type="checkbox"/> TIER LEVEL:	<input type="checkbox"/> VERIFICATION DATE:					

Custom Report – CPSOR Module (box checked to remove entire CPSOR section on report)

SCOPE II User Guide – Query & View

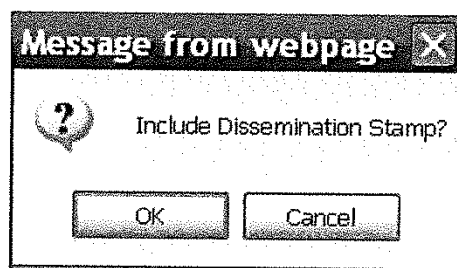
After you have checked all of the boxes to indicate the data you want removed from the report, enter RELEASE TO information in the Dissemination Stamp field (at the bottom of the response) and click on PRINT PREVIEW.

UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL
SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.
LAS VEGAS METRO PD [REDACTED] 04/23/2013 12:23:58

[D Smith P=1234]

GO TO PRINT VIEW PRINT PREVIEW

Click on the GO TO PRINT VIEW button to view the report. The following pop-up box will appear:



To include the Dissemination Stamp, click on OK. If you would like to receive the report without the stamp, click on Cancel.

PER NEVADA REVISED STATUTES, LAS VEGAS METRO PD IS AUTHORIZED TO RELEASE OUR AGENCY'S
CRIMINAL HISTORY INFORMATION ONLY. FOR OTHER AGENCY INFORMATION, CONTACT THE AGENCY
DIRECTLY – OR – FOR COMPLETE BACKGROUND CHECK, CONTACT THE STATE OF NEVADA REPOSITORY.

UNLAWFUL DISSEMINATION OF THIS RESTRICTED INFORMATION IS PROHIBITED. VIOLATION WILL
SUBJECT THE OFFENDER TO CRIMINAL AND CIVIL LIABILITY.
LAS VEGAS METRO PD [REDACTED] 04/23/2013 12:29:22

RELEASE TO: D SMITH P#1234

GO TO SCREEN VIEW PRINT PREVIEW

The screen will refresh, update the Dissemination Stamp and display a Print Preview button.

Click the PRINT PREVIEW button and a window will pop up with the document. Either right click on the document or press Ctrl + P on your keyboard.

SCOPE II User Guide – Query & View



You will then see the entire response in a printable report. Each page of the report will include the Dissemination Stamp.²⁷³

7.17 Data Fields

Attention	Enter the name and badge/personnel number of the person requesting the inquiry. If used, must also fill out Reason Code field.
Date of Birth (DOB)	Search as exact match or a range. To query a range, select a number from the drop-down menu. <ul style="list-style-type: none">• MM: 01-12• DD: 01-31• YYYY: 4-digit year
Event Number / Department Record Number (EVT / DR#)	Enter the event number or Department Record number. Must be exact match to receive a response. Query with hyphen (i.e., 130128-1234 or 94-12345). Maximum of 20 alphabetic, numeric and special characters.
Height (HGT)	Enter a value of 0-9 in the FT field. Inches (IN) may be entered as one or two numbers (i.e., 1 or 01), with a maximum of 11. To query a range, select a number from the drop-down menu.
ID#	A system generated number within SCOPE. Maximum 9 numeric characters.
Legacy ID#	Enter ID number from SCOPE Legacy. Must be queried with prefix CS-. Maximum 15 numeric characters.
Legacy SID#	Enter SCOPE Legacy system Identification number. (Note this is not the Legacy ID# or State ID#) Maximum 8 numeric characters
License Plate # (LIC)	Enter a license plate number.

²⁷³ (Feature 14934 - September 2015)

SCOPE II User Guide – Query & View

	<p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 20 alphabetic and numeric characters. No spaces or special characters (hyphens or symbols) are allowed.</p> <p><i>The License Plate field will allow for the entry of special characters (i.e., -, *, #, ?, /, \, @, +, #, etc.).²⁷⁴</i></p>
License State (LIS)	Select from the drop-down menu the state that corresponds with the license plate number field.
Moniker	<p>Enter a nickname or alias of the subject.</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 50 alphabetic and spaces. Will not accept hyphens, special characters or numbers.</p>
Name (Last, First & Middle)	<p>Enter the name of the subject (last, first and middle initial or name).</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 30 alphabetic characters, apostrophe and hyphen.</p>
Name Suffix	Select from the drop-down menu. A name denoting seniority, titles or degrees (i.e., JR, SR, III, MD).
Race	Select from the drop-down menu. ²⁷⁵
Reason Code	<p>Select the reason for the inquiry from the drop-down menu. Codes mirror those in JLINK III query.²⁷⁶</p> <p>If used, must also fill out Attention field.</p>
Sex	Select from the drop-down menu.
SOC#	Enter as 9 consecutive digits with no punctuation. For example: SOC  would be entered as  .
VIN #	<p>Enter the vehicle's identification number.</p> <p>May query using a wildcard search. The asterisk (*) is used as the wild card search character and can be in any position: start, middle or end of the keyword (e.g., HEN*, *HEN, HE*N).</p> <p>Maximum of 20 alphabetic and numeric characters.</p>

²⁷⁴ (Feature 16404 - June 2015)

²⁷⁵ (Feature 14701- January 2016)

²⁷⁶ (Feature 17374- January 2016)

SCOPE II User Guide – Query & View

Weight (WGT)	Enter a value of 1 to 999. To query a range, select a number from the drop-down menu.
--------------	---

8 Appendix A

8.1 Keyboard Shortcuts / Hot Keys

SCOPE II uses keyboard shortcuts to provide easy access to functionality without having to use a mouse.

The shortcuts used for the SCOPE II application are described below:

Tab - Moves the cursor to next field

Shift / Tab - Moves the cursor back to the previous field

Down and Up Arrow Keys – Moves within a drop down field

Right and Left Arrow Keys – Moves within a textbox

Space Bar – Toggles between check / uncheck in a checkbox

Enter Key – Is the same as clicking on the SEND button

CTRL+End Key – moves your cursor to the bottom of the page

Customized SCOPE II Shortcuts

ATL+G – Takes you within the module, gray bar to gray bar

SHIFT+ATL+G – Moves to the previous module, gray bar to gray bar

ATL+J – Takes you back to PBR Tab.

ATL+K – Clicks on the SEND button.

ATL+M – Takes you to Module Query on Menu Navigation

ATL+N – Takes you to the Add Module Tab

ATL+Q – Takes you to the Query Tab on Menu Navigation

ATL+1 – Toggles between Full Record View and Summary View

ATL+2 – Clicks on the Clear All button within the query interface.

ATL+3 – Toggles between expand / collapse within the current gray bar.

SCOPE II User Guide – Query & View

9 Appendix B

9.1 Acronyms

Acronym	Meaning	Location
ACC	Accessory	Criminal History
AD	Arrest Disposition	Criminal History
AFIS	Automated Fingerprint Identification System	Advanced Query
AGY	Arresting Agency	Criminal History
AR	Arrest Record	Criminal History
ATL	Attempt to Locate	Incidents
ATT	Attempted	Criminal History
BK#	Booking Number	Criminal History
BW	Bench Warrant	Criminal History
CCN	Court Case Number	Criminal History
CPSOR	Convicted Person Sex Offender	Criminal History
DOD	Date of Death	Advance Query
DR. LIC State	State Driver's License Number issued	Advanced Query
DR. LIC#	Driver's License Number	Advanced Query
Employee ID#	Personnel Number	PBR
EVT#/DR#	Event/Report Number Depends on agency, which of the two will be used	Criminal History

SCOPE II User Guide – Query & View

GFIPM	Global Federated Identity and Privilege Management	Security (User Roles/Rights)
Legacy ID#	Original SCOPE ID number	PBR
Legacy SID#	SCOPE Legacy system Identification number. (Note this is not the Legacy ID# or State ID#)	PBR
LEP	LEP (Limited English Proficiency) NRE – No Read English NRWA – No Read/Write Any NRWE – No Read/Write English NWE – No Write English NSE – No Speak English	PBR
MISC#	Passport, Business License, Military ID etc.	Advance Query
Moniker	Nick Name or Street Name	PBR
MP	Missing Person	Incidents
NCJIS	Nevada Criminal Justices System	
NOK	Next of Kin	PBR
OFF	Offense	Criminal History
PBR	Person Base Record	PBR
PCN#	Process Control Number Attached to arrest	Criminal History
POB	Place of Birth	Advance Query
RN#	Record Number	Criminal History
Serial#	Used to query CCW, or any articles with a serial number	Advance Query
SMT	Scars Marks Tattoos	PBR
UCID	Unique Charge ID	Criminal History

SCOPE II User Guide – Query & View

Value #	FBI/SID (State ID#)/Citation number ²⁷⁷	Advance Query
---------	--	---------------

²⁷⁷ Feature 18993 – March 2017

EXHIBIT 6

From: Jackie V. Nichols <jnichols@maclaw.com>
Sent: Friday, September 14, 2018 8:37 AM
To: maggie
Cc: pharan@nvlitigation.com; Nick Crosby
Subject: RE: LVRJ v. LVMPD: Sex Trafficking [IWOV-iManage.FID1013982]
Attachments: 161219-2159.pdf; Arres Report Log.xlsx

We have employed a team of three individuals to work on reviewing, redacting and producing records for this case. The individuals needed to be trained on the information that needed to be redacted. This is the reason for discrepancies within the first batch

Please know that our team is doing their best, but mistakes will happen. If you or your client believe a mistake has been made, please let us know and we are happy to review the record and provide an amended version.

Outstanding Information from December 2016:

161201-3880 (Juvenile Suspect protected by NRS 62h.025)
161206-3249 (No Documents)
161208-1999 (No Documents)
161211-2416 (No Documents)
161221-2656 (No Documents)
161220-3595 (No Documents)
161229-4095 (No Documents)

Redactions:

Moving forward, we will not be redacting sex, race or ethnicity for either the victim or suspect. As for witnesses, we will only be redaction personal information, but leaving the name of the witness unless it is a confidential informant. Also, productions will occur every Friday generally around 1:30/2 p.m. I was able to get this week's production earlier this morning.

Event Number 161212-2159:

I have attached a new version of the record we discussed last week providing the witness's name. As for the victim, we cannot agree to release that information because it is a juvenile. Even if the juvenile was the one committing the crime, their information would then be protected by NRS 62h.025.

Arrest Reports:

There were some issues with this production, mainly that hardly any arrest reports exist for soliciting because it is a misdemeanor. Generally, officers only do arrest reports for felonies as a declaration of arrest is sufficient to move forward with a misdemeanor case and not a felony. There are instances, however, where officers will do arrest reports for misdemeanors. Because there were only about 5-6 arrest reports for the batch that the team reviewed this past week they also included declarations of arrest (at no charge) since this was the very first batch. If your client prefers just the arrest reports, we can include only those moving forward. Attached is a privilege log regarding any redactions and enumerating all the cases reviewed. We notated which cases were open and the cases that were brought on bench warrants, resulting in no documents being produced. The privilege log also notates which event numbers have arrest reports, the X in the status column. Please let us know what your client prefers for this request.

From: maggie [mailto:maggie@nvlitigation.com]
Sent: Thursday, September 13, 2018 12:33 PM
To: Jackie V. Nichols
Cc: Nick Crosby; pharan@nvlitigation.com
Subject: LVRJ v. LVMPD: Sex Trafficking

Jackie:

I'm following up to see when you expect to produce the documents that were missing from last week's production, whether you have been able to follow up with your client about the redactions (we agreed that there were unnecessary redactions), and when we can expect the arrest reports slated for production this week. I am also wondering if you think we should provide supplemental briefing and a status report in advance of the status check.

Maggie



ATTORNEYS AT LAW

701 East Bridger Ave., Suite 520
Las Vegas, NV 89101
(702)728-5300 (T) / (702)425-8220 (F)
www.nvlitigation.com

IMPORTANT NOTICE: Privileged and/or confidential information, including attorney-client communication and/or attorney work product may be contained in this message. This message is intended only for the individual or individuals to whom it is directed. If you are not an intended recipient of this message (or responsible for delivery of this message to such person), any dissemination, distribution or copying of this communication is strictly prohibited and may be a crime. No confidentiality or privilege is waived or lost by any misdirection of this message. If you received this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender by return e-mail.

EXHIBIT 7

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST
Trespass - Vice Related

Page 1 of 1

ID # 1806613

True Name <u>HARRIS, JOJO</u>	Date of Arrest <u>6.15.14</u>	Time of Arrest <u>0230</u>
Other Charges Recommended for Consideration		

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of 18 years. That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the offense(s) of TRESPASS at the location of 3799 S. LAS VEGAS BLVD. That the offense(s) occurred at approximately 0230 hours on the 15 day of JUNE, 2014.

While I DETECTIVE A. BEAS ; DETECTIVE R. LEUNG PH#8556 was/were working in an covert capacity investigating vice related crimes at MGM HOTEL RESORT located at 3799 S LVLVD, LVN 89119, I/we saw a person at THE CRAZY HORSE BAR who I later identified as JOJO HARRIS and by DETECTIVE A. BEAS I/we stopped him/her because WE OBSERVED BOTH FEMALES LOITERING FOR THE PURPOSE OF PROSTITUTION

and I identified myself as a police officer by voice, badge, and police identification. S/O H. ORTEGA advised that BOTH FEMALES previously transacted with MGM RESORT PROPERTIES by ARIA S/O URCINO (HARRIS) a representative of the owner, on 12-12-13 (HARRIS) for TRESPASSING

(Details to support additional charges, if applicable) BOTH FEMALES WERE OBSERVED TALKING TO SEVERAL DIFFERENT MALES WHILE SITTING AT THE CRAZY HORSE BAR. BOTH FEMALES PREVIOUSLY TRESPASSED. HARRIS ON 12-12-13 @ ARIA RESORTS

JOJO HARRIS was transported to CCDC/LVCJ by PATROL TRASHER VAN and booked accordingly.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

Declarant's Signature

Print Declarant's Name

LVMPD HSD 3 (Rev. 11-11)

P#

LVRJ542

Page 1 of 1

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST

I.D. #: 1806613

True Name: JASON HARRIS

Date of Arrest: 05/01/06 Time of Arrest: 0330

OTHER CHARGES RECOMMENDED FOR CONSIDERATION:

060501-0354

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with LVMPD (Department), Clark County, Nevada, being so employed for a period of 3 (years) (months). That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the offense of SOLICITING PROST. at the location of 3900 W. S. LEBLOND LVN 89109 (ADDRESS / CITY / STATE / ZIP) and that the offense occurred at approximately 0330 hours on the 01 day of MAY 2006 in the county of Clark or City of Las Vegas, NV.

DETAILS FOR PROBABLE CAUSE:

I CAME INTO CONTACT WITH JASON HARRIS ID# 1806613 DURING CONVERSATION HARRIS DEC AGREE TO HAVE SEXUAL INTERCOURSE & FELIATION ON MYSELF FOR \$800.00
HARRIS WAS THEN ~~TRANSPORTED~~ ^{ARRESTED} FOR SOLICITING PROSTITUTION.

This document's dissemination of this Record is Regulated by Law. Secondary Dissemination of any kind is Prohibited and could subject the offender to Criminal and Civil Liability.
This Information Released To: LVS - 1201
By: [Signature] Date: 7/2/06
Las Vegas Metro Police Dept

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

Declarant's Signature

Print Declarant's Name

LVMPD 22 - A (REV. 6-01)

P #

(2) ORIGINAL - RECORDS

LVRJ543

3865

Page 1 of 1

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST

I.D. #: 1765560

True Name: WILSON, NICOLE

Date of Arrest: 06-01-02 Time of Arrest: 0600

OTHER CHARGES RECOMMENDED FOR CONSIDERATION:

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with LUMPO (Department), Clark County, Nevada, being so employed for a period of 2 years (months). That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the offense of WARRANTS at the location of 3400 S LUREN LANE, 89109 and that the offense occurred at approximately 0600 hours on the 01 day of JUNE, 2002.

DETAILS FOR PROBABLE CAUSE:

ON THE ABOVE DATE AND TIME I OFFICER T. CORN 5584 WAS DISPATCHED TO THE ABOVE ADDRESS TO REFUSE TO A TRESPASS INCLUSION. UPON ARRIVAL I MADE CONTACT WITH THE SUSPECT WHO IDENTIFIED HIMSELF AS WILSON, NICOLE THROUGH A TX DL. A RECORDS CHECK WAS RUN ON WILSON WHICH SHOWED AN ELECTRONIC WARRANT OUT OF JUSTICE COURT. WILSON WAS ARRESTED FOR HER WARRANT AND TRANSPORTED TO CCDC AND BOOKED ACCORDINGLY.

The Use and Dissemination of this Record is Regulated by Law. Secondary Dissemination of any kind is Prohibited and could subject the offender to Criminal and Civil Liability.
This Information Released To:
WES 153584
By PAW Date 10/2/17
Las Vegas Metro Police Dept

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

Declarant's Signature

T. CORN

5584

Print Declarant's Name

LVMPD 22 - A (REV. 3-81)

P #

(2) ORIGINAL - RECORDS

LVRJ544

3866

Page 1 of 1

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST

I.D. #: 1765560

True Name: WILSON, NICOLE

Date of Arrest: 2-25-06 Time of Arrest: 2320

OTHER CHARGES RECOMMENDED FOR CONSIDERATION:

N/A

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with LVMPD (Department), Clark County, Nevada, being so employed for a period of 15 years (months). That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the offense of TRESPASS at the location of BELLAGIO 3600 S. LVR. LVNV (ADDRESS / CITY / STATE / ZIP) and that the offense occurred at approximately 2320 hours on the 25 day of FEB. 2005 in the county of Clark or ☐ City of Las Vegas, NV.

