



1 **NCCH**
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8 **EIGHTH JUDICIAL DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 AMERICAN CIVIL LIBERTIES UNION OF
11 NEVADA, a domestic nonprofit organization;
SERGIO MORAIS-HECHAVARRIA, an
12 individual,

13 Petitioners,

14 vs.

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a governmental entity; KEVIN
16 MCMAHILL, in his official capacity as Las Vegas
Metropolitan Police Department Sheriff,

17 Respondents.

Case No.: A-25-930343-W

Department: 11

**Notice of Change in Petitioner
Sergio Morais-Hechavarria's
Circumstances**

18 Petitioners, American Civil Liberties Union of Nevada ("ACLU of Nevada") and Sergio
19 Morais-Hechavarria, hereby submit this Notice of Change in Petitioner Sergio Morais-
20 Hechavarria's Circumstances. This Notice is supported by the attached Declaration of Petitioners'
21 Counsel.

22 Petitioners submit this Notice to inform this Court that Mr. Morias-Hechavarria was
23 released from the Clark County Detention Center's (CCDC) custody on October 16, 2025, directly
24 to U.S. Immigration and Customs Enforcement (ICE). Decl. Pet'r's Counsel, ¶ 7. Mr. Morias-

1 Hechavarria was not transferred from CCDC to an inpatient treatment facility to carry out the terms
2 of his sentence in his criminal case as ordered by a Nevada District Court judge. Counsel was not
3 informed of Mr. Morias-Hechavarria's release from CCDC and learned of Petitioner's transfer to
4 ICE when counsel visited CCDC to request a legal visit with Mr. Morias-Hechavarria. *Id.* at ¶¶ 4-
5 8. According to the Department of Homeland Security's "Ice Locator," Mr. Morias-Hechavarria
6 is now at the El Paso Service Processing Center located in El Paso, Texas. *Id.* at ¶¶ 9-10.

7
8 Dated October 23, 2025.

9 Respectfully Submitted:

10 **AMERICAN CIVIL LIBERTIES**
11 **UNION OF NEVADA**

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1 **DECLARATION OF PETITIONER’S COUNSEL IN SUPPORT OF**
2 **PETITIONERS’ NOTICE OF CHANGE IN PETITIONER MORIAS-**
3 **HECHAVARRIA’S CIRCUMSTANCES**

4 SADMIRA RAMIC makes the following declaration:

5 1. I am an attorney duly licensed to practice law in the State of Nevada.

6 2. I am an attorney of record for Petitioners American Civil Liberties Union of
7 Nevada and Sergio Morais-Hechavarria in the above case.

8 3. I am familiar with the facts and circumstances of this case.

9 4. On October 21, 2025, I visited the Clark County Detention Center (CCDC)
10 located in Las Vegas, Nevada.

11 5. Upon arriving at the front desk, I requested a legal visit with Mr. Morais-
12 Hechavarria who was being detained at the facility by LVMPD.

13 6. The officer at the front desk informed me that I could not conduct a legal visit
14 with Mr. Morais-Hechavarria because he was not in their custody.

15 7. The officer at the front desk also informed me that Mr. Morais-Hechavarria was
16 released on October 16, 2025, directly to U.S. Immigration and Customs Enforcement
17 (ICE).

18 8. Despite being attorney of record for Mr. Morais-Hechavarria in this matter, at no
19 point prior to October 21, 2025, was I informed of his transfer to ICE.

20 9. After visiting CCDC on October 21, 2025, I conducted a search for Mr. Morais-
21 Hechavarria using the “ICE locator” on the official website of the Department of
22 Homeland Security.

23 10. The ICE locator indicated that Mr. Morais-Hechavarria was in ICE custody and
24 was moved from Las Vegas, Nevada to the El Paso Service Processing Center located
 in El Paso, Texas.

1 11.Despite being attorney of record for Mr. Morais-Hechavarria in this matter, no
2 one informed me that he was transported out of Nevada to Texas.

3
4 I declare under penalty of perjury that the foregoing is true and correct. (NRS 53.045).
5 EXECUTED this 22nd day of October, 2025.

6 /s/ Sadmira Ramic
7 Sadmira Ramic
8 Senior Staff Attorney
9 ACLU of Nevada
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on October 23, 2025, I electronically filed a true and correct copy of
3 the forgoing NOTICE OF CHANGE IN PETITIONER SERGIO MORAIS-HECHAVARRIA'S
4 CIRCUMSTANCES. I further certify that all participants in the case are registered CM/ECF users
5 and that service will be accomplished on all participants by:

- 6
- 7 ☒ CM/ECF
- 8 ☐ Electronic mail; or
- 9 ☐ US Mail or Carrier Service
- 10

11 /s/ Sadmira Ramic

12 SADMIRA RAMIC

13 An employee of the ACLU of Nevada

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