



RPLY

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UNION OF NEVADA**

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EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

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

Petitioners,

vs.

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

Respondents.

Case No.: A-25-930343-W

Department: III

**Reply in Support of Petition for
Writ of Mandamus Or, in the
Alternative, Verified Petition for
Writ of Habeas Corpus**

Petitioners, American Civil Liberties Union of Nevada (“ACLU of Nevada”) and Sergio
Morais-Hechavarria, hereby submit this Reply in Support of Petition for Writ of Mandamus or, in
the alternative, Petition for Writ of Habeas Corpus.

This Reply is supported by the following memorandum of points and authorities, the
pleadings and papers filed with this Court, any attached exhibits, and any oral argument the Court
may permit.

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While LVMPD has intentionally tried to moot this case by abruptly deciding to release Mr. Morais-Hechavarria to ICE the day after this litigation commenced after refusing to place him on a transfer list for months due to an outstanding ICE warrant, this case is not moot and the relevant facts are not in dispute. LVMPD admits it entered into a 287(g) agreement with ICE (“the Agreement”). It does not dispute that the agency has agreed to hold people on ICE administrative warrants for up to 48 hours and that LVMPD will not be reimbursed for any expenses associated with those holds. LVMPD does not deny that over the last year alone ICE has requested holds for hundreds of people detained at the Clark County Detention Center (“CCDC”). It admits that dozens of LVMPD officers have already been assigned to carrying out this agreement.

This Court can and must get to the substantive issues underlying this case. Hundreds, if not thousands, of people will be harmed by LVMPD's 287(g) agreement. This harm is imminent, and LVMPD cannot be allowed to disregard Nevada law in carrying out the Agreement.

1 **I. ACLU of Nevada is a suitable party to bring suit under the public importance**
2 **doctrine.**

3 In the context of the public importance doctrine, "appropriateness has three main facets:
4 the plaintiff must not be a 'sham plaintiff' with no true adversity of interest; he or she must be
5 capable of competently advocating his or her position; and he or she may still be denied standing
6 if 'there is a plaintiff more directly affected by the challenged conduct in question who has or is
7 likely to bring suit,'" which ensures that the plaintiff will serve as a true and strong adversary. *Nev.*
8 *Pol'y. Rsch. Inst., Inc. v. Cannizzaro*, 507 P.3d 1203, 1210 (Nev. 2022); *see also Schwartz v.*
9 *Lopez*, 132 Nev. 732, 743, 382 P.3d 886, 894-95 (Nev. 2016) (clarifying that an appropriate party
10 "mean[s] that there is no one else in a better position who will likely bring an action and that the
11 plaintiff is capable of fully advocating his or her position in court"). As such, Respondents blatantly
12 misstate the standard for appropriateness under the public importance doctrine when they say that
13 only "a public actor with institutional responsibility when the dispute concerns the scope of local
14 law-enforcement authority" could bring suit. Resp'ts' Resp. to Pet. at 17: 4-7.

15 Under the actual standard, ACLU of Nevada is an appropriate party. Just like Nevada
16 Policy Research Institute, ACLU of Nevada is a nonprofit organization, and its mission is to
17 defend and advance the civil liberties, civil rights, and other fundamental human rights of
18 all Nevadans. As part of that mission, ACLU of Nevada has litigated and continues to litigate
19 numerous lawsuits related to ensuring government actors are transparent and acting within the
20 bounds of Nevada law with respect to immigration enforcement. Therefore, ACLU of Nevada is
21 not a "sham plaintiff." *See Cannizzaro*, 507 P.3d at 1210 (NPRI is a nonprofit corporation whose
22 primary missions are to conduct public policy research and advocate for policies that protect
23 individual liberties and promote transparency, accountability, and efficiency in government. NPRI
24 thus is not a 'sham plaintiff—its 'sincerity' in challenging the legislators' dual employment 'is
 unquestioned.'"). LVMPD has offered no evidence to the contrary – judging from the length of

1 their response, LVMPD seems to believe that the ACLU of Nevada very sincerely challenges the
2 Department's authority to detain people unlawfully. Additionally, as demonstrated in the legal
3 pleadings in this case, as well as other matters in Nevada state and federal courts, ACLU of Nevada
4 is capable of competently advocating for its position.