DETAILS FOR PROBABLE CAUSE:

I SAW NICOLE WILSON, INSIDE
THE BELLAGIO HOTEL AND WAS TOLD BY SECURITY
THAT SHE HAD BEEN WARNED NOT TO RETURN TO
MIRAGE RESORT PROPERTIES BY S/O MANNY PENA
ON 10/15/05.

WILSON WAS ARRESTED AND BOOKED INTO
C.C.D.E.

The Use and Dissemination of this
Record is Regulated by Law. Secondary
Dissemination of any kind is Prohibited
and could subject the offender to Criminal
and Civil Liability.
This Information Released To
By: MANNY Date: 10/25/05
Las Vegas Metro Police Dept

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

Declarant's Signature

S. Digilio

Print Declarant's Name
LVMPD 22 - A (REV. 6-01)

S. Digilio 4074

P#

(2) ORIGINAL - RECORDS



LVRJ545

Page F of 5

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST

I.D. #: 2505674

True Name: POWELL, ROBERT

Date of Arrest: 07/25/07 Time of Arrest: 2330

OTHER CHARGES RECOMMENDED FOR CONSIDERATION:

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with LVMPD (Department), Clark County, Nevada, being so employed for a period of 16 years (months). That I believe (on the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the offense of LISTED BELOW at the location of 200 S. MAIN ST. LVN 89101 (ADDRESS / CITY / STATE / ZIP) and that the offense occurred at approximately 2330 hours on the 25 day of JULY 2007 in the county of ☐ Clark or ☒ City of Las Vegas, NV.

DETAILS FOR PROBABLE CAUSE:

THAT I DET. R. HOLMAN PH 4006 WAS CONTACTED BY LAPD YICE DET. WHO STATED HE HAS INFORMATION ON A PIMP IN VEGAS WHO WAS RECRUITING GIRLS FROM LOS ANGELES.

STATED HE WAS CONTACTED VIA MYSPACE.COM ON HIS UNDERCOVER ACCOUNT (YAHOO.COM) BY MYSPACE.COM CHAT "DADDYWARBUCKSS WHO WAS LATER ID'D AS ROBERT POWELL #0505674.

POWELL WROTE ~~REPORTED~~ IN A EMAIL STATING "MY BOTTOM (MEANING MAIN GIRL) TOLD YOU WE WERE GONNA SEND A TICKET SO YOU CAN COME OUT HERE. I'LL MAKE SURE YOU HAVE A PLACE TO STAY. ALSO STATED CALL THIS NUMBER (702)

A CALL WAS PLACED BY PARTNER DET. IN WHICH A CONVERSATION WAS STARTED WITH POWELL THINKING HE WAS TALKING TO THE GIRL FROM MYSPACE.COM / BE

POWELL ASKED HOW LONG HAD I BEEN IN THE GAME (MEANING BEING IN PROSTITUTION) ASKED IF SHE HAD A DADDY? (PIMP). AFTER BEING TOLD NO DADDY WAS INVOLVED POWELL IMMEDIATELY OFFERED TO BUY A ^(BUS) TICKET FROM LOS ANGELES TO VEGAS.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

Declarant's Signature

R. COWARD-HOLMAN

Print Declarant's Name

LVMPD 22 - A (REV. 6-01)

P#

(2) ORIGINAL - RECORDS

LVRJ546

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST CONTINUATION PAGE

Page 2 of 5

ID #: 2505674

POWELL STATED THAT HE WANTED _____ TO COME
TO VEGAS AND WORK FOR HIM. MEANING TURN DATES
FOR MONEY AND HE WOULD TEACH HER EVERYTHING ABOUT VEGAS.

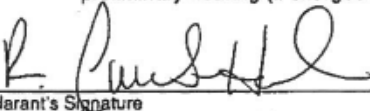
POWELL STATED HE WANTED ME TO WORK THE
HOTELS, TRACK (STREETS) AND INTERNET DATES.
HE TOLD ME THE PRICE FOR OUTCALLS WOULD
BE \$1250-\$300, INCALL WOULD BE \$150-\$300.
POWELL STATED HE WANTED TO CHARGE \$150 THEN
ALOT MORE PEOPLE WILL COME BECAUSE OF THE
PRICE AND WE COULD MAKE ALOT OF MONEY TOGETHER.

POWELL STATED HE WOULD PROVIDE A PLACE FOR ME
TO STAY AND MOST GIRLS. FELT COMFORTABLE AT HIS
HOUSE BECAUSE THERE HE COULD PROVIDE FOOD, SHELTER,
CLOTHES, TRANSPORTATION, SECURITY, MANICURES AND PEDICURES. ^{phone} ~~the~~
minutes

POWELL STATED HE WOULD TAKE ALL OF MY MONEY
FROM MY DATES BUT WOULD MAKE SURE I WAS TAKEN
CARE OF. HE ALSO STATED HE HAD 2 OTHER PROSTITUTES
BUT ONLY ONE "NIKI" WAS FAITHFUL WHO HE REFERRED
TO AS ~~THE~~ ^{HIS} LOYAL ONE AND BOTTOM. (MAIN GIRL)

POWELL STATED I HAD NOTHING TO WORRY ABOUT
HE WANTED ME TO FEEL COMFORTABLE AND TRUST

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).



Declarant's Signature

R. Cawarden-Holman

Print Declarant's Name

4006

P #



LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST CONTINUATION PAGE

Page 3 of 5

ID #: 2505674

EACH OTHER BECAUSE THATS ALL WE HAD.

POWELL STATED HE WANTED TO SEE HOW I WORKED
OUT IN VEGAS AND LET HIS LEASE EXPIRE ON HIS
APARTMENT AND HEAD TO ARIZONA NEXT WEEK.

POWELL THEN ASKED IF I WOULD AGREE TO COME
TO VEGAS AND WORK FOR HIM (MEANING BE HIS PROSTITUTE)
I AGREED AND TOLD HIM YES.

POWELL DID GO TO GREYHOUND BUS STATION AND PURCHASED
A ONE-WAY TICKET IN Y/C NAME
CONFIRMATION # LEAVING LA AT 1700HRS
ARRIVING IN LAS VEGAS AT 2325 ON 07/25/07.

THEN CALLED POWELL AND TOLD HIM SHE WAS
ON THE BUS AND HEADING TO VEGAS. POWELL STATED HE
HAD A WHITE HONDA AND WOULD BE THERE TO
PICK HER UP, AND ALSO STATED HE WOULD BE WEARING
A BROWN SHIRT.

~~NOT~~ I MADE CONTACT W/ OFFICER
AND ASKED HER TO PLAY THE RUE OF
ENTERED THE BUS STATION WHERE SHE
STAYED INSIDE UNTIL POWELL CAME INSIDE TO MEET

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

R. Cawthell
Declarant's Signature

R. Cawthell-Helman 4006
Print Declarant's Name P #

LVMPD 22-B (3-41)

(2) ORIGINAL - RECORDS



LVRJ548

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST CONTINUATION PAGE

Page 4 of 5

ID #: 2505674

HER. POWELL APPROACHED AND OFFICER THANKED
HIM FOR THE TICKET WHICH HE REPLIED NO PROBLEM.

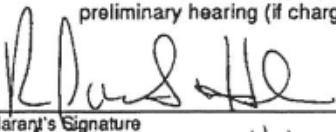
DET. J. GENTRY #6172, D. HUNKINS #7309, J. NOYONTI #6748
SGT. VIGNA #3606 AND MYSELF APPROACHED POWELL
AND PLACED POWELL UNDER ARREST.

POWELL WAS CHARGED WITH FURNISHING ~~PROSTITUTION~~
TRANSPORTATION FOR PROSTITUTION, DUE TO PURCHASING
A GREENWOOD BUS TICKET, HANGING BECAUSE HE
INTICED, PERSUADED BY OFFERING TO PROVIDE
SHELTER, TRANSPORTATION TO DATES, SECURITY, FOOD,
LAWYERS, CLOTHES, MINUTES ON THE PHONE, MANICURES
AND PEDICURES IN EXCHANGE FOR HER TO MAKE
MONEY BY PROSTITUTING. POWELL WAS ALSO CHARGED
WITH ATT. LIVE/ON EARNING OF A PROSTITUTE AS
HE STATED HE WOULD TAKE ALL THE MONEY
THAT WAS MADE FROM THE DATES BUT SHE
WOULD STILL BE TAKEN CARE OF.

POWELL WAS TRANSPORTED TO CCDC BY MYSELF
AND DET. GENTRY WHO ALSO READ POWELL MIRANDA.
POWELL STATED HE UNDERSTOOD.

POWELL'S 1998 HONDA ACCORD NV 152TPW WAS

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).



Declarant's Signature

R. HOWARD-HOLMAN

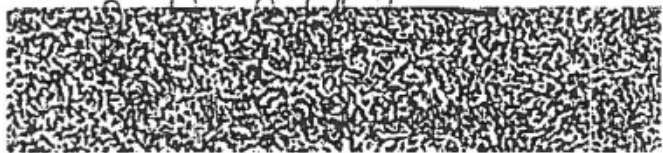
Print Declarant's Name

4006

P #

LVMPD 22-B (3-81)

(2) ORIGINAL - RECORDS



LVRJ549

3871

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST CONTINUATION PAGE

Page 5 of 5

ID #: 2505674 724-577

IMPOUNDED AS IT WAS BEING USED TO PROVIDE
TRANSPORTATION FOR ACTS OF PROSTITUTION. 528-455

POWELL ALSO HAD \$1,073 IN HIS WALLET THAT WAS
SEIZED. POWELL COULD NOT EXPLAIN WHERE THE
MONEY CAME FROM, AND STATED HE HAD NO
LEGITIMATE MEANS OF EMPLOYMENT. THAT I
SEIZED THE MONEY THINKING THE PROCEEDS CAME
FROM PROSTITUTION.

POWELL WAS IN POSSESSION OF 2 CELL PHONES
WHICH WERE USED IN THE COMMISSION OF THE
LISTED CRIMES. THE PHONES WERE ~~SEIZED~~ IMPOUNDED
AS EVIDENCE. A LAPTOP (TOSHIBA) WAS IMPOUNDED
WHICH WAS BELIEVED TO BE USED TO RECRUIT
GIRLS FROM MYSPACE.COM.

POWELL WAS PAROLEE) WITHOUT INCIDENT.

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are a misdemeanor).

[Signature]

Declarant's Signature

[Signature]
Print Declarant's Name

LVMPD 22-B (3-91)

(2) ORIGINAL - RECORDS



LVRJ550

1 TRAN

DISTRICT COURT

2
3 CLARK COUNTY, NEVADA

4 * * * * *

5
6 LAS VEGAS REVIEW-JOURNAL,)

7 Plaintiff,)

8 vs.)

9 LAS VEGAS METROPOLITAN POLICE)

10 DEPARTMENT,)

11 Defendant.)

CASE NO. A-18-775378

DEPT. NO. XV

Transcript of Proceedings

12 BEFORE THE HONORABLE JOE HARDY, DISTRICT COURT JUDGE

13 **SUPPLEMENTAL BRIEFING**

14 WEDNESDAY, MARCH 27, 2019

15 **APPEARANCES:**

16 For the Plaintiff: MARGARET A. MCLEITCHIE, ESQ.

17
18 For the Defendant: JACKIE NICHOLS, ESQ.

19
20
21 RECORDED BY: MATTHEW YARBROUGH, DISTRICT COURT

22 TRANSCRIBED BY: KRISTEN LUNKWITZ

23
24 Proceedings recorded by audio-visual recording, transcript
25 produced by transcription service.

1 WEDNESDAY, MARCH 27, 2019 AT 10:00 A.M.

2

3 THE LAW CLERK: *Las Vegas Review-Journal versus*
4 *Las Vegas Metropolitan Police Department.*

5 MS. NICHOLS: Good morning, Your Honor. Jackie
6 Nichols on behalf of the Las Vegas Metropolitan Police
7 Department.

8 MS. MCLEATCHIE: Good morning, Your Honor. Maggie
9 McLetchie for the Las Vegas Review-Journal.

10 THE COURT: Good morning.

11 MS. MCLEATCHIE: Your Honor, we do have some easy
12 housekeeping matters.

13 THE COURT: Okay. Good.

14 MS. MCLEATCHIE: First, if I can leave it with your
15 Clerk, we have an Order from the last hearing --

16 THE COURT: Yeah.

17 MS. MCLEATCHIE: -- that's signed.

18 THE COURT: Are those --

19 MS. MCLEATCHIE: We don't have competing Orders.

20 THE COURT: Okay.

21 MS. MCLEATCHIE: We can leave it with the Clerk for
22 your review and signature.

23 THE COURT: Thank you. Sure.

24 MS. MCLEATCHIE: Thank you. And, then, with regard
25 to the briefing schedule on the soon to be filed, formally

1 filed Amended Petition, due to Ms. Nichols's schedule, I
2 don't think we'll be able to expedite it as quickly as we
3 would have hoped, which does, I think, give me time to do
4 an opening brief. And what Ms. Nichols and I would propose
5 for the briefing schedule, if the Court's amenable, is that
6 my opening brief be due on April 5th, her response be due on
7 the 22nd of April, and, then, my Reply, if any, would be due
8 on May 2nd. And we would propose, if suitable for the
9 Court, a hearing for the week of May 6th.

10 MS. NICHOLS: I would agree to that, Your Honor.

11 THE COURT: Okay. So, April 5th, the opening
12 brief; April 22nd, the response; May 2nd, the Reply, if any.
13 In terms of the hearing, are we talking about an
14 evidentiary hearing?

15 MS. MCLEITCHIE: I don't think we'll require an
16 evidentiary hearing at that stage, Your Honor.

17 THE COURT: Okay. Is that your understanding?

18 MS. NICHOLS: Yes.

19 THE COURT: Okay.

20 MS. NICHOLS: I'm under that same impression, Your
21 Honor.

22 THE COURT: Okay. So, let's -- the week of May
23 6th?

24 THE CLERK: We can do the 6th or the 8th. Whichever
25 works.

1 THE COURT: Monday or Wednesday? Do either of you
2 have a preference?

3 MS. MCLEATCHIE: The Court's convenience.

4 MS. NICHOLS: Doesn't matter to me, Your Honor.

5 THE COURT: Okay. Let's do the Wednesday.

6 THE CLERK: May 8th of 2019 at 9 a.m.

7 MS. MCLEATCHIE: Your Honor, do you need us to
8 write up an Order on that schedule?

9 THE COURT: The schedule, I don't. You're both
10 here and it'll be in the minute order.

11 MS. MCLEATCHIE: Great.

12 THE COURT: Thank you for asking. So, I don't
13 think we need one. But if you want to do one, you're
14 welcome to.

15 MS. MCLEATCHIE: We don't need to do one, Your
16 Honor.

17 THE COURT: Okay.

18 MS. MCLEATCHIE: Thank you.

19 THE COURT: In terms of today?

20 MS. MCLEATCHIE: Today, we have before the Court
21 the issues regarding the scope of the redactions. And I
22 don't know if you -- we submitted simultaneous briefing. I
23 don't know if you want to hear from me first and, then, Ms.
24 Nichols?

25 THE COURT: Well, let me tell you what an

1 inclination or two and a question or two and, then, hear
2 from you all.

3 So, the manual is called SCOPE. Right? Or the
4 SCOPE manual? That one, to me, seems fairly easy. I did
5 review the redacted copy. I don't think there are any
6 issues with the redactions and, so, I'd be inclined to make
7 that part of whatever order arises from today. I know the
8 Review-Journal may have things to say about that but that'd
9 be my initial inclination on that one.

10 On the solicitation arrests, I'm not following
11 what Metro is doing, I guess is the way to say it, in terms
12 of the, quote/unquote: Open solicitation arrest. I think
13 I agree with the Review-Journal's argument that, hey, we
14 did this stipulation and order, and that's the one way back
15 on August 22nd. With respect to the LVRJ's request for
16 arrest reports for solicitation of trespass produced in
17 2014 through '16, without waiving future rights, parties
18 agreed -- without waiving LVRJ's rights for the records, to
19 narrow this request to solicitation arrest, amend the
20 request to include the year 2017 and later maybe 2018.
21 Then, here, the LVMPD will produce these records on a
22 rolling basis with the sequence of production of month/year
23 to be provided to be decided by the LVRJ, etcetera,
24 etcetera, etcetera.

25 So, it seems -- and I'm not sure, you know, so

1 I'll welcome arguments on that, but it seems I'm not sure
2 that LVMPD is doing that.

3 Let's see. There has been issues, claims,
4 statements about requesting a jury way back at that same
5 hearing on August 22nd, 2018. I said, as part of everything
6 -- let's see, somewhere in the brief, whether either party
7 felt the jury trial would be necessary. Nobody has made a
8 jury request yet, so I'm inclined to say there's not going
9 to be a jury trial.

10 Then, there's a bunch of other stuff, which we
11 have 20 minutes to talk about. So, Ms. McLetchie, if you
12 want to go first?

13 MS. MCLETCHE: So, at this point, Your Honor,
14 Metro has had every opportunity to come forward with
15 evidence to support its redactions and its apparent
16 position that open arrest reports, not just solicitation or
17 reports, Your Honor, are not subject to the Public Records
18 Act. And I don't think there are factual issues that this
19 point that require a jury trial and I think that we
20 provided the Court with a citation to that in a petition
21 matter. The Court may order a trial regarding factual
22 issues, if necessary. I think it's akin to a summary
23 judgment standard.

