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Department, Andrew Bauman, Matthew Kravetz, Supreet Kaur,

David Jeong, and Theron Young

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CONNIE SEMPER¹, an individual; ASHLEY
MEDLOCK, an individual; LONICIA
BOWIE, an individual; MICHAEL GREEN,
an individual; CLINTON REECE, an
individual; COREY JOHNSON, an
individual; DEMARLO RILEY, an
individual; CORY BASS, an individual;
CARLOS BASS, an individual; BREANNA
NELLUMS, an individual; and ANTONIO
WILLIAMS, an individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
ANDREW BAUMAN, individually and in
his capacity as a Las Vegas Metropolitan
Police Department Officer; DAVID JEONG,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; SUPREET KAUR, individually and
in his capacity as a Las Vegas Metropolitan
Police Department Officer; MATTHEW
KRAVETZ, individually and in his capacity
as a Las Vegas Metropolitan Police
Department Officer; and THERON YOUNG,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer,

Defendants.

Case Number:

2:20-cv-01875-APG-EJY

JOINT PRE-TRIAL ORDER

¹ Pursuant to FRCP 25, Ms. Semper has been substituted for Phillip Semper pursuant to this court's order date January 13, 2022, as she is the executrix of his estate.

1 **I. NATURE OF THE ACTION**

2 **A. BACKGROUND**

3 This is a civil rights case brought under 42 U.S.C. § 1983. On August 19, 2018,
4 Plaintiffs attended a birthday party at the Rio Hotel and Casino (“Rio”) located inside room
5 2037. About thirty-two individuals were in attendance and all attendees were African
6 American.

7 That same night LVMPD Detective Nicholas Brigandi, who is part of LVMPD’s
8 Central Intelligence Unit, saw a picture on social media of Cory Bass and two other men that
9 Brigandi realized had been taken at the Rio Hotel. The social media post indicated that these
10 men would be attending a birthday party at the hotel. Brigandi determined that Bass and the
11 two other men had been previously designated as gang members by LVMPD and contacted
12 Defendant Officer Bauman to notify Bauman that Bass and the two men were at the Rio.

13 Uniformed LVMPD officers arrived at the Rio and spoke with security about the party.
14 Rio security indicated that they had previously received a guest complaint about noise coming
15 from room 2037. Rio security escorted LVMPD to room 2037 where security knocked on the
16 door and advised Cory Bass that everyone in the room had to leave. LVMPD officers then
17 announced their presence and instructed all guests to line up in the hotel room foyer. LVMPD
18 officers escorted each guest into the hallway where the guests were handcuffed, checked for
19 identification, and frisked for weapons. Plaintiffs Phillip Semper and Corey Johnson were
20 detained and then arrested for carrying concealed firearms without a permit. Other guests,
21 including Plaintiffs Medlock, Bowie, and Green, were arrested on unrelated warrants.
22 LVMPD officers released guests without warrants, including Plaintiffs Reece and Riley, from
23 the scene after Rio security read a trespass warning. Prior to their release, LVMPD officers
24 directed Plaintiff Reece to lift his shirt so that LVMPD officers photographs taken of his
25 tattoos and held Plaintiff Riley until he provided a DNA sample to the LVMPD Detectives.
26 Local news outlets published a statement from a LVMPD captain saying that everyone who
27 had attended the party had been a gang member. The media also published Plaintiffs Green,
28 Johnson, Medlock, and Semper’s booking photographs and names in relation to the party.

Due in whole or in part to their presence at the party, LVMPD designated Plaintiffs as either gang members or gang affiliates. Since August 19, 2018, LVMPD officers have stopped Plaintiffs Reece and Riley while the men were leaving funerals designated as “gang funerals” by LVMPD, and extended Reece’s designation as a “gang member” based upon his attendance at those funerals. On October 8, 2020, Plaintiffs initiated this lawsuit.

B. THE COURT’S ORDERS AND CLAIMS REMAINING FOR TRIAL

1. The Court’s orders

Plaintiffs initially brought fourteen claims for relief including: (1) Violation of Title VI of the Civil Rights Act; (2) Violation of the Fourteenth Amendment (Equal Protection); (3) Violation of the Fourteenth Amendment (*Monell* claim); (4) Violation of the Fourth Amendment (Unreasonable search and seizure); (5) Violation of the Fourth Amendment (*Monell* regarding policies related to unreasonable search and seizure); (6) Violation of the Fourth Amendment (Unlawful detention); (7) Violation of the Fourth Amendment (*Monell* regarding policies related to unlawful detention); (8) Civil Conspiracy under 42 U.S.C. § 1983; (9) Civil Conspiracy under 42 U.S.C. § 1985; (10) Civil Conspiracy under Nevada law; (11) Intentional Infliction of Emotional Distress; (12) Negligent Infliction of Emotional Distress; (13) False Imprisonment; and (14) Negligent Training, Supervision, and Retention. The LVMPD Defendants filed a motion for partial dismissal. Plaintiffs conceded that 1) former-Sheriff Joseph Lombardo be dismissed from this lawsuit, 2) that individual defendants, Bauman, Kravetz, Kaur, Jeong, and Young should be dismissed from Plaintiffs’ first cause of action asserting a Title VI claim, 3) Plaintiffs’ Fourteenth Amendment claims for violation of the right to equal protection be dismissed as it is subsumed by Plaintiffs’ Title VI claim, and 4) Plaintiffs’ negligent training, supervision, and retention claims be dismissed. The Court also dismissed all of Plaintiff’s Nevada state law tort claims. (ECF No. 38).

Plaintiffs filed an amended complaint bringing ten claims for relief: (1) Violation of Title VI of the Civil Rights Act; (2) Violation of the Fourteenth Amendment (Procedural Due Process); (3) Violation of the First Amendment Right to Association and Expression (Direct Prohibition); (4) Violation of the First Amendment Right to Association and

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1 Expression (Chilling); (5) Violation of Fourth Amendment (Unreasonable search and seizure
2 against individual Defendant officers); (6) Violation of the Fourth Amendment (Unreasonable
3 search and seizure against LVMPD pursuant to *Monell*); (7) Violation of the Fourth
4 Amendment (Unlawful detention against individual Defendant officers); (8) Violation of the
5 Fourth Amendment (Unlawful detention against LVMPD pursuant to *Monell*); (9) Civil
6 Conspiracy under 42 U.S.C. § 1983; (10) Civil Conspiracy under 42 U.S.C. § 1985. The
7 LVMPD Defendants filed a second motion to dismiss. The Court dismissed Plaintiffs' ninth
8 and tenth causes of action alleging Civil Conspiracy and limited Plaintiffs' third and fourth
9 causes of action to allegations related to expressive association.

10 After the close of discovery, the LVMPD Defendants filed a motion for summary
11 judgment and Plaintiffs filed a motion for partial summary judgment. The Court addressed
12 both motions in the same order ("the MSJ Order"). (*See* ECF No. 176). The Plaintiffs did not
13 contest Defendant David Jeong's motion for summary judgment, which the Court granted in
14 its entirety. The Court granted defensive summary judgment for Defendant LVMPD regarding
15 Plaintiffs' Fourteenth Amendment (Procedural Due Process) and Fourth Amendment claims
16 premised on *Monell*. The following claims remain for trial:

17 **1. Plaintiffs' Title VI claim:** The Court found an issue of genuine material fact
18 remains whether LVMPD intentionally discriminated against all Plaintiffs based on race
19 through its gang enforcement and investigation.

20 **2. Plaintiffs' First Amendment claim:** The Court granted offensive summary
21 judgment in favor of the Plaintiffs on their First Amendment claims for both direct prohibition
22 of speech and chilling effect of speech.

23 **3. Plaintiffs' Fourth Amendment claims:** The Court found an issue of genuine
24 material fact remains whether the individual LVMPD Defendants Bauman, Kravetz, Kaur,
25 and/or Young unreasonably seized and searched the Plaintiffs at the August 19, 2018, birthday
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1 party. And, in the alternative, if the initial detention was lawful, whether the individual
2 LVMPD Defendants unlawfully prolonged the detention of Plaintiff Riley.²

3 **II. STATEMENT OF JURISDICTION AND VENUE**

4 This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (federal question). This Court
5 also has jurisdiction pursuant to First, Fourth, and Fourteenth Amendments of the United
6 States Constitution, 42 U.S.C. § 1983 (deprivation of rights), and 42 U.S.C. § 2000d
7 (discrimination by program receiving federal financial assistance). Plaintiffs' federal claims
8 are brought pursuant to 42 U.S.C. §1983.

9 Venue is proper pursuant to 28 U.S.C. § 1391(b) as the events giving rise to the claims
10 occurred in the District of Nevada, specifically in the City of Las Vegas, County of Clark.

11 **III. STATEMENT OF ADMITTED FACTS**

12 The following facts are admitted by the parties and require no proof.

- 13 1. LVMPD is a political subdivision of the State of Nevada.
- 14 2. On August 19, 2018, Plaintiffs attended a party at the Rio Hotel in Room 2037.
- 15 3. The party was a birthday party for Cory Bass.
- 16 4. There were at least thirty-two people, including Plaintiffs and Cory Bass, in
17 Room 2037 at 2:43 AM on August 19, 2018.
- 18 5. Defendants Bauman, Kravetz, Kaur, and Young were, at all times relevant to
19 this lawsuit, police officers employed by LVMPD and were acting under the color of law in
20 the course and scope of their employment.
- 21 6. Defendant Bauman, Kravetz, Kaur, and Young operated as a FLEX team
22 assigned to LVMPD's Convention Center Area Command.
- 23 7. Bauman, Young, Kravetz, and Kaur arrived at Rio Hotel to investigate a party
24 where they believed three men were present who were designated as gang members by
25 LVMPD.

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² The Court granted summary judgment in favor of the individual LVMPD officers on the prolonged detention claims brought by Plaintiffs Bowie, Green, Medlock, and Reece.

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1 8. None of the men that Defendants Bauman, Young, Kravetz, and Kaur were
2 investigating were the Plaintiffs.

3 9. Prior to arriving at the Rio Hotel, Bauman, Young, Kravetz, and Kaur had no
4 evidence that any criminal activity was or would be happening at the party

5 10. At the time they arrived at the Rio Hotel, Defendants Bauman, Young, Kravetz,
6 and Kaur were dressed in green LVMPD uniforms.

7 11. On August 19, 2018, Defendant Bauman was Young, Kravetz, and Kaur's
8 supervising officer.

9 12. After Defendants Bauman, Young, Kravetz, and Kaur arrived at the Rio Hotel,
10 Rio security escorted the LVMPD Defendants to Room 2037 where Rio security knocked on
11 the door.

12 13. When an occupant of Room 2037 answered the door, Rio security told the
13 occupants of room 2037 they were being evicted.

14 14. A short time later, the individual LVMPD Defendants told everyone inside
15 Room 2037 they needed to leave.

16 15. The LVMPD Defendants directed the guests line up, and the Plaintiffs
17 complied with that direction.

18 16. In total, at least thirty-two guests were detained for some period of time.

19 17. The LVMPD Defendants and other LVMPD officers directed the guests,
20 including Plaintiffs, to exit one-by-one where a LVMPD officer would frisk each occupant.

21 18. Defendants Bauman, Young, Kravetz, and Kaur ran identification checks on
22 all guests.

23 19. Some guests were placed in handcuffs.

24 20. Plaintiffs Phillip Semper and Corey Johnson were arrested for concealed
25 carrying without a permit.

26 21. Plaintiffs Ashley Medlock, Lonicia Bowie, and Michael Green (and other non-
27 party partygoers) were arrested due to outstanding warrants.

28

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1 22. All guests, including Plaintiffs, were interviewed about their attendance at the
2 party.

3 23. Plaintiff Clinton Reece was released by LVMPD officers at approximately
4 3:49 AM.

5 24. Prior to his release, LVMPD photographed Clinton Reece's tattoos on his
6 torso.

7 25. At 6:40 AM, LVMPD officers collected Plaintiff Riley's DNA using a buccal
8 swab.

9 26. LVMPD officers asked Plaintiff Riley to sign a consent form authorizing the
10 collection of his DNA.

11 27. LVMPD officers released Plaintiff Riley after his DNA collected.

12 28. LVMPD employees designate people as either "gang members" and "gang
13 affiliates" if those people meet criteria set by LVMPD's policy.

14 29. Plaintiffs Green, Riley, and Reece were designated as gang members.

15 30. Plaintiffs Medlock, Bowie, Semper, and Johnson were designated as affiliates
16 to other gang members.

17 31. LVMPD authorizes its employees to initially designate a person as a "gang
18 member" if that person meets two of ten criteria offered by LVMPD's policy related to gang
19 designations.

20 32. After initial designation as a gang member, LVMPD authorizes employees re-
21 designate a person as a "gang member" if the person meets only one "gang member" criteria.

22 33. If a person affiliates with known gang members and the officer can identify the
23 affiliate by name and connection to specific gang, that is a potential criteria for "gang
24 member" designation".

25 34. LVMPD authorizes its employees to designate a person as a "gang affiliate" or
26 "gang associate" if the employee determines that the person affiliates or associates with an
27 active gang member(s) and the relationship can be clearly identified.

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1 35. If an LVMPD officer decides to nominate a person for designation as a “gang
2 member”, “gang associate”, or “gang affiliate”, the officer completes a document known as a
3 field interview card describing the designation, the criteria supporting the designation, and
4 factual basis the officer has for satisfying the criteria.

5 36. If the officer marks “Yes” next to “Gang Activity” on a person’s field interview
6 card, the card is routed to LVMPD’s Gang Section.

7 37. LVMPD uploads approved “gang member” and “gang affiliate” designations
8 into a database known as GangNet.

9 38. An employee in LVMPD’s Gang Section reviews each field interview card to
10 ensure that Field Interview card provides a factual basis for the relevant criteria before the
11 person’s information on the card is submitted to GangNet.

12 39. If LVMPD’s Gang Section approves the nomination, the designation is
13 uploaded into GangNet.

14 40. GangNet is a database that documents members, associates, and affiliates of
15 criminal street gangs and is used to collect descriptions, tattoos, affiliations, locations,
16 vehicles, field interview cards, criminal histories and activities.

17 41. GangNet is shared with other law enforcement agencies in and out of the state.

18 42. Defendant Young completed a field interview card for Plaintiff Bowie on
19 August 18, 2018.

20 43. Defendant Young marked Bowie’s interview card as “Yes” under “Gang
21 Activity”, “Affiliate” under “Gang Affiliate/Member”. “Corey Bass” under “Affiliate Name”;
22 “Affiliates w/ Gang” under “How Determined”, and “Hillside Gangster Crips” under “Gang
23 Name”.

24 44. Defendant Young determined that Bowie affiliated with a gang on August 19,
25 2018, in part because Plaintiff Bowie was present at Cory Bass’s birthday party, and Cory
26 Bass had been previously designated as a gang member.

27 45. Based upon this field interview card, LVMPD entered Plaintiff Bowie into
28 GangNet as a “gang affiliate/associate”.

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1 46. Defendant Young completed a field interview card for Plaintiff Green on
2 August 19, 2018.

3 47. Defendant Young marked Plaintiff Green's interview card as "Yes" under
4 "Gang Activity", "Member" under "Gang Affiliate/Member", "Affiliates w/ Gang" under
5 "How Determined", and "Rollin 60s Crips" under "Gang Name".

6 48. Defendant Young determined that Plaintiff Green affiliated with a gang on
7 August 19, 2018, in part because Plaintiff Green was present at the birthday party of Cory
8 Bass, who had been previously designated as a gang member by LVMPD.

9 49. Based upon this field interview card and Defendant Young's indication that
10 Riley affiliated with a gang, LVMPD entered Plaintiff Riley into GangNet as a gang member
11 of the gang "Rollin 60s Crips".

12 50. Defendant Young completed a field interview card for Plaintiff Johnson on
13 August 18, 2018.

14 51. Defendant Young marked Plaintiff Johnson's interview card as "Yes" under
15 "Gang Activity", "Affiliate" under "Gang Affiliate/Member". "Corey Bass" under "Affiliate
16 Name"; "Affiliates w/ Gang" under "How Determined", and "Hillside Gangster Crips" under
17 "Gang Name".

18 52. Defendant Young determined that Plaintiff Johnson affiliated with a gang on
19 August 19, 2018, because Plaintiff Johnson in part was present at Cory Bass's birthday party,
20 and Cory Bass had been previously designated as a gang member.

21 53. Based upon this field interview card, LVMPD entered Plaintiff Bowie into
22 GangNet as a "gang affiliate/associate".

23 54. Defendant Young marked Bowie's interview card as "Yes" under "Gang
24 Activity", "Affiliate" under "Gang Affiliate/Member". "Corey Bass" under "Affiliate Name";
25 "Affiliates w/ Gang" under "How Determined", and "Hillside Gangster Crips" under "Gang
26 Name".

