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Electronically Filed
Sep 14 2022 01:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

IN THE MATTER OF SEARCH
WARRANTS REGARDING SEIZURE
OF DOCUMENTS, LAPTOP
COMPUTERS, CELLULAR
TELEPHONES, AND OTHER
DIGITAL STORAGE DEVICES FROM
THE PREMISES OF LAS VEGAS
BISTRO, LLC AND LITTLE
DARLINGS OF LAS VEGAS, LLC

LAS VEGAS BISTRO, LLC D/B/A
LARRY FLYNT'S HUSTLER CLUB;
AND LITTLE DARLINGS OF LAS
VEGAS, LLC,

Appellants,

vs.

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT,

Respondents.

Case No.: 84931-COA

Appeal from the Eighth Judicial District
Court, The Honorable Jerry A. Wiese II
Presiding.

**RESPONDENT LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT'S OPPOSITION TO
APPELLANTS' MOTION TO
SUSPEND THE RULES PURSUANT
TO NRAP 2 AND ORDER
PROCEEDINGS FOR EXPEDITED
BRIEFING AND DECISION**

I. INTRODUCTION

Appellants provide no basis warranting expedited briefing and review of the instant appeal. Notably, Appellants have received the property identified in their initial briefing with the district court, with the exception of the Apple Laptop that is subject to a separate appeal involving a different party making an ownership claim to the same laptop involving the same search warrant. The return of such property moots any basis for expediting the instant appeal. Finally, Appellants have not presented a substantial case on the merits, nor have they articulated good cause for expedited review of the instant appeal.

II. PROCEDURAL HISTORY AND STATEMENT OF FACTS

A. THE COURT PROPERLY FOUND LVMPD HAD PROBABLE CAUSE TO EXECUTE THE WARRANT AND SEIZE APPELLANTS' PROPERTY.

On April 5, 2022, Detectives from LVMPD's Special Investigations Section (SIS) had probable cause to execute a search warrant and to seize property related to the crimes Advancing Prostitution and Living from Earnings of Prostitute at the premises of Larry Flynt's Hustler Club and Little Darlings. *See* Motion to Suspend the Rules Pursuant to NRAP 2 and Order Proceedings for Expedited Briefing and Decision (Motion) at Exhibit 1. Upon seizing property from Larry Flynt's Hustler Club and Little Darlings, both establishments filed an action to unseal the search warrant applications, quash the search warrant, and return the property. *Id.*

In addition to contending that the warrant lacked probable cause, the

Appellants contended that the property seized contained privileged information. *Id.* The district court denied Appellants' requested relief in its entirety. Reviewing the search warrant applications *in camera*, the district court determined that probable cause existed for the issuance of the warrant and seizure of the property.

In relation to Appellants' arguments for the return of property and concerns about the disclosure of privileged material, the district court determined that the Appellants could provide LVMPD with a list of the contact information of individuals who would be subject to the privileged information, such as attorneys and/or accountants, including their names, addresses, and telephone numbers. *Id.* Based on the information provided to LVMPD by Appellants, LVMPD's Digital Forensic Lab would electronically separate records that would contain such privileged information. LVMPD's Digital Forensic Lab would hold on to the information and not provide it to the SIS detectives. *Id.*

B. APPELLANTS' REQUEST FOR A STAY IS DENIED.

The Appellants then sought a stay of the district court's order, and both the district court and this Court denied the same. *See* Order Denying Stay on file herein. Appellants now rely on the same basis to request expedited briefing and decision from this Court on appeal. *See* Motion.

C. GO BEST, LLC OBTAINS AN ORDER REQUIRING THE RETURN OF THE SAME SEIZED PROPERTY.

With the instant case pending on appeal, GO BEST, LLC, who is managed

by the same individual who manages the Hustler Club, Jason Mohny, sought a Court order seeking the return of an Apple Laptop that was seized when LVMPD executed the search warrant at the Hustler Club. *See* Court of Appeals of Nevada Case No. 85082, LVMPD’s Emergency Motion for Relief to Stay Under NRAP 27(e) filed on August 1, 2022 on file herein.