24 Starting with the arrest reports and Declarations
25 of Arrest, again, these are not just the solicitation

1 arrests but I think this -- whether this issue of whether
2 arrest reports correlating to open matters can be withheld,
3 I think applies to all of the arrest reports that are at
4 issue in the case. So, it's a general question about
5 arrest reports.

6 And Metro has gone back and forth on this. In
7 open court, Mr. Crosby agreed these records were public.
8 We have a stipulation, as the Court pointed out, the R-J
9 learned that Metro may be actually withholding arrest
10 reports at the meet and confer. There were -- there was
11 some suggestion, I think now that I go back -- and went
12 back and looked at the redactions log, but it was confusing
13 because it was listed on a redactions log, not on a
14 withholding log. And I think that their decision to
15 withhold these records, I think, frankly, was a violation
16 of the stipulation that they agreed to that, then, became a
17 court order. There was back and forth at the meet and
18 confer and it wasn't even clear then. After the meet and
19 confer, Ms. Nichols did confirm that Metro was withholding
20 the records.

21 But I think, Your Honor, there has obviously been
22 a lot of questions in this case about why meet and confers
23 and why discovery might be needed and I think this is an
24 important -- this is an example of why Metro, frankly,
25 can't be trusted to just comply with the order, let alone

1 to do so in a cost-effective manner. An issue that -- this
2 issue came up in the context of me inquiring of the Metro
3 representative at the meet and confer about why it was
4 taking so long and he said: Oh, because we're withholding
5 open -- we're withholding open arrest reports. And I said:
6 Really? And he said: Oh no, maybe not really. Anyway,
7 long story short, they are withholding open arrest reports.
8 We only cut -- discovered it circuitously.

9 As this Court has already recognized in its August
10 8th Order on page 3, public access to a record -- arrest
11 reports is not solely governed by 170A -- 179A, the NPRA
12 also applies. To the extent Metro is trying to relitigate
13 that issue, it can't.

14 As we pointed out in our original opening brief in
15 support of the Petition, the version of 179 in place at the
16 time of the request did require production to a reporter of
17 any -- of arrest reports, of criminal history records.
18 Metro relies on some amendments to that chapter, including
19 the fact that it now says the following records must be
20 provided to a reporter, any which blank, in any which
21 blank. And it says any which contain criminal history
22 information and, then, has another qualifier. But there --
23 those are two different sets of records that must be
24 produced, otherwise the words, any which, in front of, in
25 front of the two bullet points in the statute would

1 obviously be superfluous language. And, so, their
2 interpretation of 179A, is, A, irrelevant because the
3 version of 179A, in place of the time of the request,
4 governs. And, B, it's irrelevant because the Public
5 Records Act applies, as well, as this Court has already
6 recognized and ordered.

7 After arguing originally that *Donrey* doesn't apply
8 to the arrest reports, Metro now relies on that case to
9 support its secret decision to withhold open arrest
10 reports.

11 *Donrey*, which notably also predates important
12 amendments to the NPRA --

13 THE COURT: Yeah. I'm going to --

14 MS. MCLEATCHIE: Sure.

15 THE COURT: -- pause you there.

16 MS. MCLEATCHIE: Sure.

17 THE COURT: I -- *Donrey* is an old case that
18 predates the amendments to the statute. So, I -- I mean,
19 we'll hear from Metro but I have a hard time seeing how
20 anybody could rely on *Donrey* as good law. I really don't
21 understand that.

22 MS. MCLEATCHIE: And, in *Donrey*, they actually did
23 order disclosure of the records at issue. And the portion
24 of the decision that they're relying on, even if it were
25 good law, doesn't actually help them because it does not

1 stand for the blanket proposition that anything pertaining
2 to an open investigation always merits protection.
3 Instead, it described particular -- for investigative
4 documents, which were at issue in *Donrey*, certain
5 circumstances under which the balancing test may favor
6 nondisclosure, but they were -- it was never even set up a
7 blanket rule that anything pertaining to an open
8 investigation were -- was secret.

9 And, in this case, Metro has never come forward to
10 explain how even -- how disclosure of the records would
11 jeopardize the interest articulated in the *Donrey* test.
12 They haven't explained why -- how any -- how there's any
13 interest in nondisclosure, let alone how that interest in
14 nondisclosure outweighs the presumption in favor of access.
15 And, so, I think that open -- the open arrest reports must
16 be produced, Your Honor, both in light of this Court's
17 order and in light of the stipulation and order.

18 The sex trafficking victims issue, Your Honor, I
19 will concede is a much more complicated issue. However, I
20 will point out at Metro never raised NRS 200.3772 in its
21 five-day response, as required under NRS 239.10 -- I think
22 it's .107(d)(2) [sic], and did not even bother to raise it
23 in its response to the Petition. In fact, Metro failed to
24 raise its new statutory argument until, I think it was
25 August 27, '18. I have e-mails with Ms. Nichols, which was

1 after its signed stipulation that became an order of this
2 Court, setting forth a process for determining which
3 victims' names could be disclosed because they had been --
4 had become part of the public record.

5 To be clear, the R-J is not seeking victims' names
6 so it can disclose unknown victims, which is what this
7 statute Metro now relies on, is designed to protect
8 against. Instead, it's the Review-Journal's position that
9 if the name of a sex trafficking victim is already in the
10 public domain, the records should not be redacted. This is
11 to facilitate investigation and reporting, not the public
12 disclosure or shaming of sex trafficking victims the
13 statute is describe -- is intended to protect against.

14 Further, Metro actually has never come forward
15 with evidence establishing who is and who isn't a sex
16 trafficking victim. For example, if the underlying case
17 didn't result in a conviction, I don't think somebody can
18 be determined to be a victim under the statute.

19 In any case, we -- there is some back and forth in
20 the briefing about the FOIA -- the FOIA test for public
21 disclosure. And Metro points out that under that test
22 where there's an explicit FOIA exemption, that the burden
23 shifts to the requester to establish that the information
24 at issue is in the public domain. The stipulation and
25 order, Your Honor, essentially did take on that burden. We

1 had agreed that if Metro gave us the list of cases, that we
2 would do the work of determining which sex trafficking
3 victims and undercover officers had testified in court and,
4 then, we would be able to assuage any concerns about
5 release of those records. That was a mechanism that we sat
6 and met and conferred about and that we explicitly agreed
7 to, to on -- to address this very issue. And Metro, after
8 the stipulation and order, never moved to modify the order,
9 they failed to raise this issue at their two previous
10 opportunities to do so, and I don't think now they should
11 be allowed to rework the whole framework of this case.

12 While there are other jurisdictions that have
13 limiting applications of the public domain test, I think
14 that the privacy questions that Metro raises need to be
15 looked at in the context of both two Nevada Supreme Court
16 cases and that's the *Montesano* case and the *Hartfield* case
17 that we cite -- we cited, and those are both Nevada Supreme
18 Court cases, and the Nevada Supreme Court has explicitly
19 held in both those cases that where there is public
20 disclosure, that privacy interests are diminished. Further
21 --

22 THE COURT: I'm going to have to give you two
23 minutes.

24 MS. MCLEITCHIE: Pardon?

25 THE COURT: Two more minutes.

1 MS. MCLEATCHIE: Two more minutes. Okay.

2 THE COURT: Sorry.

3 MS. MCLEATCHIE: I'll move on to undercover
4 officers who testify. Your Honor, Metro conflates
5 undercover officers who testify with sex trafficking
6 victims, there is no statute -- they don't cite a statute
7 for undercover officers. And, where the undercover
8 officers have testified in open court, we don't think that
9 there is any basis to redact their names and we don't think
10 they've come forward with the evidence to establish that.

11 With regard to unit assignments, I think that
12 Metro's reliance on federal cases is without merit. FBI
13 special agents are not the same as Metro street officers
14 whose job it is to engage with the public. The self-
15 serving declaration of Sheriff Lombardo doesn't satisfy the
16 evidentiary burden required to justify nondisclosure.
17 While the CCSD case does establish a privacy balancing test
18 that's somewhat new, perhaps in Nevada, the Supreme Court
19 in that decision, Your Honor, made very clear that didn't -
20 - that it did not change the existing framework.

21 And the Nevada Supreme Court couldn't have, Your
22 Honor, because NRS 239.0113 establishes an evidentiary
23 burden and the Nevada Supreme Court made clear that the
24 burden is still on the government. They've never met their
25 burden to establish that there is a privacy interest with

1 regard to where patrol officers were.

2 They argue that: Well, if we give you the patrol
3 officer's unit assignments, you might be able to discern
4 where undercover officers work. That assumes that the
5 universe of officers is either patrol officers or
6 undercover officers, where -- which is not the case in
7 which Metro has never established, Your Honor.

8 I don't think they've met their evidentiary
9 burden. If the Court disagrees and thinks that the burden
10 shifts to us, I think that we should be allowed to have the
11 opportunity to cross-examine Sheriff Lombardo and to be
12 able to come forward to explain why our interest in
13 disclosure outweighs the alleged privacy interest that we,
14 again, don't think is at stake, Your Honor.

15 THE COURT: Thank you.

16 MS. NICHOLS: Very briefly, Your Honor, as far as
17 the *Donrey* case is concerned, the Supreme Court recently
18 cited to it in its *CCSD versus LVRJ* case, whereas it said
19 that the new balancing test related to privacy interest
20 also comports with the balancing test in *Donrey*. And, so,
21 the way that *Donrey* is applied in public records cases is,
22 first, under the NPRA, I don't disagree with Ms.
23 McLetchie's interpretation that there has to be a statute
24 that deems the information or record confidential. But the
25 Supreme Court has reiterated in all of its cases, even

1 after the amendments and the NPRA, that if there is no
2 statute, then the Court does apply the *Donrey* balancing
3 test. So, I don't think that *Donrey* is completely
4 eviscerated. I do think it still survives as far as the
5 balancing test is concerned.

6 With respect to the arrest reports that are open,
7 it has always been my understanding, Your Honor, in working
8 with Ms. McLetchie, that open cases were not -- that we
9 were not disclosing records in relation to open cases.
10 And, if you look at Exhibit 6 to Ms. McLetchie's
11 supplemental brief, there is --

12 THE COURT: Okay. Bear with me a second.

13 MS. NICHOLS: Not a problem.

14 THE COURT: Turn a few hundred pages to get there.
15 Okay.

16 MS. NICHOLS: And, towards the very bottom of the
17 page, it's titled Arrest Reports and, then, two thirds down
18 the bottom of that paragraph, it says:

19 Attached is a privilege log regarding any
20 redactions and enumerating all cases reviewed. We
21 notated which cases were open and the cases that were
22 brought on bench warrants resulting in no documents
23 being produced.

24 That is what -- in that paragraph, I notate that
25 we weren't producing arrest reports or arrest records in

1 relation to open cases. And, then, I further go on and say
2 as far as the records that we have produced, to clarify any
3 -- in our privilege log, we marked an X for the records
4 that we produced. And, so, if you look at the privilege
5 log that we produced, we made an X of every single document
6 that -- of all the records that we included under those
7 event numbers. So, if there was a miscommunication between
8 Ms. McLetchie and I, then I'm going to couch it up to that.
9 But in no way did we ever waive our right not to protect
10 open arrest reports or arrest records in general.

11 NRS 179A.100 subsection 1 makes it clear, and it
12 uses the language and, that in open cases, the only records
13 that can be produced are records that demonstrate
14 conviction. And I think that is -- it coincides with
15 *Donrey* because you had -- you have -- the defendants in
16 these cases have constitutional rights. They're appealing
17 -- they're going -- their cases could be impacted by the
18 disclosure of open information. And NRS 179A.0 -- .070
19 that defines criminal history information says information
20 related to the subject and the arrest. So, at a minimum --
21 or, I should say at most, the -- what the R-J is entitled
22 to is to know that they are arrested. And the Declarations
23 of Arrest that we've included in our supplemental briefing
24 demonstrates that this contains investigative information,
25 which could impact an open case. So, if this Court is

1 inclined to say that the R-J is entitled to arrest
2 information as it relates to open cases, then the
3 Department is arguing that it should be at least entitled
4 to redact the investigative information of the second half
5 of the Declarations of Arrest that give details about the
6 crime committed and the investigation done.

7 As far as the redactions, I think NRS 200.3771 and
8 200.3773 make it pretty clear that the Department is
9 expressly prohibited from releasing information related to
10 victims of sex trafficking. And the statutes define what a
11 victim of sex trafficking is, they cite the statutes. And,
12 so, I think that's pretty clear and I don't understand what
13 -- why this is a complicated issue. In our eyes, it's not.
14 If the Court is inclined to have an order, it has to give
15 the victim an opportunity to be heard. And that's clearly
16 in the statute as well.

17 THE COURT: Well, let me -- on the solicitation
18 arrest reports, --

19 MS. NICHOLS: Uh-huh.

20 THE COURT: -- how do you square your argument
21 with the stipulation filed on August 22nd?

22 MS. NICHOLS: My understanding, in entering into
23 that stipulation, Your Honor, was that we were not
24 producing open cases. We were going to produce all of the
25 records that they requested as it relates -- as it related

1 to closed cases. That was my understanding for this whole
2 entire set as it relates to this sex trafficking case.
3 That has been my understanding since the very beginning.

4 With the public domain doctrine, it's the R-J that
5 bears the burden to show that the records that we are
6 producing are in the public domain as a permanent record in
7 unredacted format. And, until they can show us that, I
8 don't think that we're obligated to leave undercover
9 officer names unredacted. I think there are large
10 investigative concerns. Those are -- that is reiterated in
11 the case law that I cited to, as well as the two
12 declarations, which would be Sheriff Joe Lombardo's and Mr.
13 Steven Grammas, who is the President of the Police
14 Protective Association, which also goes to the
15 confidentiality of the unit assignments.

16 Steven Grammas actually said in his declaration
17 that -- kind of outlines all the issues that those cases
18 that I cited to raised, that by providing the unit
19 assignments to even patrol officers, we're putting these
20 officer's lives in danger. Someone could follow them home
21 from there they're at at their area commands and I just --
22 under the new *CCSD versus LVRJ* case, it says that the
23 burden just -- or the government has the burden of
24 demonstrating a nontrivial privacy interest. And
25 nontrivial includes -- is anything that would subject the

1 person to harassment, embarrassment, annoyance, and I
2 believe that the declaration by Steve Grammas demonstrates
3 that, that revealing these unit assignments would subject
4 these officers to that kind of conduct.

5 So, it's our position that the burden then shifts
6 to the R-J under the balancing test of *CCSD versus LVRJ*.
7 And that's all I have for you, Your Honor.

8 THE COURT: Thank you. I'm going to have to skip
9 rebuttal.

10 MS. MCLEITCHIE: Okay, Your Honor.

11 THE COURT: So, the -- this is certainly one case
12 where I wish I had more time. So, I apologize for not
13 being as thorough as I would have liked in preparation for
14 today. But, in any event, I can make partial rulings right
15 now as I have done before.

16 The redactions to the SCOPE manual are and were
17 properly done. The -- like I said, I did review that SCOPE
18 manual personally, and the redactions, and the law. Again,
19 I find that those redactions were properly done.

20 The -- we're not going to have a jury trial. And
21 the right to is -- you know, it's up to the Court's
22 discretion in these types of cases under the statute and
23 this is not a case where it would make sense for many
24 different reasons: Financial reasons, it -- the particular
25 issues in the case, the substance of the Petition, and the

1 responses. This petition case, whatever -- however you
2 want to call it, does not merit a jury trial on any issue.

3 And, so, to the extent we're going to have an
4 evidentiary hearing or a trial, those will be done as an
5 evidentiary hearing in front of me as the judge and/or a
6 bench trial. So, to be clear on that, apart from the
7 substance, the issue was raised, you know, way back in
8 August. And, to date, my review does not show any jury
9 trial being demanded, which further supports my order today
10 on that issue.

11 The -- if a victim testified in open court or if
12 an undercover officer testified in open court, that's now a
13 -- you can't now claim that any record identifying the
14 victim by name or the undercover officer by name is not a
15 public record. So, the redaction of those names -- and I'm
16 being very specific, names, would not be proper.

17 Now, having said that, as I sit here, you know, I
18 can't say, well, undercover officer Fred testified in
19 whatever case, I have no idea, but that's a general finding
20 and conclusion by the Court. How that affects everything,
21 I can't say as I sit here right now.

22 So, the patrol names and unit assignments, I'm
23 going to -- the original request was '14, '15, and '16
24 years. Is that right? Or -- 2014, 2015, I can't remember.

25 MS. MCLETCHE: Yes, Your Honor.

1 THE COURT: Okay. There's been no evidence --
2 well, there's been evidence -- let me take that back.
3 There has been evidence submitted by Metro in opposition to
4 those requests. But I pointed out deficiencies and issues
5 with that evidence that's been submitted, you know, back
6 before I think the writ was taken up and the case stayed.
7 And the -- Metro has not met its burden, let's put it that
8 way, of demonstrating either that they're not public record
9 or that the -- even if applying the case, which has
10 recently been cited to me, *CCSD* case, I think you all have
11 referred to it as, even applying the test in that case,
12 Metro's concerns expressed through evidence are speculative
13 in nature. Given the years in question -- and this is
14 subject to any additional years, but I'm ruling right now
15 on 2014, '15, '16, those have to be produced.

16 MS. MCLEATCHIE: Your Honor, I just checked the --
17 my -- the supplemental brief and it was 2017 as well, I
18 believe.