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1 55. Defendant Young determined that Bowie affiliated with a gang on August 19,
2 2018, because Plaintiff Bowie was present at Cory Bass's birthday party, and Cory Bass had
3 been previously designated as a gang member.

4 56. Based upon this field interview card, LVMPD entered Plaintiff Bowie into
5 GangNet as a "gang affiliate/associate".

6 57. Defendant Young completed a field interview card for Plaintiff Reece on
7 August 19, 2018.

8 58. Defendant Young marked Plaintiff Reece's interview card as "Yes" under
9 "Gang Activity", "Member" under "Gang Affiliate/Member", "Affiliates w/ Gang" under
10 "How Determined", and "Gerson Park Kingsmen" under "Gang Name".

11 59. Defendant Young determined that Plaintiff Reece affiliated with a gang on
12 August 19, 2018, in part because Plaintiff Reece was present at Cory Bass's birthday party,
13 and Cory Bass had been previously designated as a gang member.

14 60. Based upon this field interview card and Defendant Young's indication that
15 Reece affiliated with a gang, LVMPD entered Plaintiff Reece into GangNet as a gang member
16 of the gang "Gerson Park Kingsmen".

17 61. Defendant Young completed a field interview card for Plaintiff Riley on
18 August 19, 2018.

19 62. Defendant Young marked Riley's interview card as "Yes" under "Gang
20 Activity", "Member" under "Gang Affiliate/Member", "Affiliates w/ Gang" under "How
21 Determined", and "Squad Up" under "Gang Name".

22 63. Defendant Young determined that Plaintiff Riley affiliated with a gang on
23 August 19, 2018, in part because Plaintiff Riley was present at Cory Bass's birthday party,
24 and Cory Bass had been previously designated as a gang member.

25 64. Based upon this field interview card and Defendant Young's indication that
26 Riley affiliated with a gang, LVMPD entered Plaintiff Riley into GangNet as a gang member
27 of the gang "Squad Up".
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1 65. Defendant Young completed another field interview card for Plaintiff Reece
2 on March 11, 2022.

3 66. Defendant Young marked Plaintiff Reece's interview card as "Yes" under
4 "Gang Activity", "Member" under "Gang Affiliate/Member", "Affiliates w/ Gang" under
5 "How Determined", and "Gerson Park Kingsmen" under "Gang Name".

6 67. LVMPD designates some funerals as "gang funerals".

7 68. Funerals deemed "gang funerals" by LVMPD include funerals for people
8 designated as gang members by LVMPD or who LVMPD believes have strong gang ties.

9 69. LVMPD may designate a funeral as a "gang funeral" if LVMPD believes
10 people designated as gang members are attending the funeral.

11 70. LVMPD may have visible, uniformed officers posted near a funeral designated
12 as a "gang funeral".

13 71. LVMPD photographs and documents people who attend a gang funeral even
14 if those people are not engaging in criminal conduct.

15 72. LVMPD documents the license plates and clothing of funeral attendees even
16 if the attendee is not engaging in criminal activity.

17 73. Plaintiff Reece attended funerals on November 25, 2017, March 13, 2020, and
18 March 11, 2022, LVMPD designated as "gang funerals".

19 74. Plaintiff Reece was detained by LVMPD officers while leaving the November
20 25, 2017, funeral.

21 75. As discussed above, the LVMPD officer that detained Plaintiff Reece
22 completed a field interview card designating Plaintiff Reece as a "gang member" on
23 November 25, 2017, due to Plaintiff Reece's presence at the funeral.

24 76. Plaintiff Reece was detained by LVMPD officers while leaving the March 13,
25 2020, funeral.

26 77. The LVMPD officer that detained Plaintiff Reece completed a field interview
27 card on March 13, 2020, related to Plaintiff Reece's detention.

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1 78. In that field interview card, the LVMPD officer designated Plaintiff Reece as
2 a “gang member” for affiliating with a gang.

3 79. In that same interview card, the LVMPD officer included information that
4 Plaintiff Reece was leaving the funeral at the time he was detained.

5 80. Plaintiff Reece was also detained by LVMPD officers while leaving the March
6 11, 2022, funeral.

7 81. Defendant Young completed a field interview card designating Plaintiff Reece
8 as a “gang member” on March 11, 2022, in part due to his presence at the funeral.

9 82. On December 11, 2020, Plaintiff Riley was stopped by Defendant LVMPD
10 officers leaving a vigil.

11 83. That December 11, 2020, vigil was designated as a “gang funeral” by LVMPD.

12 84. An LVMPD officer completed a field interview card for Plaintiff Riley,
13 marking “Yes” next to “Gang Activity” on that document and referenced Plaintiff Riley’s
14 attendance at the vigil.

15 85. LVMPD included the information from the December 11, 2020, field interview
16 in Plaintiff Riley’s file in GangNet.

17 86. Defendant LVMPD receives funding from the federal government.

18 87. In receiving funding from the federal government, LVMPD agrees to comply
19 with Title VI.

20 88. LVMPD documents the race of people LVMPD designates as “gang members”
21 and “gang affiliates”.

22 89. As of January of 2018, LVMPD had active designations for 12,287 individuals
23 as “gang members” and 2,211 as “gang affiliates”.

24 90. As of January of 2018, 8,232 of the people designated as “gang members” or
25 “gang affiliates” by LVMPD were identified as “Black” by LVMPD.

26 91. As of January of 2018, 2,648 of the people designated as “gang members” or
27 “gang affiliates” by LVMPD were identified as White by LVMPD.

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1 92. As of January of 2021, LVMPD had active designations for 11,628 individuals
2 as “gang members” and 2,180 as “gang affiliates”.

3 93. As of January of 2021, 8,136 of the people designated as “gang members” or
4 “gang affiliates” by LVMPD were identified as “Black”.

5 94. As of January of 2021, 1,923 of the people designated as “gang members” or
6 “gang affiliates” by LVMPD were identified as “White”.

7 95. LVMPD does not know what the actual racial composition of the Gerson Park
8 Kingsmen is.

9 96. LVMPD does not believe that racial designations have significant value to law
10 enforcement in the context of gang enforcement.

11 **IV. STATEMENT OF UNCONTESTED ISSUES OF FACT**

12 The following facts, though not admitted, will not be contested at trial by evidence to
13 the contrary: None.

14 **V. STATEMENT OF CONTESTED ISSUES OF FACT**

15 The following are issues of fact to be tried and determined at trial.

16 **Title VI**

17 1. Whether LVMPD discriminated against the Plaintiffs by using racial
18 categories in its gang enforcement activities and, if so, whether the discrimination was
19 motivated by race and race was a determining factor in LVMPD’s decisions.

20 2. Whether LVMPD officers are trained to consider race when determining if an
21 individual is a gang member or affiliate.

22 3. The percentage of Clark County residents identifying as “Black or African
23 American,” “two or more races,” and “White alone”.³

24 4. Whether LVMPD categorizes some gangs as “Black Gangs”, including the
25 Rollin 60s Crips and the Gerson Park Kingsmen.

26
27 ³ The parties will determine closer to trial whether these percentages are in dispute. If necessary,
28 Plaintiffs will file a motion for judicial notice regarding the relevant census data prior to trial to resolve the issue.

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1 5. Whether LVMPD believes that membership in the Rollin 60s Crips is limited
2 to Black or African-American people.

3 6. Whether LVMPD is aware that there are white and Latino people who are
4 members of the Rollin 60s Crips.

5 7. Whether LVMPD is aware of the actual racial composition of the Rollin 60s
6 Crips is.

7 8. Whether LVMPD believes that membership in the Gerson Park Kingsmen is
8 limited to Black or African-American people.

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10 9. If Plaintiffs are entitled to damages, whether the Plaintiffs' damages are
11 entitled to more than nominal damages.

12 10. Whether Plaintiffs are entitled to injunctive relief, and if so, what injunctive
13 relief are they entitled to.⁴

14 **First Amendment**

15 1. Whether Plaintiffs suffered damages from LVMPD's inclusion of their names
16 in GangNet in violation of their First Amendment rights and, if so, the amount of damages.

17 2. Whether LVMPD told the general public that Plaintiffs Johnson, Medlock, and
18 Green were gang members because Plaintiffs had attended Cory Bass's birthday party, and if
19 so:

20 A. Whether the statements violated the First Amendment;

21 B. If the statements violated the First Amendment, whether Plaintiffs suffered
22 damages from LVMPD's statements;

23 C. If Plaintiffs suffered damages, the amount of damages.

24 3. When attendees leave a gang funeral, whether Defendant LVMPD will stop an
25 attendee for suspicious behavior even if that behavior does not suggest criminal activity.

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⁴ Parties intend to resolve this issue through a Motion for Permanent Injunction filed by Plaintiffs.

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4. Whether LVMPD considers wearing clothing honoring a deceased person previously designated a gang member to be gang attire, which is a criteria that LVMPD may rely upon to designate a person as a “gang member” under LVMPD policy.

5. Whether Plaintiffs are entitled to injunctive relief, and if so, what injunctive relief are they entitled to.⁵

Fourth Amendment

1. Whether the individual LVMPD Defendants encountered marijuana odor and/or smoke coming from room 2037.

2. Whether Rio security had previous complaints related to room 2037 prior to LVMPD Defendants arrival, the scope of those complaints and what was reported to LVMPD Defendants prior to accessing room 2037.

3. Whether the individual LVMPD Defendants had reasonable suspicion to detain Plaintiffs.

4. Whether the individual LVMPD Defendants had reasonable suspicion to frisk the Plaintiffs for weapons.

5. Whether the individual LVMPD Defendants prolonged the detention of Plaintiff Riley.

6. Whether the Plaintiff Riley voluntarily consented to being detained by LVMPD Defendants until his DNA was collected by LVMPD officers.

7. Whether the individual LVMPD Defendants exceeded the scope of permissible search of Plaintiff Reece.

8. If individual LVMPD Defendants violated Plaintiffs’ Fourth Amendment rights, whether Plaintiffs are entitled to more than nominal damages.

VI. ISSUES OF LAW TO BE DETERMINED AT TRIAL

1. Whether Plaintiff has sufficient evidence that any alleged discrimination against the Plaintiffs was intentional and/or motivated by race.

⁵ Parties intend to determine this through a Motion for Permanent Injunction filed by Plaintiffs.

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2. Whether any of the individual LVMPD Defendants can be liable for the searches and seizures conducted by non-party LVMPD officers.

3. If marijuana odor or smoke was present, whether the presence of marijuana odor or smoke created a legal basis to detain the Plaintiffs.

4. If marijuana odor or smoke was present, whether the presence of marijuana odor or smoke created a legal basis to search the Plaintiffs.

5. Whether the individual LVMPD Defendants unlawfully detained Plaintiff Riley or whether the detention was reasonable and/or Plaintiff Riley consented to the detention.

6. Whether the individual LVMPD Defendants' search of Plaintiff Clinton Reece exceeded the scope permissible under the Fourth Amendment.

7. Whether the individual LVMPD Defendants are protected by the doctrine of qualified immunity on Plaintiffs' federal law § 1983 claims against the individual defendants.

VII. EXHIBITS

A. STIPULATIONS RELATED TO EXHIBITS

1. Exhibits admissible in their entirety

The parties stipulate that the following exhibits are stipulated into evidence in this case and may be so marked by the clerk:

1. LVMPD Policy – 4/103.27 Social Media and Electronic Communications (03/28/18) (LVMPD 000281-000283);

2. LVMPD Job Descriptions (LVMPD 000335-000370);

3. LVMPD Policy 5-206.16 Department Response to Criminal Street Gangs (LVMPD 000391-000395);

4. Interlocal Agreement (LVMPD 004688-004691);

5. Memorandum of Understanding for Participation in the GangNet Database (LVMPD 004692-004698);

6. BWC X83026982 Audit Trail 8-18-2018 (LVMPD 004699-004708);

7. Audit Trail Bauman - 180818-4592 (LVMPD 004709-004710);

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- 1 8. Copy of CCAC Roster (LVMPD 004955-004958);
- 2 9. Gangs and CIU (LVMPD 004959-004960);
- 3 10. Gangs Chart (LVMPD 004961);
- 4 11. Central Intelligence Unit Chart (LVMPD 004962);
- 5 12. CCAC Chart (LVMPD 004963);
- 6 13. Department Organizational Chart (LVMPD 004964);
- 7 14. Video Evicting Hotel Occupants (LVMPD 004986);
- 8 15. Buccal Swab Kit - Demarlo Riley Consent Form (LVMPD 004987-004988);
- 9 16. LVMPD Policy and Procedure re Business Trespass Program (LVMPD
- 10 004989-004990);
- 11 17. LVMPD Trespass Training Video (LVMPD 005012);
- 12 18. GangNet Gatekeeper Entry Instructions (LVMPD 005261-005274);
- 13 19. GangNet Definitions and Procedures Manual (LVMPD 005275-005284);
- 14 20. LVMPD 6.255 Department Response to Criminal Street Gangs (2023)
- 15 (LVMPD 005324-005329);
- 16 21. Agreement with Nye County (LVMPD 005337-005339);
- 17 22. Agreement with NLVPD (LVMPD 005340-005342);
- 18 23. Agreement with HPD (LVMPD 005343-005346);
- 19 24. Agreement with Lincoln County Sheriff (LVMPD 005347-005355);
- 20 25. Agreement with NV DPS, NV (LVMPD 005356-005369);
- 21 26. Agreement with Interlocal with DPS (2012) (LVMPD 005370-005378);
- 22 27. Agreement with Interlocal with FBI (2016) (LVMPD 005379-005382);
- 23 28. Agreement with MOU CalGang (2021) (LVMPD 005383-005389);
- 24 29. Agreement with MOU with FBI (2016) (LVMPD 005390-005396);
- 25 30. Agreement with CCSDPD (LVMPD 005397-005399);
- 26 31. Agreement with Boulder City PD (LVMPD 005400-005404);
- 27 32. Agreement with City of LV Detention and Enforcement (LVMPD 005405-
- 28 005409);

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33. Agreement with US Marshals (LVMPD 005410-005414);
34. Agreement with NV DPS (LVMPD 005415-005422);
35. Agreement with AZ DPS (LVMPD 005423-005426);
36. Agreement with Mesquite PD (LVMPD 005427-005429);
37. 2017 LVMPD Budget regarding Gang Task Force (LVMPD 005511);
38. 2017 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005512);
39. 2018 LVMPD Budget regarding Gang Task Force (LVMPD 005513);
40. 2018 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005514);
41. Additional 2018 LVMPD Budget regarding Gang Task Force (LVMPD 005515);
42. 2019 LVMPD Budget regarding Gang Task Force (LVMPD 005516);
43. 2019 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005517);
44. State and Local Task Force Agreement between the Drug Enforcement Administration Los Angeles Field Division and Las Vegas Metropolitan Police Department Program – Funded State and Local Task Force Agreement, dated October 1, 2017 (LVMPD 005518-005524);
45. Federal Bureau of Investigation Cost Reimbursement Agreement, dated August 27, 2018 (LVMPD 005525-005526);
46. LVMPD Revised Purchase Order regarding GangNet, dated July 27, 2018 (LVMPD 005527-005528).