Despite the fact that the district court already provided a valid, enforceable order, Mohny’s dissatisfaction with Judge Weise’s order and the denial of his request for a stay, led him to file a separate action via GO BEST, LLC, seeking the same relief, on June 10, 2022. *Id.* Interestingly, GO BEST, LLC’s motion contained a signed declaration from Mohny stating that LVMPD seized “the Macbook Pro laptop belonging to GO BEST.” *Id.* Thereafter, in addition to the same arguments raised below in this case, LVMPD argued that GO BEST, LLC was attempting to relitigate the same issue and that Mohny was bound by the district court’s prior order. *Id.* Furthermore, LVMPD highlighted a fact that was now in dispute. Ralph James (“James”), who is the General Manager of Hustler, also indicated that his Apple Laptop that was used for Hustler’s business was seized by LVMPD during the search. *Id.* As a result, it became unclear who the Apple Macbook laptop actually belonged to, Hustler or GO BEST. On July 19, 2022, Judge Gloria Sturman contradicted Judge Weise’s ruling by granting GO BEST, LLC’s motion and ordered LVMPD to return the Apple Laptop.

D. THIS COURT GRANTED LVMPD’S REQUEST TO STAY THE GO BEST, LLC ORDER.

LVMPD subsequently appealed Judge Sturman’s order requiring that it return the Apple Laptop and sought a stay of the order. *Id.* This Court then granted LVMPD’s request for a stay and ruled that LVMPD is not required to return the laptop and also must cease any efforts to copy its contents. *See* Order Denying Motion to Dismiss and Granting Stay filed on September 1, 2022 on file herein.

E. PROPERTY ALLEGEDLY CONTAINING PRIVILEGED MATERIALS HAS BEEN RETURNED, EXCEPT FOR THE DISPUTED LAPTOP.

Prior to the instant motion being filed, LVMPD notified the Appellants that property, including cellphones and computers, were available to be returned. *See* LVMPD’s Notice of Returned Property attached hereto as **Exhibit A**. On July 26, 2022, Colleen McCarty, counsel for Appellants retrieved from LVMPD the following property:

Little Darlings:

- HP Prodesk Desktop Computer with Power Cable
- Apple Mac Mini portable Desktop Computer with power cable
- Black Dell XPS Desktop Computer with Power Cord
- Black Dell Optiplex 3060 Desktop Computer with Power Cord
- Black HP Pro Desk Desktop Computer with Power Cord
- Electronic Tablets with Charging Stations
- Black Cellphone
- Lexar 64GB Thumbdrives
- Sandisk 32GB Thumbdrive
- Unknown Make Thumbdrives
- Microsoft Thumbdrive

Hustler Club:

- Black HP Laptop
- IPAD from Rear Desk Model A1893
- IPAD from Middle Desk Model A1673
- White Apple iPhone with Clear Case

LVMPD also returned the personal cellphones to the individuals. *Id.* The Apple Laptop that is being claimed as property by both GO BEST, LLC and the Hustler Club is available to be returned but has not been returned because of the ownership dispute. *Id.* Ownership of the Apple Laptop is a central issue in the instant appeal and LVMPD's appeal related to GO BEST, LLC.

III. LEGAL ARGUMENT

The Nevada Rules of Appellate Procedure allow Appellants to move to expedite the Court's decision or to suspend any provision of the Rules in a particular case. NRAP 2. While Appellants ask that the Court grant its appeal, it appears that the Motion merely seeks to expedite the briefing for appeal. However, Appellants ignore the fact that they are free to file their Opening Brief at any time prior to November 23, 2022 in an effort to expedite this Appeal. The fact that Appellants have not yet filed such a brief demonstrates expedited briefing is not necessary. Nevertheless, Appellants have failed to demonstrate why expedition of this case is justified.

Appellants first argument that an expedited and definitive answer to the propriety of LVMPD's action will provide the "necessary closure" for all

interested parties is not “good cause” basis for expedition. Appellants do not explain how expedition will do anything to further the interests of the parties that cannot be addressed by following the procedures already established within NRAP. For instance, there is no allegation or assertion that Appellants cannot conduct business without certain property, necessitating expedited briefing and determination by this Court. Stated differently, Appellants do nothing to demonstrate that expedited briefing or decision by this Court is warranted.