19 THE COURT: The original request?

20 MS. MCLEATCHIE: I apologize, Your Honor. I argued
21 that 2017 should also be produced --

22 THE COURT: Should be. Yeah.

23 MS. MCLEATCHIE: -- due to the passage of time.

24 THE COURT: See, I did remember something. Yeah.
25 So, I'm ruling right now, '14, '15, '16.

1 MS. MCLEATCHIE: Okay.

2 THE COURT: There may be issues with '17 but the
3 original request is essentially granted for the reasons set
4 forth in the -- that I've said, as well as all the other
5 reasons set forth in the R-J's briefs.

6 I will, again, reiterate that given the issues and
7 the potential appellate issues, Ms. McLetchie, when you do
8 the Order -- please do the Order, include the reasons in
9 there, submit it to Ms. Nichols for review and approval.
10 The other issues, I simply am not prepared to rule on right
11 now.

12 MS. MCLEATCHIE: Your Honor, I may have missed it
13 but did you rule on the question of whether they can
14 withhold arrest reports?

15 THE COURT: Yeah. No. I'm glad you asked that.
16 So, I can rule right now on the solicitation arrest. I --
17 the first thing I looked to is the stipulation and order
18 filed on August 22nd, 2018. And if you read the language in
19 the stipulation, which became an order signed by the Court,
20 you have a section 1 with respect to LVRJ's public record
21 request regarding investigative case files pertaining to
22 sex trafficking cases closed in 2014 through '16, the
23 parties agree -- and that goes through subsections A
24 through L. So, that's as to sex trafficking cases that are
25 closed.

1 But, then, you look at subsection 2, which is what
2 I'm doing and prepared to rule on this morning, with
3 respect to the LVRJ's request for arrest reports for
4 solicitation or trespass produced in 2014 through '16.
5 Without waiving future rights, parties agreed we're
6 narrowing it to solicitation arrests, which that's what I'm
7 ruling on this morning, solicitation arrests. LVRJ's
8 amended that to include the year 2017, which would be
9 included in this Order from today. So, years '14 through
10 '17. LVMPD is supposed to produce those records on a
11 rolling basis. And there's nothing that indicates we're
12 limiting those particular reports to open or closed cases.
13 So, that applies to both open and closed cases to be
14 produced on a rolling basis.

15 Now, there may be information in those reports
16 that potentially has other confidentiality issues. So,
17 just off the top of my head, I could think of, you know,
18 but I'll call it an alleged victim because it's an arrest
19 report, alleged victims personally identifying information.
20 I don't -- I can't rule right now that that is subject to
21 disclosure. So, I -- kind of in a vacuum but, say -- let's
22 say it had an alleged victim's telephone number. That may
23 be confidential personally identifying information that I
24 could understand why it may not be produced. But I can't -
25 - but, generally speaking, those open report arrests need

1 to be produced per the stipulation.

2 Everything else, I'll have to defer ruling on.

3 MS. MCLEATCHIE: Thank you, Your Honor. Just for
4 clarification, the stipulation and order also pertains to
5 trespass as well as solicitation arrest reports. So,
6 should the Order encompass solicitation -- the trespass as
7 well?

8 THE COURT: No. Because I only -- because what
9 you did in this stipulation and order that I'm relying on
10 is, you know, without waiving your rights, like, you know,
11 if you want me to rule at a future date, you did narrow --

12 MS. MCLEATCHIE: I understand. I understand.
13 Because we narrowed it to solicitation, of course.

14 THE COURT: Yeah.

15 MS. MCLEATCHIE: Thank you.

16 THE COURT: And, again, that's certainly without
17 prejudice.

18 MS. MCLEATCHIE: Understood.

19

20 PROCEEDING CONCLUDED AT 10:39 A.M.

21 * * * * *

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23

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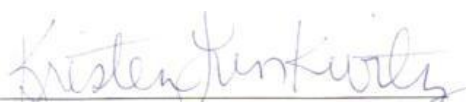
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CERTIFICATION

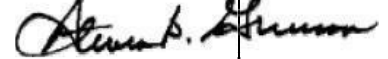
I certify that the foregoing is a correct transcript from the audio-visual recording of the proceedings in the above-entitled matter.

AFFIRMATION

I affirm that this transcript does not contain the social security or tax identification number of any person or entity.



KRISTEN LUNKWITZ
INDEPENDENT TRANSCRIBER



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3 ALINA M. SHELL, Nevada Bar No. 11711

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9 *Counsel for Petitioner, Las Vegas Review-Journal*

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 LAS VEGAS REVIEW-JOURNAL,

Case No.: A-18-775378-W

13 Petitioner,

Dept. No.: XV

14 vs.

NOTICE OF ENTRY OF ORDER

15 LAS VEGAS METROPOLITAN POLICE
16 DEPARTMENT,

17 Respondent.

18 TO: THE PARTIES HERETO AND THEIR RESPECTIVE COUNSEL OF RECORD:

19 PLEASE TAKE NOTICE that on the 12th day of April, 2019, an Order was entered
20 in the above-captioned action. A copy of the Order is attached hereto as Exhibit 1.

21 DATED this 12th day of April, 2019.

22 /s/ Margaret A. McLetchie

23 MARGARET A. MCLEATCHIE, Nevada Bar No. 10931

24 ALINA M. SHELL, Nevada Bar No. 11711

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Counsel for Petitioner, Las Vegas Review-Journal

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of April, 2019, pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, I did cause a true copy of the foregoing NOTICE OF ENTRY OF ORDER in *Las Vegas Review-Journal v. Las Vegas Metropolitan Police Department*, Clark County District Court Case No. A-18-775378-W, to be served electronically using the Odyssey File & Serve system, to all parties with an email address on record.

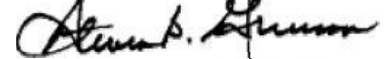
Nick D. Crosby, and Jackie V. Nichols
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Attorneys for Las Vegas Metropolitan Police Department

/s/ Pharan Burchfield
An Employee of McLetchie Law

INDEX OF EXHIBITS TO NOTICE OF ENTRY OF ORDER

Exhibit	Description
1	April 12, 2019 Order

EXHIBIT 1



1 **ORDR**

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9 **EIGHTH JUDICIAL DISTRICT COURT**
10 **CLARK COUNTY, NEVADA**

11 LAS VEGAS REVIEW-JOURNAL,

Case No.: A-18-775378-W

12 Petitioner,

Dept. No.: XV

13 vs.

14 **ORDER**

15 LAS VEGAS METROPOLITAN POLICE
16 DEPARTMENT,

17 Respondent.

18 This matter, having come before the Court on March 27, 2019 for a hearing on
19 supplemental briefing submitted by Petitioner the Las Vegas Review-Journal's ("Review-
20 Journal") and Respondent the Las Vegas Metropolitan Police Department ("Metro"), and
21 the Court, having reviewed all of the papers and pleadings on file in this matter, and having
22 entertained the arguments of counsel, considered the points and authorities thereof, and for
23 good cause appearing, the Court hereby finds as follows:

24 **I. FINDINGS OF FACT**

25 1. This matter stems from the LVRJ's Petition for Writ of Mandamus
26 seeking public records from LVMPD pursuant to the Nevada Public Records Act, Nev.
27 Rev. Stat. § 239.001 *et seq.* (the "NPR").

28 2. Among other things, the Review-Journal requested that Metro produce
public records reflecting officer unit assignments for calendar years 2014, 2015, and 2016.¹

¹ The Review-Journal subsequently clarified that it only sought unit assignments for patrol officers and did not want unit assignments for undercover officers, and further amended its request to include patrol officer unit assignments for calendar year 2017.

1 The Review-Journal also requested, *inter alia*, arrest reports for solicitation or trespass that
2 were produced in calendar years 2014, 2015, and 2016, and investigative case files
3 pertaining to sex trafficking cases closed in 2014-2016.

4 3. On May 31, 2018, the Review-Journal filed a Public Records Act
5 Application Pursuant to NRS § 239.001/Petition for Writ of Mandamus seeking the
6 production of public records pertaining to Metro's investigations of sex trafficking crimes
7 and related matters (the "Petition").

8 4. This Court held hearings regarding the Petition on August 8, 2018 and
9 August 22, 2018. Pursuant to those hearings, this Court entered two written orders on
10 September 7, 2018.

11 5. In the Order regarding the August 8, 2018 hearing, the Court deferred
12 ruling on whether the information regarding officer unit assignments was confidential and
13 ordered the parties to engage in further good faith meet and confer efforts to address that
14 issue.

15 6. On August 22, 2018, following direction from the Court, Metro agreed to
16 produce arrest reports, case reports, and requests for prosecution for 2014 through 2018,
17 and the parties filed a Stipulation and Order outlining the protocol Metro would implement
18 in producing those arrest reports. That Stipulation and Order was entered with the Court on
19 August 22, 2018.

20 7. Notably, the Stipulation and Order did not limit Metro's obligation to
21 produce solicitation arrest reports to only closed cases.

22 8. Additionally, with regards to investigative case files for closed sex
23 trafficking cases, the Stipulation and Order noted that the Review-Journal amended its
24 request to include 2017 and 2018 case files.

25 9. With regard to solicitation arrest reports, the Stipulation and Order
26 provides that Metro will produce solicitation arrest reports produced in 2014 through 2017.
27 (Stipulation and Order, pp. 2-3, § 2.)

28 ///

10. The Stipulation and Order does not limit Metro's production obligation to closed cases, nor does it permit Metro to redaction information from those reports.

11. On August 27, 2018, Metro notified the Review-Journal that it would be redacting victim and witness names; information it was not permitted to redact pursuant to the terms of the Stipulation and Order.

12. In subsequent correspondence with the Review-Journal, Metro stated it would be redacting addresses, telephone numbers, Social Security numbers, dates of birth, victim names, undercover officer information, and juvenile information. As justification for its decision to violate the terms of the Stipulation and Order, Metro cited Nev. Rev. Stat. § 200.377 *et seq.*

13. On March 13, 2019, the Court conducted a hearing on the Review-Journal's motion to amend its Petition. During that hearing, the Court and the parties discussed the parties' disputes regarding the historical officer unit assignments and the scope of redactions to the records Metro agreed to produce pursuant to the Stipulation and Order. During that hearing, the Court ordered the parties to submit supplemental briefing regarding the disputes by no later than 5:00 p.m. on March 18, 2019.

14. Both parties submitted supplemental briefing on March 18, 2019.

15. Metro has had multiple opportunities to present evidence supporting its confidentiality claims, as required by Nev. Rev. Stat. 239.0114.

16. The Court finds that Metro has met its evidentiary burden of supporting the redactions made to the SCOPE manual it provided to the Review-Journal.

II. CONCLUSIONS OF LAW

17. The Court, having reviewed the supplemental briefs submitted by the parties on March 18, 2019, as well as all other pleadings and papers on file in this matter, including the Review-Journal's Petition, the Review-Journal's Opening Brief, Metro's Response, the Review-Journal's Reply, and all other filings in this matter, hereby makes the following findings of law:

///

1 ***SCOPE Manual***

2 18. A governmental entity seeking to withhold or redact records must
3 establish by a preponderance of the evidence that the records are confidential or privileged
4 and that the interest in nondisclosure outweighs the strong presumption in favor of public
5 access. *See* Nev. Rev. Stat. § 239.0113(2); *Reno Newspapers, Inc. v. Gibbons*, 127 Nev.
6 873, 880, 266 P.3d 623, 628 (2011). As noted above, Metro met its evidentiary burden to
7 support its redactions and the Review-Journal has not sought to cross-examine the persons
8 making declarations in support of the redactions. Thus, Metro need not produce an
9 unredacted version of the manual.

10 ***Historical Information Regarding Patrol Officer Unit Assignments***

11 19. The NPRA sets forth the default rule that public records are to be made
12 available to the public for inspection or copying. Nev. Rev. Stat. § 239.010(1); *Gibbons*,
13 127 Nev. at 882, 266 P.3d at 628. The purpose of the NPRA is to “foster democratic
14 principles by providing members of the public with access to inspect and copy public
15 books and records to the extent permitted by law[.]” Nev. Rev. Stat. § 239.001(1).

16 20. The NPRA must be construed liberally; government records are presumed
17 public records subject to the act, and any limitation on the public’s access to public records
18 must be construed narrowly. Nev. Rev. Stat. 239.001(2) and 239.001(3).

19 21. A governmental entity seeking to withhold or redact records must
20 establish by a preponderance of the evidence that the records are confidential or privileged
21 and that the interest in nondisclosure outweighs the strong presumption in favor of public
22 access. *See* Nev. Rev. Stat. § 239.0113(2); *Gibbons*, 127 Nev. at 880, 266 P.3d at 628
23 (citation omitted).

24 22. The Nevada Supreme Court has emphasized that in meeting this burden,
25 governmental entities cannot rely on a “non-particularized showing, . . . or by expressing
26 hypothetical concerns.” *Gibbons*, 127 Nev. at 880, 266 P.3d at 628; *see also Reno*
27 *Newspapers v. Sheriff*, 126 Nev. 211, 218, 234 P.3d 922, 927 (2010) (“A mere assertion of
28 possible endangerment does not ‘clearly outweigh’ the public interest in access to these

1 records.”) (quotation omitted).

2 23. The Review-Journal initially requested that Metro disclose unit
3 assignment for patrol officers for calendar years 2014, 2015, and 2016. Subsequently, the
4 Review-Journal amended its request to include patrol officer unit assignments for calendar
5 year 2017.

6 24. At this time, the Court defers ruling on whether Metro must disclose
7 officer unit assignments for calendar year 2017.

8 25. With regard to patrol officer unit assignments for calendar years 2014,
9 2015, and 2016, the Court finds that Metro failed to meet its evidentiary burden under Nev.
10 Rev. Stat. § 239.0113(2). The declarations from Sheriff Joseph Lombardo and Las Vegas
11 Police Protective Association President Steve Grammas to support the assertion that officer
12 unit assignments should be kept confidential are too speculative in nature to satisfy Metro’s
13 burden under Nev. Rev. Stat. § 239.0113(2).

14 26. In its March 19, 2019 Supplement, Metro also cited the Nevada Supreme
15 Court’s opinion in *Clark County School District v. Las Vegas Review-Journal*, 134 Nev.
16 Adv. Op. 34, 429 P.3d 313 (2018), to justify withholding historical information about
17 patrol officer unit assignments.

18 27. In CCSD, the Supreme Court adopted a two-part balancing test set forth in
19 *Cameranesi v. U.S. Dep’t of Defense*, 856 F.3d 626 (9th Cir. 2017) to be applied by courts
20 in cases “in which the nontrivial personal privacy interest of a person named in an
21 investigative report may warrant redaction.”

22 28. Under that test, which the CCSD Court explicitly held cohered with the
23 NPRA, a governmental entity must first assert a “personal privacy interest stake to ensure
24 that disclosure implicates a personal privacy interest that is nontrivial or ... more than [] de
25 minimis.” CCSD, 429 P.3d at 320 (quotation omitted). Then, if the governmental entity “
26 succeeds in showing that the privacy interest at stake is nontrivial, the requester ‘must show
27 that the public interest sought to be advanced is a significant one and that the information
28 [sought] is likely to advance that interest.’” *Id.* (quotation omitted).

1 29. Metro has not met this burden. First, Metro has not provided evidence to
2 show that (even sufficiently explained how) the requested records implicate any personal
3 privacy interest. Metro's officers are public employees and patrol officers, by definition,
4 interact with the public and the community. Metro has also not sufficiently established that
5 providing the requested historical unit assignment information would reveal the identities
6 of any undercover officers. All of Metro's concerns and evidence are too speculative in
7 nature. Thus, information regarding past unit assignments does not implicate a nontrivial
8 personal privacy interest.

9 30. Metro must therefore disclose patrol officer unit assignments for calendar
10 years 2014, 2015, and 2016.

11 ***Arrest Reports***

12 31. Metro's decision to withhold arrest reports for open cases is inconsistent
13 with the terms of the Stipulation and Order. As noted, nothing in the Stipulation and Order
14 contemplates that Metro may limit its production of solicitation arrest reports to closed
15 cases only.

16 32. Accordingly, Metro must comply with the Stipulation and Order and
17 produce arrest reports for solicitation for 2014-2017 for closed and pending cases.

18 33. The court defers ruling on the propriety of any redactions, which Metro
19 must track on a log (Vaughn Index) and is required to justify by a preponderance of the
20 evidence. Nev. Rev. Stat. §239.0113.

21 ***Redaction of Victim, Witness, and Undercover Officer Names***

22 34. Pursuant to the Stipulation and Order, the parties stipulated that Metro
23 would begin a "test-run" for the December 2016 case files, and would provide the Review-
24 Journal with a list of case file names. The Stipulation and Order further provides that, after
25 Metro provides that list, the Review-Journal would then give Metro information regarding
26 whether the case was prosecuted and the names of any victim witnesses who testified, and
27 that Metro will use that information to avoid unnecessary redactions. Finally, the
28 Stipulation and Order provides that the only information to be redacted from those records

1 would be Social Security numbers.

2 35. Metro's redactions (and planned redactions) exceed the terms of the
3 Stipulation and Order and the scope of permissible redactions under the NPRA.

4 36. Moreover, the Stipulation and Order sufficiently protects privacy and
5 other interests because it limits production to information in the public domain. The
6 Nevada Supreme Court and other courts across the country have held that once information
7 enters the public domain, it cannot be kept secret—and that, any privacy interests in that
8 information fades. *See, e.g., Las Vegas Review-Journal v. Eighth Judicial Dist. Court in &*
9 *for County of Clark* ("Hartfield"), 134 Nev. Adv. Op. 7, 412 P.3d 23, 27–28 (2018) (prior
10 publication of information diminishes a privacy claim in connection with the information).

