

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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LEQUANA BROWN,  
Appellant,

v.

THE STATE OF NEVADA,  
Respondent.

Electronically Filed  
May 04 2022 01:48 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO:

**MOTION TO TRANSMIT PRESENTENCE INVESTIGATION REPORT**

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, TALEEN PANDUKHT, and submits this Motion to Transmit Presentence Investigation Report.

This Motion is based on the following memorandum, declaration, and all papers and pleadings on file herein.

Dated this 4<sup>th</sup> day of May, 2022.

Respectfully submitted,

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

BY */s/ Taleen Pandukht*

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TALEEN PANDUKHT  
Chief Deputy District Attorney  
Nevada Bar #005734  
Office of the Clark County District Attorney

## **MEMORANDUM OF POINTS AND AUTHORITIES**

COMES NOW the State of Nevada, STEVEN B. WOLFSON, Clark County District Attorney, through his Chief Deputy, TALEEN PANDUKHT, and seeks an order from this Court directing the clerk of the district court to transmit to this Court, under seal, Appellant's Presentence Investigation Report ("PSI") filed on April 20, 2020, under District Court Case No. C-19-344112-3.

The State has utilized the PSI in its Respondent's Appellate Brief for the purpose of identifying the underlying factual basis for the case to address Appellant's arguments. Therefore, the State requests this Court direct the district court clerk to transmit the PSI to this Court, in a sealed envelope, so that this Court may confirm that the references in the Answering Brief are accurate.

Dated this 4<sup>th</sup> day of May, 2022.

Respectfully submitted,

**STEVEN B. WOLFSON**  
Clark County District Attorney

BY */s/ Taleen Pandukht*

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TALEEN PANDUKHT  
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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on 4<sup>th</sup> day of May, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD  
Nevada Attorney General

STEVEN S. OWENS, ESQ.  
Counsel for Appellant

TALEEN PANDUKHT  
Chief Deputy District Attorney

*/s/ J. Hall*

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Employee, Clark County  
District Attorney's Office

TP/Elan Eldar/jh