Next, Appellants contend that good cause exists because they present a substantial case on the merits. Appellants do not present a substantial case on the merits that involves a serious legal question. The first focus of Appellants’ relief is the claim that LVMPD lacked probable cause for the two crimes being investigated—Living from the earnings of a prostitute and Advancing Prostitution. *See* Motion at 6. And, instead, LVMPD only has probable cause of solicitation. *Id.* Appellants, however, misunderstand, and quite frankly ignore, the probable cause standard. Probable cause “exists when police have reasonably trustworthy information of **facts and circumstances** that are sufficient in themselves to warrant a person of reasonable caution to believe that [a crime] has been ... committed” *State v. McKellips*, 118 Nev. 465, 472, 49 P.3d 655, 660 (2002). In Nevada, a finding of probable cause may be based on only “slight evidence.” *See Sheriff, Clark County v. Badillo*, 95 Nev. 593, 594, 600 P.2d 222 (1979) (finding probable cause despite

conflicting witness testimony when one of the witnesses identified the respondent as one of the perpetrators). Thus, the issue of probable cause is one of facts and circumstances, as articulated in the search warrant application, and not a legal issue. And, although this Court has reviewed the search warrant applications for purposes of the stay *in camera*, this review should further demonstrate that expedited briefing on the issue is not warranted.

Similarly, Appellants failed to articulate how the district court's order regarding sealing the affidavit of the search warrant amounted to clear error. Appellants merely recite the standard regarding sealing but offer no support in that the district court erred in sealing the search warrant affidavit in light of the ongoing criminal investigation.

LVMPD maintains that Appellants have not satisfied their burden under NRS 179.085. *In re 12067 Oakland Hills, Las Vegas, Nevada 89141 (Las Vegas Metro. Police Dep't v. Anderson)*, 134 Nev. 799, 805, 435 P.3d 672, 677 (Nev. App. 2018). Instead, Appellants provided nothing more than scant evidence that the property contains privileged material. And, a declaration from counsel merely stating that the property has attorney-client privilege or accountant-client privilege, is not enough. The other declarations do nothing more than baldly assert devices—not necessarily belonging to the Hustler Club—contain privileged material. *See* LVMPD's Opposition to Motion to Stay on file herein.

Moreover, the scant evidence provided regarding privileged material does not justify a return of the property. Appellants rely on NRS 179.105 for the notion that attorney-client privilege protects materials that are otherwise subject to a warrant. NRS 179.105 provides:

All property or things taken on a warrant must be retained in an officer's custody, subject to the order of the court to which the officer is required to return the proceedings before the officer, or of any other court in which the offense in respect to which the property or things are taken is triable. If it appears that the property taken is not the same as that described in the warrant, that there is no probable cause for believing the existence of the grounds on which the warrant was issued **or that the property is determined pursuant to NRS 179.11518 to be subject to the attorney-client privilege**, the magistrate shall cause it to be restored to the person from whom it was taken. However, no search warrant shall be quashed by any magistrate or judge within this State nor shall any evidence based upon a search warrant be suppressed in any criminal action or proceeding because of mere technical irregularities which do not affect the substantial rights of the accused.

(emphasis added). Under NRS 179.11518, a district attorney or the Attorney General is required to review the property for attorney-client privilege if the search warrant was issued pursuant to NRS 179.11514. NRS 179.11514 expressly applies to search warrants issued and executed upon an attorney engaged in the practice of law. Thus, the attorney-client provision within NRS 179.105 has no application here because LVMPD did not seize property from an attorney engaged in the practice of law. Other than NRS 179.11518, Appellants neglected to cite to any authority for the position that such material must be returned, despite the property being subject to a search warrant.