2. Exhibits admissible but subject to redaction

The parties stipulate to the authenticity and identity of the following exhibits and agree the following exhibits are admissible subject to redactions based on the parties' objections raised in Section VII(D), Fed. R. Evid. 5.2, and LR IC 6–1:

1. CAD 180819-0437 (LVMPD 000001);
2. Unit Log 180819-0437 (LVMPD 000002-000003);
3. CAD 180819-0412 (LVMPD 000004-000010);
4. Unit Log 180819-0412 (LVMPD 000011-000021);

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5. Temporary Custody Record – Ashley Medlock (LVMPD 000023);
6. Temporary Custody Record – Lonicia Bowie (LVMPD 000026);
7. Temporary Custody Records – Phillip Semper (LVMPD 000027-000028);
8. Temporary Custody Record – Michael Green (LVMPD 000029);
9. Temporary Custody Records – Corey Johnson (LVMPD 000030-000031);
10. Booking Voucher – Corey Johnson (LVMPD 000032);
11. Booking Voucher – Phillip Semper (LVMPD 000033);
12. BWC – Philip Adkins 0253 (LVMPD BWC 000001);
13. BWC – Philip Adkins 0304 (LVMPD BWC 000002);
14. BWC – Christina Alfonsi 0751 (LVMPD BWC 000003);
15. BWC – Christina Alfonsi 0819 (LVMPD BWC 000004);
16. BWC – Bruce Butler 0702 (LVMPD BWC 000005);
17. BWC – Abraham Cabrera 0255 (LVMPD BWC 000006);
18. BWC – Abraham Cabrera 0443 (LVMPD BWC 000007);
19. BWC – Abraham Cabrera 0444 (LVMPD BWC 000008);
20. BWC – Rodrigo Chavez 0252 (LVMPD BWC 000009);
21. BWC – Rodrigo Chavez 0503 (LVMPD BWC 000010)
22. BWC – Keaton Courtley 0444 (LVMPD BWC 000011);
23. BWC – Matthew Dannenberger 0517 (LVMPD BWC 000012);
24. BWC – Aaron Denson 0328 (LVMPD BWC 000013);
25. BWC – Aaron Denson 0405 (LVMPD BWC 000014);
26. BWC – Aaron Denson 0435 (LVMPD BWC 000015);
27. BWC – Aaron Denson 0504 (LVMPD BWC 000016);
28. BWC – Brandon Engstrom 0420 (LVMPD BWC 000017);
29. BWC – Brandon Engstrom 0442 (LVMPD BWC 000018);
30. BWC – Jimmy Espinoza 0322 (LVMPD BWC 000019);
31. BWC – Edgar Fischer 0414 (LVMPD BWC 000020);
32. BWC – John Ghebrecristos 0255 (LVMPD BWC 000021);

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- 1 33. BWC – John Ghebrecristos 0303 (LVMPD BWC 000022);
- 2 34. BWC – Patrick Grimes 0248 (LVMPD BWC 000023);
- 3 35. BWC – Patrick Grimes 0306 (LVMPD BWC 000024);
- 4 36. BWC – Patrick Grimes 0313 (LVMPD BWC 000025);
- 5 37. BWC – Patrick Grimes 0320 (LVMPD BWC 000026);
- 6 38. BWC – Patrick Grimes 0323 (LVMPD BWC 000027);
- 7 39. BWC – Patrick Grimes 0336 (LVMPD BWC 000028);
- 8 40. BWC – Patrick Grimes 0345 (LVMPD BWC 000029);
- 9 41. BWC – Patrick Grimes 0358 (LVMPD BWC 000030);
- 10 42. BWC – Patrick Grimes 0412 (LVMPD BWC 000031);
- 11 43. BWC – Patrick Grimes 0415 (LVMPD BWC 000032);
- 12 44. BWC – Patrick Grimes 0423 (LVMPD BWC 000033);
- 13 45. BWC – Patrick Grimes 0438 (LVMPD BWC 000034);
- 14 46. BWC – Janette Gutierrez 0346 (LVMPD BWC 000035);
- 15 47. BWC – Janette Gutierrez 0409 (LVMPD BWC 000036);
- 16 48. BWC – Patrick Hoag 0250 (LVMPD BWC 000037);
- 17 49. BWC – Patrick Hoag 0323 (LVMPD BWC 000038);
- 18 50. BWC – David Jeong 0259 (LVMPD BWC 000039);
- 19 51. BWC – David Jeong 0304 (LVMPD BWC 000040);
- 20 52. BWC – Logan Jex 0249 (LVMPD BWC 000041);
- 21 53. BWC – Jacob Johnson 0253 (LVMPD BWC 000042);
- 22 54. BWC – Jonathan Justice 0457 (LVMPD BWC 000043);
- 23 55. BWC – Supreet Kaur 0250 (LVMPD BWC 000044);
- 24 56. BWC – Supreet Kaur 0338 (LVMPD BWC 000045);
- 25 57. BWC – Supreet Kaur 0343 (LVMPD BWC 000046);
- 26 58. BWC – Supreet Kaur 0409 (LVMPD BWC 000047);
- 27 59. BWC – Wayne Kelly 0244 (LVMPD BWC 000048);
- 28 60. BWC – Matthew Kravetz 0243 (LVMPD BWC 000049);

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- 1 61. BWC – Matthew Kravetz 0303 (LVMPD BWC 000050);
- 2 62. BWC – Matthew Kravetz 0545 (LVMPD BWC 000051);
- 3 63. BWC – Gabriel Lea 0249 (LVMPD BWC 000052);
- 4 64. BWC – C. Loskill 0304 (LVMPD BWC 000053);
- 5 65. BWC – Christopher Marcolini 0249 (LVMPD BWC 000054);
- 6 66. BWC – Christopher Marcolini 0343 (LVMPD BWC 000055);
- 7 67. BWC – Christopher Marcolini 0445 (LVMPD BWC 000056);
- 8 68. BWC – Christopher Marcolini 0701 (LVMPD BWC 000057);
- 9 69. BWC – Shay Mikalonis 0257 (LVMPD BWC 000058);
- 10 70. BWC – Philip Mills 0334 (LVMPD BWC 000059);
- 11 71. BWC – Kyle Nuskin 0253 (LVMPD BWC 000060);
- 12 72. BWC – Kyle Nuskin 0704 (LVMPD BWC 000061);
- 13 73. BWC – Richard Palacious 0249 (LVMPD BWC 000062);
- 14 74. BWC – Jon Pifer 0458 (LVMPD BWC 000063);
- 15 75. BWC – Blake Vernon 0250 (LVMPD BWC 000064);
- 16 76. BWC – Blake Vernon 0304 (LVMPD BWC 000065);
- 17 77. BWC – Blake Vernon 0332 (LVMPD BWC 000066);
- 18 78. BWC – Blake Vernon 0336 (LVMPD BWC 000067);
- 19 79. BWC – BWC – Brandon Wedmore 0251 (LVMPD BWC 000068);
- 20 80. BWC – Brandon Wedmore 0525 (LVMPD BWC 000069);
- 21 81. BWC – Brandon Wedmore 0531 (LVMPD BWC 000070);
- 22 82. BWC – Brandon Wedmore 0545 (LVMPD BWC 000071);
- 23 83. BWC – Brooks West 0350 (LVMPD BWC 0000072);
- 24 84. BWC – Robert Winthrop 0250 (LVMPD BWC 000073);
- 25 85. BWC – Theron Young 0243 (LVMPD BWC 000074);
- 26 86. BWC – Theron Young 0443 (LVMPD BWC 000075);
- 27 87. BWC – Theron Young 0444 (LVMPD BWC 000076);
- 28 88. BWC – Ina Zerbe 0248 (LVMPD BWC 000077);

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- 1 89. BWC – Shakeel Abdal-Karim 0251 (LVMPD BWC 000078);
- 2 90. BWC – Christina Alfonsi 0716 (LVMPD BWC 000079);
- 3 91. BWC – Jeremy Bozarth 0338 (LVMPD BWC 000080);
- 4 92. BWC – Bruce Butler 0654 (LVMPD BWC 000081);
- 5 93. BWC – Matthew Dannenberger 0341 (LVMPD BWC 000082);
- 6 94. BWC – Brandon Engstrom 0349 (LVMPD BWC 000083);
- 7 95. BWC – Brandon Engstrom 0356 (LVMPD BWC 000084);
- 8 96. BWC – Edgar Fischer 0350 (LVMPD BWC 000085);
- 9 97. BWC – Janette Gutierrez 0312 (LVMPD BWC 000086);
- 10 98. BWC – Patrick Hinkel 0254 (LVMPD BWC 000087);
- 11 99. BWC – Y Hur 0252 (LVMPD BWC 000088);
- 12 100. BWC – Jason Johansson 0325 (LVMPD BWC 000089);
- 13 101. BWC – Jonathan Justice 0340 (LVMPD BWC 000090);
- 14 102. BWC – Wayne Kelly 0227 (LVMPD BWC 000091);
- 15 103. BWC – Heather Lagraves 0800 (LVMPD BWC 000092);
- 16 104. BWC – Heather Lagraves 0815 (LVMPD BWC 000093);
- 17 105. BWC – Amulfo Magana 0652 (LVMPD BWC 000094);
- 18 106. BWC – Amulfo Magana 0733 (LVMPD BWC 000095);
- 19 107. BWC – Amulfo Magana 0802 (LVMPD BWC 000096);
- 20 108. BWC – Shay Mikalonis 0224 (LVMPD BWC 000097);
- 21 109. BWC – Philip Mills 0224 (LVMPD BWC 000098);
- 22 110. BWC – DeShone Myles 0753 (LVMPD BWC 000099);
- 23 111. BWC – Richard Palacious 0359 (LVMPD BWC 000100);
- 24 112. BWC – Jon Pifer 0334 (LVMPD BWC 000101);
- 25 113. BWC – Gregory Reinert 0320 (LVMPD BWC 000102);
- 26 114. BWC – Brett Robbins 0338 (LVMPD BWC 000103);
- 27 115. BWC – Stephen Schumaker 0254 (LVMPD BWC 000104);
- 28 116. CCAC CIU Information (08/22/18) (LVMPD 000284-000287);

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117. Field Interviews (LVMPD 000371-000390);
118. FI's of Demarlo Riley (LVMPD 004842-004843);
119. FI's of Clinton Reece (LVMPD 004844-004865);
120. Copy of CCAC Roster (LVMPD 004955-004958);
121. Gangs and CIU (LVMPD 004959-004960);
122. Gangs Chart (LVMPD 004961);
123. Central Intelligence Unit Chart (LVMPD 004962);
124. CCAC Chart (LVMPD 004963);
125. Department Organizational Chart (LVMPD 004964);
126. Gang/Vice Bureau Gang Section Manual) (LVMPD 005285-005323);
127. Gang Intelligence Policy and Procedures for the GangNet System (LVMPD 005330-005336);
128. Communication Center Event Search LLV220300044583 Theron Young (LVMPD 005430-005431);
129. Communication Center Event Search LLV201200046792 (LVMPD 005432-005433);
130. Communication Center Event Search LLV200300058565 (LVMPD 005434-005435);
131. Field Interview - Clinton Reece - Event No. LLV171125003264 (LVMPD 005448);
132. Field Interview - Clinton Reece - Event No. LLV220300044583 (LVMPD 005450-005451);
133. Central Intelligence Unit Manual (LVMPD 005452-005492);
134. LVMPD - Communication Center Event Search No. LLV220300044583 (LVMPD 005494-005495);
135. LVMPD - Communication Center Event Search No. LLV171125003264 (LVMPD 005510).

1 **3. Stipulation to authenticity and identity of remaining exhibits**

2 The Parties stipulate to the authenticity and identity of all proposed exhibits with the
 3 sole exception being the Plaintiffs' objection to the authenticity and identity of LVMPD
 4 000093-000099 ("Handwritten Notes").

5 **B. AS TO THE FOLLOWING EACH PARTY PROPOSES THE**
 6 **FOLLOWING EXHIBITS TO BE USED AT TRIAL.**

7 **1. Plaintiffs' Exhibits**

- 8 1. CAD 180819-0437 (LVMPD 000001);
- 9 2. Unit Log 180819-0437 (LVMPD 000002-000003);
- 10 3. CAD 180819-0412 (LVMPD 000004-000010);
- 11 4. Unit Log 180819-0412 (LVMPD 000011-000021);
- 12 5. Temporary Custody Record – Ashley Medlock (LVMPD 000023);
- 13 6. Temporary Custody Record – Lonicia Bowie (LVMPD 000026);
- 14 7. Temporary Custody Records – Phillip Semper (LVMPD 000027-000028);
- 15 8. Temporary Custody Record – Michael Green (LVMPD 000029);
- 16 9. Temporary Custody Records – Corey Johnson (LVMPD 000030-000031);
- 17 10. Booking Voucher – Corey Johnson (LVMPD 000032);
- 18 11. Booking Voucher – Phillip Semper (LVMPD 000033);
- 19 12. BWC – Philip Adkins 0253 (LVMPD BWC 000001);
- 20 13. BWC – Philip Adkins 0304 (LVMPD BWC 000002);
- 21 14. BWC – Christina Alfonsi 0751 (LVMPD BWC 000003);
- 22 15. BWC – Christina Alfonsi 0819 (LVMPD BWC 000004);
- 23 16. BWC – Abraham Cabrera 0255 (LVMPD BWC 000006);
- 24 17. BWC – Abraham Cabrera 0443 (LVMPD BWC 000007);
- 25 18. BWC – Abraham Cabrera 0444 (LVMPD BWC 000008);
- 26 19. BWC – Rodrigo Chavez 0252 (LVMPD BWC 000009);
- 27 20. BWC – Rodrigo Chavez 0503 (LVMPD BWC 000010)
- 28 21. BWC – Keaton Courtley 0444 (LVMPD BWC 000011);

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22. BWC – Matthew Dannenberger 0517 (LVMPD BWC 000012);
23. BWC – Aaron Denson 0328 (LVMPD BWC 000013);
24. BWC – Aaron Denson 0405 (LVMPD BWC 000014);
25. BWC – Aaron Denson 0435 (LVMPD BWC 000015);
26. BWC – Aaron Denson 0504 (LVMPD BWC 000016);
27. BWC – Brandon Engstrom 0420 (LVMPD BWC 000017);
28. BWC – Brandon Engstrom 0442 (LVMPD BWC 000018);
29. BWC – John Ghebrecristos 0255 (LVMPD BWC 000021);
30. BWC – John Ghebrecristos 0303 (LVMPD BWC 000022);
31. BWC – Patrick Grimes 0248 (LVMPD BWC 000023);
32. BWC – Patrick Grimes 0306 (LVMPD BWC 000024);
33. BWC – Patrick Grimes 0313 (LVMPD BWC 000025);
34. BWC – Patrick Grimes 0320 (LVMPD BWC 000026);
35. BWC – Patrick Grimes 0323 (LVMPD BWC 000027);
36. BWC – Patrick Grimes 0336 (LVMPD BWC 000028);
37. BWC – Patrick Grimes 0345 (LVMPD BWC 000029);
38. BWC – Patrick Grimes 0358 (LVMPD BWC 000030);
39. BWC – Patrick Grimes 0412 (LVMPD BWC 000031);
40. BWC – Patrick Grimes 0415 (LVMPD BWC 000032);
41. BWC – Patrick Grimes 0423 (LVMPD BWC 000033);
42. BWC – Patrick Grimes 0438 (LVMPD BWC 000034);
43. BWC – Janette Gutierrez 0346 (LVMPD BWC 000035);
44. BWC – Janette Gutierrez 0409 (LVMPD BWC 000036);
45. BWC – Patrick Hoag 0250 (LVMPD BWC 000037);
46. BWC – Patrick Hoag 0323 (LVMPD BWC 000038);
47. BWC – Jacob Johnson 0253 (LVMPD BWC 000042);
48. BWC – Jonathan Justice 0457 (LVMPD BWC 000043);
49. BWC – Supreet Kaur 0250 (LVMPD BWC 000044);

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- 1 50. BWC – Supreet Kaur 0338 (LVMPD BWC 000045);
- 2 51. BWC – Supreet Kaur 0343 (LVMPD BWC 000046);
- 3 52. BWC – Supreet Kaur 0409 (LVMPD BWC 000047);
- 4 53. BWC – Wayne Kelly 0244 (LVMPD BWC 000048);
- 5 54. BWC – Matthew Kravetz 0243 (LVMPD BWC 000049);
- 6 55. BWC – Matthew Kravetz 0303 (LVMPD BWC 000050);
- 7 56. BWC – Matthew Kravetz 0545 (LVMPD BWC 000051);
- 8 57. BWC – C. Loskill 0304 (LVMPD BWC 000053);
- 9 58. BWC – Christopher Marcolini 0249 (LVMPD BWC 000054);
- 10 59. BWC – Christopher Marcolini 0343 (LVMPD BWC 000055);
- 11 60. BWC – Christopher Marcolini 0445 (LVMPD BWC 000056);
- 12 61. BWC – Christopher Marcolini 0701 (LVMPD BWC 000057);
- 13 62. BWC – Shay Mikalonis 0257 (LVMPD BWC 000058);
- 14 63. BWC – Philip Mills 0334 (LVMPD BWC 000059);
- 15 64. BWC – Blake Vernon 0250 (LVMPD BWC 000064);
- 16 65. BWC – Blake Vernon 0304 (LVMPD BWC 000065);
- 17 66. BWC – Blake Vernon 0332 (LVMPD BWC 000066);
- 18 67. BWC – Blake Vernon 0336 (LVMPD BWC 000067);
- 19 68. BWC – Brooks West 0350 (LVMPD BWC 0000072);
- 20 69. BWC – Robert Winthrop 0250 (LVMPD BWC 000073);
- 21 70. BWC – Theron Young 0243 (LVMPD BWC 000074);
- 22 71. BWC – Theron Young 0443 (LVMPD BWC 000075);
- 23 72. BWC – Theron Young 0444 (LVMPD BWC 000076);
- 24 73. BWC – Ina Zerbe 0248 (LVMPD BWC 000077);
- 25 74. BWC – Christina Alfonsi 0716 (LVMPD BWC 000079);
- 26 75. BWC – Matthew Dannenberger 0341 (LVMPD BWC 000082);
- 27 76. BWC – Brandon Engstrom 0349 (LVMPD BWC 000083);
- 28 77. BWC – Brandon Engstrom 0356 (LVMPD BWC 000084);