11 37. Nev. Rev. Stat. § 200.3771 does not dictate a contrary conclusion and does
12 not render victim information permanently confidential. In adopting protections for victims
13 of sex offenses, the Nevada Legislature specifically found that the State has a compelling
14 interest in assuring that a victim of a sex offense "[t]estifies at the criminal trial of the
15 person charged with committing the sexual offense, offense involving a pupil or child or
16 sex trafficking." Nev. Rev. Stat. § 200.377(1)(c). Once a victim testifies in court, that
17 significant government interest has been fulfilled and the need to keep that person's name
18 confidential has dissipated.

19 38. Nevada's Public Records Act does not parallel the federal Freedom of
20 Information Act's (FOIA). However, the reasoning behind a line of cases concerning FOIA
21 is persuasive value and supports the proposition that Nev. Rev. Stat. § 200.3771 does not
22 require secrecy with regard to victims' names who testified in open court.

23 39. In general, when a federal agency withholds information under law
24 enforcement exemption (Exemption 7) (5 U.S.C. § 552(b)(7)), disclosure may nevertheless
25 be required under the public domain doctrine based on prior release information. Despite
26 the fact that Exemption 7 explicitly protects certain records, "a number of courts have
27 recognized a 'public domain doctrine' pursuant to which information withheld under
28 Exemption 7 must [nonetheless] be disclosed." 3 A.L.R. Fed. 3d Art. 5 (Originally

published in 2015); *see also Hronek v. Drug Enf't Agency*, 16 F. Supp. 2d 1260, 1279 (D. Or. 1998), *aff'd*, 7 Fed. Appx. 591 (9th Cir. 2001) (explaining that “the government cannot rely on an otherwise valid exemption to claim to justify withholding information that has been ‘officially acknowledged’ or is in the ‘public domain’”) (citing *Davis v. U.S. Dept. of Justice*, 968 F.2d 1276, 1279 (D.C.Cir.1992) (quoting *Afshar v. Department of State*, 702 F.2d 1125, 1130–34 (D.C.Cir.1983))).

40. In the case of victims, witnesses, and undercover officers who testify in open court, once those individuals testify, their names have entered the public domain. Thus, their names cannot be kept confidential.

41. Accordingly, Metro cannot redact the names of victims, witnesses, or undercover officers who have testified in open court.

42. Metro must comply with the Stipulation and Order.

This Matter is Not Suitable for a Jury Trial

43. Pursuant to Nev. Rev. Stat. § 34.220, if an answer to a petition for a writ of mandamus is made which raises a question of fact essential to the determination of the motion and affecting the substantial rights of the parties, a court may, in its discretion, order the question to be tried before a jury.

44. Having reviewed all the papers and pleading on file in this matter, and having entertained argument from the parties on August 8, 2018, August 22, 2018, and March 27, 2019, the Court finds that this case does not merit a jury trial on any issues.

45. The purpose of a jury trial in a mandamus proceeding such as the case at bar is to decide disputed factual issues which are “critical in demonstrating the propriety of a writ of mandamus.” *Round Hill Gen. Imp. Dist. v. Newman*, 97 Nev. 601, 604, 637 P.2d 534, 536 (1981).

46. Having reviewed this case in its entirety, the Court finds that there are no disputed issues of fact which merit a jury trial.

47. Moreover, a jury trial would cause the parties ~~and taxpayers~~ to incur unnecessary costs. BM

1 48. Accordingly, this matter is not appropriate for trial. To the extent that the
2 Court determines that an evidentiary hearing is necessary, the Court will conduct such a
3 hearing. Additionally, should the Court determine that a trial on any issue of fact is
4 necessary, such a trial will proceed as a bench trial.

5 **III. ORDER**

6 IT IS HEREBY ORDERED AND ADJUDGED that Metro does not have to
7 produce an unredacted version of the SCOPE Manual.

8 IT IS FUTHER ORDERED that Metro must produce information regarding
9 officer unit assignments for all patrol officers for calendar years 2014, 2015, and 2016.


10 IT IS FURTHER ORDERED that Metro must produce arrest reports for
11 solicitation for calendar years 2014, 2015, 2016, 2017, and 2018, regardless of the status of
12 any criminal case.

13 IT IS FURTHER ORDERED that Metro may not redact the names of victims,
14 witnesses, or undercover officers who testified in open court from any of the records it is
15 producing in this matter.

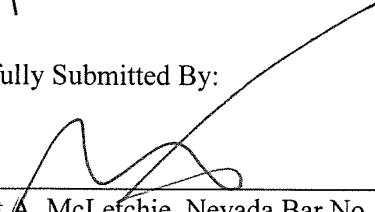
16 IT IS FURTHER ORDERED that this matter is not appropriate for jury trial, as
17 there are no disputed issues of fact which merit a jury trial.

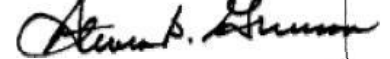
18 THE COURT DEFERS RULING ON THE OTHER UNRESOLVED ISSUES IN
19 THIS MATTER.

20
21 April 12, 2019
22 Date


DISTRICT COURT JUDGE BM

23 Respectfully Submitted By:

24
25 
26 Margaret A. McLetchie, Nevada Bar No. 10931
27 MCLETCHE LAW
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8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LAS VEGAS REVIEW-JOURNAL,

Case No.: A-18-775378-W
Dept. No.: XV

11 Petitioner,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT,

HEARING REQUESTED

14 Respondent.

15 **LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S MOTION FOR 54(b)**
16 **CERTIFICATION AND FOR STAY PENDING APPEAL**

17 Respondent Las Vegas Metropolitan Police Department ("LVMPD" or the
18 "Department"), by and through its attorneys of record, Nicholas Crosby, Esq. and Jackie Nichols,
19 Esq., of the law firm of Marquis Aurbach Coffing, hereby files its Motion for 54(b) Certification
20 and for Stay Pending Appeal.

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

1 This Motion is made and based upon the papers and pleadings on file herein, the
2 Memorandum of Points and Authorities, and any oral argument allowed by the Court at a hearing
3 on this matter.

4 Dated this 15 day of April, 2019.

MARQUIS AURBACH COFFING

By: 

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*Attorneys for Respondent, Las Vegas
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MEMORANDUM OF POINTS & AUTHORITIES

I. INTRODUCTION

15 Based upon the Las Vegas Review-Journal's ("LVRJ") Petition under the Nevada Public
16 Records Act ("NPR"), the Court ordered LVMPD to produce patrol officer unit assignments
17 for the years 2014, 2015, and 2016. While many of LVRJ's other requests remain active—either
18 not ordered to be disclosed by the Court or in the midst of production by LVMPD—LVRJ's
19 specific request for unit assignments has been resolved. Accordingly, LVMPD asks that this
20 Court grant final judgment certification pursuant to NRCP 54(b) of the March 27th Order as it
21 relates to the production of unit assignments. Additionally, LVMPD asks that this Court stay its
22 Order to produce unit assignments pending appeal pursuant to NRAP 8(c). Certifying the Order
23 as final allows the Parties to reach a final order as to the particular request of unit assignments
24 and, further, staying execution of the Order preserves the status quo pending resolution of the
25 matter on appeal.

II. STATEMENT OF FACTS

27 As the Court is aware, this matter stems from the Petition for Writ of Mandamus of LVRJ
28 seeking public records from LVMPD under NRS 239.001 *et seq.*, relating to various records,

1 including LVMPD's unit assignments for officers from 2014–2016. *See Exhibit 1* to Petition.
2 On April 27, 2017, LVMPD provided the names and badge numbers of officers on the force
3 from 2014-2016. *Id.* at **Exhibit 7**. Prior to this disclosure, however, General Counsel informed
4 LVRJ that it was not providing unit assignments due to safety concerns. *Id.* at **Exhibit 6**. After
5 Ms. McLetchie became involved, Mr. Crosby also explained that unit assignments would not be
6 produced because of officer safety and it would reveal identities of officers working in covert
7 positions. *Id.* at **Exhibit 20**.

8 LVRJ then filed its Petition seeking access to the unit assignments. *See* Petition on file
9 herein, *generally*. After initial briefing and oral argument, the Court ordered LVMPD to submit
10 supplemental briefing on the production of unit assignments. *See* Order from August 22, 2018
11 Hearing on file herein. LVMPD submitted a Supplemental Brief on August 29, 2018 in support
12 of its position that the disclosure of patrol officer unit assignments can reveal the identities of
13 past or future undercover and covert officers. *See* LVMPD's Supplemental Brief filed on August
14 29, 2018 on file herein. At the March 4, 2019 status check, LVMPD requested additional
15 briefing on the unit assignment issue in light of the Supreme Court's recent decision in *Clark*
16 *County School District v. Las Vegas Review-Journal*, 134 Nev. Adv. Op. 34, 429 P.3d 313
17 (2018), which adopted a balancing test regarding an individual's nontrivial privacy interest in
18 relation to public records. On March 18, 2019, the Parties submitted simultaneous briefs that
19 addressed the unit assignment issue. Following a final hearing on March 27, 2019, the Court
20 issued an Order which, among other things, concluded that the NPRA requires LVMPD to
21 produce unit assignments for patrol officers for calendar years 2014, 2015, and 2016. *See* Order
22 entered on April 12, 2019.

23 **III. LEGAL ARGUMENT**

24 First, the Court's Order requiring production of patrol officer unit assignments should be
25 certified as final. While the instant case involves requests for dissemination of a variety of
26 records, the request for unit assignment of patrol officers is separate from LVRJ's remaining
27 requests. Furthermore, any order from the Supreme Court on the unit assignment issue would
28

1 not affect LVRJ's remaining record requests. Accordingly, certification of the March 27, 2019
2 Order as it pertains to the production of unit assignments is proper.

3 Second, a stay of an order is appropriate to preserve the status quo during the pendency
4 of appellate proceedings, to ensure that neither party is prejudiced. Here, the Court should grant
5 LVMPD's Motion for Stay because the object of its appeal would be defeated without a stay,
6 because LVRJ will not suffer any serious injury if the stay is granted, and because the privacy
7 rights of nonparties would be jeopardized if the stay is not granted.

8 **A. THIS COURT SHOULD CERTIFY THE ORDER AS FINAL UNDER**
9 **NRCP 54(B).**

10 A party may move for an order certifying a judgment as final when other claims remain
11 pending in the matter. This is confirmed by NRCP 54(b), which states, in pertinent part:

12 **(b) Judgment on Multiple Claims or Involving Multiple Parties.** When an
13 action presents more than one claim for relief--whether as a claim, counterclaim,
14 crossclaim, or third-party claim--or when multiple parties are involved, the court
15 may direct entry of a final judgment as to one or more, but fewer than all, claims
16 or parties only if the court expressly determines that there is no just reason for
17 delay. Otherwise, any order or other decision, however designated, that
18 adjudicates fewer than all the claims or the rights and liabilities of fewer than all
19 the parties does not end the action as to any of the claims or parties and may be
20 revised at any time before the entry of a judgment adjudicating all the claims and
21 all the parties' rights and liabilities.

22 When a district court is asked to certify a judgment based on the resolution of fewer than
23 all claims, the court is only charged with determining whether the claim sought to be certified is
24 separate from the remaining claims. *Hallicrafters Co. v. Moore*, 102 Nev. 526, 528, 728 P.2d
25 441, 442 (1986). If the claim is separate, the court may expressly determine that there is no just
26 reason for delay. *Id.*; see also NRCP 54(b); *Mallin v. Farmers Ins. Exch.*, 106 Nev. 606, 609-10,
27 797 P.2d 978, 981 (1990), *overruled on other grounds by Matter of Estate of Sarge*, 134 Nev.
28 Adv. Op. 105, 432 P.3d 718 (2018) (the district court is required only to make an express
determination that there is no just reason for delay and an express direction for the entry of
judgment). On the other hand, if the claims asserted in an action, albeit separate, are so closely
related that the appellate court must necessarily decide important issues pending below in order

1 to decide the issues appealed, there can be no finding that there is no just reason for delay, and
2 certification of an order is not proper. *Id.*

3 Consequently, the Order directing production of patrol officer unit assignments should be
4 certified as final pursuant to NRCP 54(b), because it is a separate claim for production of
5 records. Separate causes of action may frequently state only a single claim for relief for
6 purposes of NRCP 54(b) when they arise out of a single transaction, or a series of related
7 transactions. *Id.* at 527–28, 728 P.2d at 442. Multiple claims for relief can arise, however, from
8 a single transaction, or a series of related transactions, in some circumstances. *Id.* The latter
9 applies to the instant case. The NPRA permits a requester to seek access to public records. NRS
10 239.010. Thus, each record request is a separate claim for purposes of a public record action.
11 NRS 239.011. Here, the Order resolves LVRJ’s claim for production of unit assignments. The
12 issue of unit assignments will not affect any of LVRJ’s remaining requests. NRCP 54(b)
13 certification will simply permit LVMPD and LVRJ to move forward with a pending appeal of
14 the Order concerning production of unit assignments. Thus, this Court should certify as final the
15 Order pursuant to NRCP 54(b).

16 **B. A STAY PRESERVES THE STATUS QUO.**

17 As noted above, the purpose of a stay is to preserve the status quo. *See Nelson v. Heer*,
18 121 Nev. 832, 835, 122 P.3d 1252, 1254 (2005); *see also United States v. State of Mich.*, 505
19 F.Supp. 467, 471 (W.D. Mich. 1980) (stating that the purpose of a stay is to preserve, not
20 change, the status quo). In this case, LVMPD being required to produce the contested
21 information would upset the status quo because LVMPD cannot un-ring the bell—once the
22 information is released, any confidentiality or privacy interest in those documents is destroyed.
23 As such, in the event the Nevada Supreme Court alters or vacates the decision, the damage will
24 have already been done. Thus, the Order should be stayed as to unit assignments through the
25 pendency of LVMPD’s appeal.

26 **C. THE NRAP 8(c) FACTORS WEIGH IN FAVOR OF A STAY.**

27 Courts are afforded discretion in determining whether a stay is appropriate because
28 decisions regarding a requested stay are fact-intensive. *See Aspen Fin. Servs., Inc. v. Eighth*

1 *Judicial Dist. Court*, 128 Nev. 635, 289 P.3d 201, 205–06 (2012) (reviewing a district court’s
2 denial of a stay for an abuse of discretion and recognizing that “[d]etermining whether to grant
3 such a stay is a fact-intensive, case-by-case determination”).

4 That being said, in assessing a request for a stay, courts should consider the NRAP 8(c)
5 factors, including: (1) Whether the object of the appeal will be defeated if the stay or injunction
6 is denied; (2) Whether appellant will suffer irreparable or serious injury if the stay or injunction
7 is denied; (3) Whether the respondent/real party in interest will suffer irreparable or serious
8 injury if the stay or injunction is granted; and (4) Whether appellant/petitioner is likely to prevail
9 on the merits of the appeal. *See, e.g., Hansen v. Dist. Ct.*, 116 Nev. 650, 657, 6 P.3d 982, 986
10 (2000); *see also Clark Cty. Office of Coroner/Med. Exam’r v. Las Vegas Review-Journal*, 134
11 Nev. Adv. Op. 24, 415 P.3d 16, 19 (2018) (Cherry, J., concurring in part and dissenting in part)
12 (suggesting that courts may consider other factors because the Rule states that courts “will
13 generally consider” the enumerated factors). A moving party need not satisfy all four NRAP
14 8(c) factors; instead, one or two particularly strong factors may counterbalance other factors that
15 are weak or inapplicable. *See Mikohn Gaming Corp. v. McCrea*, 120 Nev. 248, 251, 89 P.3d 36,
16 38 (2004).

17 1. **The Object of LVMPD’s Appeal Will be Defeated if the Requested**
18 **Stay is Denied.**

19 Parties should not be penalized for exercising their appellate rights, especially where the
20 issues on appeal are legitimate and pursued in good faith. Here, the litigation between the parties
21 implicates significant legal determinations that are constantly evolving in light of the Nevada
22 Supreme Court’s examination of distinct factual scenarios in relation to the NPRA. The harm
23 caused by disclosure of these particular records would be irreparable and immediate upon the
24 documents being produced. As such, the object of the appeal will be to avoid producing these
25 documents altogether, and such an appeal would be moot if the documents were already
26 produced. Thus, the first factor weighs in favor of a stay.

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1 **2. Interested Parties will Suffer Irreparable Injury if a Stay is Not**
2 **Granted.**

3 As noted above, the disputed production of unit assignments of patrol officers involves
4 discrete nontrivial privacy interests, the public disclosure of which would irreparably destroy
5 those privacy interests. First, as detailed in the Supplemental Briefing provided by LVMPD,
6 disclosure of unit assignments for all patrol officers constitutes an unwarranted risk of harm to
7 those officers, as members of the public have already harassed police officers after gaining
8 knowledge of their personal information. Further, allowing redaction of officers given a
9 particular assignment (such as undercover officers) does not actually protect those officers when
10 all other names are disclosed; through simple deduction, any member of the public would be able
11 to ascertain which officers in a given unit have been redacted. Thus, the officers have personal
12 nontrivial privacy interests that would be harmed if unit assignments were to be disclosed.

13 Privacy interests cannot be adequately compensated with monetary damages. Further,
14 the privacy interests detailed above would be immediately and irreparably harmed as soon as the
15 documents are produced. As such, irreparable harm will result without a stay pending appeal,
16 and the second NRAP 8(c) factor is satisfied here.