Moreover, courts recognize that the movant bears the burden of establishing that the property contains privileged material. *In re Grand Jury Investigation*, 974 F.2d 1068, 1070 (9th Cir. 1992). There, the court required the corporation to submit a privilege log regarding the material that was alleged to be privileged. *Id.* A log should identify: (a) the attorney and client involved, (b) the nature of the document, (c) all persons or entities shown on the document to have received or sent the document, (d) all persons or entities known to have been furnished the document or informed of its substance, and (e) the date the document was generated, prepared, or dated. *Id.* (citation omitted). Without this information, Appellants cannot satisfy their burden that the information contained in *all* devices is privileged material. The privilege log is necessary as there is an exception to privileges, including the crime-fraud exception. *Clark v. United States*, 289 U.S. 1, 15, 53 S.Ct. 465, 469, 77 L.Ed. 993 (1933); 8 John H. Wigmore, Evidence § 2298 (McNaughton Rev.1961 and Supp.1991). In *United States v. Zolin*, 491 U.S. 554, 565, 109 S.Ct. 2619, 2627, 105 L.Ed.2d 469 (1989), the Supreme Court held that in camera review of privileged information may be used to establish whether the crime-fraud exception applies. In other words, just because Appellants assert the privilege applies, a privilege log is necessary so that LVMPD can seek *in camera* review of particular records if there is a basis to believe that the material would fall under the crime-fraud exception. Simply put, Appellants failed to meet their

burden that such property contains privileged material. Regardless, Appellants have been returned their property (with the exception of the Apple Laptop) outlined in the prior declarations, mooted any request for return of property.

Appellants main contention is that LVMPD must be prohibited from searching the material it has retrieved from the electronic devices. *See* Motion at 9-11. NRS 179.085 does not allow Appellants to challenge the search process but merely authorizes a court to return the property. Appellants have no standing to dictate how LVMPD conducts its searches. Thus, the district court could not have erred in allowing LVMPD to institute its own protocol in sifting out alleged privileged material.

Finally, the GO BEST, LLC appeal is relevant to the instant appeal. And given the cross-over of the legal and factual issues, as well as the complexity of the same, the instant appeal should not be expedited as it could have an effect on the GO BEST, LLC appeal.

IV. CONCLUSION

Based on the foregoing, LVMPD requests the Court deny Appellants' motion in its entirety.

Dated this 14th day of September, 2022.

MARQUIS AURBACH

By: /s/ Jackie V. Nichols
Attorneys for Respondent

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **RESPONDENT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S OPPOSITION TO APPELLANTS' MOTION TO SUSPEND THE RULES PURSUANT TO NRAP 2 AND ORDER PROCEEDINGS FOR EXPEDITED BRIEFING AND DECISION** was filed electronically with the Nevada Supreme Court on the 14th day of September, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Deanna Forbush, Esq.
Colleen McCarty, Esq.
Attorneys for Movants and Real Parties in Interest
Las Vegas Bistro, LLC and Little Darlings of Las Vegas, LLC

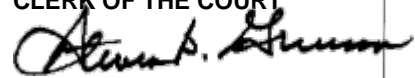
I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

Zachary M. Youngsma, Esq.
Shafer & Associates, P.C.
3800 Capital City Blvd., Suite 2
Lansing, Michigan 48906
Attorney for Movants and Real Parties in Interest
Las Vegas Bistro, LLC and Little Darlings of Las Vegas, LLC

/s/ Leah Dell

An employee of Marquis Aurbach

Exhibit A



Marquis Aurbach

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Jackie V. Nichols, Esq.
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Las Vegas, Nevada 89145
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DISTRICT COURT

CLARK COUNTY, NEVADA

IN RE SEARCH WARRANT REGARDING
SEIZURE OF DOCUMENTS, LAPTOP
COMPUTERS, CELLULAR TELEPHONES
AND OTHER DIGITAL STORAGE DEVICES
FROM THE PREMISES OF LAS VEGAS
BISTRO, LLC AND LITTLE DARLINGS OF
LAS VEGAS, LLC,

Case No.: A-22-851073-C
Dept. No.: 7

Movants and Real Parties in Interest.

NOTICE OF RETURNED PROPERTY

In accordance with the Court's July 27, 2022 order, please take notice that Defendant Las Vegas Metropolitan Police Department ("LVMPD"), returned property that was no longer necessary to retain for the purposes of the criminal investigation and that was not required for the purpose of completing the privileged redaction. The specific property returned to Petitioners is detailed in the Property Withdrawal Receipts attached hereto as **Exhibit A** and **Exhibit B**.