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- 1 78. BWC – Janette Gutierrez 0312 (LVMPD BWC 000086);
- 2 79. BWC – Patrick Hinkel 0254 (LVMPD BWC 000087);
- 3 80. BWC – Y Hur 0252 (LVMPD BWC 000088);
- 4 81. BWC – Jonathan Justice 0340 (LVMPD BWC 000090);
- 5 82. BWC – Wayne Kelly 0227 (LVMPD BWC 000091);
- 6 83. BWC – Shay Mikalonis 0224 (LVMPD BWC 000097);
- 7 84. BWC – Philip Mills 0224 (LVMPD BWC 000098);
- 8 85. LVMPD Policy – 4/103.27 Social Media and Electronic Communications
- 9 (03/28/18) (LVMPD 000281-000283);
- 10 86. CCAC CIU Information (08/22/18) (LVMPD 000284-000287) – Limited to
- 11 basis for individual LVMPD Defendants’ presence at the Rio, number of people detained
- 12 during incident, and that all people present received designations as either “gang members”
- 13 or “gang associates”;
- 14 87. Field Interviews (LVMPD 000371-000390) – Limited only to process used to
- 15 designate Plaintiffs as gang members or gang associates and establishing that designation was
- 16 based in whole or in part on Plaintiffs’ presence at Cory Bass’s birthday party;
- 17 88. Policy 5-206.16 Department Response to Criminal Street Gangs (LVMPD
- 18 000391-000395);
- 19 89. Training Material and Documents regarding Black Gangs (LVMPD 000570-
- 20 000866) – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related
- 21 policing or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
- 22 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
- 23 designations and how LVMPD uses those designations;
- 24 90. Training Material and Documents regarding Gang and Gang Trends (LVMPD
- 25 001290-001537) – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-
- 26 related policing or LVMPD’s practices, (2) practices and policies related to investigating non-
- 27 criminal associations, and (3) practices and policies related to “gang member” and “gang
- 28 affiliate” designations and how LVMPD uses those designations;

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1 91. Training Material and Documents regarding Gang Enforcement (LVMPD
2 001538-001575) – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-
3 related policing or LVMPD’s practices, (2) practices and policies related to investigating non-
4 criminal associations, and (3) practices and policies related to “gang member” and “gang
5 affiliate” designations and how LVMPD uses those designations;

6 92. Training Material and Documents regarding Gang Investigation (LVMPD
7 001576-001676) – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-
8 related policing or LVMPD’s practices, (2) practices and policies related to investigating non-
9 criminal associations, and (3) practices and policies related to “gang member” and “gang
10 affiliate” designations and how LVMPD uses those designations;

11 93. Training Material and Documents regarding Hybrid Gangs (LVMPD 001677-
12 001854) – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related
13 policing or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
14 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
15 designations and how LVMPD uses those designations;

16 94. PowerPoints regarding Gang Liaison Officer (LVMPD 001934-002937) –
17 Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related policing
18 or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
19 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
20 designations and how LVMPD uses those designations;

21 95. PowerPoints regarding Gang Response Officer Training (LVMPD 002938-
22 003639) – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related
23 policing or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
24 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
25 designations and how LVMPD uses those designations;

26 96. PowerPoints regarding Gangs and Gang Net (LVMPD 003640-003723)
27 CONFIDENTIAL – Limited to the trainings discussion of (1) the use of race in LVMPD’s
28 gang-related policing or LVMPD’s practices, (2) practices and policies related to investigating

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1 non-criminal associations, and (3) practices and policies related to “gang member” and “gang
2 affiliate” designations and how LVMPD uses those designations;

3 97. PowerPoints regarding Gangs and Gang Trends (LVMPD 003724-3945) –
4 Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related policing
5 or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
6 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
7 designations and how LVMPD uses those designations;

8 98. LVMPD Body Worn Camera Policy (LVMPD 004504–004513);

9 99. Interlocal Agreement (LVMPD 004688-004691);

10 100. Memorandum of Understanding for Participation in the GangNet Database
11 (LVMPD 004692-004698);

12 101. BWC X83026982 Audit Trail 8-18-2018 (LVMPD 004699-004708);

13 102. Audit Trail Bauman - 180818-4592 (LVMPD 004709-004710);

14 103. White Supremacist Extremist Militia - Lesson Plan (LVMPD 004711-004758)
15 – Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related policing
16 or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
17 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
18 designations and how LVMPD uses those designations;

19 104. Gangs in Clark County LP (01102016) 6 Hours (LVMPD 004759-004816) –
20 Limited to the trainings discussion of (1) the use of race in LVMPD’s gang-related policing
21 or LVMPD’s practices, (2) practices and policies related to investigating non-criminal
22 associations, and (3) practices and policies related to “gang member” and “gang affiliate”
23 designations and how LVMPD uses those designations;;

24 105. FI’s of Demarlo Riley (LVMPD 004842-004843);

25 106. FI’s of Clinton Reece (LVMPD 004844-004865) – Limited only to LVMPD
26 004864–004865;

27 107. Copy of CCAC Roster (LVMPD 004955-004958);

28 108. Gangs and CIU (LVMPD 004959-004960);

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109. Gangs Chart (LVMPD 004961);
110. Central Intelligence Unit Chart (LVMPD 004962);
111. CCAC Chart (LVMPD 004963);
112. Department Organizational Chart (LVMPD 004964);
113. Buccal Swab Kit - Demarlo Riley Consent Form (LVMPD 004987-004988);
114. GangNet Gatekeeper Entry Instructions (LVMPD 005261-005274);
115. GangNet Definitions and Procedures Manual (LVMPD 005275-005284);
116. Gang/Vice Bureau Gang Section Manual) (LVMPD 005285-005323);
117. LVMPD 6.255 Department Response to Criminal Street Gangs (2023)
(LVMPD 005324-005329);
118. Gang Intelligence Policy and Procedures for the GangNet System (LVMPD
005330-005336);
119. Agreement with Nye County (LVMPD 005337-005339);
120. Agreement with NLVPD (LVMPD 005340-005342);
121. Agreement with HPD (LVMPD 005343-005346);
122. Agreement with Lincoln County Sheriff (LVMPD 005347-005355);
123. Agreement with NV DPS, NV (LVMPD 005356-005369);
124. Agreement with Interlocal with DPS (2012) (LVMPD 005370-005378);
125. Agreement with Interlocal with FBI (2016) (LVMPD 005379-005382);
126. Agreement with MOU CalGang (2021) (LVMPD 005383-005389);
127. Agreement with MOU with FBI (2016) (LVMPD 005390-005396);
128. Agreement with CCSDPD (LVMPD 005397-005399);
129. Agreement with Boulder City PD (LVMPD 005400-005404);
130. Agreement with City of LV Detention and Enforcement (LVMPD 005405-
005409);
131. Agreement with US Marshals (LVMPD 005410-005414);
132. Agreement with NV DPS (LVMPD 005415-005422);
133. Agreement with AZ DPS (LVMPD 005423-005426);

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- 1 134. Agreement with Mesquite PD (LVMPD 005427-005429);
- 2 135. Communication Center Event Search LLV220300044583 Theron Young
- 3 (LVMPD 005430-005431);
- 4 136. Communication Center Event Search LLV201200046792 (LVMPD 005432-
- 5 005433);
- 6 137. Communication Center Event Search LLV200300058565 (LVMPD 005434-
- 7 005435);
- 8 138. Field Interview - Clinton Reece - Event No. LLV171125003264 (LVMPD
- 9 005448);
- 10 139. Field Interview - Clinton Reece - Event No. LLV220300044583 (LVMPD
- 11 005450-005451);
- 12 140. Central Intelligence Unit Manual (LVMPD 005452-005492);
- 13 141. LVMPD - Communication Center Event Search No. LLV220300044583
- 14 (LVMPD 005494-005495);
- 15 142. LVMPD - Communication Center Event Search No. LLV171125003264
- 16 (LVMPD 005510);
- 17 143. 2017 LVMPD Budget regarding Gang Task Force (LVMPD 005511);
- 18 144. 2017 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005512);
- 19 145. 2018 LVMPD Budget regarding Gang Task Force (LVMPD 005513);
- 20 146. 2018 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005514);
- 21 147. Additional 2018 LVMPD Budget regarding Gang Task Force (LVMPD
- 22 005515);
- 23 148. 2019 LVMPD Budget regarding Gang Task Force (LVMPD 005516);
- 24 149. 2019 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005517);
- 25 150. State and Local Task Force Agreement between the Drug Enforcement
- 26 Administration Los Angeles Field Division and Las Vegas Metropolitan Police Department
- 27 Program – Funded State and Local Task Force Agreement, dated October 1, 2017 (LVMPD
- 28 005518-005524);

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151. Federal Bureau of Investigation Cost Reimbursement Agreement, dated August 27, 2018 (LVMPD 005525-005526);

152. LVMPD Revised Purchase Order regarding GangNet, dated July 27, 2018 (LVMPD 005527-005528);

153. Body Worn Camera Videos of Officer Harrison Malburg (LVMPD BWC 000117-000119) – CONFIDENTIAL;

154. Body Worn Camera Video of Officer Nicholas Morelli (LVMPD BWC 000120) – CONFIDENTIAL;

155. Reporters Transcript of Hearing, Case No. 18F15424X, Vol. 1 – 4 (ACLUNV 000108–407);

156. 20180819 LVMPD CCAC Tweet (ACLUNV 000408);

157. E-Bail Receipt, August 20, 2018, Corey Johnson (ACLUNV 000409–000410);

158. Newspaper article, *Police: 9 local gang members arrested during bust at Rio Hotel & Casino* (ACLU 000411–000412);

159. Newspaper article, *Las Vegas Metro Police Busts Casino Hotel ‘Gang Party’* (ACLUNV 000413–000416);

160. Newspaper article, *Nine identified after gang party arrests at Rio Las Vegas hotel–casino* (ACLUNV 000417–000418);

161. Gang Database Removal Request (ACLUNV 000419–000421).

Plaintiffs reserve to right to use any other document or other exhibit for the purposes of rebuttal or impeachment.

2. Defendants’ Exhibits

1. CAD 180819-0437 (LVMPD 000001);

2. Unit Log 180819-0437 (LVMPD 000002-000003);

3. CAD 180819-0412 (LVMPD 000004-000010);

4. Unit Log 180819-0412 (LVMPD 000011-000021);

5. Property Report re Abandoned Items (LVMPD 000022);

6. Temporary Custody Record – Ashley Medlock (LVMPD 000023);

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- 1 7. Temporary Custody Records – Antonio Williams (LVMPD 000024-000025);
- 2 8. Temporary Custody Record – Lonicia Bowie (LVMPD 000026);
- 3 9. Temporary Custody Records – Phillip Semper (LVMPD 000027-000028);
- 4 10. Temporary Custody Record – Michael Green (LVMPD 000029);
- 5 11. Temporary Custody Records – Corey Johnson (LVMPD 000030-000031);
- 6 12. Booking Voucher – Corey Johnson (LVMPD 000032);
- 7 13. Booking Voucher – Phillip Semper (LVMPD 000033);
- 8 14. Property Reports – Phillip Semper (LVMPD 000034-000035);
- 9 15. Request for Prosecution Form – Corey Johnson (LVMPD 000036);
- 10 16. Request for Prosecution Form – Phillip Semper (LVMPD 000037);
- 11 17. Property Release to Phillip Semper – Glock GNBH 19, Serial No. BESE045,
- 12 HS Produkt XD40, Serial No. XD381869 (LVMPD 000038);
- 13 18. Property Release to Corey Johnson – Glock GMBH 30, Serial No. SKA808
- 14 (LVMPD 000039);
- 15 19. Arrest Report – Corey Johnson (LVMPD 000040-000042);
- 16 20. Arrest Report – Phillip Semper (LVMPD 000043-000045);
- 17 21. Declaration of Arrest – Phillip Semper (LVMPD 000046-000048);
- 18 22. Declaration of Arrest – Lonicia Bowie (LVMPD 000049);
- 19 23. Declaration of Arrest – Antonio Williams (LVMPD 000050);
- 20 24. Declaration of Arrest – Ashley Medlock (LVMPD 000051);
- 21 25. Declaration of Arrest – Corey Johnson (LVMPD 000052-000054);
- 22 26. Declaration of Arrest – Michael Green (LVMPD 000055);
- 23 27. Voluntary Statement – Phillip Semper (LVMPD 000056-000065);
- 24 28. Voluntary Statement – Corey Johnson (LVMPD 000066-000073);
- 25 29. Audio – Voluntary Statement – Corey Johnson (LVMPD 000074);
- 26 30. Audio – Voluntary Statement – Phillip Semper (LVMPD 000075);
- 27 31. Audio – Miscellaneous Phone (LVMPD 000076);
- 28 32. Audio – Radio (LVMPD 000077);

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- 1 33. GVB Weekly Area Commend Information Bulletin (LVMPD 000078-
- 2 000092);
- 3 34. Handwritten Notes (LVMPD 000093-000099);
- 4 35. Training History – A. Bauman (LVMPD 000100-000143);
- 5 36. Training History – D. Jeong (LVMPD 000144-000169);
- 6 37. Training History – S. Kaur (LVMPD 000170-000186);
- 7 38. Training History – M. Kravetz (LVMPD 000187-000208);
- 8 39. Training History – T. Young (LVMPD 000209-000228);
- 9 40. LVMPD Powerpoint – Unified Problem Abatement Concept (LVMPD
- 10 000229-000253);
- 11 41. BWC – Philip Adkins 0253 (LVMPD BWC 000001);
- 12 42. BWC – Philip Adkins 0304 (LVMPD BWC 000002);
- 13 43. BWC – Christina Alfonsi 0751 (LVMPD BWC 000003);
- 14 44. BWC – Christina Alfonsi 0819 (LVMPD BWC 000004);
- 15 45. BWC – Bruce Butler 0702 (LVMPD BWC 000005);
- 16 46. BWC – Abraham Cabrera 0255 (LVMPD BWC 000006);
- 17 47. BWC – Abraham Cabrera 0443 (LVMPD BWC 000007);
- 18 48. BWC – Abraham Cabrera 0444 (LVMPD BWC 000008);
- 19 49. BWC – Rodrigo Chavez 0252 (LVMPD BWC 000009);
- 20 50. BWC – Rodrigo Chavez 0503 (LVMPD BWC 000010)
- 21 51. BWC – Keaton Courtley 0444 (LVMPD BWC 000011);
- 22 52. BWC – Matthew Dannenberger 0517 (LVMPD BWC 000012);
- 23 53. BWC – Aaron Denson 0328 (LVMPD BWC 000013);
- 24 54. BWC – Aaron Denson 0405 (LVMPD BWC 000014);
- 25 55. BWC – Aaron Denson 0435 (LVMPD BWC 000015);
- 26 56. BWC – Aaron Denson 0504 (LVMPD BWC 000016);
- 27 57. BWC – Brandon Engstrom 0420 (LVMPD BWC 000017);
- 28 58. BWC – Brandon Engstrom 0442 (LVMPD BWC 000018);

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- 1 59. BWC – Jimmy Espinoza 0322 (LVMPD BWC 000019);
- 2 60. BWC – Edgar Fischer 0414 (LVMPD BWC 000020);
- 3 61. BWC – John Ghebrecristos 0255 (LVMPD BWC 000021);
- 4 62. BWC – John Ghebrecristos 0303 (LVMPD BWC 000022);
- 5 63. BWC – Patrick Grimes 0248 (LVMPD BWC 000023);
- 6 64. BWC – Patrick Grimes 0306 (LVMPD BWC 000024);
- 7 65. BWC – Patrick Grimes 0313 (LVMPD BWC 000025);
- 8 66. BWC – Patrick Grimes 0320 (LVMPD BWC 000026);
- 9 67. BWC – Patrick Grimes 0323 (LVMPD BWC 000027);
- 10 68. BWC – Patrick Grimes 0336 (LVMPD BWC 000028);
- 11 69. BWC – Patrick Grimes 0345 (LVMPD BWC 000029);
- 12 70. BWC – Patrick Grimes 0358 (LVMPD BWC 000030);
- 13 71. BWC – Patrick Grimes 0412 (LVMPD BWC 000031);
- 14 72. BWC – Patrick Grimes 0415 (LVMPD BWC 000032);
- 15 73. BWC – Patrick Grimes 0423 (LVMPD BWC 000033);
- 16 74. BWC – Patrick Grimes 0438 (LVMPD BWC 000034);
- 17 75. BWC – Janette Gutierrez 0346 (LVMPD BWC 000035);
- 18 76. BWC – Janette Gutierrez 0409 (LVMPD BWC 000036);
- 19 77. BWC – Patrick Hoag 0250 (LVMPD BWC 000037);
- 20 78. BWC – Patrick Hoag 0323 (LVMPD BWC 000038);
- 21 79. BWC – David Jeong 0259 (LVMPD BWC 000039);
- 22 80. BWC – David Jeong 0304 (LVMPD BWC 000040);
- 23 81. BWC – Logan Jex 0249 (LVMPD BWC 000041);
- 24 82. BWC – Jacob Johnson 0253 (LVMPD BWC 000042);
- 25 83. BWC – Jonathan Justice 0457 (LVMPD BWC 000043);
- 26 84. BWC – Supreet Kaur 0250 (LVMPD BWC 000044);
- 27 85. BWC – Supreet Kaur 0338 (LVMPD BWC 000045);
- 28 86. BWC – Supreet Kaur 0343 (LVMPD BWC 000046);