5 While Mr. Morais-Hechavarria filed the petition as a person directly impacted by
6 LVMPD's unlawful actions, the mere possibility that other individuals may have a more direct
7 interest in bringing a challenge to LVMPD's authority to enter into a 287(g) agreement does not
8 mean that ACLU of Nevada is an inappropriate party to do so. *See id* at 1210-1211 (citing *Trs.*
9 *for Alaska*, 736 P.2d at 330 ((holding "the mere possibility that the Attorney General may sue does
10 not mean that appellants are inappropriate plaintiffs" and stating "the crucial inquiry is whether
11 the more directly concerned potential plaintiff has sued or seems likely to sue in the
12 foreseeable future"))) (citing *Utah Chapter of Sierra Club*, 148 P.3d at 972-73 ((recognizing that
13 more than one party may be appropriate and a party is not required to have the greatest interest to
14 have standing))). This is particularly true here where no other person has or is likely to bring suit,
15 and LVMPD has taken actions to deliberately limit Mr. Morais-Hechavarria's participation in the
16 lawsuit by releasing him directly to ICE instead of transporting him to a treatment facility which
17 subsequently resulted in his removal from the United States within a matter of days to a country
18 in which he had never resided.

19 Considering that LVMPD does not dispute that this is a matter of public importance
20 involving the separation of powers, the ACLU has standing under the public importance doctrine
21 to challenge LVMPD's authority to enter into a 287(g) agreement to detain people on
22 administrative warrants issued by ICE.

23 **II. Mr. Morais-Hechavarria's release from LVMPD custody does not render the claims**
24 **moot.**

1 As a general rule, a controversy must be present through all stages of the proceeding, and
2 even though a case may present a live controversy at its beginning, subsequent events may render
3 the case moot. *Valdez-Jimenez v. Eighth Judicial Dist. Court of Nev.*, 136 Nev. 155, 460 P.3d 976
4 (2020). However, even where a case is moot, the Court may consider it if it involves a matter of
5 widespread importance that is capable of repetition, yet evading review. *Id.* at *158. Under such
6 circumstances, the party seeking to overcome mootness must prove that (1) the duration of the
7 challenged action is relatively short, (2) there is a likelihood that a similar issue will arise in the
8 future, and (3) the matter is important. *Id.*

9 All three factors are satisfied here, and the *Valdez-Jimenez* case is comparative. Petitioners
10 in *Valdez-Jimenez* challenged the Eighth Judicial Court's bail process as unconstitutional after
11 their motions to vacate or reduce their bonds were denied. *Id.* at *157. Petitioners filed a petition
12 for a writ of mandamus seeking relief, but by the time the case was heard by the Nevada Supreme
13 Court, both were released from custody. *Id.* The Nevada Supreme Court held that despite their
14 release, the case could proceed because the issues presented fell within the exception to the
15 mootness doctrine. *Id.* at *158. The Court held that all three factors mentioned above were met
16 because 1) given the time restraints inherent in criminal cases, most bail orders are short in duration
17 and the issues concerning bail and pretrial detention become moot once the case is resolved by
18 dismissal, guilty plea, or trial; 2) documents from other criminal cases in which defendants have
19 raised similar arguments before the justice court or district court about the process of setting bail
20 support the Petitioners' argument that the question presented is likely to arise in the future with
21 respect to the individuals who are similarly situated to the Petitioners; and 3) the issues presented
22 are of widespread importance, as they affect many arrestees and involve the constitutionality of
23 Nevada's bail system. *Id.* at *158-161.