Dated this 26th day of August, 2022.

MARQUIS AURBACH

By: /s/ Jackie V. Nichols

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 Real Party in Interest, Las
Vegas Metropolitan Police Department

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **NOTICE OF RETURNED PROPERTY** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 26th day of August, 2022. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Deanna L. Forbush, Esq.
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Attorneys for Movants and Real Parties in Interest
Las Vegas Bistro, LLC and Little Darlings of Las Vegas, LLC

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

/s/ Krista Busch
An employee of Marquis Aurbach

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).

Case # A-22-851073-C - Las Vegas Bistro, LLC, Plaintiff(s)**Envelope Information**

Envelope Id

10433827

Submitted Date

8/26/2022 2:21 PM PST

Submitted User Name

pfloyd@maclaw.com

Case Information

Location

Department 7

Category

Civil

Case Type

Other Civil Matters

Case Initiation Date

4/12/2022

Case #

A-22-851073-C

Assigned to Judge

Bell, Linda Marie

Filings

Filing Type

EFileAndServe

Filing Code

Notice - NOTC (CIV)

Filing Description

Notice of Returned Property

Client Reference Number

14687-16

Filing on Behalf ofLas Vegas Metropolitan Police
Department**Filing Status**

Accepted

Accepted Date

8/26/2022 2:22 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Security	Download
Notice of Returned Property.pdf	Public Filed Document	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Sherry Harper		Yes	8/26/2022 2:26 PM PST
Sent	Colleen McCarty	Fox Rothschild, LLP	Yes	Not Opened
Sent	Colleen McCarty	Fox Rothschild, LLP	Yes	Not Opened
Sent	Deanna Forbush	Fox Rothschild, LLP	Yes	8/26/2022 2:22 PM PST
Sent	Deanna Forbush	Fox Rothschild, LLP	Yes	Not Opened
Sent	Zachary M. Youngsma		Yes	Not Opened
Sent	Sherry` Harper		Yes	Not Opened
Sent	Krista Busch	Marquis Aurbach Coffing	Yes	Not Opened
Sent	Nicholas Crosby	Marquis Aurbach Coffing	Yes	Not Opened
Sent	Jackie V. Nichols	Marquis Aurbach Coffing	Yes	Not Opened
Sent	Sherri Mong	Marquis Aurbach Coffing	Yes	Not Opened
Sent	Doreen Loffredo	Fox Rothschild, LLP	Yes	Not Opened

Parties with No eService

Name	Address
Las Vegas Metropolitan Police Department	

Name	Address
None	

Fees

Notice - NOTC (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
Envelope Total:	\$0.00
	<i>Waiver selected</i>

Filing Attorney Jackie Nichols

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Version: 2022.0.2.9933






EXHIBIT A

CRIMINALISTICS BUREAU

DATE 07-26-2022

TIME 09:09:58 AM

ITEM INFORMATION		DESCRIPTION	\$
AC# 22024141	Item 1	 BLACK HP LAPTOP SER #: CNDLK102W85 Pkg/Itm: 1/1 Sec Bg: 1/1	\$0.00
CS# F	Qty 1		
EV# 220400019200	Type OFFICE		
AC# 22024141	Item 2	  S. BY: 172	\$0.00
CS# F	Qty 1		
EV# 220400019200	Type OFFICE		
MONEY TOTAL			\$0.00

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE

PO-2 SHANNON HINDS, DIB [006598]

REASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]

CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7-26-22

PRINT NAME: Colleen E. McCarty

EMAIL ADDRESS:




PHONE:

TITLE/RANK: Atty.