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- 1 87. BWC – Supreet Kaur 0409 (LVMPD BWC 000047);
- 2 88. BWC – Wayne Kelly 0244 (LVMPD BWC 000048);
- 3 89. BWC – Matthew Kravetz 0243 (LVMPD BWC 000049);
- 4 90. BWC – Matthew Kravetz 0303 (LVMPD BWC 000050);
- 5 91. BWC – Matthew Kravetz 0545 (LVMPD BWC 000051);
- 6 92. BWC – Gabriel Lea 0249 (LVMPD BWC 000052);
- 7 93. BWC – C. Loskill 0304 (LVMPD BWC 000053);
- 8 94. BWC – Christopher Marcolini 0249 (LVMPD BWC 000054);
- 9 95. BWC – Christopher Marcolini 0343 (LVMPD BWC 000055);
- 10 96. BWC – Christopher Marcolini 0445 (LVMPD BWC 000056);
- 11 97. BWC – Christopher Marcolini 0701 (LVMPD BWC 000057);
- 12 98. BWC – Shay Mikalonis 0257 (LVMPD BWC 000058);
- 13 99. BWC – Philip Mills 0334 (LVMPD BWC 000059);
- 14 100. BWC – Kyle Nuskin 0253 (LVMPD BWC 000060);
- 15 101. BWC – Kyle Nuskin 0704 (LVMPD BWC 000061);
- 16 102. BWC – Richard Palacious 0249 (LVMPD BWC 000062);
- 17 103. BWC – Jon Pifer 0458 (LVMPD BWC 000063);
- 18 104. BWC – Blake Vernon 0250 (LVMPD BWC 000064);
- 19 105. BWC – Blake Vernon 0304 (LVMPD BWC 000065);
- 20 106. BWC – Blake Vernon 0332 (LVMPD BWC 000066);
- 21 107. BWC – Blake Vernon 0336 (LVMPD BWC 000067);
- 22 108. BWC – BWC – Brandon Wedmore 0251 (LVMPD BWC 000068);
- 23 109. BWC – Brandon Wedmore 0525 (LVMPD BWC 000069);
- 24 110. BWC – Brandon Wedmore 0531 (LVMPD BWC 000070);
- 25 111. BWC – Brandon Wedmore 0545 (LVMPD BWC 000071);
- 26 112. BWC – Brooks West 0350 (LVMPD BWC 000072);
- 27 113. BWC – Robert Winthrop 0250 (LVMPD BWC 000073);
- 28 114. BWC – Theron Young 0243 (LVMPD BWC 000074);

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115. BWC – Theron Young 0443 (LVMPD BWC 000075);
116. BWC – Theron Young 0444 (LVMPD BWC 000076);
117. BWC – Ina Zerbe 0248 (LVMPD BWC 000077);
118. BWC – Shakeel Abdal-Karim 0251 (LVMPD BWC 000078);
119. BWC – Christina Alfonsi 0716 (LVMPD BWC 000079);
120. BWC – Jeremy Bozarth 0338 (LVMPD BWC 000080);
121. BWC – Bruce Butler 0654 (LVMPD BWC 000081);
122. BWC – Matthew Dannenberger 0341 (LVMPD BWC 000082);
123. BWC – Brandon Engstrom 0349 (LVMPD BWC 000083);
124. BWC – Brandon Engstrom 0356 (LVMPD BWC 000084);
125. BWC – Edgar Fischer 0350 (LVMPD BWC 000085);
126. BWC – Janette Gutierrez 0312 (LVMPD BWC 000086);
127. BWC – Patrick Hinkel 0254 (LVMPD BWC 000087);
128. BWC – Y Hur 0252 (LVMPD BWC 000088);
129. BWC – Jason Johansson 0325 (LVMPD BWC 000089);
130. BWC – Jonathan Justice 0340 (LVMPD BWC 000090);
131. BWC – Wayne Kelly 0227 (LVMPD BWC 000091);
132. BWC – Heather Lagraves 0800 (LVMPD BWC 000092);
133. BWC – Heather Lagraves 0815 (LVMPD BWC 000093);
134. BWC – Amulfo Magana 0652 (LVMPD BWC 000094);
135. BWC – Amulfo Magana 0733 (LVMPD BWC 000095);
136. BWC – Amulfo Magana 0802 (LVMPD BWC 000096);
137. BWC – Shay Mikalonis 0224 (LVMPD BWC 000097);
138. BWC – Philip Mills 0224 (LVMPD BWC 000098);
139. BWC – DeShone Myles 0753 (LVMPD BWC 000099);
140. BWC – Richard Palacious 0359 (LVMPD BWC 000100);
141. BWC – Jon Pifer 0334 (LVMPD BWC 000101);
142. BWC – Gregory Reinert 0320 (LVMPD BWC 000102);

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143. BWC – Brett Robbins 0338 (LVMPD BWC 000103);
144. BWC – Stephen Schumaker 0254 (LVMPD BWC 000104);
145. LVMPD Policy – 5/200.00 Searches (03/28/18) (LVMPD 000254-000280);
146. LVMPD Policy – 4/103.27 Social Media and Electronic Communications (03/28/18) (LVMPD 000281-000283);
147. CCAC CIU Information (08/22/18) (LVMPD 000284-000287);
148. Photos – Phillip Semper (LVMPD 000288-000296);
149. Photos – Rio Party Photos (LVMPD 000297-000323);
150. Photos – Rio Party Members (LVMPD 000324-000326);
151. Photos – Rio Party Members 2 (LVMPD 000327-000334);
152. LVMPD Job Descriptions (LVMPD 000335-000370);
153. Field Interviews (LVMPD 000371-000390);
154. Policy 5-206.16 Department Response to Criminal Street Gangs (LVMPD 000391-000395);
155. Criminal History Record Search for Plaintiffs (LVMPD 000558-000569);
156. Training Material and Documents regarding Black Gangs (LVMPD 000570-000866);
157. Training Material and Documents regarding Constitutional Policing (LVMPD 000867-001289);
158. Training Material and Documents regarding Gang and Gang Trends (LVMPD 001290-001537);
159. Training Material and Documents regarding Gang Enforcement (LVMPD 001538-001575);
160. Training Material and Documents regarding Gang Investigation (LVMPD 001576-001676);
161. Training Material and Documents regarding Hybrid Gangs (LVMPD 001677-001854);

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- 1 162. Training Material and Documents regarding Jail Gang Intel (LVMPD 001855-
- 2 001983);
- 3 163. Training Material and Documents regarding Search and Seizures (LVMPD
- 4 001984);
- 5 164. Training Material and Documents regarding Search Incident to Lawful Arrest
- 6 (LVMPD 001985-001993);
- 7 165. PowerPoints regarding Gang Liaison Officer (LVMPD 001934-002937);
- 8 166. PowerPoints regarding Gang Response Officer Training (LVMPD 002938-
- 9 003639);
- 10 167. PowerPoints regarding Gangs and Gang Net (LVMPD 003640-003723)
- 11 CONFIDENTIAL;
- 12 168. PowerPoints regarding Gangs and Gang Trends (LVMPD 003724-3945);
- 13 169. PowerPoints regarding Hispanic Gangs (LVMPD 003946-004340);
- 14 170. PowerPoints regarding Juggalos (LVMPD 004341-004380);
- 15 171. PowerPoints regarding Marijuana (LVMPD 004381-004433);
- 16 172. PowerPoints regarding Strip Corridor Ordinance Enforcement (LVMPD
- 17 004434-004503);
- 18 173. Interlocal Agreement (LVMPD 004688-004691);
- 19 174. Memorandum of Understanding for Participation in the GangNet Database
- 20 (LVMPD 004692-004698);
- 21 175. BWC X83026982 Audit Trail 8-18-2018 (LVMPD 004699-004708);
- 22 176. Audit Trail Bauman - 180818-4592 (LVMPD 004709-004710);
- 23 177. White Supremacist Extremist Militia - Lesson Plan (LVMPD 004711-
- 24 004758);
- 25 178. Gangs in Clark County LP (01102016) 6 Hours (LVMPD 004759-004816);
- 26 179. FI's of Phillip Semper (LVMPD 004817-004821);
- 27 180. FI's of Corey Johnson (LVMPD 004822-004833);
- 28 181. FI's of Ashley Medlock (LVMPD 004834-004835);

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182. FI's of Michael Green (LVMPD 004836-004841);
183. FI's of Demarlo Riley (LVMPD 004842-004843);
184. FI's of Clinton Reece (LVMPD 004844-004865);
185. FI's of Lonicia Bowie (LVMPD 004866-004871);
186. Fusion Liaison Officer Certification Lesson Plan (LVMPD 004874-004927);
187. Video of Course – ABB2001 Implicit Bias Recognition (LVMPD 004928);
188. LVMPD Policy 1/403.01 - Internal Affairs Bureau (LVMPD 004929-004930);
189. LVMPD Policy 5/101.25 Employee Mediation Program (LVMPD 004931-004932)
190. LVMPD Policies: 5/101.26 Maintenance of Values and Ethics; 5/101.28 Relief of Duty and Temporary Assignment; and 5/101/.29 Pretermination Hearing (LVMPD 004933 - 004950);
191. LVMPD Policy 5/101/.52 Criminal Violations by Law Enforcement Employees (LVMPD 004951-004954);
192. Copy of CCAC Roster (LVMPD 004955-004958);
193. Gangs and CIU (LVMPD 004959-004960);
194. Gangs Chart (LVMPD 004961);
195. Central Intelligence Unit Chart (LVMPD 004962);
196. CCAC Chart (LVMPD 004963);
197. Department Organizational Chart (LVMPD 004964);
198. Link to Articulate Presentation regarding ABR2102 – Racial Profiling <https://360.articulate.com/review/content/a431c588-e351-458d-96f1-a2304d81d745/review> (LVMPD 004984);
199. Link to Articulate Presentation re ABBIB2101 – Implicit Bias Recognition <https://360.articulate.com/review/content/be8e8ff4-9550-4960-a190-d05742f6ca9a/review> (LVMPD 004985);
200. Video Evicting Hotel Occupants (LVMPD 004986);
201. Buccal Swab Kit - Demarlo Riley Consent Form (LVMPD 004987-004988);

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1 202. LVMPD Policy and Procedure re Business Trespass Program (LVMPD
2 004989-004990);

3 203. LVMPD Policy and Procedure re Citizen's Arrest, Summons in Lieu of Arrest
4 (SILA), and In-Custody Trespass (LVMPD 005007-005011);

5 204. LVMPD Trespass Training Video (LVMPD 005012);

6 205. LVMPD Standardized Lesson Plan re Patrol Procedures – Response to
7 Misdemeanor Crimes, dated May 9, 2017 (LVMPD 005013-005031);

8 206. LVMPD Standardized Lesson Plan re Patrol Procedures – Calls for Service,
9 dated March 17, 2015 (LVMPD 005032-005048);

10 207. LVMPD Standardized Lesson Plan re Patrol Procedures – Tactical Approach
11 to Major Crimes, dated March 10, 2015 (LVMPD 005049-005059);

12 208. LVMPD Standardized Lesson Plan re Criminal Law 2 – Misdemeanor
13 Citations Non-Arrest, dated November 8, 2017 (LVMPD 005060-005091);

14 209. LVMPD Patrol Procedures re Response to Misdemeanor Crimes (LVMPD
15 005092-005102);

16 210. LVMPD Standardized Lesson Plan re Patrol Procedures – Response to
17 Misdemeanor Crimes, dated August 22, 2013 (LVMPD 005103-005124);

18 211. LVMPD Standardized Lesson Plan re Criminal Law 2 – Misdemeanor
19 Citations Non-Arrest, dated August 2012 (LVMPD 005125-005151);

20 212. LVMPD Standardized Lesson Plan re Patrol Procedures – Response to
21 Misdemeanor Crimes, dated October 29, 2014 (LVMPD 005152-005170);

22 213. Additional LVMPD Standardized Lesson Plan re Criminal Law 2 –
23 Misdemeanor Citations Non-Arrest, dated August 2012 (LVMPD 005171-005196);

24 214. Additional LVMPD Standardized Lesson Plan re Patrol Procedures –
25 Response to Misdemeanor Crimes, dated October 29, 2014 (LVMPD 005197-005218);

26 215. Additional LVMPD Standardized Lesson Plan re Criminal Law 2 –
27 Misdemeanor Citations Non-Arrest, dated August 2012 (LVMPD 005219-005248);
28

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- 1 216. Michael Green Field Interview Card - Interview Date of November 7, 2014
- 2 (LVMPD 005249-005250);
- 3 217. Demario Riley Field Interview Card - Interview Date of August, 2008
- 4 (LVMPD 005251-005252);
- 5 218. Demario Riley Field Interview Card - Interview Date of July 31, 2005
- 6 (LVMPD 005253-005255);
- 7 219. Demario Riley Field Interview Card - Interview Date of November 8, 2007
- 8 (LVMPD 005256-005260);
- 9 220. GangNet Gatekeeper Entry Instructions (LVMPD 005261-005274);
- 10 221. GangNet Definitions and Procedures Manual (LVMPD 005275-005284);
- 11 222. Gang/Vice Bureau Gang Section Manual) (LVMPD 005285-005323);
- 12 223. LVMPD 6.255 Department Response to Criminal Street Gangs (2023)
- 13 (LVMPD 005324-005329);
- 14 224. Gang Intelligence Policy and Procedures for the GangNet System (LVMPD
- 15 005330-005336);
- 16 225. Agreement with Nye County (LVMPD 005337-005339);
- 17 226. Agreement with NLVPD (LVMPD 005340-005342);
- 18 227. Agreement with HPD (LVMPD 005343-005346);
- 19 228. Agreement with Lincoln County Sheriff (LVMPD 005347-005355);
- 20 229. Agreement with NV DPS, NV (LVMPD 005356-005369);
- 21 230. Agreement with Interlocal with DPS (2012) (LVMPD 005370-005378);
- 22 231. Agreement with Interlocal with FBI (2016) (LVMPD 005379-005382);
- 23 232. Agreement with MOU CalGang (2021) (LVMPD 005383-005389);
- 24 233. Agreement with MOU with FBI (2016) (LVMPD 005390-005396);
- 25 234. Agreement with CCSDPD (LVMPD 005397-005399);
- 26 235. Agreement with Boulder City PD (LVMPD 005400-005404);
- 27 236. Agreement with City of LV Detention and Enforcement (LVMPD 005405-
- 28 005409);

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1 237. Agreement with US Marshals (LVMPD 005410-005414);
2 238. Agreement with NV DPS (LVMPD 005415-005422);
3 239. Agreement with AZ DPS (LVMPD 005423-005426);
4 240. Agreement with Mesquite PD (LVMPD 005427-005429);
5 241. Communication Center Event Search LLV220300044583 Theron Young
6 (LVMPD 005430-005431);
7 242. Communication Center Event Search LLV201200046792 (LVMPD 005432-
8 005433);
9 243. Communication Center Event Search LLV200300058565 (LVMPD 005434-
10 005435);
11 244. Communication Center Event Search LLV071108001840 (LVMPD 005436-
12 005441);
13 245. LVMPD Arrest Report - Riley Demarlo - Event No. 2582019 (LVMPD
14 005442-005445);
15 246. Field Interview - Clinton Reece - Event No. LLV171119000425 (LVMPD
16 005446-005447);
17 247. Field Interview - Clinton Reece - Event No. LLV171125003264 (LVMPD
18 005448);
19 248. Field Interview - Clinton Reece - Event No. LLV210800087747 (LVMPD
20 005449);
21 249. Field Interview - Clinton Reece - Event No. LLV220300044583 (LVMPD
22 005450-005451);
23 250. Central Intelligence Unit Manual (LVMPD 005452-005492);
24 251. LVMPD - Communication Center Event Search No. LLV171119000425
25 (LVMPD 005493);
26 252. LVMPD - Communication Center Event Search No. LLV220300044583
27 (LVMPD 005494-005495);
28

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1 253. LVMPD - Communication Center Event Search No. LLV210800087747
2 (LVMPD 005496-005509);

3 254. LVMPD - Communication Center Event Search No. LLV171125003264
4 (LVMPD 005510);

5 255. Body Worn Camera Video of Officer Andrew Bauman (LVMPD BWC
6 000105) – CONFIDENTIAL;

7 256. Body Worn Camera Video of Officer Keaton Courtley (LVMPD BWC
8 000106) – CONFIDENTIAL;

9 257. Body Worn Camera Video of Officer Aaron Denson (LVMPD BWC 000107)
10 – CONFIDENTIAL;

11 258. Body Worn Camera Videos of Officer Matthew Kravetz (LVMPD BWC
12 000108-000109) – CONFIDENTIAL;