17 **3. Will Not Suffer Any Serious or Irreparable Injury if a Stay is**
18 **Granted.**

19 While the disclosure of the disputed categories of documents would immediately harm
20 the privacy interests implicated as noted above, on the contrary, any harm suffered by LVRJ or
21 the general public by a delay in the disclosure of documents would be only temporary. In the
22 event the Nevada Supreme Court decides that the ordered disclosure would not violate any
23 nontrivial privacy interests, then LVMPD will disclose the documents in full at that time. The
24 public interest in knowing what units particular patrol officers were assigned to is not time-
25 sensitive. There is no looming deadline that would make public disclosure of this information at
26 a later date somehow less impactful. Additionally, LVMPD will continue to provide responsive
27 records that are not impacted by this Court's recent Order to LVRJ on a rolling basis. Therefore,
28 any interest in receiving this information now is easily outweighed by the risk of serious or

1 irreparable harm if the information is disclosed before the Nevada Supreme Court can render an
2 opinion on whether disclosure is appropriate. LVMPD thus satisfies the third NRAP 8(c) factor
3 for granting a stay pending appeal.

4 **4. LVMPD is Likely to Prevail on the Merits of its Appeal.**

5 In weighing this final factor, the Supreme Court has articulated that “a movant does not
6 always have to show a probability of success on the merits, [but] the movant must ‘present a
7 substantial case on the merits when a serious legal question is involved and show that the balance
8 of equities weighs heavily in favor of granting the stay.’” *Hansen*, 116 Nev. at 659, 6 P.3d at
9 987. Here, LVMPD presents serious legal questions which satisfy this final factor.

10 Indeed, and with all due respect for this Court, LVMPD maintains that the Court’s
11 decision as to the unit assignments of patrol officers was erroneous and should be overturned.
12 As the Court is aware, the Nevada Supreme Court has recently agreed that privacy interests can
13 outweigh the public interest in an NPRA case. *See, e.g. Clark County School District v. Las*
14 *Vegas Review-Journal*, 134 Nev. Adv. Op. 34, 429 P.3d 313 (2018). The facts at issue in this
15 case are substantially similar to those in the *CCSD* case, so LVMPD’s emergency appeal will, at
16 a minimum, “present a substantial case on the merits when a serious legal question is involved.”
17 As such, this Court should enter the requested stay during the pendency of the appeal.

18 **IV. CONCLUSION**

19 Final certification of this Court’s order to produce patrol officer unit assignments is
20 proper under NRCP 54(b). As this Court has ordered LVMPD to produce the disputed
21 documents immediately, LVMPD will be left in the difficult position of complying with the
22 district court’s order and thus, mooted the appeal, or preserving the issue for appeal and
23 consequently disobeying this Court’s Order. This is a textbook example of when a stay pending
24 appeal must be granted. As explained above, each of the NRAP 8(c) factors weigh in LVMPD’s
25 favor.

26 ///

27 ///

28 ///

MARQUIS AURBACH COFFING

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1 Based on the foregoing, LVMPD respectfully requests the Court grants its Motion for
2 54(b) Certification and for Stay Pending Appeal.

3 Dated this 15 day of April, 2019.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.
Nevada Bar No. 8996
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
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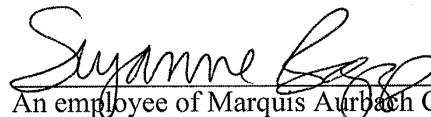
1 CERTIFICATE OF SERVICE

2 I hereby certify that the foregoing LAS VEGAS METROPOLITAN POLICE
3 DEPARTMENT'S MOTION FOR 54(B) CERTIFICATION AND FOR STAY PENDING
4 APPEAL was submitted electronically for filing and/or service with the Eighth Judicial District
5 Court on the 15 day of April, 2019. Electronic service of the foregoing document shall be
6 made in accordance with the E-Service List as follows:¹

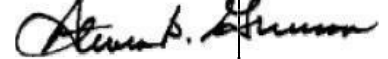
7 Margaret A. McLetchie, Esq.
8 Alina M. Shell, Esq.
9 MCLECHIE SHELL LLC
701 East Bridger Avenue, Suite 520
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Email: maggie@nvlitigation.com
10 Counsel for Petitioner,
11 Las Vegas Review-Journal

12 I further certify that I served a copy of this document by mailing a true and correct copy
13 thereof, postage prepaid, addressed to:

14 N/A

15 
16 An employee of Marquis Aurbach Coffing

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27 ¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System
28 consents to electronic service in accordance with NRCP 5(b)(2)(D).



1 **NONO**
2 MARGARET A. MCLEATCHIE, Nevada Bar No. 10931
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9 *Counsel for Petitioner, Las Vegas Review-Journal, Inc.*

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 LAS VEGAS REVIEW-JOURNAL,

Case No.: A-18-775378-W

13 Petitioner,

Dept. No.: XV

14 vs.

15 **NOTICE OF NON-OPPOSITION TO**
16 **LAS VEGAS METROPOLITAN**
17 **POLICE DEPARTMENT'S**
18 **MOTION FOR 54(b)**
19 **CERTIFICATION AND STAY**
20 **PENDING APPEAL**

21 LAS VEGAS METROPOLITAN POLICE
22 DEPARTMENT,

23 Respondent.

Hearing Date: May 20, 2019

Hearing Time: 9:00 a.m.

24 Petitioner the Las Vegas Review-Journal ("Review-Journal") hereby submits this
25 Notice of Non-Opposition to the Las Vegas Metropolitan Police Department's Motion for
26 54(b) Certification and Stay Pending Appeal.

27 Respectfully submitted this 10th day of May, 2019.

28 /s/ Margaret A. McLetchie

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ALINA M. SHELL, Nevada Bar No. 11711

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Counsel for Petitioner, Las Vegas Review-Journal

NOTICE OF NON-OPPOSITION

On April 15, 2019, the Las Vegas Metropolitan Police Department (“Metro”) filed a Motion for 54(b) Certification and for Stay Pending Appeal requesting the Court grant final certification pursuant to NRCP 54(b) of the March 27, 2019, Order as it relates to the production of officer unit assignments, and further requesting the Court stay that portion of the Order pending appeal. The Review-Journal hereby notifies the Court that, in the interests of judicial efficiency¹ and reducing the costs of litigation for the parties, it does not oppose either request. Notwithstanding that non-opposition, however, the Review-Journal disagrees with Metro’s assessment of the factors this Court must consider pursuant to Nevada Rule of Appellate Procedure 8(c), and wishes the record to be clear: Metro is not likely to succeed on the merits and a requester is greatly prejudiced when access to public records is delayed. The Review-Journal will seek to expedite Nevada Supreme Court proceedings to the extent possible to avoid delays.

A. The Review-Journal Does Not Oppose 54(b) Certification.

As Metro discusses in its Motion, pursuant to Nevada Rule of Civil Procedure 54(b), when an action presents more than one claim for relief, a court may direct entry of a final judgment as to one or more claims “if the court expressly determines that there is no just reason for delay.” In this instance, the Review-Journal’s request for records reflecting past unit assignments for patrol officers is one of several records requests that are the subject of the instant litigation, and is segregable from the other requests. Thus, the Review-Journal does not object to Metro’s request for 54(b) certification of this single issue.

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¹ As discussed below, the Review-Journal anticipates that, if this Court were to deny a stay, Metro would file a motion at the Nevada Supreme Court and wishes to minimize motion practice and attorney’s fees.

B. The Review-Journal Disagrees With Metro’s Assessment of the Rule 8(c) Factors.

While the Review-Journal does not oppose Metro’s request for a stay pending appeal of the portion of the March 27, 2019, Order regarding officer unit assignments, it disagrees with Metro’s assertions regarding the lack of harm to the Review-Journal that would occur with a stay and its likelihood of success on the merits of the appeal.

1. The Rule 8(c) Factors.

This Court must consider four factors in deciding whether to issue a stay: (1) “whether the object of the appeal will be defeated if the stay is denied;” (2) “whether appellant/petitioner will suffer irreparable or serious injury if the stay is denied;” (3) “whether respondent/real party in interest will suffer irreparable or serious injury if the stay is granted;” and (4) “whether appellant/petitioner is likely to prevail on the merits in the appeal.” *Hansen v. Eighth Judicial Dist. Court ex rel. Cty. of Clark*, 116 Nev. 650, 657, 6 P.3d 982, 986 (2000) (citing Nev. R. App. P. 8(c) and *Kress v. Corey*, 65 Nev. 1, 189 P.2d 352 (1948)); accord *Mikohn Gaming Corp. v. McCrea*, 120 Nev. 248, 251, 89 P.3d 36, 38 (2004). In addition, as the United States Supreme Court has held, courts must also consider “where the public interest lies.” *Hilton v. Braunskill*, 481 U.S. 770, 776 (1987) (citations omitted); accord *NML Capital, Ltd. v. Republic of Argentina*, No. 2:14-CV-492-RFB-VCF, 2015 WL 3489684, at *4 (D. Nev. June 3, 2015).

The Nevada Supreme Court has “not indicated that any one factor carries more weight than the others,” and instead “recognizes that if one or two factors are especially strong, they may counterbalance other weak factors.” *Mikohn Gaming Corp.*, 120 Nev. at 251, 89 P.3d at 38 (citing *Hansen*, 116 Nev. 650, 6 P.3d 982 (2000)).

While there may be some merit to Metro’s assertions that the first two NRAP 8(c) factors—(1) “whether the object of the appeal will be defeated if the stay is denied;” and (2) “whether appellant/petitioner will suffer irreparable or serious injury if the stay is denied”—weigh in favor of a stay, the Review-Journal disagrees with Metro’s conclusion that the Review-Journal and the public will not suffer harm as a result of a stay, and further disagrees with Metro’s assessment that it is likely to prevail on appeal.

2. A Stay Will Injure the Review-Journal and the Public.

Metro asserts in its Motion that a stay will not cause serious or irreparable injury to the Review-Journal. (Motion, pp. 7:19-8:3.) This assertion ignores that pursuant to the Nevada Public Records Act (“NPRA”) and the First Amendment, the Review-Journal has a substantial interest in the immediate production of public records, including records pertaining to patrol officer unit assignments.

The legislative intent underpinning the NPRA is to foster democratic principles by ensuring easy and expeditious access to public records. Nev. Rev. Stat. § 239.001(1); *see also Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 626 (2011) (holding that “the provisions of the NPRA are designed to promote government transparency and accountability”). Indeed, the importance of access—and specifically, speedy access—is reflected in the NPRA’s mandate that courts prioritize public records matters. Nev. Rev. Stat. § 239.001(2) (“The court shall give this matter priority over other civil matters to which priority is not given by other statutes...”).

Not only does the NPRA reflect a mandate favoring access, a specific legislative interest in swift disclosure is woven throughout the NPRA. For example, Nev. Rev. Stat. § 239.0107(1) mandates that, by not later than the end of the fifth business day after receiving a records request, a governmental entity must either (1) make the records available; (2) if they entity does not have custody of the requested records, notify the requester of that fact and direct them to the appropriate government entity; (3) if the records are not available by the end of the fifth business day, provide notice of that fact and a date when the records will be available; or (4) if the records or any part of the records are confidential, provide the requestor with notice of that fact and a citation to the statute or law making the records confidential. Nev. Rev. Stat. § 239.0107(1)(a)-(d).

In addition to this timely notification and disclosure scheme, the NPRA specifically provides for expedited court consideration of a governmental entity’s denial of a records request. Nev. Rev. Stat. § 239.011(2) (mandating that a court give an application for public records “priority over other civil matters”). Thus, the NPRA is designed to provide quick

1 access to withheld public records, not to reward non-compliance or delay.

2 Metro asserts the Review-Journal will not suffer any serious or irreparable harm
3 because Metro is producing other records, and because any harm caused by a delay in the
4 disclosure of records pertaining to patrol officer unit assignments would be temporary.
5 (Motion, p. 7:19-27.) Aside from evidencing a fundamental misunderstanding of how
6 investigative journalism works, Metro’s position ignores the irreparable harm that the
7 continued withholding of the requested records inflicts on the public. As noted above, the
8 NPRA specifically provides that the public has a presumptive right of access to public
9 records. See Nev. Rev. Stat. § 239.001(1). The continued withholding of the requested
10 reports violates that right.

11 Additionally, the continued withholding of the requested documents thwarts one of
12 the central roles of investigative journalism: publicizing information about issues that affect
13 the public interest. As the paper of record for the State of Nevada, the Review-Journal has
14 an important role to play in identifying and providing in-depth reporting on issues of concern
15 to the citizens of Nevada. And this reporting can lead to changes in public agencies.

16 Finally, the denial of access to public records impinges on the Review-Journal’s
17 First Amendment rights to access public records and report on them—and any violation of a
18 First Amendment right is irreparable harm. *See, e.g., Globe Newspaper Co. v. Pokaski*, 868
19 F.2d 497, 507 (1st Cir. 1989) (“even a one to two day delay impermissibly burdens the First
20 Amendment”). The importance of immediate public access to documents has also been
21 recognized in cases providing the press with access to public records in court files. *See, e.g.,*
22 *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110,126-27 (2d Cir. 2006) (“Our public
23 access cases and those in other circuits emphasize the importance of immediate access where
24 a right of access is found.”) (emphasis added) (citations omitted)); *Grove Fresh Distribs.,*
25 *Inc. v. Everfresh Juice Co.*, 24 F.3d 893, 897 (7th Cir. 1994) (public access to documents in
26 court’s file “should be immediate and contemporaneous”).

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1 **3. Metro Is Unlikely to Prevail on Appeal.**

2 The Review-Journal also disagrees with Metro’s assessment that it is likely to
3 prevail on appeal. (*See* Motion, p. 9:4-17.) Much as it did in its March 18, 2019,
4 Supplemental Brief in support of its Response to the Review-Journal’s Opening Brief
5 (*compare* March 18, 2019 Supplement Brief, pp. 12:9-14:16 *and* Motion, p. 8:4-17), Metro
6 relies on the Nevada Supreme Court’s recent decision in *Clark County School District v. Las*
7 *Vegas Review-Journal*, 134 Nev. Adv. Op. 34, 429 P.3d 313 (2018), to assert that the privacy
8 interests in patrol officer unit assignments outweighs the public’s interest in the records.

9 This reliance is misplaced. First, the *CCSD* test is inapplicable because Metro
10 cannot identify a nontrivial personal privacy interest Metro officers might have regarding
11 information about their previous unit assignments. That is because there is none. Unlike
12 *CCSD*, the records at issue are not investigative reports; they are akin to historical
13 employment data. Metro officers are public employees working for the community, and
14 much information about them is presumptively public. Second, information regarding Metro
15 officers’ prior unit assignments is public information subject to disclosure under the NPRA
16 because such information concerns the provision of a public service. Metro officers are
17 tasked with enforcing state and local laws and the safety of the citizens of the Las Vegas
18 area. Thus, the public has a significant interest in information regarding officer unit
19 assignments.

20 Notwithstanding these disagreements with Metro’s assessment of the third and
21 fourth Rule 8(c) factors, in the interests of judicial efficiency and reducing the costs of
22 litigation, the Review-Journal does not oppose a stay of this narrow portion of the Court’s
23 March 27, 2019, Order pending appeal. As this Court is aware, pursuant to NRAP 8(a)(1), a
24 party seeking a stay pending appeal must first move the district court for a stay. If the district
25 court denies that stay, the party may then move the Supreme Court or Court of Appeals for
26 a stay. NRAP 8(a)(2). The Review-Journal anticipates that, were it to oppose the instant
27 request for a stay, Metro would move the Supreme Court for a stay pursuant to NRAP 8(a)(2).
28 Such litigation would only increase the attorney’s fees the public is footing the bill for. Thus,

1 to avoid unnecessary expenses, the Review-Journal does not oppose Metro's request for a
2 stay.

3 DATED this 10th day of May, 2019.

4
5 /s/ Margaret A. McLetchie

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Email: maggie@nvlitigation.com

Counsel for Petitioner, Las Vegas Review-Journal

10
11
12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on this 10th day of May, 2019, pursuant to Administrative Order
14 14-2 and N.E.F.C.R. 9, I did cause a true copy of the foregoing NOTICE OF NON-
15 OPPOSITION TO LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S MOTION
16 FOR 54(b) CERTIFICATION AND STAY PENDING APPEAL in *Las Vegas Review-*
17 *Journal v. Las Vegas Metropolitan Police Department*, Clark County District Court Case
18 No. A-18-775378-W, to be served electronically using the Odyssey File & Serve system, to
19 all parties with an email address on record.

20 Nick D. Crosby, and Jackie V. Nichols

21 **MARQUIS AURBACH COFFING**

22 10001 Park Run Drive

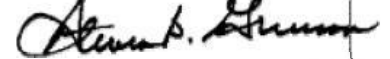
23 Las Vegas, NV 89145

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Attorneys for Las Vegas Metropolitan Police Department

24
25 /s/ Pharan Burchfield

26 An Employee of McLetchie Law



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8 Telephone: (702) 382-0711
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10 ncrosby@maclaw.com
11 jnichols@maclaw.com
12 *Attorneys for Respondent, Las Vegas*
13 *Metropolitan Police Department*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LAS VEGAS REVIEW-JOURNAL,

11 Petitioner,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
14 DEPARTMENT,

15 Respondent.

Case No.: A-18-775378-W

Dept. No.: XV

16 **LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S REPLY IN SUPPORT OF**
17 **MOTION FOR 54(b) CERTIFICATION AND FOR STAY PENDING APPEAL**

18 Respondent Las Vegas Metropolitan Police Department ("LVMPD" or the
19 "Department"), by and through its attorneys of record, Nicholas Crosby, Esq. and Jackie Nichols,
20 Esq., of the law firm of Marquis Aurbach Coffing, hereby files its Reply in Support of Motion
21 for 54(b) Certification and for Stay Pending Appeal.

22 ///

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24 ///

25 ///

26 ///

27 ///

28 ///

1 This Reply is made and based upon the papers and pleadings on file herein, the
2 Memorandum of Points and Authorities, and any oral argument allowed by the Court at a hearing
3 on this matter.

4 Dated this 15 day of May, 2019.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.
Nevada Bar No. 8996
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Respondent, Las Vegas
Metropolitan Police Department*

MEMORANDUM OF POINTS & AUTHORITIES

I. INTRODUCTION

15 The Las Vegas Review-Journal ("LVRJ") concedes that certification of this Court's
16 Order entered March 27, 2019 pertaining to the production of unit assignments is proper.
17 Likewise, LVRJ admits that the first two factors under the Rule 8(c) analysis favor a stay.
18 Despite its non-opposition, LVRJ countered LVMPD's Motion with respect to the last two
19 factors under Rule 8(c) for a stay. Accordingly, this Reply is limited to addressing the last two
20 factors for the record.

II. LEGAL ARGUMENT

22 A moving party need not satisfy all four NRAP 8(c) factors; instead, one or two
23 particularly strong factors may counterbalance other factors that are weak or inapplicable. *See*
24 *Mikohn Gaming Corp. v. McCrea*, 120 Nev. 248, 251, 89 P.3d 36, 38 (2004). Undoubtedly, the
25 first two factors, as admitted by LVRJ, weigh in favor of a stay. LVRJ argues, however, that the
26 last two factors, whether LVRJ will suffer irreparable harm if the stay is granted and whether
27 LVMPD is likely to prevail on the merits in the appeal, weighs against a stay. To the contrary,
28 LVRJ will not be irreparably harmed and the Supreme Court's recent decision in *Clark County*

1 **III. CONCLUSION**

2 Based on the foregoing, LVMPD respectfully requests the Court enter an order certifying
3 the March 27, 2019 Order as final and for Stay Pending Appeal as to the disclosure of unit
4 assignments.

5 Dated this 15 day of May, 2019.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.
Nevada Bar No. 8996
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Respondent, Las Vegas
Metropolitan Police Department*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S REPLY IN SUPPORT OF MOTION FOR 54(B) CERTIFICATION AND FOR STAY PENDING APPEAL** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 15th day of May, 2019. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

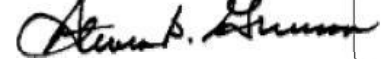
Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
MCLETCHIE SHELL LLC
701 East Bridger Avenue, Suite 520
Las Vegas, NV 89101
Email: maggie@nvlitigation.com
Counsel for Petitioner,
Las Vegas Review-Journal

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

N/A


An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).



1 **Marquis Aurbach Coffing**
2 Nick D. Crosby, Esq.
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12 *Attorneys for Respondent, Las Vegas*
13 *Metropolitan Police Department*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LAS VEGAS REVIEW-JOURNAL,

11 Petitioner,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
14 DEPARTMENT,

15 Respondent.

Case No.: A-18-775378-W

Dept. No.: XV

16 **ERRATA TO LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S REPLY IN**
17 **SUPPORT OF MOTION FOR 54(b) CERTIFICATION AND FOR STAY PENDING**
18 **APPEAL**

18 Respondent Las Vegas Metropolitan Police Department ("LVMPD" or the
19 "Department"), by and through its attorneys of record, Nicholas Crosby, Esq. and Jackie Nichols,
20 Esq., of the law firm of Marquis Aurbach Coffing, hereby submits its Errata to the Reply in
21 Support of Motion for 54(b) Certification and for Stay Pending Appeal filed on May 15, 2019.

22 ///

23 ///

24 ///

25 ///

26 ///

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28 ///

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 Please take notice that *Page 3* was inadvertently missing from LVMPD's Reply in
2 Support of Motion for 54(b) Certification and for Stay Pending Appeal and, therefore, should be
3 attached thereto.

4 Dated this 16 day of May, 2019.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.
Nevada Bar No. 8996
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Respondent, Las Vegas
Metropolitan Police Department*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **ERRATA TO LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S REPLY IN SUPPORT OF MOTION FOR 54(B) CERTIFICATION AND FOR STAY PENDING APPEAL** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 15th day of May, 2019. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
MCLETCHIE SHELL LLC
701 East Bridger Avenue, Suite 520
Las Vegas, NV 89101
Email: maggie@nvlitigation.com
Counsel for Petitioner,
Las Vegas Review-Journal

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N/A


An employee of Marquis Aurbach Coffing

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1. *School District v. Las Vegas Review-Journal*, 134 Nev. Adv. Op. 34, 429 P.3d 313 (2018)
2 protects information that involves a nontrivial privacy interest, such as the unit assignments at
3 issue here.

4 **A. LVRJ WILL NOT SUFFER ANY SERIOUS OR IRREPARABLE INJURY**
5 **IF A STAY IS GRANTED.**

6 First and foremost, LVRJ cannot be irreparably injured by nondisclosure if it is not
7 entitled to disclosure in the first place. It is LVMPD's position that the unit assignments
8 requested is confidential. At most, LVRJ will suffer a temporary injury that would be cured by
9 the Supreme Court's ruling. A temporary injury is not an irreparable injury. As indicated in the
10 initial Motion, if the Supreme Court orders disclosure of the unit assignments on appeal, any
11 temporary injury belied by LVRJ would be resolved. LVRJ mistakenly contends that
12 nondisclosure inflicts irreparable harm on the public. However, LVRJ has previously
13 represented that it would not be disclosing the unit assignments to the public. Thus, the public
14 harm argument fails. Any potential harm suffered by LVRJ is outweighed by the first two
15 factors that tilt in favor of LVMPD.

16 **B. LVMPD IS LIKELY TO PREVAIL ON THE MERITS OF ITS APPEAL.**

17 LVMPD must 'present a substantial case on the merits when a serious legal question is
18 involved and show that the balance of equities weighs heavily in favor of granting the stay.'" *Hansen*, 116 Nev. at 659, 6 P.3d at 987. Here, LVMPD presents serious legal questions which
19 satisfy this final factor. Disclosure of unit assignments is an issue of first impression in Nevada.
20 As such, LVMPD maintains that under the recent Nevada Supreme Court case, unit assignments
21 of patrol officers involve a nontrivial privacy interest, warranting LVMPD's withholding of the
22 unit assignments. LVMPD's appeal will, at a minimum, "present a substantial case on the merits
23 when a serious legal question is involved." Balancing all factors, it is clear that the scale tips in
24 favor if a stay. As such, this Court should enter the requested stay during the pendency of the
25 appeal.
26

27 ///

28 ///

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Writ of Mandamus

COURT MINUTES

May 16, 2019

A-18-775378-W	Las Vegas Review-Journal, Plaintiff(s) vs. Las Vegas Metropolitan Police Department, Defendant(s)
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May 16, 2019	Chambers	Las Vegas Metropolitan Police Department's Motion for 54(b) Certification and for Stay Pending Appeal
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HEARD BY: Hardy, Joe

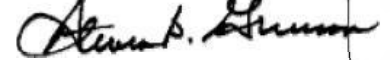
COURTROOM: Chambers

COURT CLERK: Kristin Duncan

JOURNAL ENTRIES

- COURT ORDERED, Respondent Las Vegas Metropolitan Police Department's Motion for 54(b) Certification and Stay Pending Appeal is hereby ADVANCED and GRANTED in its entirety for the reasons set forth in the Motion and as unopposed pursuant to EDCR 2.20(e). Respondent's counsel is to prepare the written order, submit it to all counsel for review and approval, and submit it to Department 15's chambers within 10 days pursuant to EDCR 7.21.

CLERK'S NOTE: A copy of this minute order was e-mailed to: Nick D. Crosby, Esq. [ncrosby@maclaw.com], Jackie V. Nichols, Esq. [jnichols@maclaw.com], and Margaret A. McLetchie, Esq. [maggie@nvlitigation.com]. (KD 5/16/19)



1 **Marquis Aurbach Coffing**
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ncrosby@maclaw.com
6 jnichols@maclaw.com
Attorneys for Respondent, Las Vegas
7 *Metropolitan Police Department*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LAS VEGAS REVIEW-JOURNAL,

Case No.: A-18-775378-W
Dept. No.: XV

11 Petitioner,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
14 DEPARTMENT,

15 Respondent.

16 **NOTICE OF ENTRY OF ORDER**

17 PLEASE TAKE NOTICE that an Order Regarding Respondent's Motion for 54(b)
18 Certification and for Stay Pending Appeal was entered on the 29th day of May, 2019, a copy of
19 which is attached hereto.

20 Dated this 30 day of May, 2019.

21 MARQUIS AURBACH COFFING

22 By: 

23 Nick D. Crosby, Esq.
24 Nevada Bar No. 8996
25 Jackie V. Nichols, Esq.
26 Nevada Bar No. 14246
27 10001 Park Run Drive
28 Las Vegas, Nevada 89145
Attorneys for Respondent, Las Vegas
Metropolitan Police Department

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **NOTICE OF ENTRY OF ORDER** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 30th day of May, 2019. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
MCLECHIE LAW
701 East Bridger Avenue, Suite 520
Las Vegas, NV 89101
Email: maggie@nvlitigation.com
*Counsel for Petitioner,
Las Vegas Review-Journal*

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

N/A


An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

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(702) 382-0711 FAX: (702) 382-5816

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5/29/2019 3:21 PM
Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

Original

1 Marquis Aurbach Coffing
2 Nick D. Crosby, Esq.
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12 *Attorneys for Respondent, Las Vegas*
13 *Metropolitan Police Department*

14 DISTRICT COURT

15 CLARK COUNTY, NEVADA

16 LAS VEGAS REVIEW-JOURNAL,

17 Petitioner,

18 vs.

19 LAS VEGAS METROPOLITAN POLICE
20 DEPARTMENT,

21 Respondent.

Case No.: A-18-775378-W
Dept. No.: XV

22 ORDER

23 This matter, having come before the Court on May 20¹⁶, 2019 for a hearing on Respondent
24 the Las Vegas Metropolitan Police Department's ("LVMPD") Motion for 54(b) Certification and
25 for Stay Pending Appeal, and the Court, having reviewed all of the papers and pleadings on file
26 in this matter, and having considered the points and authorities thereof, and for good cause
27 shown:

28 1. IT IS HEREBY ORDERED, ADJUDGED AND DECREED that LVMPD's
Motion for NRCP 54(b) Certification is GRANTED;

2. IT IS FURTHER ORDERED that because no just reason for delay exists, this
Court enters an express direction for the entry of judgment as to the Order filed on April 12,
2019 related to the Las Vegas Review-Journal's public record request of Patrol Officer Unit
Assignments for the years 2014-2016;

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 3. IT IS FURTHER ORDERED that LVMPD's Motion for Stay Pending Appeal is
2 also GRANTED.

3 **ORDER**

4 IT IS SO ORDERED this 28th day of May, 2019.

5
6
7 
8 DISTRICT COURT JUDGE

9 Respectfully Submitted By:

10 MARQUIS AURBACH COFFING

11
12 By: 

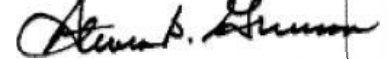
13 Nick D. Crosby, Esq.
14 Nevada Bar No. 8996
15 Jackie V. Nichols, Esq.
16 Nevada Bar No. 14246
17 10001 Park Run Drive
18 Las Vegas, Nevada 89145
19 Attorneys for Respondent,
20 Las Vegas Metropolitan Police Department

21 Approved as to Form and Content:

22 MCLEATCHIE LAW

23
24 By: 

25 Margaret A. McLetchie
26 Nevada Bar No. 10931
27 701 E. Bridger Ave., Suite 520
28 Las Vegas, Nevada 89101
Attorneys for Petitioner,
Las Vegas Review-Journal



1 **Marquis Aurbach Coffing**
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6 jnichols@maclaw.com
Attorneys for Respondent, Las Vegas
7 *Metropolitan Police Department*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LAS VEGAS REVIEW-JOURNAL,

Case No.: A-18-775378-W
Dept. No.: XV

11 Petitioner,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT,

14 Respondent.

15
16 **RESPONDENT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S NOTICE**
17 **OF APPEAL**

18 Respondent Las Vegas Metropolitan Police Department, by and through its attorneys of
19 record, Nicholas Crosby, Esq. and Jackie Nichols, Esq., of the law firm of Marquis Aurbach
20 Coffing, hereby appeals to the Supreme Court of Nevada from the Order regarding Respondent's
21 Motion for 54(b) Certification and for Stay Pending Appeal filed on May 29, 2019 and noticed

22 ///

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24 ///

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28 ///

MARQUIS AURBACH COFFING

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on May 30, 2019, attached hereto as **Exhibit A**, respectively.

Dated this 5 day of June, 2019.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.
Nevada Bar No. 8996
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Respondent, Las Vegas
Metropolitan Police Department*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **RESPONDENT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S NOTICE OF APPEAL** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 5th day of June, 2019. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
MCLETCHE LAW
701 East Bridger Avenue, Suite 520
Las Vegas, NV 89101
Email: maggie@nvlitigation.com
Counsel for Petitioner,
Las Vegas Review-Journal

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

N/A


An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

EXHIBIT “A”



Marquis Aurbach Coffing

Nick D. Crosby, Esq.

Nevada Bar No. 8996

Jackie V. Nichols, Esq.

Nevada Bar No. 14246

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Las Vegas, Nevada 89145

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jnichols@maclaw.com

Attorneys for Respondent, Las Vegas

Metropolitan Police Department

DISTRICT COURT

CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT,

Respondent.

Case No.: A-18-775378-W

Dept. No.: XV

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that an Order Regarding Respondent's Motion for 54(b) Certification and for Stay Pending Appeal was entered on the 29th day of May, 2019, a copy of which is attached hereto.

Dated this 30 day of May, 2019.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.

Nevada Bar No. 8996

Jackie V. Nichols, Esq.

Nevada Bar No. 14246

10001 Park Run Drive

Las Vegas, Nevada 89145

Attorneys for Respondent, Las Vegas

Metropolitan Police Department

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

CERTIFICATE OF SERVICE

I hereby certify that the foregoing NOTICE OF ENTRY OF ORDER was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 30th day of May, 2019. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
MCLECHIE LAW
701 East Bridger Avenue, Suite 520
Las Vegas, NV 89101
Email: maggie@nvlitigation.com
Counsel for Petitioner,
Las Vegas Review-Journal

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

N/A


An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

MARQUIS AURBACH COFFING

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Las Vegas, Nevada 89145
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10 ncrosby@maclaw.com
11 jnichols@maclaw.com
12 *Attorneys for Respondent, Las Vegas*
13 *Metropolitan Police Department*

Original

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Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

DISTRICT COURT

CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT,

Respondent.

Case No.: A-18-775378-W

Dept. No.: XV

ORDER

16
17 This matter, having come before the Court on May 20¹⁶, 2019 for a hearing on Respondent
18 the Las Vegas Metropolitan Police Department's ("LVMPD") Motion for 54(b) Certification and
19 for Stay Pending Appeal, and the Court, having reviewed all of the papers and pleadings on file
20 in this matter, and having considered the points and authorities thereof, and for good cause
21 shown:

22 1. IT IS HEREBY ORDERED, ADJUDGED AND DECREED that LVMPD's
23 Motion for NRCP 54(b) Certification is GRANTED;

24 2. IT IS FURTHER ORDERED that because no just reason for delay exists, this
25 Court enters an express direction for the entry of judgment as to the Order filed on April 12,
26 2019 related to the Las Vegas Review-Journal's public record request of Patrol Officer Unit
27 Assignments for the years 2014-2016;

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 3. IT IS FURTHER ORDERED that LVMPD's Motion for Stay Pending Appeal is
2 also GRANTED.

3 ORDER

4 IT IS SO ORDERED this 15th day of May, 2019.

5
6 
7 DISTRICT COURT JUDGE
8

9 Respectfully Submitted By:

10 MARQUIS AURBACH COFFING

11
12 By: 

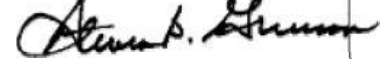
13 Nick D. Crosby, Esq.
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15 Jackie V. Nichols, Esq.
16 Nevada Bar No. 14246
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19 Attorneys for Respondent,
20 Las Vegas Metropolitan Police Department

21 Approved as to Form and Content:

22 MCLETCHIE LAW

23
24 By: 

25 Margaret A. McLetchie
26 Nevada Bar No. 10931
27 701 E. Bridger Ave., Suite 520
28 Las Vegas, Nevada 89101
Attorneys for Petitioner,
Las Vegas Review-Journal



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*Attorneys for Respondent, Las Vegas
Metropolitan Police Department*

DISTRICT COURT

CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT,

Respondent.

Case No.: A-18-775378-W

Dept. No.: XV

**RESPONDENT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S CASE
APPEAL STATEMENT**

Respondent Las Vegas Metropolitan Police Department, by and through their attorneys of record, the law firm of Marquis Aurbach Coffing, hereby files this Case Appeal Statement.

1. Name of appellant filing this Case Appeal Statement:

Las Vegas Metropolitan Police Department

2. Identify the Judge issuing the decision, judgment, or order appealed from:

Honorable Judge Joe Hardy

3. Identify each appellant and the name and address of counsel for each appellant:

Appellant: Las Vegas Metropolitan Police Department

Nick D. Crosby, Esq.
Jackie V. Nichols, Esq.
Marquis Aurbach Coffing
10001 Park Run Drive
Las Vegas, Nevada 89145

1 4. Identify each respondent and the name and address of appellate counsel, if known,
2 for each respondent (if the name of a respondent's appellate counsel is unknown, indicated as
3 much and provide the name and address of that respondent's trial counsel):

4 **Respondent:** Las Vegas Review-Journal

5 Margaret A. McLetchie Esq.
6 Alina M. Shell, Esq.
7 McLetchie Law
701 East Bridger Ave, Suite 520
Las Vegas, Nevada 89101

8 5. Indicate whether any attorney identified above in response to question 3 or 4 is
9 not licensed to practice law in Nevada and, if so, whether the district court granted that attorney
10 permission to appear under SCR 42 (attach a copy of any district court order granting such
11 permission):

12 N/A

13 6. Indicate whether appellant was represented by appointed or retained counsel in
14 the district court:

15 Retained.

16 7. Indicate whether appellant is represented by appointed or retained counsel on
17 appeal:

18 Retained.

19 8. Indicate whether appellant was granted leave to proceed in forma pauperis, and
20 the date of entry of the district court order granting such leave:

21 N/A

22 9. Indicate the date the proceedings commenced in the district court (e.g., date
23 complaint indictment, information, or petition was filed):

24 May 31, 2018.

25 10. Provide a brief description of the nature of the action and result in the district
26 court, including the type of judgment or order being appealed and the relief granted by the
27 district court:

28 This action concerns a Petition for Writ of Mandamus regarding Nevada's Public

1 Records Act. Respondents sought, amongst other records, names, badge
2 numbers, and unit assignments of all LVMPD peace officers for calendar years
3 2014, 2015, 2016. LVMPD objected to providing unit assignments and the
4 District Court ordered production of unit assignments for patrol officers from
5 2014, 2015, and 2015. LVMPD sought and the District Court ordered NRCP
6 54(b) certification and stay pending appeal of the claim regarding the production
7 of unit assignments.

8 11. Indicate whether the case has previously been the subject of an appeal to or
9 original writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket
10 number of the prior proceeding:

11 This case has previously been the subject of an original writ proceeding:
12 Las Vegas Metropolitan Police Department v. Las Vegas Review-Journal,
13 Case No. 76848

14 12. Indicate whether this appeal involves child custody or visitation:

15 N/A

16 13. If this is a civil case, indicate whether this appeal involves the possibility of
17 settlement:

18 This case does not involve the possibility of settlement.

19 Dated this 5 day of June, 2019.

20 MARQUIS AURBACH COFFING

21 By: 

22 Nick D. Crosby, Esq.
23 Nevada Bar No. 8996
24 Jackie V. Nichols, Esq.
25 Nevada Bar No. 14246
26 10001 Park Run Drive
27 Las Vegas, Nevada 89145
28 *Attorneys for Respondent, Las Vegas
Metropolitan Police Department*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **RESPONDENT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S CASE APPEAL STATEMENT** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 5th day of June, 2019. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
MCLETCHIE LAW
701 East Bridger Avenue, Suite 520
Las Vegas, NV 89101
Email: maggie@nvlitigation.com
Counsel for Petitioner,
Las Vegas Review-Journal

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

N/A


An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

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REGISTER OF ACTIONS

CASE NO. A-18-775378-W

Las Vegas Review-Journal, Plaintiff(s) vs. Las Vegas Metropolitan Police
Department, Defendant(s)

§
§
§
§
§
§
§

Case Type: **Writ of Mandamus**
Date Filed: **05/31/2018**
Location: **Department 15**
Cross-Reference Case Number: **A775378**
Supreme Court No.: **78967**

PARTY INFORMATION

Defendant	Las Vegas Metropolitan Police Department	Lead Attorneys Nick D Crosby <i>Retained</i> 702-382-0711(W)
Plaintiff	Las Vegas Review-Journal	Margaret A. McLetchie <i>Retained</i> 702-728-5300(W)

EVENTS & ORDERS OF THE COURT

	OTHER EVENTS AND HEARINGS
05/31/2018	Petition for Writ of Mandamus <i>Public Records Act Application Pursuant to NRS 239.001/Petition for Writ of Mandamus (Expedited Matter Pursuant to Nev. Rev. Stat. 239.011)</i>
05/31/2018	Exhibits <i>Appendix of Exhibits in Support of Public Records Act Application Pursuant to NRS 239.001/Petition for Writ of Mandamus</i>
05/31/2018	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure (NRS Chapter 19)</i>
05/31/2018	Summons Electronically Issued - Service Pending <i>Summons - Civil</i>
06/05/2018	Affidavit of Service <i>Affidavit of Service</i>
06/27/2018	Stipulation and Order <i>Stipulation and Order Regarding Briefing Schedule</i>
06/27/2018	Notice of Entry of Stipulation and Order <i>Notice of Entry of Stipulation and Order</i>
06/29/2018	Stipulation and Order <i>Stipulation and Order Regarding Briefing Schedule (Second Request)</i>
06/29/2018	Notice of Entry of Stipulation and Order <i>Notice of Entry of Stipulation and Order</i>
07/05/2018	Petitioners Opening Brief <i>Opening Brief in Support of Public Records Act Application Pursuant to Nev. Rev. Stat. 239.001/ Petition for Writ of Mandamus</i>
07/26/2018	Order Granting Motion <i>Order Granting Respondent Las Vegas Metropolitan Police Department's Ex Parte Motion to Exceed Page Limit of Response Brief</i>
07/26/2018	Respondent's Brief <i>Respondent LVMPD's Response to Las Vegas Review-Journal's Opening Brief Regarding NRS 239.001-Petition for Writ of Mandamus</i>
07/26/2018	Notice of Entry of Order <i>Notice of Entry of Order Granting Respondent LVMPD's Ex Parte Motion to Exceed Page Limit of Response Brief</i>
07/26/2018	Appendix <i>Table of Contents of Exhibits Attached to Respondent LVMPD's Response to Las Vegas Review Journal's Opening Brief</i>
08/02/2018	Petitioner's Reply Brief <i>Reply to Response to Opening Brief in Support of Public Records Act Application Pursuant to Nev. Rev. Stat. 239.001/ Petition for Writ of Mandamus</i>
08/03/2018	Stipulation and Order <i>Stipulation and Order Allowing Excess Pages</i>
08/03/2018	Notice of Entry of Stipulation and Order <i>Notice of Entry of Stipulation and Order</i>
08/08/2018	Hearing (9:00 AM) (Judicial Officer Hardy, Joe) 08/08/2018, 08/22/2018 Parties Present Minutes <i>08/01/2018 Reset by Court to 08/08/2018</i> Result: Continued
08/20/2018	Recorders Transcript of Hearing <i>Recorders Transcript of Hearing Re:</i>
08/20/2018	Brief <i>Supplemental Brief Regarding LVMPD's Response to Las Vegas Review-Journal's Petition for Writ of Mandamus</i>
08/20/2018	Supplement <i>Supplemental Brief in Support of Public Records Act Application Pursuant to Nev. Rev. Stat. 239.001/ Petition for Writ of Mandamus</i>
08/20/2018	Exhibits <i>Appendix of Exhibits to Supplemental Brief in Support of Public Records Act Application Pursuant to Nev. Rev. Stat. 239.001/ Petition for Writ of Mandamus</i>
08/22/2018	Stipulation and Order <i>Stipulation and Order</i>

08/23/2018 **Notice of Entry of Stipulation and Order**
Notice of Entry of Stipulation and Order

08/27/2018 **Recorders Transcript of Hearing**
Recorders Transcript of Hearing Re:

08/29/2018 **Supplement**
Las Vegas Metropolitan Police Department's Supplemental Brief in Support of Its Response to Las Vegas Review-Journal's Petition for Writ of Mandamus

09/07/2018 **Order**
Order From August 8, 2018 Hearing

09/07/2018 **Order**
Order From August 22, 2018 Hearing

09/07/2018 **Response**
Las Vegas Review-Journal's Response to Las Vegas Metropolitan Police Department's Second Supplemental Brief in Support of Its Response to Las Vegas Review-Journal's Petition for Writ of Mandamus (Addressing Unit Assignments)

09/07/2018 **Exhibits**
Appendix of Exhibits to Las Vegas Review-Journal's Response to Las Vegas Metropolitan Police Department's Second Supplemental Brief in Support of Its Response to Las Vegas Review-Journal's Petition for Writ of Mandamus (Addressing Unit Assignments)

09/08/2018 **Exhibits**
Supplemental Appendix of Exhibits to Las Vegas Review-Journal's Petition for Writ of Mandamus

09/11/2018 **Notice of Entry of Order**
Notice of Entry of Order

09/11/2018 **Notice of Entry of Order**
Notice of Entry of Order

09/14/2018 **Stipulation and Order**
Stipulation and Order Regarding Briefing Schedule for Motion for Attorney Fees

09/14/2018 **Notice of Entry of Stipulation and Order**
Notice of Entry of Stipulation and Order

10/16/2018 **Notice of Change of Firm Name**
Notice of Change of Firm Name

02/14/2019 **Order Scheduling Status Check**
Amended Order Setting Status Check

02/14/2019 **Order Scheduling Status Check**
Order Setting Status Check

02/15/2019 **Minute Order** (3:00 AM) (Judicial Officer Hardy, Joe)
Setting of Status Check.
[Minutes](#)
 Result: Minute Order - No Hearing Held

02/22/2019 **Motion to Amend**
Motion for Leave to File Amended Public Records Act Application Pursuant to NRS 239.001 / Petition for Writ of Mandamus - Expedited Matter Pursuant to Nev. Rev. Stat. 239.011

03/04/2019 **Status Check** (9:00 AM) (Judicial Officer Hardy, Joe)
Status Check: September 7, 2018, Order
[Parties Present](#)
[Minutes](#)
 Result: Matter Heard

03/04/2019 **Stipulation and Order**
Amendment to Stipulation and Order

03/04/2019 **Notice of Entry of Stipulation and Order**
Notice of Entry of Amendment to Stipulation and Order

03/11/2019 **Opposition to Motion**
Respondent LVMPD's Opposition to LVRJ's Motion for Leave to File Amended Public Records Act Application Pursuant to NRS 239.001/Petition for Writ of Mandamus

03/13/2019 **Motion for Leave** (9:00 AM) (Judicial Officer Hardy, Joe)
Motion for Leave to File Amended Public Records Act Application Pursuant to NRS 239.001/ Petition for Writ of Mandamus
[Parties Present](#)
[Minutes](#)
 Result: Motion Granted

03/18/2019 **Supplemental Brief**
LVMPD's Supplemental Brief in Support of Its Response to LVRJ's Opening Brief Regarding NRS 239.001/Petition for Writ of Mandamus

03/18/2019 **Supplemental Brief**
Petitioner The Las Vegas Review-Journal's Supplemental Brief Regarding Arrest Reports, Redactions, and Patrol Officer Unit Assignments

03/18/2019 **Exhibits**
Appendix of Exhibits in Support of Petitioner The Las Vegas Review-Journal's Supplemental Brief Regarding Arrest Reports, Redactions, and Patrol Officer Unit Assignments

03/22/2019 **Supplemental Brief**
Las Vegas Metropolitan Police Department's Supplemental Brief Regarding Scope Manual

03/27/2019 **Hearing** (9:00 AM) (Judicial Officer Hardy, Joe)
Supplemental Briefing
[Parties Present](#)
[Minutes](#)
 Result: Matter Heard

03/28/2019 **Demand for Jury Trial**
Jury Demand

04/01/2019 **Order**
Order Granting Motion to Amend Petition

04/01/2019 **Notice of Entry of Order**
Notice of Entry of Order

04/01/2019 **Supplement**
Supplement to Public Records Act Application Pursuant to NRS 239.001/ Petition for Writ of Mandamus (Expedited Matter Pursuant to Nev. Rev. State. 239.011)

04/01/2019 **Exhibits**

Appendix of Exhibits in Support of Supplement to Public Records Act Application Pursuant to NRS 239.001/ Petition for Writ of Mandamus

04/09/2019 **Petitioners Opening Brief**
Opening Brief in Support of Supplement to Public Records Act Application Pursuant to Nev. Rev. Stat. 239.001/ Petition for Writ of Mandamus

04/12/2019 **Order**
Order

04/12/2019 **Notice of Entry of Order**
Notice of Entry of Order

04/12/2019 **Motion for Protective Order**
Las Vegas Metropolitan Police Department's Motion for Protective Order on an Order Shortening Time

04/12/2019 **Appendix**
Appendix of Exhibits to Las Vegas Metropolitan Police Department's Motion for Protective Order on an Order Shortening Time

04/15/2019 **Motion**
Las Vegas Metropolitan Police Department's Motion for 54(b) Certification and for Stay Pending Appeal

04/16/2019 **Clerk's Notice of Hearing**
Notice of Hearing

04/18/2019 **Errata**
Errata to Las Vegas Metropolitan Police Department's Motion for Protective Order on an Order Shortening Time

04/24/2019 **Response**
Respondent Las Vegas Metropolitan Police Department's Response to Las Vegas Review-Journal's Opening Brief Regarding NRS 239.001 Petition for Writ of Mandamus

04/25/2019 **Motion for Order Extending Time**
Unopposed Untimely Motion for Extension of Time for Response to Las Vegas Metropolitan Police Department's Motion for Protective Order

04/26/2019 **Stipulation and Order**
Stipulation and Order Regarding Supplemental Briefing Hearing

04/26/2019 **Notice of Entry of Stipulation and Order**
Notice of Entry of Stipulation and Order

04/29/2019 **Stipulation and Order**
Stipulation and Order Regarding Supplemental Briefing Schedule

04/29/2019 **Notice of Entry of Order**
Notice of Entry of Order

05/10/2019 **Non Opposition**
Notice of Non-Opposition to Las Vegas Metropolitan Police Department Motion for 54(b) Certification and Stay Pending Appeal

05/15/2019 **Reply in Support**
LVMPD's Reply in Support of Motion for 54(b) Certification and for Stay Pending Appeal

05/15/2019 **Errata**
Errata to LVMPD's Reply in Support of Motion for 54(b) Certification and for Stay Pending Appeal

05/16/2019 **Motion For Stay** (3:00 AM) (Judicial Officer Hardy, Joe)
Las Vegas Metropolitan Police Department's Motion for 54(b) Certification and for Stay Pending Appeal
[Minutes](#)
05/20/2019 Reset by Court to 05/16/2019
Result: Minute Order - No Hearing Held

05/17/2019 **Reply in Support**
Reply Brief in Support of Public Records Act Supplement to Application Pursuant to Nev. Rev. Stat. 239.001 / Petition for Writ of Mandamus

05/17/2019 **Response**
Response in Opposition to Las Vegas Metropolitan Police Department's Motion for Protective Order

05/22/2019 **Hearing** (9:00 AM) (Judicial Officer Hardy, Joe)
Hearing: Amended Petition for Writ of Mandamus
[Parties Present](#)
[Minutes](#)
05/08/2019 Continued to 05/22/2019 - Stipulation and Order - Las Vegas Metropolitan Police Department; Las Vegas Review-Journal
Result: Matter Heard

05/24/2019 **Reply in Support**
Las Vegas Metropolitan Police Department's Reply in Support of Motion for Protective Order

05/29/2019 **Order**
Order

05/30/2019 **Notice of Entry of Order**
Notice of Entry of Order

06/05/2019 **Notice of Appeal**
Respondent Las Vegas Metropolitan Police Department's Notice of Appeal

06/05/2019 **Case Appeal Statement**
Respondent Las Vegas Metropolitan Police Department's Case Appeal Statement

06/05/2019 **Minute Order** (3:00 AM) (Judicial Officer Hardy, Joe)
Minute Order: In Camera Review
[Minutes](#)
Result: Minute Order - No Hearing Held

06/10/2019 **Recorders Transcript of Hearing**
Recorders Transcript of Hearing Re:

06/19/2019 **Status Check** (9:00 AM) (Judicial Officer Hardy, Joe)
06/19/2019, 07/17/2019, 10/02/2019
Status Check: Meet and Confer
[Parties Present](#)
[Minutes](#)
Result: Continued

06/21/2019 **Motion for Protective Order** (9:00 AM) (Judicial Officer Truman, Erin)
06/21/2019, 07/19/2019, 09/13/2019
Las Vegas Metropolitan Police Department's Motion for Protective Order on an OST
[Parties Present](#)
[Minutes](#)
04/26/2019 Reset by Court to 05/29/2019

	05/29/2019	Reset by Court to 06/21/2019
	09/06/2019	Reset by Court to 09/13/2019
	09/13/2019	Reset by Court to 09/13/2019
	Result: Matter Continued	
06/21/2019	Order	
	Order	
06/21/2019	Notice of Entry of Order	
	Notice of Entry of Order	
06/21/2019	Order	
	Order Regarding In Camera Review	
06/24/2019	Notice of Entry of Order	
	Notice of Entry of Order	
10/17/2019	CANCELED Status Check: Compliance (3:00 AM) (Judicial Officer Truman, Erin)	
	Vacated	
	Status Check: Compliance / 9-13-19 DCRR	
11/06/2019	Status Check (9:00 AM) (Judicial Officer Hardy, Joe)	
	Status Check: Deposition Dates	

FINANCIAL INFORMATION

	Defendant Las Vegas Metropolitan Police Department		
	Total Financial Assessment		27.50
	Total Payments and Credits		27.50
	Balance Due as of 10/18/2019		0.00
04/26/2019	Transaction Assessment		3.50
04/26/2019	Efile Payment	Receipt # 2019-25938-CCCLK	(3.50)
06/05/2019	Transaction Assessment	Las Vegas Metropolitan Police Department	24.00
06/05/2019	Fee Waiver		(24.00)
	Plaintiff Las Vegas Review-Journal		
	Total Financial Assessment		270.00
	Total Payments and Credits		270.00
	Balance Due as of 10/18/2019		0.00
06/01/2018	Transaction Assessment		270.00
06/01/2018	Efile Payment	Receipt # 2018-36977-CCCLK	(270.00)
		Las Vegas Review-Journal	