ORGANIZATION: Fox Rothschild LLP

CRIMINALISTICS BUREAU

DATE 06-29-2022
TIME 03:46:05 PM

ITEM INFORMATION		DESCRIPTION	\$
AC# 22024083 CS# F EV# 220400019200	Item 1 Qty 1 Type OFFICE	 IPAD FROM REAR DESK MODEL A1893 SER #: GG8WQ3S3JF8J Pkg/Itm: 1/1 Sec Bg: 1/1	\$0.00
AC# 22024083 CS# F EV# 220400019200	Item 2 Qty 1 Type OFFICE	 IPAD FROM MIDDLE DESK MODEL A1673 SER #: DMPRLA6MH1MK Pkg/Itm: 2/2 Sec Bg: 2/2	\$0.00
AC# 22024141 CS# F EV# 220400019200	Item 4 Qty 1 Type ELECTRONICS	 WHITE APPLE IPHONE W/CLEAR CASE Pkg/Itm: 2/4 Sec Bg: 2/4	\$0.00
MONEY TOTAL			\$0.00

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE PO-2 SHANNON HINDS, DIB [006598]
REASON PROPERTY IS BEING REMOVED: Pending Release to Owner
OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]

CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7-26-22

PRINT NAME: Colleen McCarty

EMAIL ADDRESS:

PHONE:

TITLE/RANK: Atty.

ORGANIZATION: Fox Rothschild LLP

CRIMINALISTICS BUREAU

DATE 07-07-2022

TIME 03:09:29 PM

ITEM INFORMATION		DESCRIPTION	\$
IC# 22024141	Item 10	 BLUE IPHONE W/CLEAR CASE Pkg/Itm: 8/10 Sec Bg: 8/10	\$0.00
CS# F	Qty 1		
IV# 220400019200	Type ELECTRONICS		
MONEY TOTAL			\$0.00

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE

PO-2 SHANNON HINDS, DIB [006598]

REASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]



CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7/7/22

PRINT NAME: Andrea Allen Woods

EMAIL ADDRESS: _____

PHONE: 702-280-8499


TITLE/RANK: _____

ORGANIZATION: _____

CRIMINALISTICS BUREAU

DATE 07-07-2022

TIME 03:10:15 PM

ITEM INFORMATION		DESCRIPTION	\$
AC# 22024141	Item 11	 BLACK IPHONE W/PINK CASE Pkg/Itm: 9/11 Sec Bg: 9/11	\$0.00
CS# F	Qty 1		
CV# 220400019200	Type ELECTRONICS		
MONEY TOTAL			\$0.00

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE

PO-2 SHANNON HINDS, DIB [006598]

REASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]

CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7-26-22

PRINT NAME: Beth Hues

EMAIL ADDRESS: bethhues@gmail.com

PHONE: 702 931 7812


TITLE/RANK:

ORGANIZATION:

CRIMINALISTICS BUREAU

DATE 07-07-2022

TIME 03:08:07 PM

ITEM INFORMATION		DESCRIPTION	\$
AC# 22024141	Item 9	 BLACK IPHONE W/BLACK CASE Pkg/Itm: 7/9 Sec Bg: 7/9	\$0.00
CS# F	Qty 1		
EV# 220400019200	Type ELECTRONICS		
MONEY TOTAL			\$0.00

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE

PO-2 SHANNON HINDS, DIB [006598]

ASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

FICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]

CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7-8-22

LAST NAME: Reyna Martinez

MAIL ADDRESS:

PHONE: 702 580-9564

TITLE/RANK:






ORGANIZATION:

EXHIBIT B

CRIMINALISTICS BUREAU

DATE 07-26-2022

TIME 11:23:20 AM

ITEM INFORMATION		DESCRIPTION	\$
AC# 22023487 CS# SA EV# 220400019181	Item 7 Qty 1 Type OFFICE	 HP Prodesk Desktop Computer with Power Cable SER #: MXL92240Q Pkg/Itm: 7/7 Sec Bg: 7/7	\$0.00
AC# 22023487 CS# SA EV# 220400019181	Item 8 Qty 1 Type OFFICE	 Apple Mac Mini Portable Desktop Computer with Power Cable SER #: C07XN6PSJYW0 Pkg/Itm: 8/8 Sec Bg: 8/8	\$0.00
AC# 22023487 CS# SA EV# 220400019181	Item 9 Qty 1 Type OFFICE	 Black Dell XPS Desktop Computer with Power Cord SER #: J79X2W2 Pkg/Itm: 9/9 Sec Bg: 9/9	\$0.00
AC# 22023487 CS# SA EV# 220400019181	Item 10 Qty 1 Type OFFICE	 Black Dell Optiplex 3060 Desktop Computer with Power Cord SER #: H3DW2W2 Pkg/Itm: 10/10 Sec Bg: 10/10	\$0.00
AC# 22023487 CS# SA EV# 220400019181	Item 11 Qty 1 Type OFFICE	 Black HP Pro Desk Desktop Computer with Power Cord SER #: 2UA6311TJS Pkg/Itm: 11/11	\$0.00

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE

EVID MATTHEW RODENBEEK, EVID [009611]

REASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]

CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7-26-22

PRINT NAME: Colleen McCarthy

EMAIL ADDRESS:

PHONE:






TITLE/RANK: Atty.

ORGANIZATION: Fox Rothschild LLP

CRIMINALISTICS BUREAU

DATE 07-26-2022

TIME 11:23:20 AM

ITEM INFORMATION		DESCRIPTION	\$
		Sec Bg: 11/11	
AC# 22023487	Item 12	 Electronic Tablets with Charging Stations SER #: UNKNOWN Pkg/Itm: 12/12 Sec Bg: 12/12	\$0.00
CS# SA	Qty 3		
EV# 220400019181	Type OFFICE		
AC# 22023487	Item 13	 Black Unknown Cellphone Pkg/Itm: 13/13 Sec Bg: 13/13	\$0.00
CS# SA	Qty 1		
EV# 220400019181	Type ELECTRONICS		
AC# 22023487	Item 15	 Lexar 64GB Thumbdrives Pkg/Itm: 15/15 Sec Bg: 15/15	\$0.00
CS# SA	Qty 3		
EV# 220400019181	Type OFFICE		
AC# 22023487	Item 16	 Sandisk 32GB Thumbdrive Pkg/Itm: 15/16 Sec Bg: 15/16	\$0.00
CS# SA	Qty 1		
EV# 220400019181	Type OFFICE		
AC# 22023487	Item 17	 Unknown Make Thumbdrives Pkg/Itm: 15/17 Sec Bg: 15/17	\$0.00
CS# SA	Qty 7		
EV# 220400019181	Type OFFICE		

INSTRUCTIONS: Immediately return the above-listed items to the Evidence Vault upon completion of the investigation or court appearance, or this receipt indicating permanent release or temporary transfer of the items and with the recipient's signature and contact information

RECEIVED FROM EVIDENCE

EVID MATTHEW RODENBEEK, EVID [009611]

REASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

OFFICER RECEIVING ITEMS

SIGNATURE:



PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]



CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE:

DATE:

PRINT NAME:

EMAIL ADDRESS:

PHONE:



TITLE/RANK:

ORGANIZATION:

CRIMINALISTICS BUREAU

DATE 07-26-2022

TIME 11:23:20 AM

ITEM INFORMATION		DESCRIPTION	\$
AC# 22023487	Item 18		
CS# SA	Qty 1	Microsoft Thumbdrive	\$0.00
EV# 220400019181	Type OFFICE	Pkg/Itm: 15/18 Sec Bg: 15/18	
AC# 22023487	Item 19		
CS# SA	Qty 1	Dark Blue Samsung SM-N975U Cellphone with	\$0.00
EV# 220400019181	Type ELECTRONICS	Clear Case Passcode 197676 Pkg/Itm: 16/19 Sec Bg: 16/19	
MONEY TOTAL			\$0.00

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RECEIVED FROM EVIDENCE

EVID MATTHEW RODENBEEK, EVID [009611]

REASON PROPERTY IS BEING REMOVED:

Pending Release to Owner

OFFICER RECEIVING ITEMS

SIGNATURE: 

PHOTO: No

PO-2 ROBERT CHAVEZ, SIS [007758]

CIRCLE ONE: PERMANENT RELEASE / TEMPORARY TRANSFER

SIGNATURE: 

DATE: 7-26-22

PRINT NAME: Colleen McLanahan

EMAIL ADDRESS: a.hj

PHONE: 702.734.1000

TITLE/RANK: A/Hj

ORGANIZATION: FOX Rothschild LLP