13 259. Body Worn Camera Videos of Officer Ashley Lif (LVMPD BWC 000110-
14 000113) – CONFIDENTIAL;

15 260. Body Worn Camera Video of Officer Jordan Mitchell (LVMPD BWC 000114)
16 – CONFIDENTIAL;

17 261. Body Worn Camera Videos of Officer Theron Young (LVMPD BWC 000115-
18 000116) – CONFIDENTIAL;

19 262. 2017 LVMPD Budget regarding Gang Task Force (LVMPD 005511);

20 263. 2017 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005512);

21 264. 2018 LVMPD Budget regarding Gang Task Force (LVMPD 005513);

22 265. 2018 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005514);

23 266. Additional 2018 LVMPD Budget regarding Gang Task Force (LVMPD
24 005515);

25 267. 2019 LVMPD Budget regarding Gang Task Force (LVMPD 005516);

26 268. 2019 LVMPD Budget regarding Safe Streets Task Force (LVMPD 005517);

27 269. State and Local Task Force Agreement between the Drug Enforcement
28 Administration Los Angeles Field Division and Las Vegas Metropolitan Police Department

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1 Program – Funded State and Local Task Force Agreement, dated October 1, 2017 (LVMPD
2 005518-005524);

3 270. Federal Bureau of Investigation Cost Reimbursement Agreement, dated
4 August 27, 2018 (LVMPD 005525-005526);

5 271. LVMPD Revised Purchase Order regarding GangNet, dated July 27, 2018
6 (LVMPD 005527-005528);

7 272. Body Worn Camera Videos of Officer Harrison Malburg (LVMPD BWC
8 000117-000119) – CONFIDENTIAL;

9 273. Body Worn Camera Video of Officer Nicholas Morelli (LVMPD BWC
10 000120) – CONFIDENTIAL;

11 274. Body Worn Camera Videos of Officer Joel Blasko (LVMPD BWC 000121-
12 000125) – CONFIDENTIAL;

13 275. Body Worn Camera Video of Officer Casey Clarkson (LVMPD BWC 000126)
14 – CONFIDENTIAL;

15 276. Body Worn Camera Video of Officer Weston Ferguson (LVMPD BWC
16 000127) – CONFIDENTIAL;

17 277. Body Worn Camera Video of Officer Steven Garrett (LVMPD BWC 000128)
18 – CONFIDENTIAL;

19 278. Body Worn Camera Videos of Officer Chris Gibson (LVMPD BWC 000129-
20 000130) – CONFIDENTIAL;

21 279. Body Worn Camera Videos of Officer Dennis Moyer (LVMPD BWC 000131-
22 000133) – CONFIDENTIAL;

23 280. Body Worn Camera Videos of Officer Edgar Nahum (LVMPD BWC 000134-
24 000135) – CONFIDENTIAL;

25 281. Body Worn Camera Video of Officer Strahinja Pavlovic (LVMPD BWC
26 000136) – CONFIDENTIAL;

27 282. Traffic Video (LVMPD BWC 000137-000146) – CONFIDENTIAL;
28

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- 1 283. Body Worn Camera Video of Officer Shawn Auger (LVMPD BWC 000147)
2 – CONFIDENTIAL;
- 3 284. Body Worn Camera Videos of Officer Ian Bates (LVMPD BWC 000148-
4 000150) – CONFIDENTIAL;
- 5 285. Body Worn Camera Video of Officer Jacob Belloso (LVMPD BWC 000151)
6 – CONFIDENTIAL;
- 7 286. Body Worn Camera Videos of Officer Ryan Brown (LVMPD BWC 000152-
8 000153) – CONFIDENTIAL;
- 9 287. Body Worn Camera Video of Officer Gigi Centeno (LVMPD BWC 000154)
10 – CONFIDENTIAL;
- 11 288. Body Worn Camera Video of Officer Donald Fletcher (LVMPD BWC
12 000155) – CONFIDENTIAL;
- 13 289. Body Worn Camera Video of Officer Larry Jones (LVMPD BWC 000156) –
14 CONFIDENTIAL;
- 15 290. Body Worn Camera Video of Officer Quinn Lambo (LVMPD BWC 000157)
16 – CONFIDENTIAL;
- 17 291. Body Worn Camera Video of Officer Timothy O’Niell (LVMPD BWC
18 000158) – CONFIDENTIAL;
- 19 292. Body Worn Camera Videos of Officer James Pennington (LVMPD BWC
20 000159-000164) – CONFIDENTIAL;
- 21 293. Body Worn Camera Video of Officer Tyler Rice (LVMPD BWC 000165) –
22 CONFIDENTIAL;
- 23 294. Body Worn Camera Video of Officer Paul Rosado (LVMPD BWC 000166) –
24 CONFIDENTIAL;
- 25 295. Body Worn Camera Video of Officer Jesse Roybal (LVMPD BWC 000167) –
26 CONFIDENTIAL;
- 27 296. Body Worn Camera Videos of Officer Kyla Smith (LVMPD BWC 000168-
28 000171) – CONFIDENTIAL;

297. Body Worn Camera Videos of Officer Charles Stuart (LVMPD BWC 000172-000173) – CONFIDENTIAL;

298. Body Worn Camera Videos of Officer Ryan Thacker (LVMPD BWC 000174-000179) – CONFIDENTIAL;

299. Body Worn Camera Video of Officer Shaun Ward (LVMPD BWC 000180) – CONFIDENTIAL; and

300. Body Worn Camera Video of Officer Donte Wesley (LVMPD BWC 000181) – CONFIDENTIAL.

C. AS TO THE FOLLOWING EXHIBITS, THE PARTY AGAINST WHOM THE SAME WILL BE OFFERED OBJECTS TO THEIR ADMISSIONS UPON THE GROUNDS STATED.

1. Plaintiffs' Exhibits

PROPOSED EXHIBIT	OBJECTION
Training History – A. Bauman (LVMPD 000100-000143)	FRE 401, 403
Training History – D. Jeong (LVMPD 000144-000169)	FRE 401, 403
Training History – S. Kaur (LVMPD 000170-000186)	FRE 401, 403
Training History – M. Kravetz (LVMPD 000187-000208)	FRE 401, 403
Training History – T. Young (LVMPD 000209-000228)	FRE401, 403
BWC	Defendant objects to BWC that is not relevant to remaining claims and/or duplicative.
Theron Young's Personnel File [(LVMPD 000396-000425)	FRE 401, 403
Andrew Bauman's Personnel File(LVMPD 000426-000477)	FRE 401, 403
Matthew Kravetz's Personnel File (LVMPD 000478-000511)	FRE 401, 403
Supreet Kaur's Personnel File (LVMPD 000512-000538)	FRE 401, 403
Body Worn Camera Videos of Officer Harrison Malburg (LVMPD BWC 000117-000119)	FRE 401, 403
Body Worn Camera Video of Officer Nicholas Morelli (LVMPD BWC 000120)	FRE 401, 403
Reporters Transcript of Hearing, Case No. 18F15424X, Vol. 1 – 4 (ACLUNV 000108–407)	FRE 401, 403;

20180819 LVMPD CCAC Tweet (ACLUNV 000408)	FRE 401, 403; 801, 901
Newspaper article, <i>Las Vegas Metro Police Busts Casino Hotel 'Gang Party'</i> (ACLUNV 000413–000416)	FRE 401, 403; 801, 901
Newspaper article, <i>Nine identified after gang party arrests at Rio Las Vegas hotel–casino</i> (ACLUNV 000417–000418)	FRE 401, 403; 801
Gang Database Removal Request (ACLUNV 000419–000421)	FRE 401, 403; 801, 901

2. Defendants' Exhibits

Proposed Exhibit	Objection and Grounds
CAD 180819-0437 (LVMPD 000001)	FRE 403 – Contains reference to uncharged bad acts unrelated to claims. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Unit Log 180819-0437 (LVMPD 000002-000003)	FRE 403 – Contains reference to uncharged bad acts unrelated to claims. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
CAD 180819-0412 (LVMPD 000004-000010)	FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Unit Log 180819-0412 (LVMPD 000011-000021)	FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Property Report re Abandoned Items (LVMPD 000022)	FRE 401 – Not relevant to current claims or defenses. FRE 403 – Items not connected to Plaintiffs, presentation of information will

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1		result in unfair prejudice and confusion of issues.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		FRE 805 – Hearsay within hearsay.
5		
6	Temporary Custody Record – Ashley Medlock (LVMPD 000023);	FRE 403 – Underlying basis for warrants have no probative value but are prejudicial.
7		FRE 404 – References unrelated underlying basis for warrants
8		FRE 602 – Lack of personal knowledge.
9		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
10		FRE 805 – Hearsay within hearsay.
11		
12	Temporary Custody Records – Antonio Williams (LVMPD 000024-000025);	FRE 401 – No longer a party to this matter so not relevant to Plaintiffs’ claims or Defendants’ defenses.
13		FRE 403 – No probative value as Williams is not a Plaintiff but prejudicial do to underlying criminal allegations against Williams.
14		FRE 404 – References unrelated misdemeanor conduct
15		FRE 602 – Lack of personal knowledge.
16		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
17		FRE 805 – Hearsay within hearsay.
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26	Temporary Custody Record – Lonicia Bowie (LVMPD 000026);	FRE 403 – Underlying basis for warrants have no probative value but are prejudicial.
27		
28		

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	<p>FRE 404 – References unrelated underlying basis for warrants.</p> <p>FRE 602 – Lack of personal knowledge.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
Temporary Custody Records – Phillip Semper (LVMPD 000027-000028);	<p>FRE 404 – References felony allegations that did not result in conviction</p> <p>FRE 602 – Lack of personal knowledge.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
Temporary Custody Record – Michael Green (LVMPD 000029);	<p>FRE 403 – Underlying basis for warrants have no probative value but are prejudicial.</p> <p>FRE 404 – References unrelated underlying basis for warrants.</p>
Temporary Custody Records – Corey Johnson (LVMPD 000030-000031);	<p>FRE 404 – References felony allegations that did not result in conviction</p> <p>FRE 602 – Lack of personal knowledge.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p> <p>FRE 901 – No foundation has been laid.</p>
Booking Voucher – Corey Johnson (LVMPD 000032);	<p>FRE 403 – Duplicative to other records (i.e. Temporary Custody Record)</p> <p>FRE 404 – References felony allegations that did not result in conviction</p> <p>FRE 602 – Lack of personal knowledge.</p>

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1		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
2		
3		FRE 805 – Hearsay within hearsay.
4		
5	Booking Voucher – Phillip Semper (LVMPD 000033);	FRE 403 – Duplicative to other records (i.e. Temporary Custody Record)
6		FRE 404 – References felony allegations that did not result in conviction
7		
8		FRE 602 – Lack of personal knowledge.
9		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
10		
11		FRE 805 – Hearsay within hearsay.
12		
13	Property Reports – Phillip Semper (LVMPD 000034-000035);	FRE 403 – Low probative value as it does not include any evidence that makes a contested fact more or less likely, prejudicial in it references contraband (cocaine) not attributed to Plaintiffs, buccal swaps collected from other parties other than Plaintiffs, and firearms not attributed to Plaintiffs; Property report also causes confusion as it infers that all property seized, including cocaine and additional firearms, belonged to Plaintiffs listed on the report.
14		
15		FRE 404 – Reference to contraband (i.e. cocaine) with Plaintiff's names listed on it imputes possession to Plaintiffs.
16		
17		FRE 602 – Lack of personal knowledge.
18		
19		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
20		
21		FRE 805 – Hearsay within hearsay.
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27	Request for Prosecution Form – Corey Johnson (LVMPD 000036)	FRE 403 – Duplicative to other records (i.e. Temporary Custody Record)
28		

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1		FRE 404 – References felony allegations that did not result in conviction.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		
5		FRE 805 – Hearsay within hearsay.
6	Request for Prosecution Form – Phillip Semper (LVMPD 000037)	FRE 403 – Duplicative to other records (i.e. Temporary Custody Record)
7		
8		FRE 404 – References felony allegations that did not result in conviction
9		
10		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
11		
12		FRE 805 – Hearsay within hearsay.
13	Property Release to Phillip Semper – Glock GNBH 19, Serial No. BESE045, HS Produkt XD40, Serial No. XD381869 (LVMPD 000038)	FRE 401/403 - Relevance and potential prejudice.
14		
15		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
16		
17		FRE 805 – Hearsay within hearsay.
18	Property Release to Corey Johnson – Glock GMBH 30, Serial No. SKA808 (LVMPD 000039);	FRE 401/403 - Relevance and potential prejudice.
19		
20		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
21		
22		FRE 805 – Hearsay within hearsay.
23	Arrest Report – Corey Johnson (LVMPD 000040-000042)	FRE 403 – Duplicative to other records (i.e. Temporary Custody Record); prejudicial in that it references felony allegations that did not result in conviction.
24		
25		
26		FRE 404 – References felony allegations that did not result in conviction; also states that Semper admitted to prior involvement with the gang “Squad Up”.
27		
28		

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		FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Arrest Report – Phillip Semper (LVMPD 000043-000045)		FRE 403 – Duplicative to other records (i.e. Temporary Custody Record); prejudicial in that it references felony allegations that did not result in conviction. FRE 404 – References felony allegations that did not result in conviction; also states that Semper admitted to prior involvement with the gang “Squad Up”. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Declaration of Arrest – Phillip Semper (LVMPD 000046-000048)		FRE 403 – Duplicative to other records (i.e. Temporary Custody Record); prejudicial in that it references felony allegations that did not result in conviction. FRE 404 – References felony allegations that did not result in conviction; also states that Semper admitted to prior involvement with the gang “Squad Up”. FRE 602 – Lack of personal knowledge. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Declaration of Arrest – Lonicia Bowie (LVMPD 000049)		FRE 403 – Duplicative in that information is already reflected in other documents (i.e. Temporary Custody Records). FRE 802 – Content if offered against Plaintiffs would constitute hearsay.

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1		FRE 805 – Hearsay within hearsay.
2		
3	Declaration of Arrest – Antonio Williams (LVMPD 000050)	FRE 401 – Not relevant as it discusses the basis for arrest for a person who is not a Plaintiff to this matter.
4		
5		FRE 403 – Low probative value but may result in unfair prejudice and/or confusion in jury imputing Williams’ bad acts on Plaintiffs.
6		
7		FRE 602 – Lack of personal knowledge.
8		
9		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
10		
11		FRE 805 – Hearsay within hearsay.
12		
13	Declaration of Arrest – Ashley Medlock (LVMPD 000051)	FRE 403 – Duplicative in that information is already reflected in other documents (i.e. Temporary Custody Records).
14		
15		FRE 602 – Lack of personal knowledge.
16		
17		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
18		
19		FRE 805 – Hearsay within hearsay.
20	Declaration of Arrest – Corey Johnson (LVMPD 000052-000054)	FRE 403 – Duplicative to other records (i.e. Temporary Custody Record); prejudicial in that it references felony allegations that did not result in conviction.
21		
22		FRE 404 – References felony allegations that did not result in conviction; also states that Semper admitted to prior involvement with the gang “Squad Up”.
23		
24		FRE 602 – Lack of personal knowledge.
25		
26		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
27		
28		FRE 805 – Hearsay within hearsay.

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1		
2	Declaration of Arrest – Michael Green (LVMPD 000055)	FRE 403 – Duplicative in that information is already reflected in other documents (i.e. Temporary Custody Records); contains information not relevant to current claims.
3		
4		
5		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
6		
7		FRE 805 – Hearsay within hearsay.
8		
9	Voluntary Statement – Phillip Semper (LVMPD 000056-000065)	FRE 401 - Not relevant to current claims as interview occurred after initial detention
10		
11		FRE 404 - Discusses alleged bad acts that did not result in conviction
12		
13		FRE 802 – Semper is deceased and has been replaced by his estate as a party; cannot be presented against other Plaintiffs.
14		
15		FRE 805 – Hearsay within hearsay.
16	Voluntary Statement – Corey Johnson (LVMPD 000066-000073)	FRE 401 - Not relevant to current claims as interview occurred after initial detention
17		
18		FRE 404 - Discusses alleged bad acts that did not result in conviction.
19		
20		FRE 602 – Lack of personal knowledge.
21		
22		FRE 802 – Cannot be presented as evidence in regards to other Plaintiffs.
23		
24	Audio – Voluntary Statement – Corey Johnson (LVMPD 000074)	FRE 401 - Not relevant to current claims
25		
26		FRE 404 - Discusses alleged bad acts that did not result in conviction
27		
28		FRE 602 – Lack of personal knowledge.