1 Like bail orders, the duration of people being held by LVMPD pursuant to the Agreement
2 is short in nature. It is unlikely that those people could bring an individual habeas petition
3 challenging their unlawful detention and get a resolution before they are turned over to ICE
4 custody and, as in Mr. Morais-Hechavarria’s case, deported out of the country. There is a
5 likelihood that a similar issue will arise in the future. Respondents signed the Agreement and
6 became legally obligated to perform the actions outlined within it, including holding people on
7 behalf of ICE. The key issue here- whether Respondents have the authority to enter into a 287(g)
8 agreement- is relevant to the many instances LVMPD will detain people for ICE in the future.
9 LVMPD’s argument that Petitioners have not identified a “concrete likelihood that the same
10 unique confluence [...] will recur”, Resp. at 15: 8-11, misstates the standard. The issues do not
11 have to be identical but rather similar. *See Valdez-Jimenez*, 136 Nev. at 160 (“the second factor of
12 the mootness exception requires that the question presented is likely to arise in the future with
13 respect to the complaining party or individuals who are *similarly* situated to the complainant.”)
14 (emphasis added). Additionally, just like in *Valdez-Jimenez*, Respondents’ authority to hold people
15 in detention on behalf of ICE has been challenged in criminal cases by defense attorneys on behalf
16 of their clients, *see e.g. State v. Poole*, No. 19-F-08292X (Las Vegas Just. Ct. Clark Cnty., Nev.
17 filed July 2, 2025), which is a clear indication that Mr. Morais-Hechavarria’s case is not an isolated
18 incident. Finally, the issues presented in this case are of widespread importance because they
19 impact many immigrant detainees and involve statutory and constitutional questions under Nevada
20 law. *See Valdez-Jimenez*, 136 Nev. at 160; *see also Johnston v. Eighth Judicial Dist. Court of Nev.*,
21 518 P.3d 94, 100 (Nev. 2022) (“Pretrial detention and the parameters of house arrest affect many
22 arrestees, and these issues touch on the constitutionality of Nevada's bail and pretrial release
23 regime.”).

1 The widespread importance of the matter is further exasperated by Respondents' own
2 actions in this case- the transfer of Mr. Morais-Hechavarria to ICE custody rather than inpatient
3 treatment immediately after the Petition was filed- which created the circumstances Respondents
4 now rely upon to argue that the case should be dismissed as moot.

5 **III. LVMPD has not identified a Nevada law authorizing the Department to enter into an**
6 **agreement with the federal government to detain people who are not prisoners or to**
7 **detain people without reimbursements for costs.**

8 Pursuant to Dillon's Rule under Nevada law, local government entities have no power or
9 authority except that which is expressly prescribed by the Legislature. *See Ronnow v. Las Vegas*,
10 57 Nev. 332, 342-43, 65 P.2d 133, 136 (1937) (applying Dillon's Rule to municipal corporations);
11 *Flores v. Las Vegas Clark Cty Library Dist.*, 134 Nev. 827, 833 n.7, 432 P.3d 173, 178 (2018)
12 (noting application of Dillon's Rule to local government). Respondents have not provided any
13 Nevada law that authorizes them to execute a 287(g) agreement with ICE, whether explicitly or
14 implicitly, to detain non-prisoners in a county jail without reimbursement.¹ Respondents are wrong
15 to suggest that the Nevada Legislature needs to expressly prohibited these types of agreements,
16 Resp. at 24: 25-26, as that is the exact opposite of Dillon's Rule. As Petitioners observed before,
17 the Nevada Legislature has delineated when the sheriff can enter into contracts with the federal
18 government, Opening Br. at 15: 5-16, yet it did not grant them the authority to enter into 287(g)
19 agreements. Similarly, no Nevada statute authorizes Respondents to enter into a contract to engage
20 in the actions outlined in the Agreement- holding people on behalf of the federal government,

21
22 ¹ Rather than responding directly to the issue at hand concerning their authority to enter into the
23 Agreement, Respondents argue that their actions under Policy 4.166 "to manage jail releases and
24 to coordinate orderly, on-release custodial transfers to other agencies" is authorized under
Nevada's Interlocal Cooperation Act. However, even if this was relevant to the issues raised in the
Petition, Respondents fail to appreciate that Nevada's Interlocal Cooperation Act still requires that
the public agency have authority under Nevada law to perform such actions. *See* NRS 277.180.

1 conducting civil arrests, and executing administrative warrants i.e. civil warrants signed by
2 executive employees rather than a judge.

3
4 **IV. LVMPD did not act pursuant to Policy 4.166 when it continued to hold Mr. Morais-Hechavarria in its custody.**

5 Respondents argue that Petitioners cannot challenge the Agreement, even if it is unlawful
6 under Nevada law, because it was not "operational" when they detained Mr. Morais Hechavarria
7 for nearly two months after a Nevada District Court judge ordered his release to a treatment facility
8 and it acted entirely under Policy 4.166.² Resp at 16: 1-11. Respondents claim that it did not hold
9 Mr. Morais-Hechavarria for ICE, only in criminal custody until a bed became available at the
10 treatment facility, and there was a "federally supervised transfer at the release boundary" with ICE
11 just as he was being processed for release to be transported to treatment. Resp. at 2:13-16, 4:7-9.
12 This effort to avoid the merits of the Petition is a red herring since the issue in this matter was ripe
13 once LVMPD signed the Agreement as the ACLU of Nevada still has standing to raise this
14 challenge. LVMPD's version of Mr. Morais-Hechavarria's detention is also unsupported by
15 Respondents' exhibits and directly contradicts representations made in the Respondents' response.

16
17 **A. The Agreement went into effect the day ICE and the sheriff affixed their signatures.**

18 LVMPD does not dispute Sheriff McMahon, on behalf of LVMPD, signed the Agreement
19 on May 31, 2025, and an ICE official signed it on June 16, 2025. Opening Br. Ex. 1. Once both
20 parties signed the Agreement, it was fully executed. Petitioners do not have to wait until
21 Respondents "exercise their authority" under the Agreement to challenge their unlawful action of
22

23 ² As discussed *infra*, documents provided by LVMPD do not support its contention that it was
24 acting pursuant to Policy 4.166, but even so, the provisions within the policy of reporting anyone
who is "foreign born" to ICE involve unequal treatment of individuals based on their national
origin which implicate separate constitutional issues.

1 entering into the Agreement in the first place. This is true even if, as LVMPD wrongly argues,
2 LVMPD was acting pursuant to Policy 4.166 when it continued to hold Mr. Morais-Hechavarria
3 in its custody, because ACLU of Nevada has public importance standing under NPRI as discussed
4 *supra* Part I.

5 **B. LVMPD held Mr. Morais-Hechavarria for two months, refusing to place him**
6 **on a transfer list, due to his ICE warrant.**

7 Respondents' own documents show that LVMPD was holding Mr. Morais Hechavarria on
8 an ICE warrant, not because a bed was unavailable at a treatment facility. Respondents received
9 an ICE detainer and an administrative warrant for Mr. Morais-Hechavarria. *See* Resp. Ex. I and J.
10 On August 19, 2025, a social worker for the Clark County Public Defender's office emailed CCDC
11 stating that Mr. Morais-Hechavarria was ready to be transported to an inpatient treatment facility
12 as soon as a bed became available. Opening Br. Ex. 5. An employee at CCDC responded that they
13 will not transfer him *because of the ICE warrant. Id.* As such, he was not put on the wait list for a
14 bed. CCDC refused to place Mr. Morais-Hechavarria on the transfer list a second time when the
15 treatment facility, Westcare, contacted CCDC on August 21, 2025, asking when Mr. Morais-
16 Hechavarria would be transferred. Exhibit 1. CCDC said to Westcare that Mr. Morais-Hechavarria
17 would not be placed on the transfer list expressly because of the ICE warrant. *Id.* After CCDC
18 continued to refuse to release him to be transported to an inpatient treatment facility, Petitioners
19 filed the Petition on October 13, 2025. Only after this Petition was filed did LVMPD abruptly
20 decide to place Morais-Hechavarria on the transfer list.

21 While Respondents frame Mr. Morais-Hechavarria's detention as normal course of
22 business for LVMPD, suggesting that Mr. Morais-Hechavarria was transferred as soon as a bed
23 became available and ICE just so happened to be present when that transfer occurred, LVMPD
24 unlawfully held Mr. Morais-Hechavarria for an additional two months, intentionally refusing to

1 place him on a transfer list because the Department was honoring an administrative warrant issued
2 by ICE.

3 **V. Respondent errs in suggesting LVMPD can claim federal exemption from state law**
4 **or that the INA preempts this action.**

5 Respondents argue that LVMPD's actions under the 287(g) agreement cannot be
6 challenged under state law because LVMPD personnel act as "de facto immigration officers" under
7 8 U.S.C. § 1357(g)(10)(B), and "for all practical purposes, the provisions of the INA that enable
8 ICE agents to enforce immigration law apply with equal force to LVMPD." Resp. at 22: 1-13.
9 Respondents' presumption is wrong for two reasons. First, LVMPD cannot be considered a federal
10 actor under the 287(g) agreement if the agreement itself is invalid, which is precisely the point of
11 the Petition. Sheriff McMahon's signing of the agreement occurred *before* he or other LVMPD
12 personnel could begin taking direction from that federal agency. Second, the INA expressly does
13 not preempt state law; the plain language states that the federal government may only enter into a
14 287(g) agreement with local government entity "to the extent consistent with state and local law."
15 See 8 U.S.C. § 1357(g)(1).

16 The law is not so Kafkaesque that LVMPD can sign a 287(g) agreement that the
17 Department was never authorized to sign under state law and then use that same agreement to
18 avoid a determination as to whether the Department could sign it in the first place.

19 **VI. Petitioners' claims are not otherwise preempted by federal law.**

20 Immigration enforcement is exclusively a federal power, and under the Tenth Amendment
21 it cannot be commanded on States' officers, including those of their political subdivisions. See
22 *Printz v. United States*, 521 U. S. 898, 935, 117 S. Ct. 2365, 138 L. Ed. 2d 914 (1997) (holding
23 that the Federal Government may not compel state officers to enforce federal law). Nonetheless,
24 Respondents' wrongly claim that if Nevada law prohibited them from entering into the Agreement,
such authority would be preempted because it would be an "obstacle" to Congress' intent of

enhancing cooperation between federal and local law enforcement in enforcing immigration law. Resp. at 28:18-26, 29:1-2. This would not only violate the Tenth Amendment, but it is contrary to the provision enacted by Congress within the INA which states: “Nothing in this subsection shall be construed to require any State or political subdivision of a State to enter into an agreement with the Attorney General under this subsection.” See 8 U.S.C. § 1357(g)(9).

VII. The Petition does not request that this Court “negate” any ICE warrants, only to determine that LVMPD cannot enforce such warrants under state law.

To the extent that Respondents argue that Petitioners seek to “negate” an administrative warrant issued by ICE, Respondents are wrong. Resp. at 13:1-3. Nothing in Petitioners’ writ will make an ICE warrant cease to exist. Rather, Petitioners’ writ only seeks to bar LVMPD from enforcing administrative warrants issued by ICE; this Court would not be the first state court to ban state actors from enforcing ICE warrants under their respective state laws. See *Lunn v. Commonwealth*, 477 Mass. 517, 78 N.E.3d 1143, 1154 (Mass. 2017) (holding that Massachusetts court officers do not have the authority to arrest someone at the request of Federal immigration authorities, pursuant to a civil immigration detainer, and hold them beyond the time that they were to be entitled to be released from State custody); *People ex rel. Wells v. DeMarco*, 2018 NY Slip Op 07740, 168 A.D.3d 31, 88 N.Y.S.3d 518 (App. Div.) (holding that the Petitioner was entitled to a writ of habeas corpus following his arrest by a county sheriff based on an ICE administrative because the sheriff lacked New York authority to effectuate a criminal arrest pursuant to the ICE warrant, which was civil in nature and not issued by a judge or a court); *Cisneros v. Elder*, 2018 Colo. Dist. LEXIS 3388 (holding that the sheriff does not have legal authority under Colorado law to detain people pursuant to ICE administrative warrants and detainers); *Nash v. Mikesell*, 2024 COA 68, 557 P.3d 369 (holding that a 287(g) agreement must comply with Colorado statutory law and under Colorado law, sheriffs are prohibited from arresting individuals on the basis of civil

1 immigration detainees). ICE may continue to issue and enforce its own warrants as authorized
2 under federal law, but federal law does not require any state actor or court to assist in that process.

3 **VIII. ICE is not a necessary party.**

4 Respondents claim ICE is a necessary party, but fail to cite to the standard provided under
5 Nevada law. NRCP 19(a)(1) provides the standard for who is considered a necessary party under
6 Nevada law, requiring joinder if it will not deprive the court of subject-matter jurisdiction and:

7 (A) in that person's absence, the court cannot accord complete relief among existing
8 parties; or

9 (B) that person claims an interest relating to the subject of the action and is so
situated that disposing of the action in the person's absence may:

10 (i) as a practical matter impair or impede the person's ability to protect the
11 interest; or

12 (ii) leave an existing party subject to substantial risk of incurring double,
multiple, or otherwise inconsistent obligations because of the interest.

13 Notably, NRCP 19(a)(1) does not state, or even infer, that every party to every legal agreement is
14 automatically a necessary party. In this case, it is clear that NRCP 19(a)(1) does not apply. No
15 current party, not LVMPD, ACLU of Nevada, nor Mr. Morais-Hechavarria need ICE's input to
16 determine whether LVMPD has the legal authority under Nevada law to enter into a 287(g)
17 agreement and all relief sought can be obtained from Respondents without ICE. As for NRCP
18 19(a)(1)(B), LVMPD does not clearly define the interest that ICE has in the Agreement that
19 violates Nevada state law and so contravenes federal law, and nothing in NRCP 19(a)(1)(B)
20 indicates that LVMPD can assert ICE's claims for it, and ICE has not sought to intervene.

21 Even if this Court determined that ICE was a necessary party as defined under NRCP
22 19(a)(1), the Court would not be required to dismiss this action. Petitioners' action is brought
23 pursuant to state law, which only LVMPD, not ICE, is subject to; as such, it is not feasible for
24 Petitioners to join ICE as a respondent. *See County of Stanislaus v. Pacific Gas & Elec. Co.*, 114

1 F.3d 858, 863 (9th Cir. 1997) (determining that the federal agencies are immune to state law claims
2 pursuant to the Supremacy Clause of the United States Constitution); *Jamul Action Comm. v.*
3 *Simermeyer*, 974 F.3d 984, 998 (9th Cir. 2020) (determining that joinder is infeasible when the
4 party is immune to suit).

5 If ICE is a necessary party, but it is not feasible to join ICE, NRCP 19(b) applies, which
6 states that “[i]f a person who is required to be joined if feasible cannot be joined, the court must
7 determine whether, in equity and good conscience, the action should proceed among the existing
8 parties or should be dismissed.” According to the factors provided by NRCP 19(b), this action
9 should proceed as all factors favor Petitioners. First, a judgment rendered in ICE’s absence would
10 not prejudice that agency – LVMPD is better equipped to defend its authority under Nevada state
11 law than ICE. Nor does a judgement interfere with ICE’s own enforcement efforts because, as
12 LVMPD has represented in its briefing, ICE can simply be present when LVMPD releases person
13 of interest from CCDC. Resp. at 2:13-18, 26:7-11. Second, a judgment rendered in ICE’s absence
14 would be adequate as a Court order banning LVMPD from entering into a 287(g) agreement would
15 be sufficient to provide complete relief. By comparison, Petitioners would not have an adequate
16 remedy if this action was dismissed – LVMPD would continue to violate state law with impunity,
17 and as state law would never apply to ICE, there would be no way to rectify LVMPD’s unlawful
18 actions.

19 **IX. Conclusion**

20 For the foregoing reasons, the Court should grant Petitioners’ Petition for a Writ of
21 Mandamus or, in the alternative, Petition for Writ of Habeas Corpus.

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1 Dated this 19th day of November, 2025.

2 **AMERICAN CIVIL LIBERTIES**
3 **UNION OF NEVADA**

4 

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13 *Attorneys for Petitioners*

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2025, I electronically filed the foregoing **REPLY**
IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS OR, IN THE
ALTERNATIVE, VERIFIED PETITION FOR WRIT OF HABEAS CORPUS, with the
Eighth Judicial District Court using the e-filing system. Participants in the case who are registered
with this Court's electronic filing system will receive notice that the document has been filed and
is available on the court's electronic filing system. To my knowledge, all parties in this matter are
registered with this Court's electronic filing system.



An employee of the ACLU of Nevada

EXHIBIT 1

From: [Nicole Weis](#)
To: [Sadmira Ramic](#)
Subject: Fw: [EXTERNAL] FW: Sergio Morais Hechaavarria
Date: Friday, November 7, 2025 11:03:56 AM

This Message Is From an External Sender

This message came from outside your organization.

From: Samiko Swonger <S9615S@LVMPD.COM>
Sent: Thursday, August 21, 2025 2:15 PM
To: Tammy Singletary <tammy.singletary@westcare.com>; Glennie Chavez <Glennie.Chavez@ClarkCountyNV.gov>; gardis.canty <gardis.canty@westcare.com>
Cc: Nicole Weis <Nicole.Weis@ClarkCountyNV.gov>; Amy Finley <a13103f@LVMPD.COM>
Subject: RE: [EXTERNAL] FW: Sergio Morais Hechaavarria

He will not be able to go to treatment. He has a warrant so his county charges have to be satisfied before he can be released to ICE.

From: Tammy Singletary <tammy.singletary@westcare.com>
Sent: Thursday, August 21, 2025 2:03 PM
To: Glennie Chavez <Glennie.Chavez@ClarkCountyNV.gov>; Gardis Canty <gardis.canty@westcare.com>
Cc: Nicole Weis <Nicole.Weis@ClarkCountyNV.gov>; Samiko Swonger <S9615S@LVMPD.COM>; Amy Finley <a13103f@LVMPD.COM>
Subject: RE: [EXTERNAL] FW: Sergio Morais Hechaavarria

CAUTION: This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your LVMPD account credentials.**

Adding Samiko and Amy to the thread so they can provide the release date.

From: Glennie Chavez <Glennie.Chavez@ClarkCountyNV.gov>
Sent: Thursday, August 21, 2025 12:17 PM
To: Tammy Singletary <tammy.singletary@westcare.com>; Gardis Canty <gardis.canty@westcare.com>
Cc: Nicole Weis <Nicole.Weis@ClarkCountyNV.gov>
Subject: [EXTERNAL] FW: Sergio Morais Hechaavarria

CAUTION: This email originated from outside of WestCare. DO NOT click links or open attachments unless you were expecting the email, recognize the sender, and know the content is safe.

Referral was sent but we never got a response as to when I available. CCed is Mr. Hechavarria's attorney, and we would like to know when a bed becomes available. Thank you.

From: Glennie Chavez

Sent: Tuesday, August 19, 2025 4:51 PM

To: Tammy Singletary <tammy.singletary@westcare.com>; Amy Finley <a13103f@lvmpd.com>; Samiko Swonger <s9615s@lvmpd.com>

Cc: Nicole Weis <Nicole.Weis@ClarkCountyNV.gov>

Subject: Sergio Morais Hechaavarria

Please see above referral for Sergio Morais Hechaavarria, he is ready to go as soon as bed becomes available.

Glennie Chavez, LMSW

Social Worker

Clark County Public Defender's Office

P: (702) 455-2140 / F: (702) 383-2873

Glennie.chavez@clarkcountynv.gov

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