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1		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
2		
3		FRE 805 – Hearsay within hearsay.
4		
5	Audio – Voluntary Statement – Phillip Semper (LVMPD 000075)	FRE 401 - Not relevant to current claims
6		FRE 404 - Discusses alleged bad acts that did not result in conviction
7		FRE 602 – Lack of personal knowledge.
8		FRE 802 - To the extent it is offered against other plaintiffs
9		
10		FRE 805 – Hearsay within hearsay.
11		
12	Audio – Miscellaneous Phone (LVMPD 000076)	FRE 403 – References firearms that Plaintiffs did not possess and not relevant to current claims or defenses.
13		
14		FRE 404 - Discusses alleged bad acts that did not result in conviction
15		FRE 602 – Lack of personal knowledge.
16		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
17		FRE 805 – Hearsay within hearsay.
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21	Audio – Radio (LVMPD 000077);	FRE 403 – References firearms that Plaintiffs did not possess and not relevant to current claims or defenses.
22		
23		FRE 404 - Discusses alleged bad acts that did not result in conviction
24		FRE 602 – Lack of personal knowledge.
25		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
26		
27		FRE 805 – Hearsay within hearsay.
28		

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1		
2	VB Weekly Area Commend Information Bulletin (LVMPD 000078-000092)	FRE 401 – Not relevant to current claims
3		FRE 403 – Unfair prejudice, may confuse the jury as it references criminal conduct that Plaintiffs were not involved in.
4		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
5		FRE 805 – Hearsay within hearsay.
6		
7		
8		
9	Handwritten Notes (LVMPD 000093- 000099)	FRE 802 – Content of record when offered against Plaintiffs would constitute hearsay.
10		FRE 805 – Hearsay within hearsay.
11		FRE 901 – <u>No foundation has been laid.</u>
12	Training History – A. Bauman (LVMPD 000100-000143)	FRE 401 – Contains information not relevant to current claims or defenses
13		FRE 404 – Inadmissible to extent it is used to bolster credibility.
14		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
15		FRE 805 – Hearsay within hearsay.
16		
17		
18	Training History – D. Jeong (LVMPD 000144-000169)	FRE 401 – Contains information not relevant to current claims or defenses
19		FRE 404 – Inadmissible to extent it is used to bolster credibility.
20		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
21		FRE 805 – Hearsay within hearsay.
22		.
23		
24	Training History – S. Kaur (LVMPD 000170-000186)	FRE 401 – Contains information not relevant to current claims or defenses
25		FRE 404 – Inadmissible to extent it is used to bolster credibility.
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1		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
2		
3		FRE 805 – Hearsay within hearsay.
4	Training History – M. Kravetz (LVMPD 000187-000208)	FRE 401 – Contains information not relevant to current claims or defenses
5		FRE 404 – Inadmissible to extent it is used to bolster credibility.
6		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
7		FRE 805 – Hearsay within hearsay.
8		
9		
10	Training History – T. Young (LVMPD 000209-000228)	FRE 401 – Contains information not relevant to current claims or defenses
11		FRE 404 – Inadmissible to extent it is used to bolster credibility.
12		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
13		FRE 805 – Hearsay within hearsay.
14		
15		
16		
17	LVMPD Powerpoint – Unified Problem Abatement Concept (LVMPD 000229-000253)	FRE 401 – Not relevant to current claims
18		FRE 403 – May confuse the jury as UPAC is not longer at issue with remaining Fourth Amendment claims
19		FRE 404(a) – Inadmissible character evidence if used to establish character.
20		FRE 702 – To extent the policy either draws legal conclusions or offers opinions or justifications requiring expert testimony
21		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
22		FRE 805 – Hearsay within hearsay.
23		
24		
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26		
27	LVMPD BWC 000001–104	FRE 401 – Many videos entirely depict imagery not relevant to current claims and defenses.
28		

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1		FRE 403 – Duplicative in that many of the videos effectively record the same events; unfairly prejudicial to the extent officers discuss and videos depict bad acts, including uncharged conduct, of people other than Plaintiffs, including outstanding warrants and prior criminal history.
2		FRE 404 – Officers discuss uncharged criminal conduct or inadmissible prior bad acts.
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		FRE 805 – Hearsay within hearsay.
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12	LVMPD Policy – 5/200.00 Searches (03/28/18) (LVMPD 000254-000280)	FRE 401 – Not relevant to current claims
13		FRE 403 – May confuse jury as LVMPD policies are not at issue with remaining Fourth Amendment claims.
14		FRE 702 – To extent the policy either draws legal conclusions or offers opinions or justifications requiring expert testimony
15		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
16		FRE 805 – Hearsay within hearsay.
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20	CCAC CIU Information (08/22/18) (LVMPD 000284-000287)	FRE 401 – Contains information not relevant to current claims and defenses
21		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury with incidents and people unrelated to claims or defenses; discussion of other people's bad acts
22		FRE 404 – Inadmissible character evidence
23		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
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1		FRE 805 – Hearsay within hearsay.
2	Photos – Phillip Semper (LVMPD 000288-000296)	FRE 401 – Contains information not relevant to current claims or defenses
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4		FRE 403 - If mugshot-style photos, unfair prejudice with low probative value. <i>See e.g. United States v. McCoy</i> , 848 F.2d 743, 746 (6th Cir. 1988).
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7		
8	Photos – Rio Party Members (LVMPD 000324-000326)	FRE 401 – Contains information not relevant to current claims or defenses
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10		FRE 403 - If mugshot-style photos, unfair prejudice with low probative value. <i>See e.g. United States v. McCoy</i> , 848 F.2d 743, 746 (6th Cir. 1988).
11		
12		
13	Photos – Rio Party Members (LVMPD 000324-000326)	FRE 401 – Contains information not relevant to current claims or defenses
14		
15		FRE 403 - If mugshot-style photos, unfair prejudice with low probative value. <i>See e.g. United States v. McCoy</i> , 848 F.2d 743, 746 (6th Cir. 1988).
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18	Photos – Rio Party Members 2 (LVMPD 000327-000334)	FRE 401 – Contains information not relevant to current claims or defenses
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20		FRE 403 - If mugshot-style photos, unfair prejudice with low probative value. <i>See e.g. United States v. McCoy</i> , 848 F.2d 743, 746 (6th Cir. 1988).
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23	Field Interviews (LVMPD 000371-000390);	FRE 401 – Contains information not relevant to current claims and defenses
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25		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
26		
27		FRE 404 – Inadmissible character evidence
28		

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	FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Criminal History Record Search for Plaintiffs (LVMPD 000558-000569);	FRE 401 – Contains information not relevant to current claims and defenses FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses FRE 404 – Inadmissible character evidence FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Training Material and Documents regarding Black Gangs (LVMPD 000570-000866)	FRE 401 – Contains information not relevant to current claims FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Training Material and Documents regarding Constitutional Policing (LVMPD 000867-001289)	FRE 401 – Not relevant to current claims FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony. FRE 802 – Content if offered against Plaintiffs would constitute hearsay.

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	FRE 805 – Hearsay within hearsay.
Training Material and Documents regarding Gang and Gang Trends (LVMPD 001290-001537)	<p>FRE 401 – Contains information not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p> <p>.</p>
Training Material and Documents regarding Gang Enforcement (LVMPD 001538-001575)	<p>FRE 401 – Contains information not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p> <p>.</p>
Training Material and Documents regarding Gang Investigation (LVMPD 001576-001676)	<p>FRE 401 – Contains information not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p>

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1		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
2		
3		FRE 805 – Hearsay within hearsay.
4	Training Material and Documents regarding Hybrid Gangs (LVMPD 001677-001854)	FRE 401 – Contains information not relevant to current claims
5		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
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7		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
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9		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
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11		FRE 805 – Hearsay within hearsay.
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14	Training Material and Documents regarding Jail Gang Intel (LVMPD 001855-001983)	FRE 401 – Not relevant to current claims
15		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
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17		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
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19		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
20		
21		FRE 805 – Hearsay within hearsay.
22		
23	Training Material and Documents regarding Search and Seizures (LVMPD 001984)	FRE 401 – Not relevant to current claims
24		
25		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
26		
27		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
28		

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		FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
Training Material and Documents regarding Search Incident to Lawful Arrest (LVMPD 001985-001993)		FRE 401 – Not relevant to current claims FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
PowerPoints regarding Gang Liaison Officer (LVMPD 001934-002937)		FRE 401 – Contains information not relevant to current claims FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony. FRE 802 – Content if offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
PowerPoints regarding Gang Response Officer Training (LVMPD 002938-003639)		FRE 401 – Contains information not relevant to current claims FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury FRE 702 – To extent the training offers legal conclusions or contains opinions or

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1		justifications that would require expert witness testimony.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		
5		FRE 805 – Hearsay within hearsay.
6	PowerPoints regarding Gangs and Gang	FRE 401 – Contains information not relevant to current claims
7	Net (LVMPD 003640-003723)	
8	CONFIDENTIAL	FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
9		
10		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
11		
12		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
13		
14		FRE 805 – Hearsay within hearsay.
15	PowerPoints regarding Gangs and Gang	FRE 401 – Contains information not relevant to current claims
16	Trends (LVMPD 003724-3945)	
17		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
18		
19		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
20		
21		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
22		
23		FRE 805 – Hearsay within hearsay.
24		
25	PowerPoints regarding Hispanic Gangs	FRE 401 – Contains information not relevant to current claims
26	(LVMPD 003946-004340);	
27		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
28		

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1		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
2		
3		
4		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
5		
6		FRE 805 – Hearsay within hearsay.
7		
8	PowerPoints regarding Juggalos (LVMPD 004341-004380);	FRE 401 – Contains information not relevant to current claims
9		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
10		
11		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
12		
13		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
14		
15		FRE 805 – Hearsay within hearsay.
16		
17	PowerPoints regarding Marijuana (LVMPD 004381-004433)	FRE 401 – Not relevant to current claims
18		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
19		
20		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
21		
22		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
23		
24		FRE 805 – Hearsay within hearsay.
25		
26	PowerPoints regarding Strip Corridor Ordinance Enforcement (LVMPD 004434-004503);	FRE 401 – Not relevant to current claims
27		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
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	<p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
White Supremacist Extremist Militia - Lesson Plan (LVMPD 004711-004758)	<p>FRE 401 – Contains information not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
Gangs in Clark County LP (01102016) 6 Hours (LVMPD 004759-004816)	<p>FRE 401 – Contains information not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
FI's of Phillip Semper (LVMPD 004817-004821);	FRE 401 – Contains information not relevant to current claims and defenses

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1		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
2		
3		FRE 404 – Inadmissible character evidence
4		
5		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
6		
7		FRE 805 – Hearsay within hearsay.
8		
9	FI's of Corey Johnson (LVMPD 004822-004833);	FRE 401 – Contains information not relevant to current claims and defenses
10		
11		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
12		
13		FRE 404 – Inadmissible character evidence
14		
15		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
16		FRE 805 – Hearsay within hearsay.
17		
18	FI's of Ashley Medlock (LVMPD 004834-004835);	FRE 401 – Contains information not relevant to current claims and defenses
19		
20		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
21		
22		FRE 404 – Inadmissible character evidence
23		
24		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
25		FRE 805 – Hearsay within hearsay.
26		.
27	FI's of Michael Green (LVMPD 004836-004841);	FRE 401 – Contains information not relevant to current claims and defenses
28		
		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of

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1		confusing jury from incidents unrelated to claims or defenses
2		
3		FRE 404 – Inadmissible character evidence
4		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
5		FRE 805 – Hearsay within hearsay.
6		
7	FI's of Demarlo Riley (LVMPD 004842-004843);	FRE 401 – Contains information not relevant to current claims and defenses
8		
9		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
10		
11		FRE 404 – Inadmissible character evidence
12		
13		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
14		FRE 805 – Hearsay within hearsay.
15		
16	FI's of Clinton Reece (LVMPD 004844-004865);	FRE 401 – Contains information not relevant to current claims and defenses
17		
18		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
19		
20		FRE 404 – Inadmissible character evidence
21		
22		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
23		FRE 805 – Hearsay within hearsay.
24		
25	FI's of Lonicia Bowie (LVMPD 004866-004871);	FRE 401 – Contains information not relevant to current claims and defenses
26		
27		FRE 403 - Unfair prejudice substantially outweighs probative value; risk of confusing jury from incidents unrelated to claims or defenses
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	<p>FRE 404 – Inadmissible character evidence</p> <p>FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
<p>Fusion Liaison Officer Certification Lesson Plan (LVMPD 004874-004927);</p>	<p>FRE 401 – Not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
<p>Video of Course – ABB2001 Implicit Bias Recognition (LVMPD 004928)</p>	<p>FRE 401 – Contains information not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
<p>LVMPD Policy 1/403.01 - Internal Affairs Bureau (LVMPD 004929-004930);</p>	<p>FRE 401 – Not relevant to current claims</p> <p>FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury</p> <p>FRE 702 – To extent the policy offers legal conclusions or contains opinions or</p>

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1		justifications that would require expert witness testimony.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		
5		FRE 805 – Hearsay within hearsay.
6	LVMPD Policy 5/101.25 Employee Mediation Program (LVMPD 004931-004932)	FRE 401 – Not relevant to current claims
7		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
8		
9		FRE 702 – To extent the policy offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
10		
11		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
12		
13		FRE 805 – Hearsay within hearsay.
14		
15	LVMPD Policies: 5/101.26 Maintenance of Values and Ethics; 5/101.28 Relief of Duty and Temporary Assignment; and 5/101/.29 Pretermination Hearing (LVMPD 004933 - 004950);	FRE 401 – Not relevant to current claims
16		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
17		
18		FRE 702 – To extent the policy offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
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20		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
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22		FRE 805 – Hearsay within hearsay.
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25	LVMPD Policy 5/101/.52 Criminal Violations by Law Enforcement Employees (LVMPD 004951-004954);	FRE 401 – Not relevant to current claims
26		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
27		
28		FRE 702 – To extent the policy offers legal conclusions or contains opinions or

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1		justifications that would require expert witness testimony.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		FRE 805 – Hearsay within hearsay.
5		
6	Link to Articulate Presentation regarding ABR2102 – Racial Profiling https://360.articulate.com/review/content/a431c588-e351-458d-96f1-a2304d81d745/review (LVMPD 004984)	FRE 401 – Not relevant to current claims
7		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
8		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
9		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
10		FRE 805 – Hearsay within hearsay.
11		
12	Link to Articulate Presentation re ABBIB2101 – Implicit Bias Recognition https://360.articulate.com/review/content/be8e8ff4-9550-4960-a190-d05742f6ca9a/review (LVMPD 004985)	FRE 401 – Not relevant to current claims
13		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
14		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
15		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
16		FRE 805 – Hearsay within hearsay.
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25	LVMPD Policy and Procedure re Citizen’s Arrest, Summons in Lieu of Arrest (SILA), and In-Custody Trespass (LVMPD 005007-005011)	FRE 401 – Not relevant to current claims
26		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
27		FRE 702 – To extent the training offers legal conclusions or contains opinions or
28		

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1		justifications that would require expert witness testimony.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		
5		FRE 805 – Hearsay within hearsay.
6	LVMPD Standardized Lesson Plan re	FRE 401 – Not relevant to current claims
7	Patrol Procedures – Response to	
8	Misdemeanor Crimes, dated May 9, 2017 (LVMPD 005013-005031)	FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
9		
10		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
11		
12		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
13		
14		FRE 805 – Hearsay within hearsay.
15	LVMPD Standardized Lesson Plan re	FRE 401 – Not relevant to current claims
16	Patrol Procedures – Calls for Service, dated March 17, 2015 (LVMPD 005032-005048)	
17		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
18		
19		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
20		
21		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
22		
23		FRE 805 – Hearsay within hearsay.
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25	LVMPD Standardized Lesson Plan re	FRE 401 – Not relevant to current claims
26	Patrol Procedures – Tactical Approach to Major Crimes, dated March 10, 2015 (LVMPD 005049-005059)	
27		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
28		
		FRE 702 – To extent the training offers legal conclusions or contains opinions or

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1		justifications that would require expert witness testimony.
2		
3		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
4		FRE 805 – Hearsay within hearsay.
5		
6	LVMPD Standardized Lesson Plan re	FRE 401 – Not relevant to current claims
7	Criminal Law 2 – Misdemeanor Citations	
8	Non-Arrest, dated November 8, 2017	FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
9	(LVMPD 005060-005091)	
10		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
11		
12		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
13		
14		FRE 805 – Hearsay within hearsay.
15		
16	LVMPD Patrol Procedures re Response to	FRE 401 – Not relevant to current claims
17	Misdemeanor Crimes (LVMPD 005092-005102)	
18		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
19		
20		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
21		
22		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
23		
24		FRE 805 – Hearsay within hearsay.
25		
26	LVMPD Standardized Lesson Plan re	FRE 401 – Not relevant to current claims
27	Patrol Procedures – Response to	
28	Misdemeanor Crimes, dated August 22, 2013 (LVMPD 005103-005124)	FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury

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1		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
2		
3		
4		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
5		
6		FRE 805 – Hearsay within hearsay.
7		
8	LVMPD Standardized Lesson Plan re Criminal Law 2 – Misdemeanor Citations Non-Arrest, dated August 2012 (LVMPD 005125-005151)	FRE 401 – Not relevant to current claims
9		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
10		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
11		
12		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
13		
14		FRE 805 – Hearsay within hearsay.
15		
16		
17	LVMPD Standardized Lesson Plan re Patrol Procedures – Response to Misdemeanor Crimes, dated October 29, 2014 (LVMPD 005152-005170)	FRE 401 – Not relevant to current claims
18		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
19		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
20		
21		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
22		
23		FRE 805 – Hearsay within hearsay.
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25		
26	Additional LVMPD Standardized Lesson Plan re Criminal Law 2 – Misdemeanor Citations Non-Arrest, dated August 2012 (LVMPD 005171-005196)	FRE 401 – Not relevant to current claims
27		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
28		

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1		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
2		
3		
4		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
5		
6		FRE 805 – Hearsay within hearsay.
7		
8	Additional LVMPD Standardized Lesson Plan re Patrol Procedures – Response to Misdemeanor Crimes, dated October 29, 2014 (LVMPD 005197-005218)	FRE 401 – Not relevant to current claims
9		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
10		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
11		
12		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
13		
14		FRE 805 – Hearsay within hearsay.
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16		
17	Additional LVMPD Standardized Lesson Plan re Criminal Law 2 – Misdemeanor Citations Non-Arrest, dated August 2012 (LVMPD 005219-005248)	FRE 401 – Not relevant to current claims
18		FRE 403 - Unfair prejudice outweighs probative value, risks confusing jury
19		FRE 702 – To extent the training offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
20		
21		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
22		
23		FRE 805 – Hearsay within hearsay.
24		
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26	Michael Green Field Interview Card - Interview Date of November 7, 2014 (LVMPD 005249-005250);	FRE 401 – Not relevant to current claims or defenses
27		FRE 403 - Unfair prejudice substantially outweighs probative value.
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1		FRE 404 – Inadmissible character evidence
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3		FRE 802 – Content of report when offered
4		against Plaintiffs would constitute hearsay.
5		FRE 805 – Hearsay within hearsay.
6	Demario Riley Field Interview Card -	FRE 401 – Not relevant to current claims or
7	Interview Date of August, 2008 (LVMPD	defenses
8	005251-005252);	
9		FRE 403 - Unfair prejudice substantially
10		outweighs probative value.
11		FRE 404 – Inadmissible character evidence
12		FRE 802 – Content of report when offered
13		against Plaintiffs would constitute hearsay.
14		FRE 805 – Hearsay within hearsay.
15	Demario Riley Field Interview Card -	FRE 401 – Not relevant to current claims or
16	Interview Date of July 31, 2005 (LVMPD	defenses
17	005253-005255);	
18		FRE 403 - Unfair prejudice substantially
19		outweighs probative value.
20		FRE 404 – Inadmissible character evidence
21		FRE 802 – Content of report when offered
22		against Plaintiffs would constitute hearsay.
23		FRE 805 – Hearsay within hearsay.
24	Demario Riley Field Interview Card -	FRE 401 – Not relevant to current claims or
25	Interview Date of November 8, 2007	defenses
26	(LVMPD 005256-005260);	
27		FRE 403 - Unfair prejudice substantially
28		outweighs probative value.
		FRE 404 – Inadmissible character evidence
		FRE 802 – Content of report when offered
		against Plaintiffs would constitute hearsay.

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1		FRE 805 – Hearsay within hearsay.
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3	Gang/Vice Bureau Gang Section Manual (LVMPD 005285-005323)	FRE 401 – To extent manual is offered for anything other than surveillance, investigation, or enforcement related to expressive activities.
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5		FRE 403 - Unfair prejudice, what a department teaches is not the legal standard for constitutional conduct.
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7		FRE 702 – To extent the manual offers legal conclusions or contains opinions or justifications that would require expert witness testimony.
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9		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
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11		FRE 805 – Hearsay within hearsay.
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14	Gang Intelligence Policy and Procedures for the GangNet System (LVMPD 005330- 005336)	FRE 401 – Not relevant to current claims
15		FRE 702 – To extent the manual either draws legal conclusions or offers opinions or justifications requiring expert testimony
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17		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
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19		FRE 805 – Hearsay within hearsay.
20	Communication Center Event Search LLV220300044583 Theron Young (LVMPD 005430-005431)	FRE 403 - To extent it discusses contacts with the law enforcement unrelated to expressive association, unfair prejudice.
21		
22		FRE 404 - Cannot be used to show character.
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24		FRE 802 – Content if offered against Plaintiffs would constitute hearsay.
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26		FRE 805 – Hearsay within hearsay.
27	Communication Center Event Search LLV201200046792 (LVMPD 005432- 005433)	FRE 403 - To extent it discusses contacts unrelated to expressive association, unfair prejudice.
28		

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	<p>FRE 404 - Cannot be used to show character.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
<p>Communication Center Event Search LLV200300058565 (LVMPD 005434-005435)</p>	<p>FRE 403 - To extent it discusses contacts unrelated to expressive association, unfair prejudice.</p> <p>FRE 404 - Cannot be used to show character.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
<p>Communication Center Event Search LLV071108001840 (LVMPD 005436-005441)</p>	<p>FRE 401 – Not relevant to current claims or defenses</p> <p>FRE 403 - To extent it discusses contacts unrelated to expressive association, unfair prejudice.</p> <p>FRE 404 - Cannot be used to show character.</p> <p>FRE 802 – Content if offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
<p>LVMPD Arrest Report - Riley Demarlo - Event No. 2582019 (LVMPD 005442-005445);</p>	<p>FRE 401 – Not relevant to current claims or defenses</p> <p>FRE 403 - Unfair prejudice substantially outweighs probative value.</p> <p>FRE 404 - Cannot be used to show character;</p> <p>FRE 609 - If used for impeachment, limited to convictions and subject to time limits.</p>

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1		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
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3		FRE 805 – Hearsay within hearsay.
4	Field Interview - Clinton Reece - Event No. LLV171119000425 (LVMPD 005446-005447)	FRE 401 – Not relevant to current claims or defenses
5		FRE 403 - Unfair prejudice substantially outweighs probative value.
6		FRE 404 - Cannot be used to show character;
7		FRE 609 - If used for impeachment, limited to convictions and subject to time limits.
8		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
9		FRE 805 – Hearsay within hearsay.
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14	Field Interview - Clinton Reece - Event No. LLV171125003264 (LVMPD 005448);	FRE 403 - Unfair prejudice substantially outweighs probative value.
15		FRE 404 - Cannot be used to show character;
16		FRE 609 - If used for impeachment, limited to convictions and subject to time limits.
17		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
18		FRE 805 – Hearsay within hearsay.
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22	Field Interview - Clinton Reece - Event No. LLV210800087747 (LVMPD 005449);	FRE 401 – Not relevant to current claims or defenses
23		FRE 403 - Unfair prejudice substantially outweighs probative value.
24		FRE 404 - Cannot be used to show character;
25		FRE 609 - If used for impeachment, limited to convictions and subject to time limits.
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1		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
2		
3		FRE 805 – Hearsay within hearsay.
4	Field Interview - Clinton Reece - Event No. LLV220300044583 (LVMPD 005450-005451);	FRE 403 - Unfair prejudice substantially outweighs probative value.
5		FRE 404 - Cannot be used to show character;
6		FRE 609 - If used for impeachment, limited to convictions and subject to time limits.
7		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
8		FRE 805 – Hearsay within hearsay.
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12	Central Intelligence Unit Manual (LVMPD 005452-005492)	FRE 403 - Unfair prejudice substantially outweighs probative value.
13		FRE 702 – To extent the manual contains opinions or justifications that would require expert witness testimony.
14		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
15		FRE 805 – Hearsay within hearsay.
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19	LVMPD - Communication Center Event Search No. LLV171119000425 (LVMPD 005493)	FRE 401 – Not relevant to current claims or defenses
20		FRE 403 - Unfair prejudice substantially outweighs probative value.
21		FRE 404 - Cannot be used to show character;
22		FRE 609 - If used for impeachment, limited to convictions and subject to time limits.
23		FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.
24		FRE 805 – Hearsay within hearsay.
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1 2 3 4 5 6 7 8	LVMPD - Communication Center Event Search No. LLV220300044583 (LVMPD 005494-005495)	FRE 403 - Unfair prejudice substantially outweighs probative value. FRE 404 - Cannot be used to show character; FRE 609 - If used for impeachment, limited to convictions and subject to time limits. FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
9 10 11 12 13 14 15 16 17 18	LVMPD - Communication Center Event Search No. LLV210800087747 (LVMPD 005496-005509);	FRE 401 – Not relevant to current claims or defenses FRE 403 - Unfair prejudice substantially outweighs probative value. FRE 404 - Cannot be used to show character; FRE 609 - If used for impeachment, limited to convictions and subject to time limits. FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
19 20 21 22 23 24 25 26	LVMPD - Communication Center Event Search No. LLV171125003264 (LVMPD 005510)	FRE 403 - Unfair prejudice substantially outweighs probative value. FRE 404 - Cannot be used to show character; FRE 609 - If used for impeachment, limited to convictions and subject to time limits. FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay. FRE 805 – Hearsay within hearsay.
27 28	LVMPD BWC 000105 - 000116	FRE 401 – Not relevant to current claims or defenses

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	<p>FRE 403 - Unfair prejudice substantially outweighs probative value.</p> <p>FRE 404 - Cannot be used to show character;</p> <p>FRE 609 - If used for impeachment, limited to convictions and subject to time limits.</p> <p>FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>
LVMPD BWC 000117 – 000120	<p>FRE 401 – Not relevant to any of Plaintiffs’ claims or Defendants’ asserted defenses.</p> <p>FRE 403 – Prejudicial to the extent that officers reference uncharged or otherwise inadmissible bad acts (i.e. misdemeanor soliciting).</p> <p>FRE 403 - Unfair prejudice substantially outweighs probative value.</p> <p>FRE 404 - Cannot be used to show character;</p> <p>FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.</p> <p>FRE 805 – Hearsay within hearsay.</p>

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LVMPD BWC 000121 – 000181

FRE 401 – Not relevant to any of Plaintiffs' claims or Defendants' asserted defenses.

FRE 403 – Prejudicial to the extent that officers reference uncharged or otherwise inadmissible bad acts (i.e. misdemeanor soliciting).

FRE 403 - Unfair prejudice substantially outweighs probative value.

FRE 404 - Cannot be used to show character;

FRE 404, allegations of uncharged bad acts in that Clinton Reece was investigated but cleared of wrongdoing in relation to the incident.

FRE 404 - Cannot be used to show character;

FRE 802 – Content of report when offered against Plaintiffs would constitute hearsay.

FRE 805 – Hearsay within hearsay.

Plaintiffs reserve the right to object to any additional or other exhibits offered by any party.

D. ELECTRONIC EVIDENCE OFFERED FOR JURY DELIBERATION

Both parties intend to offer evidence for the purposes of jury deliberation, specifically video footage.

E. PLAINTIFFS MAY OFFER THE FOLLOWING DEPOSITIONS AT TRIAL AS NECESSARY.

The Plaintiffs reserve the right to use any depositions taken during discovery if the witness is unavailable or for impeachment purposes.

F. LVMPD DEFENDANTS MAY OFFER THE FOLLOWING DEPOSITIONS AT TRIAL AS NECESSARY.

The LVMPD Defendants reserve the right to use any depositions taken during discovery if the witness is unavailable or for impeachment purposes.

VIII. THE FOLLOWING WITNESSES MAY BE CALLED AT TRIAL:

A. PLAINTIFFS' WITNESSES

Plaintiffs intend to call the following witnesses at trial:

1. Corey Johnson
2. Ashley Medlock
3. Michael Green
4. Demarlo Riley
5. Clinton Reece
6. Lonicia Bowie
7. Executor of the Estate of Phillip Semper
8. Cory Bass
9. Breanna Nellums
10. Antonio Williams
11. Shane Price
Fred Hass
Landon Reyes
FRCP 30(b)(6) Designee(s) of Las Vegas Metropolitan Police Department
12. Sergeant Andrew Bauman, P#9982
13. Officer Matthew Kravetz, P#15346
14. Officer Supreet Kaur, P#16227
15. Officer David Jeong, P#14997
16. Officer Theron Young, P#15103
17. John Carlisle

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18. Officer Nicholas Brigandi, P#12933

19. Officer Rich Moreno, P#4922

20. Officer Janette Gutierrez, P#16213

21. Officer Blake Walford, P#16213

22. Officer Tyler A. Andrus, P#9246

23. Officer Harrison Malburg

24. Sharon Mendoza

25. Michael Galzara

26. Jackie Barnes

27. Officer Strahinja Pavlovic

28. John Pelletier

29. John Leon

30. Katherine Jarvis

31. Kelsey Thomas

32. Philip Conneller

33. KTNV-TV and/or their person(s) most knowledgeable

34. KSNV-TV NBC, and/or their persos(s) most knowledgeable

35. Casino.org, and/or their person(s) most knowledgeable

36. Dr. Ana Muniz

Plaintiffs reserve the right to call upon any rebuttal or impeachment of witnesses necessitated by the testimony of designated witnesses.

B. LVMPD DEFENDANTS' WITNESSES:

1. LVMPD Defendants Intend to Call the Following Witnesses at Trial.

1. Executor of the Estate of Phillip Semper

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2. Corey Johnson
 3. Ashley Medlock
 4. Cory Bass
 5. Michael Green
 6. Demarlo Riley
 7. Breanna Nellums
 8. Clinton Reece
 9. Antonio Williams
 10. Lonicia Bowie
 11. Carlos Bass
 12. Shane Price
Fred Hass
Landon Reyes
FRCP 30(b)(6) Designee(s) of Las Vegas Metropolitan Police Department
 13. Sergeant Andrew Bauman, P#9982
 14. Officer Matthew Kravetz, P#15346
 15. Officer Supreet Kaur, P#16227
 16. Officer David Jeong, P#14997
 17. Officer Theron Young, P#15103
 18. John Carlisle
 19. Officer Nicholas Brigandi, P#12933
 20. Officer Rich Moreno, P#4922
 21. Sgt. Paul Ferguson

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1 **IX. OUTSTANDING MOTIONS**

2 1. Parties agree that a motion for clarification would assist in determining
3 whether the following issues of law are still outstanding following this Court's order on the
4 Parties' cross motions for summary judgment:

5 A. Whether Plaintiff Clinton Reece may proceed with his Fourth Amendment
6 claim that officers exceeded the permissible scope of a search when they
7 were photographing his tattoos prior to his release.

8 B. Whether granting offensive summary judgment for Plaintiffs' First
9 Amendment claims included LVMPD surveillance and enforcement
10 practices related to "gang funerals" or was limited to LVMPD's policy
11 related to the designation of people as "gang members" and "gang
12 affiliates" to the extent those designations were based on expressive
13 association.

14 2. Plaintiffs will file a renewed motion for permanent injunction to address
15 whether Plaintiffs are entitled to an injunction regarding their First Amendment and Title VI
16 claims against Defendant LVMPD, and if so, the scope of that injunction.

17 3. Parties intend to meet and confer closer to trial to discuss possible redactions
18 to documents that may contain information that is inadmissible including the Central
19 Intelligence Unit (CIU) Report, Field Interview Cards, Property Reports, and body worn
20 camera footage. If the parties have any outstanding disagreements as to what is inadmissible,
21 the parties will file motions in limine to address those issues.
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23 4. Plaintiffs intend to admit census data as evidence in this matter. If Defendants
24 object to its admission, Plaintiffs will file a motion for judicial notice if necessary.
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Counsel have met and hereby submit a list of three (3) agreed-upon trial dates:

___ June 2026 _____

___ July 2026 _____

___ August 2026 _____

It is expressly understood by the undersigned the Court will set the trial of this matter on one (1) of the agreed-upon dates if possible, if not, the trial will be set at the convenience of the court's calendar.

XI. TIME FOR TRIAL.

It is estimated that the trial will take a total of 15 days.

APPROVED AS TO FORM AND CONTENT:

MARQUIS AURBACH

AMERICAN CIVIL LIBERTIES UNION
OF NEVADA

By: /s/ Craig R. Anderson
Craig R. Anderson, Esq.
Nevada Bar No. 6882
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants LVMPD,
Andrew Bauman, Matthew Kravetz,
Supreet Kaur, David Jeong, and
Theron Young

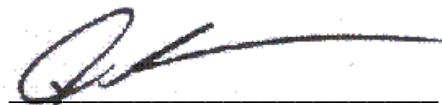
By: /s/ Christopher M. Peterson
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4362 W. Cheyenne Ave.
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Attorneys for Plaintiffs

XII. ACTION BY THE COURT.

This case is set down for jury trial on the stacked calendar on August 3, 2026 at 9:00 a.m.; Calendar call shall be held on July 28, 2026 at 9:00 a.m. in Las Vegas Courtroom 6C.

IT IS SO ORDERED:

Dated: January 5, 2026



ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE