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CASE NO: A-26-952733-W
Department 8

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY NEVADA

AMERICAN CIVIL LIBERTIES UNION OF
NEVADA, a domestic nonprofit organization, THE
FLORES FIRM LTD. d/b/a EDGAR FLORES
LAW, a domestic corporation, THE MARSHALL
PROJECT, a nonprofit organization, NEVADA
NEWS BUREAU d/b/a THE NEVADA
INDEPENDENT, a domestic nonprofit
organization,

Petitioners,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a governmental entity,

Respondent.

Case No.:

Department:

**Appendix of Exhibits in Support of
Petition for Writ of Mandamus**

Petitioners American Civil Liberties Union (ACLU) of Nevada, The Flores Firm Ltd. d/b/a
Edgar Flores Law, The Marshall Project, and Nevada News Bureau d/b/a The Nevada
Independent, by and through its undersigned counsel, hereby submit this Appendix in Support of
their Petition for Writ of Mandamus.

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3	LVMPD Service Charges	Eff. February 1, 2026
4	LVMPD Jul. 2025 Service Charges	Eff. July 1, 2025
5	LVMPD Email to ACLUNV re: Calc. of Costs	October 30, 2025
6	Tabulation Wksht: ACLUNV BWC Req.	
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20	41	Invoice: Indy Req. for Homicide Data	April 17, 2026
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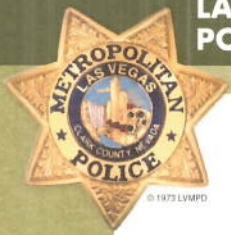
1
2 DATED this 30th day of July 2026.

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

5
6 /s/ Samantha R. Kroner
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EXHIBIT 1

LVMPD Letter to TMP re:
Costs



February 17, 2026

SENT VIA EMAIL ONLY TO:

cduncan@cov.com

Jason P. Criss
Cecile Duncan
COVINGTON & BURLING LLP
30 Hudson Yards
New York, NY 10001-2170

Re: Fees Charged for Responding to Public Records Requests by the Marshall Project

Dear Counsel:

Introduction and Common Ground

Your letter to the Las Vegas Metropolitan Police Department (LVMPD) dated February 4, 2026 has been forwarded to me. My understanding is that your client, the Marshall Project (TMP), has submitted multiple requests to our Public Records Unit (PRU) since last summer. I would like to establish some common ground with you before addressing your requests concerning labor charges.

In your letter, you seem to agree that your client has been submitting requests seeking voluminous materials. Indeed, your letter lists at least some of the requests, the number of hours PRU has reported to your client, and the number of pages provided.

Also, you seem to appreciate that Nevada law requires a police agency to thoroughly review its records because they commonly contain information that must be redacted to protect law enforcement and privacy interests. For instance, there should be no dispute regarding the following:

- Personal identifying information, like dates of birth and social security numbers, must be redacted. NRS 239B.030; NRS 603A.040; NRS 205.4617.
- In *Donrey v. Bradshaw*, 106 Nev. 630, 798 P.2d 144 (1990), the Nevada Supreme Court recognized that law enforcement files may be confidential when pertaining to a “pending or anticipated criminal proceeding,” if there are “confidential sources or investigative techniques to

protect,” if there is a danger of “denying someone a fair trial,” or if there is “potential jeopardy to law enforcement personnel.” 106 Nev. at 636, 798 P.2d at 148.

- In a series of cases, the Nevada Supreme Court has recognized privacy interests must be protected. *Clark County Sch. Dist. v. Las Vegas Review-Journal*, 134 Nev. 700, 706-707, 429 P.3d 313, 319-20 (2018) (adopting a balancing test in which the burden shifts to the requester of a record if the public agency demonstrates a “nontrivial personal privacy interest” including “intrusion[s] into a person’s reasonable expectation of privacy, seclusion, or solitude”); *Las Vegas Metro. Police Dep’t v. Las Vegas Review-Journal*, 136 Nev. 733, 478 P.3d 383 (2020) (privacy interests include information that may cause “embarrassment, shame, stigma, [or] harassment” or “endangerment, or similar harm”); *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, 136 Nev. 44, 458 P.3d 1048 (2020) (medical information, personnel files, details about sexual orientation, and other information about a person’s life give rise to privacy interests).

- The identities of confidential informers must be protected in many circumstances. NRS 49.335.

- The identities of victims of sex crimes must be protected in many circumstances. NRS 200.3771.

These are just examples. I appreciate that you are not disputing that redactions must be made. After all, a police agency collects information about people during the worst times of their lives, whether that be victims, witnesses, and even suspects. Because review for redactions is essential, the more records that are sought, the more time-consuming the effort will be.

Another point of common ground is our client’s commitment to transparency. Your client is focused on educating the public about the criminal justice system. My client shares that goal. LVMPD has long been a leader in transparency. We were one of the first big-city police departments to adopt the use of body-worn cameras. LVMPD provides statistics, reports, and policies on its website. We have a long-standing policy to inform the public about critical incidents, including officer-involved shootings. This includes a media brief on scene immediately after the incident, followed by a 72-hour briefing during which an assistant sheriff shares audio, video, and other details about the investigation. This also includes the publication of the comprehensive report prepared by officers assigned to LVMPD’s Force Investigation Team (FIT). As you know, these materials, among others, can be found on the Transparency page of our website.

The Public Records Unit

As part of LVMPD’s commitment to transparency, and to ensure LVMPD complies with the law, Sheriff Lombardo created PRU in 2017. The unit is managed by a sergeant. Six

commissioned police detectives are assigned full-time to the unit. Another seven full-time civilian employees are also assigned. These employees receive requests, gather records from various databases and other sources throughout our 6,000-member agency, review and redact the records, and then disseminate the records to the requester. We receive thousands of requests every year. Importantly, the employees in PRU have been pulled from other functions. For instance, the police detectives are no longer investigating and solving crimes because they are now assigned to PRU.

Importantly, PRU provides records to not only the general public, but to the media. The media, as you may not know, is entitled to receive records of criminal history, while the general public is not. The dissemination of records of criminal history, and information related thereto, are governed more by NRS Chapter 179A (entitled, “Records of Criminal History and Information Related to Public Safety”) than NRS Chapter 239 (the Nevada Public Records Act or NPRA).¹ As explained more immediately below, as much as we can debate whether charging for labor is permitted by the NPRA, there is no question that charging is permitted by NRS Chapter 179A.

PRU only charges for labor when the effort is burdensome. For instance, PRU does not charge the media for everyday arrest reports. For large incidents that have created a public interest, voluminous records are provided without charge. For instance, we will publish body-worn camera footage on our YouTube channel for events like mass shootings or protests. We only consider charging when the request or the series of requests are unusually burdensome and the records do not involve a matter of widespread public interest.

NRS 179A.140 Permits a Reasonable Fee

Your letter does not address Chapter 179A. But because your client is seeking information pertaining to criminal history, there is no question that a police agency may charge a reasonable fee. NRS 179A.140, provides, with emphasis added:

NRS 179A.140 Fee for furnishing information relating to records of criminal history; use of money collected.

1. Except as otherwise provided in this section, **an agency of criminal justice may charge a reasonable fee for information relating to records of criminal history provided to any person** or governmental entity.
2. An agency of criminal justice shall not charge a fee for providing such information to another agency of criminal justice if the information is provided for purposes of the administration of criminal justice.

¹ NRS 239.010(1) codifies a large list of exemptions from the NPRA. Included is NRS 179A.070, the definition of a “record of criminal history”).

3. The Central Repository shall not charge such a fee:
 - (a) For information relating to a person regarding whom the Central Repository provided a similar report within the immediately preceding 90 days in conjunction with the application by that person for professional licensure;
 - (b) For information provided to any organization that meets the criteria established by regulation pursuant to paragraph (b) of subsection 5 of [NRS 179A.310](#); or
 - (c) For information provided to a person who is required to conduct a background check pursuant to [NRS 202.2547](#).
4. The Director may request an allocation from the Contingency Account pursuant to [NRS 353.266](#), [353.268](#) and [353.269](#) to cover the costs incurred by the Department to carry out the provisions of paragraph (b) of subsection 3.
5. All money received or collected by the Department pursuant to this section must be used to defray the cost of operating the Central Repository or for any other purpose authorized by the Legislature, and any balance of the money remaining at the end of a fiscal year reverts to the State General Fund.

Here, there is no question that TMP has been seeking “information relating to records of criminal history.” A “record of criminal history” is “information” documenting an arrest, a citation, a prosecutorial decision, a warrant, an indictment, a sentencing decision, or any basic information pertaining to a person who went through the criminal justice system. NRS 179A.070(1). “Information relating to records of criminal history,” the phrase used in NRS 179A.140, is even broader. This clearly connotes all the rest of the records that would be associated with, for instance, an arrest. The statute, in fact, expressly contemplates that other information exists, like “[i]nvestigative or intelligence information, reports of crime or other information concerning specific persons collected in the course of the enforcement of criminal laws.” NRS 179A.070(2)(a).

When your client seeks, for instance, “arrest warrants and/or supporting affidavits and homicide investigation reports,” it is seeking both a “record of criminal history” and “information relating to” that record of criminal history. The record of criminal history would be the

“information contained in” the arrest warrant documenting the fact that ‘x’ person was charged with ‘x’ crime on ‘x’ date. But the bulk of the request is seeking “information relating to” that arrest warrant, namely the details contained in the supporting affidavit and investigative reports. As such, NRS 179A.140(1) clearly and unambiguously allows LVMPD to charge a reasonable fee for producing such records. And NRS 179A.140 does not limit the definition of “reasonable fee” to exclude labor costs.

The NPRA Permits Charging for Labor

To address the points in your letter concerning the NPRA, please see attached. Essentially, we simply disagree with your interpretation of NRS 239.052(1) and NRS 239.005(1). Our main points would be as follows:

- A court would likely find the NPRA ambiguous. Your letter repeatedly states otherwise, but at the same time, you expressly acknowledge, at the bottom of page 3, that “the NPRA’s fee provision does not expressly include or foreclose labor and personnel costs.” I agree with you – the NPRA could be clearer. That is why principles of statutory construction are required.
- Your letter does not address the primary rules of statutory construction that favor charging. First, the list of “actual costs” in NRS 239.005(1) is predicated by the phrase “without limitation.” In Nevada, the phrasing “without limitation” requires an expansive construction; i.e., a narrow construction is error. *Sims v. Eighth Judicial Dist. Court*, 125 Nev. 126, 130, 206 P.3d 980, 983 (2009).
- Second, the original bill draft would have expressly prevented public agencies from ever charging for labor costs. That language was specifically removed. *McKay v. Bd. of Cty. Comm’rs*, 103 Nev. 490, 492 n.2, 746 P.2d 124, 125 (1987) (holding that the failure to adopt proposed language in a bill is evidence of the Legislature’s intent to the contrary); *Palmer v. Del Webb’s High Sierra*, 108 Nev. 673, 680, 838 P.2d 435, 439 (1992) (explaining that “[t]he legislature could have easily provided that an occupational disease ‘means,’ ‘is’ or ‘is defined as’ any disease which ‘arises out of an in the course of the employment,’” but that the legislature did not, in fact, do so); *Republican Attys. Gen. Assoc. (“RAGA”) v. Las Vegas Metro. Police Dep’t*, 136 Nev. 28, 32-33, 458 P.3d 328, 332-33 (2020) (rejecting argument that a public entity waives privileges by not naming them within five days, since the Legislature specifically rejected a bill draft that would have codified such a waiver); *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, --- Nev. ---, 458 P.3d 1048 (2020) (citing *RAGA* for the same proposition).

After you review the attached memo, please let me know if you still disagree. Please know that the issue of charging has arisen from time to time since 2019. But it has never been litigated. I strongly believe that if your position were likely to prevail, someone in Nevada would have filed

suit by now. For example, whenever there is an auto accident in our jurisdiction, insurance claims adjusters and/or attorneys will routinely seek the body-worn camera footage. My understanding is they are looking for admissions as to liability or damages caught on camera. It is very labor-intensive to redact body-worn camera footage and therefore we routinely charge for the labor costs without much debate. On the other hand, when the media asks for simple arrest reports (like they do every day), we do not charge because the task will not take much effort. But when the same media asks for the “entire file” about a particular arrest, then we do charge. Again, there has never been litigation about this because, in my opinion, LVMPD has taken a reasonable position consistent with the law.

There is one point not contained in the attached memo. When construing a statute, absurd or unreasonable results must be avoided. *Leven v. Frey*, 123 Nev. 399, 405, 168 P.3d 712, 716 (2007). If a public entity could never charge its labor costs for providing records, the result would be absurd. Indeed, your client could seek every homicide file in LVMPD’s possession going back to the creation of LVMPD in 1973. The files would include interviews, CAD reports, officer reports, search warrant materials, 911 audio, interviews with witnesses, and body-worn camera footage (in later years). The effort would literally be endless. Your interpretation does not account for this. There is no way the Nevada Legislature intended to permit requesters to seek voluminous materials without the ability to recover labor costs. Moreover, if we could only charge for overtime, then we could easily reassign everyone currently working in PRU and only produce records if the requester paid time-and-a-half for every request. This is not what the Legislature intended because it would seriously undermine transparency. Therefore, such a result would be absurd.

Finally, let me just address a couple of other points contained in your letter:

- The FIT report may not be called an “officer’s report,” but other requesters would be angry with us if the only report that existed is a FIT report but was not provided just because the requester happened to use the phrase “officer’s report.” The FIT report was written by officers. No other report existed. Moreover, it was provided to your client with less redactions than contained in the published version on our website.
- The rate did go up from \$46/hour to \$47/hour. These rates are based on the actual salaries and benefits of the employees, as calculated by LVMPD’s Office of Finance. The rates are reevaluated every fiscal year. Obviously, salaries go up with the cost of living increases employees receive. The rates are approved by LVMPD’s Fiscal Affairs Committee only after the publication of a meeting agenda followed by an open meeting that anyone can attend. *See* NRS Chapter 280 (allowing for the creation of LVMPD); NRS Chapter 241 (Nevada’s Open Meeting Law).
- I agree that the Nevada Legislature and the Nevada Supreme Court require the NPRA to be construed broadly in favor of transparency. But the statutes and cases address the

records themselves and what should be redacted, not whether public agencies can charge. Again, LVMPD's charges are reasonable and consistent with the statute. There is no evidence that fees are designed to thwart transparency.

- NRS 239.053 is not relevant as far as I can tell. It is simply a special statute that protects court reporters, who can only make a living when litigants pay for their services. For instance, if I need a transcript from a hearing, LVMPD must pay the court reporter (up front), otherwise I cannot get the transcript.

Conclusion

My understanding is that our PRU staff have done their best to establish an amicable relationship with your client. Throughout the last many months, they have made efforts to work cooperatively with the requesters and to set reasonable, consistent expectations. There have been phone calls designed to assist the requesters. There are additional letters PRU has sent not attached to your letter. We understand that TMP is doing its job and is entitled to records. But please understand that they have been seeking voluminous records that require gathering, review, and redaction. PRU is always willing to work with requesters to narrow the scope of requests to avoid costs. But the law allows LVMPD to recover the labor costs associated with the production of records, not only when the records are not readily available pursuant to NRS Chapter 239, but also when they relate to criminal history, as expressly allowed by NRS 179A.140. I ask that you reconsider your position.

Sincerely,

Kevin McMahonill, Sheriff

By: /s/ Matthew J. Christian
Matthew J. Christian
Assistant General Counsel

Enclosure as stated

A public entity may recoup personnel time for gathering documents pursuant to a public records request, if the records are not readily available

I. ARGUMENT

A. Public Entities May Charge for Labor Unless the Labor Would Have Been Incurred Regardless of the Request

1. History of SB 287 (2019)

Prior to the October 1, 2019, the question of whether a public entity could charge for personnel time to gather, compile, redact, and produce public records was governed by the interplay between three statutes:

NRS 239.005 Definitions. As used in this chapter, unless the context otherwise requires:

1. “Actual cost” means the direct cost related to the reproduction of a public record. The term does not include a cost that a governmental entity incurs regardless of whether or not a person requests a copy of a particular public record.

NRS 239.052 Fees: Limitations; waiver; posting of sign or notice.

1. Except as otherwise provided in this subsection, a governmental entity may charge a fee for providing a copy of a public record. Such a fee must not exceed the actual cost to the governmental entity to provide the copy of the public record unless a specific statute or regulation sets a fee that the governmental entity must charge for the copy. A governmental entity shall not charge a fee for providing a copy of a public record if a specific statute or regulation requires the governmental entity to provide the copy without charge.

NRS 239.055 Additional fee when extraordinary use of personnel or resources is required; limitation.

1. Except as otherwise provided in NRS 239.054 regarding information provided from a geographic information system, if a request for a copy of a public record would require a governmental entity to make extraordinary use of its personnel or technological resources, the governmental entity may, in addition to any other fee authorized pursuant to this chapter, charge a fee not to exceed 50 cents per page for such extraordinary use. Such a request must be made in writing, and upon receiving such a request, the governmental entity shall inform the requester, in writing, of the amount of the fee before preparing the requested information. The fee charged by the governmental entity must be reasonable and must be based on the cost that the governmental entity actually incurs for the extraordinary use of its personnel or technological resources. The governmental entity shall not charge such a fee if the governmental entity is not required to make extraordinary use of its personnel or technological resources to fulfill additional requests for the same information.

These statutes were notoriously difficult to reconcile. Public entities would argue that they could charge for personnel time under the “extraordinary use” provision in NRS 239.055. The media would argue that personnel time was not “extraordinary” or that the public entity was charging more than what was “reasonable” or “actual.” The “50 cents per page” language also introduced confusion. District courts have been inconsistent when interpreting these statutes, resulting in several pending appeals.

For example, in a case about the hundreds of hours of gruesome Body Worn Camera footage from the 1 October mass shooting, Judge Scotti limited LVMPD to 31 cents per page based on its fee schedule. This cost applied to personnel time for redacting confidential information. However, because of the “per page” limitation within the statute, Judge Scotti determined that NRS 239.055 did not apply to electronic media, such as Body Worn Camera footage, and LVMPD was precluded from charging any costs related to the redaction of video footage. In other instances, courts have determined that the “50 cents per page” language is limited to strictly copying and

does not apply to redacting confidential information. This interpretation significantly restricts government entities' ability to charge because often times the agencies are required to provide records in electronic format. Again, these decisions have resulted in appeals. In other cases, the public entities routinely charge for personnel time.

In 2019, the media and other parties introduced SB 287. The original bill would have eliminated public entities' ability to charge for personnel time by amending the three statutes as follows:

NRS 239.005 Definitions. As used in this chapter, unless the context otherwise requires:

1. "Actual cost" means the direct cost ~~related to the reproduction~~ *incurred by a governmental entity in the provision* of a public record, *including, without limitation, the cost of ink, toner, paper, media and postage.* The term does not include a cost that a governmental entity incurs regardless of whether or not a person requests a copy of a particular public record, *including, without limitation, any overhead costs of the governmental entity and any labor costs incurred by a governmental entity in the provision of a public record.*

NRS 239.052 Fees: Limitations; waiver; posting of sign or notice.

1. Except as otherwise provided in this subsection, a governmental entity may charge a fee for providing a copy of a public record. Such a fee must not exceed the actual cost to the governmental entity to provide the copy of the public record unless a specific statute or regulation sets a fee that the governmental entity must charge for the copy. A governmental entity shall not charge a fee for providing a copy of a public record if a specific statute or regulation requires the governmental entity to provide the copy without charge.

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By repealing NRS 239.055, and by adding language to NRS 239.005(1) that expressly excluded “labor costs” from the definition of “actual costs,” SB 287 would have eliminated any argument that public entities could recoup labor costs. Therefore, public entities strongly opposed these (and other) provisions of SB 287. Public entities provided testimony to the Senate Government Affairs Committee about how some requests required the consumption of significant resources to locate, redact, and produce records. Public entities also testified that eliminating the ability to charge would encourage frivolous records requests. On the other hand, the proponents of the bill argued that public entities have overcharged in the past and that charging hinders the public’s access to records.

Two senators took the lead in negotiating a compromise: Republican Ben Kieckhefer, who was both a reporter and a public servant, and thus familiar with the issues; and Democrat Melanie Scheible, who is a deputy district attorney and thus familiar with disseminating public records. The Senators consulted with stakeholders, but could not arrive at a compromise. Instead, the

Senators introduced an amendment that they determined would address the concerns of both sides. Amendment 1133 provides as follows (with changes from the pre-2019 statutes in single strike-through and underlined, and changes from the original bill in double strike-through):

NRS 239.005 Definitions. As used in this chapter, unless the context otherwise requires:

1. “Actual cost” means the direct cost ~~related to the reproduction~~ incurred by a governmental entity in the provision of a public record, including, without limitation, the cost of ink, toner, paper, media and postage. The term does not include a cost that a governmental entity incurs regardless of whether or not a person requests a copy of a particular public record, ~~including, without limitation, any overhead costs of the governmental entity and any labor costs incurred by a governmental entity in the provision of a public record.~~

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~~made in writing, and upon receiving such a request, the governmental entity shall inform the requester, in writing, of the amount of the fee before preparing the requested information. The fee charged by the governmental entity must be reasonable and must be based on the cost that the governmental entity actually incurs for the extraordinary use of its personnel or technological resources. The governmental entity shall not charge such a fee if the governmental entity is not required to make extraordinary use of its personnel or technological resources to fulfill additional requests for the same information.~~

Amendment 1133 effectively did three things relevant to the question of personnel costs. First, Amendment 1133 modified SB 287's original language concerning the definition of "actual cost" in NRS 239.005(1). Second, Amendment 1133, just like the original bill, did not change NRS 239.052, permitting a public entity to charge for "actual costs." Third, Amendment 1133, just like the original bill, repealed NRS 239.055 and its confusing language about "50 cents per page" for "extraordinary use of [] personnel."

Amendment 1133 passed the Senate. Senators Kieckhefer and Scheible then presented Amendment 1133 to the Assembly Committee on Government Affairs. This occurred on June 3, 2019, the last day of the session. The Senators gave testimony and took questions. The Assembly passed Amendment 1133, which became law on October 1, 2019.

2. The New Law Clarifies that Public Entities May Charge for Labor

In Nevada, statutory construction "begins with consideration of the legislative history to uncover any indications of legislative intent." *A.J. v. Eighth Jud. Dist. Court*, --- Nev. ---, 394 P.3d 1209, 1213, *quoting* 2A Norman J. Singer & Shambie Singer, *Statutes and Statutory Construction* § 48:1, at 556. This rule of construction yields even to the plain meaning rule. *Id.*

Here, the statements of the Senators provide clarity as to whether entities would be able to charge for personnel time if Amendment 1133 passed. In particular, Senator Scheible testified as

follows with regard to the changes to NRS 239.005 (which is Section 3, Subsection 1 of Amendment 1133):

...[O]ne of the areas we had difficulty with was whether or not overhead, and personnel, and labor costs should be included in the definition of an actual cost. And so you'll notice that Section 3, Subsection 1 does not address that question specifically because it was our determination that in some cases *it's appropriate* and in a lot of cases it's not. It's certainly not appropriate for a government agency to depend on fees for providing public records to pay their power bill and in order to make any portion of their annual budget. *However, when a public records request comes in that is incredibly onerous, that is incredibly large* – we heard testimony on the Senate side about organizations that for legitimate reasons were requesting tens of thousands of documents and cities, counties, local jurisdictions had to *call their employees in over the weekend* to work a Saturday or they had to *invest in a printer* to leave the copier and copy room available for all of their daily functions and still be able to complete a project of copying ten thousand pages of some of their records. *And so we want to make sure they're able to account for those costs* and that's why we came to the decision we did in Section 3, Subsection 1.

[Emphasis added.]

Later, Assemblyman Smith pressed for more clarity on when a public entity could charge.

In asking his question, Assemblyman Smith wanted to know the line between what constitutes an “extraordinary use” of public resources and what does not. Senator Kieckhefer responded:

I think you'll notice at the back of the bill at page 11, we're striking NRS 239.055 relating to extraordinary use, and we are hinging the ability to recoup costs on actual costs so that *any* actual costs incurred by an extraordinary request would *still* be able to be recouped under 239.010 [sic] *which is their ability to charge fees to recoup those costs.*¹ So we're trying to *simplify* it by not having that arbitrary line of what is extraordinary and what's not. *Whatever the cost is, they can recover.*

¹ The ability to charge is in NRS 239.052.

[Emphasis added.]

The testimony of the Senators that public entities may charge for personnel time is consistent with the plain language of Amendment 1133. *See Edgington v. Edgington*, 119 Nev. 577, 582-83, 80 P.3d 1282, 1286-87 (2003) (holding that the plain language of a statute must be given effect and the goal of statutory construction is to find the Legislature's intent).

Here, the Legislature's intent is clear. The statutory changes remove the ambiguity caused by the "extraordinary use" and "50 cents per page" language in NRS 239.055. Now, to determine what types of costs the public entity may and not may charge, the statutes simply provide that a public entity "may charge a fee for providing a copy of a public record" and "[s]uch a fee must not exceed the actual cost to the governmental entity." NRS 239.052. The only limitation on what constitutes an "actual cost" is that the public entity cannot charge if it would have incurred the cost "regardless of whether or not a person requests a copy of a particular public record." NRS 239.005(1) (explored more below). Again, this comports with the Senators' testimony.

This result is strongly bolstered by the removal of the phrases "overhead costs" and "labor costs" from the original bill. *McKay v. Bd. of Cty. Comm'rs*, 103 Nev. 490, 492 n.2, 746 P.2d 124, 125 (1987) (holding that the failure to adopt proposed language in a bill is evidence of the Legislature's intent to the contrary). The original language in SB 287 would have prevented public entities from recovering overhead and labor costs. That language was removed from Amendment 1133 and thus did not make it into law. If the Legislature had intended to bar public entities from recouping personnel costs, it would kept the "overhead" and "labor" language in Amendment 1133. *Palmer v. Del Webb's High Sierra*, 108 Nev. 673, 680, 838 P.2d 435, 439 (1992) (explaining that "[t]he legislature could have easily provided than an occupational disease 'means,' 'is' or 'is

defined as' any disease which 'arises out of an in the course of the employment,'" but that the legislature did not, in fact, do so).

Indeed, in the area of public records law, the Nevada Supreme Court has specifically held that when the Legislature considers language in a bill draft, but then specifically declines to adopt that language, it must be presumed that the Legislature did not intend the language to be the law. *Republican Attys. Gen. Assoc. ("RAGA") v. Las Vegas Metro. Police Dep't*, 136 Nev. 28, 32-33, 458 P.3d 328, 332-33 (2020) (rejecting argument that a public entity waives privileges by not naming them within five days, since the Legislature specifically rejected a bill draft that would have codified such a waiver; *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, --- Nev. ---, 458 P.3d 1048 (2020) (citing *RAGA* for the same proposition). The *RAGA* Court was very clear on this principle of statutory construction:

"Few principles of statutory construction are more compelling than the proposition that Congress does not intend *sub silentio* to enact statutory language that it has earlier discarded in favor of other language." *INS v. Cardoza-Fonseca*, 480 U.S. 421, 442-43, 107 S. Ct. 1207, 94 L. Ed. 2d 434 (1987) (quoting *Nachman Corp. v. Pension Benefit Guar. Corp.*, 446 U.S. 359, 392-93, 100 S. Ct. 1723, 64 L. Ed. 2d 354 (1980) (Stewart, J., dissenting)); see also *Russello v. United States*, 464 U.S. 16, 23-24, 104 S. Ct. 296, 78 L. Ed. 2d 17 (1983) ("Where Congress includes limiting language in an earlier version of a bill but deletes it prior to enactment, it may be presumed that the limitation was not intended.")

Id.

Here, the issue is identical. The media proposed language that would have limited public entities' ability to recover labor costs. The Legislature specifically declined to adopt that language. Thus, just like the never-adopted waiver language cited in *RAGA* and *Clark County Office of the Coroner*, the never-adopted labor cost ban conclusively demonstrates the Legislature's intent to allow public entities to charge for labor.

3. The List of “Actual Costs” in NRS 239.055(1) is “Without Limitation”

The media may argue that the list of “actual costs” in NRS 239.005(1) includes only “hard” costs like toner and paper, and does not include “personnel time.” However, not only does this argument contradict the Legislature’s clear intent, it ignores the plain language of the text. The list of “actual costs” in NRS 239.005(1) is predicated by the phrase “without limitation.” In Nevada, the phrasing “without limitation” requires an expansive construction; i.e., a narrow construction is error. *Sims v. Eighth Judicial Dist. Court*, 125 Nev. 126, 130, 206 P.3d 980, 983 (2009).

In *Sims*, the Court was called on to construe NRS 178.415(3), which involves competency hearings. The statute provides that, upon receiving competency reports from the court-appointed competency examiners, the district court “shall permit counsel for both sides to examine the person or persons appointed to examine the defendant.” Additionally, “[t]he prosecuting attorney and the defendant may: (a) Introduce other evidence including, without limitation, evidence related to treatment to competency and the possibility of ordering the involuntary administration of medication; and (b) Cross-examine one another’s witnesses.” *Id.* at 130, 206 P.3d at 983 (emphasis added). The Court held that the phrase “without limitation” is unambiguously broad:

The plain and unambiguous language of NRS 178.415(3) is expansive and in no way limits the prosecuting attorney’s or defense counsel’s ability to introduce evidence during the competency hearing. The plain meaning of the statute is evidenced by the phrases “other evidence” and “without limitation,” which denote expansive legislative intent. *See Alsenz v. Clark Co. School Dist.*, 109 Nev. 1062, 1065, 864 P.2d 285, 287 (1993); *see also St. Paul Mercury Ins. Co. v. Lexington Ins. Co.*, 78 F.3d 202, 206-07 (5th Cir. 1996) (word “including” is generally given expansive reading, even without additional language of “without limitation”).

Id. [Emphasis added.]

Based on *Sims*, the “without limitation” language in NRS 239.005(1) must be construed broadly. The mere fact that the statute lists certain “actual costs” without listing “personnel” is inconsequential given the Legislature’s inclusion of the “without limitation” language. NRS 239.005(1) must not be construed narrowly to limit “actual costs” to only those items listed. Again, only a broad construction comports with the legislative history.

4. The Legislative Counsel’s Digest is in Accord

One further change between the original bill and Amendment 1133 indicates a legislative intent to permit public entities to charge for personnel time. The Legislative Counsel’s Digest from the original bill explains Section 3 of the bill (the section that alters NRS 239.005) as “clarif[ying] that the actual cost to a governmental entity: (1) includes such direct costs as the cost of ink, toner, paper, media and postage; and (2) does not include overhead and labor costs that a governmental entity incurs regardless of the request.” [Emphasis added.] In Amendment 1133, the Legislative Counsel’s Digest is modified to exclude the second clause. So like the amended bill itself, language about “overhead” and “labor” is removed. The intent is clear – to permit public entities to charge for labor, as long as the labor would not have been incurred without the request.

B. Labor Costs are Appropriate When the Records are Not “Readily Available”

Although it is clear that public entities may charge for labor as an actual cost, the statute, both before and after Amendment 1133, excludes costs “that a governmental entity incurs regardless of whether or not a person requests a copy of a particular public record.” NRS 239.005(1). Again, the Senators took questions about whether and when a public entity could charge for labor. In explaining the intent of the new definition of “actual costs,” Senator Scheible used the term “onerous” to elaborate on when she believed charging is justified. *See, supra*.

“Onerous” is a synonym of “burdensome.” Moreover, when a record is “onerous” or “burdensome” to produce, it follows that the record is not “readily available,” a phrase used elsewhere in Chapter 239.

NRS 239.0107, both before and after Amendment 1133 was passed, provides for various alternatives when responding to a records request. As provided in subsection 1, a public entity must generally provide some kind of response within five days. Within those five days, the public entity may allow inspection, deny the request, assert privileges, and/or state that a response will be forthcoming in a certain number of additional days.

Importantly, NRS 239.0107 has a subsection 2. That subsection provides (with amendments in italics and underlined):

If a public book or record of a governmental entity is **readily available** for inspection or copying, the person who has legal custody or control of the public book or record shall allow a person who has submitted a request to inspect, copy or receive a copy of a public book or record *as expeditiously as practicable*.

[Bold emphasis added.]

The phrase “readily available” is an indication of what the Legislature considers not to be “onerous” or “burdensome.” Public entities are expected to provide public records on a regular basis. It is reasonable to assume that providing records on a regular basis will require public entities to hire and retain certain personnel. When a document is readily available, the day-to-day personnel hired to provide records can do so within five days (or “as expeditiously as possible”). However, when a document is not readily available, the public entity will have to redirect resources. As Senator Scheible stated, an example of this would be paying employees to come in over a weekend on overtime. Thus, the phrase “readily available” accurately describes the type of requests that are not “onerous” or “burdensome.”

NAC 239.860 defines “readily available” as records that are “easily retrievable,” “not confidential,” and having a “nature...such that an officer, employee or agent of the agency...is not required to review the record to determine whether the record includes confidential information.” This definition applies only to state agencies. Nevertheless, it is instructive.

In other jurisdictions, courts recognize that burdensome requests are an exception to public records laws. In Arizona, for example, a public entity need not produce records that are not readily available and would require research, compilation and redaction to produce. *See Lunney v. State*, 418 P.3d 943, 954 (Ariz. Ct. App. 2017) (recognizing that the agency was not required to respond to the burdensome request); *see also Shehadeh v. Madigan*, 996 N.E.2d 1243, 1249 (Ill. App. Ct. 2013) (holding that the Attorney General satisfied its burden by explaining that its staff members would have to go through all of the 9,200 potentially responsive documents by hand); *Beckett v. Serpas*, 112 So.3d 348, 353 (La. App. Ct. 2013) (determining that segregating 10-years of files is unreasonably burdensome); *Community Youth Athletic Ctr. v. City of Nat’l City*, 164 Cal.Rptr.3d 644, 676, 220 Cal.App.4th 1385, 1425 (2013) (generally, an agency is not required to undertake extraordinarily extensive or intrusive searches, and in general, the scope of an agency’s search for public records need only be reasonably calculated to locate responsive documents).

To determine if producing documents “poses an unreasonable administrative burden,” courts consider whether the general presumption in favor of disclosure is overcome by: “(1) the resources and time it will take to locate, compile, and redact the requested materials; (2) the volume of materials requested; and, (3) the extent to which compliance with the request will disrupt the agency’s ability to perform its core functions.” *Lunney*, 418 P.3d at 954.

Using these guidelines, and knowing that the Nevada Legislature declined to provide a clear delineation, it is reasonable to conclude that labor costs “incur[red] regardless of whether or

not a person requests a copy of a particular public record” is synonymous with labor costs incurred to provide records that are not “readily available.” If the records requested are voluminous, if they require searching before they can be found or redacting before they can be produced, or if the production diverts the agency from its core function, then the records are not readily available and labor costs can be recouped.

II. CONCLUSION

The amendments to the NPRA in 2019 simplify and clarify the provisions governing the types of costs that can be charged. Under Amendment 1133, as passed, a public entity may charge its actual costs in providing records. The list of those costs is without limitation, and thus can include personnel costs. Moreover, the removal of language that would have barred overhead and labor costs is a clear indication of the Legislature’s intent to permit a public entity to charge for personnel costs. The testimony of the Senators who drafted the compromise language confirms this intent. The only limitation is that the personnel costs must not have been incurred “regardless of whether or not a person requests a copy of a particular public record.” Thus, when a request is for records that are not readily available, the requester may be charged personnel costs. Records are not readily available when they are voluminous, when they require searching and redacting, or when they pull employees from their normal day-to-day functions.

EXHIBIT 2

LVMPD Public Records
Webpage



Communications Bureau Public Records Submission

Service Charges

Effective February 1, 2026

Description	Quantity	Cost
Body Worn Camera Video/Audio Preparation, Research, Redaction	Per Hour	\$87.00
Research Fee (for records and information not readily available)	Per Hour	Varies
Redaction Fee	Per Hour	Varies

All fees may be subject to additional charge for additional personnel costs, as permitted by NRS 239.052 (1) and NRS 239.005 (1)

Public Records Unit Main Phone Line: 702-828-7489

Body Worn Camera Request Main Phone Line: 702-828-7485

EXHIBIT 3

LVMPD Service Charges

Las Vegas Metropolitan Police Department
Service Charges
Effective February 1, 2026

A service charge is a set fee based upon the actual cost of providing the service.

		Charge	Was
5000112 Office of General Counsel			
BODY WORN CAMERA SECTION:			
Video/Audio Case Preparation/Research/Redaction*	Per Hour	\$ 87.00	\$ 85.00
Copy CD/DVD/Flash Drive	Per Each	\$ 32.00	\$ 31.00
PUBLIC RECORDS SECTION:			
Case Preparation/Research/Redaction*	Per hour	\$ 47.00	\$ 47.00
Incident Crime Report Reproduction*	Per Each (up to 20 pages)**	\$ 12.00	\$ 12.00
<i>*As permitted by NRS 239.052(1) and NRS 179A.140. Expedited requests will be charged 1.5 times the hourly rate.</i>			
<i>** Printed reproduction requests over 20 pages will be charged the \$0.40 per page Copy Charge.</i>			
5000132 Special Investigations			
County Licenses			
Liquor	Per Person/Per License	\$ 350.00	\$ 350.00
Liquor/Gaming Key Employee	Per Key Employee	\$ 350.00	\$ 350.00
Non-Liquor	Per Person/Per License	\$ 300.00	\$ 300.00
City Licenses			
Privileged with Financial	Per Applicant	\$ 150.00	\$ 150.00
	Plus License	\$ 200.00	\$ 200.00
Privileged without Financial	Per Principal	\$ 150.00	\$ 150.00
Regulated	Per Principal	\$ 150.00	\$ 150.00
Investigative Services			
PHQ/FHQ License Investigations (8 hours)	Per Hour	\$ 80.00	\$ 80.00
PHQ License Investigations (6 hours)			
Update License (4 hours)			
<i>Established by City and County Ordinances. Changes, if any, will correspond with actions of the Las Vegas City Council and/or Clark County Commission.</i>			
5000146 SNCTC			
Crime Analysis Research For Public Records Requests and Subpoenas	Per Hour	\$ 73.00	\$ 73.00
5000147 Major Events Planning			
Captain	Per Hour	\$ 171.00	\$ 167.00
Lieutenant (Assignment Differential Pay)	Per Hour	\$ 151.00	\$ 147.00
Lieutenant	Per Hour	\$ 140.00	\$ 136.00
Resident Lieutenant	Per Hour	\$ 168.00	\$ 164.00
Sergeant (Assignment Differential Pay)	Per Hour	\$ 126.00	\$ 123.00
Sergeant	Per Hour	\$ 116.00	\$ 114.00
Resident Sergeant	Per Hour	\$ 140.00	\$ 136.00
Police Officer (Assignment Differential Pay)	Per Hour	\$ 94.00	\$ 92.00
Police Officer	Per Hour	\$ 87.00	\$ 85.00
Resident Officer	Per Hour	\$ 104.00	\$ 102.00
Deputy Sheriff	Per Hour	\$ 79.00	\$ 79.00
Cadet/Patrol Service Rep	Per Hour	\$ 44.00	\$ 44.00
Police Dispatcher Professional	Per Hour	\$ 78.00	\$ 78.00
Special Event Coordinator	Per Hour	\$ 69.00	\$ 69.00
Civilian - Overtime rate (Individual rate multiplied by 1.5 hours)	Per Hour	Varies	Varies
<i>Note: Fees may be adjusted in accordance with established contract salaries.</i>			
5000163 Labor Relations			
Copy of Employee Personnel Record*	Per Each	\$ 58.00	\$ 58.00
Copy of Employee Payroll Record*	Per Each	\$ 46.00	\$ 46.00
Copy of Employee Personnel AND Payroll Record*	Per Each	\$ 104.00	\$ 104.00
<i>* May be subject to additional charges for additional personnel costs, as permitted by NRS 239.052(1) and NRS 239.005(1).</i>			
5000171 Records & Fingerprint			
Employment Name Check	Per Each	\$ 6.00	\$ 6.00
Complete Record Check	Per Each	\$ 13.00	\$ 13.00
Record Search (to include No Record results)	Per Each	\$ 6.00	\$ 6.00
Incident Crime and Traffic Report Reproduction	Per Each (up to 20 pages)**	\$ 12.00	\$ 12.00
Research/Response by Subpoenas	Per Each	\$ 51.00	\$ 51.00
Research Fee (for records/information not readily available)*	Per Hour	\$ 47.00	\$ 47.00
Work Cards	Per Each	\$ 65.00	\$ 65.00
Reissue of Work Card	Per Each	\$ 65.00	\$ 65.00
Fingerprint Processing Gaming/Security Guard	Per Each	\$ 39.00	\$ 39.00
Misc. Fingerprints Only/No Submission Required	Per Each	\$ 19.00	\$ 19.00
Additional Fingerprint Card(s)	Per Each	\$ 2.00	\$ 2.00
Carry Concealed Weapon Permits			
Initial		\$ 60.00	\$ 60.00
Renewal/Additional Weapon/Name Change		\$ 25.00	\$ 25.00
Late Renewal		\$ 40.00	\$ 40.00
Duplicates/Lost/Stolen/Address Change		\$ 15.00	\$ 15.00
<i>Initial, Renewal, and Late Fees Established by NRS. Changes, if any, will correspond with actions of the legislature.</i>			
<i>* Special requests that require research of multiple systems, require reproduction of multiple or bulk documents or require statistical compilation of information will be charged a research fee.</i>			
<i>** Printed reproduction requests over 20 pages will be charged the \$0.40 per page Copy Charge.</i>			

Las Vegas Metropolitan Police Department
Service Charges
Effective February 1, 2026

A service charge is a set fee based upon the actual cost of providing the service.

		Charge	Was
5000173 Communications			
Event Computer Aided Dispatch (CAD) Search & Reproduction (incl. NO RECORD results)*	Per Each (up to 20 pages)**	\$ 29.00	\$ 29.00
Event Computer aided Dispatch (CAD) Print Redaction*	Per each 5 Minutes	\$ 5.00	\$ 5.00
Communications Record Report Search - Sharepoint or Analytics (incl. NO RECORD results)*	Per Each (up to 20 pages)**	\$ 30.00	\$ 30.00
Radio Audio Traffic and CAD Search & Reproduction (incl. Event Search & Reproduction and NO RECORD results)*	Per Each	\$ 113.00	\$ 113.00
Phone Audio Search & Reproduction (incl. Event Search & Reproduction and NO RECORD results)*	Per Each	\$ 58.00	\$ 58.00
Phone AND Radio Audio Search & Reproduction (incl. Event Search & Reproduction and NO RECORD results)*	Per Each	\$ 129.00	\$ 129.00
Research Fee (for records/information not readily available)***	Per Hour	\$ 65.00	\$ 65.00
* Subject to additional charges for additional personnel costs, as permitted by NRS 239.052(1) and NRS 239.005(1).			
** Printed reproduction requests over 20 pages will be charged the \$0.40 per page Copy Charge.			
*** Requests that require redaction, research of multiple systems, reproduction of multiple or bulk documents or statistical compilation of information will be charged a research fee.			
5000175 Crime Scene Investigations			
Crime Scene Analysis/Evidence Collection/Research/Response by Subpoenas*			
Crime Scene Analyst Supervisor (N48)	Per Hour/Per Analyst	\$ 82.00	\$ 82.00
Sr. Crime Scene Analyst (N42)	Per Hour/Per Analyst	\$ 71.00	\$ 71.00
Crime Scene Analyst II (N38)	Per Hour/Per Analyst	\$ 65.00	\$ 65.00
Photographic Print, Mug Shots*	Per Print	\$ 5.00	\$ 5.00
Photographic Prints*	Per Print	\$ 1.00	\$ 1.00
Photographic Line Up (6)*	Per Each	\$ 26.00	\$ 26.00
Digital Imaging Distribution*	Per Each	\$ 14.00	\$ 14.00
*Subject to additional charges for additional personnel costs, as permitted by NRS 239.052(1) and NRS 239.005(1).			
5000176 Forensic Laboratory			
Blood Alcohol (both positive and negative results)	Per Sample	\$ 117.00	\$ 117.00
Toxicology Screening Panel	Per Sample	\$ 130.00	\$ 130.00
Toxicology Screening Drug Confirmation (per each)	Per Sample	\$ 101.00	\$ 101.00
Biology/DNA Analysis	Per Sample	\$ 404.00	\$ 404.00
Biology/DNA Termination at Quantitation	Per Sample	\$ 282.00	\$ 282.00
Biology Screening Case - Negative Results	Per Case	\$ 149.00	\$ 149.00
Biology/DNA Database Processing	Per Sample	\$ 111.00	\$ 111.00
Administrative Costs for Other Disciplines (added to hourly rates below when billed through A/R)	Per Case	\$ 71.00	\$ 71.00
Other Disciplines/Analysis			
Seized Drug Analysis	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 84.00
Trace Materials Analysis/Fire Debris Analysis	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 84.00
Latent Print Analysis (to include AFIS and Latent Print Processing)	Per Hour + Admin Costs When Billed	\$ 65.00	\$ 65.00
Firearms Analysis	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 84.00
NIBIN firearm swabbing for DNA	Per Hour + Admin Costs When Billed	\$ 65.00	\$ 65.00
Toxicology Alcohol Calculations	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 84.00
Non-Criminal Subpoenas/Research Requests			
Quality Manager (NF)	Per Hour	\$ 103.00	\$ 103.00
Forensic Scientist II (N49)	Per Hour	\$ 84.00	\$ 84.00
Expert Witness Testimony (portal to portal)	Per Hour	Varies***	Varies***
*** Charged at the actual hourly or overtime rate of the employee required to testify.			
Misc. Charges			
Copy Charge	Per Page	\$ 0.40	\$ 0.40
Mailing Charge	Per Package	Actual Cost	Actual Cost
Audio Reproduction of Fiscal Affairs Meeting	Per Each	\$ -	\$ -
Returned Check Fee	Per Each	\$ 25.00	\$ 25.00
Research Fee (for records/information not readily available)	Per Hour	Varies***	Varies***
Redaction Fee (LEST)	Per Hour	\$ 47.00	\$ 47.00
*** Charged at the hourly rate of the position required to conduct the research.			

EXHIBIT 4

LVMPD Jul. 2025 Service
Charges

Las Vegas Metropolitan Police Department
Service Charges
Effective July 1, 2025

A service charge is a set fee based upon the actual cost of providing the service.

		Charge	Was
5000112 Office of General Counsel			
BODY WORN CAMERA SECTION:			
Video/Audio Case Preparation/Research/Redaction*	Per Hour	\$ 85.00	\$ 83.00
Copy CD/DVD/Flash Drive	Per Each	\$ 31.00	\$ 30.00
PUBLIC RECORDS SECTION:			
Case Preparation/Research/Redaction*	Per hour	\$ 47.00	\$ 46.00
Incident Crime Report Reproduction*	Per Each (up to 20 pages)**	\$ 12.00	\$ 12.00
*As permitted by NRS 239.052(1) and NRS 179A.140. Expedited requests will be charged 1.5 times the hourly rate.			
** Printed reproduction requests over 20 pages will be charged the \$0.40 per page Copy Charge.			
5000132 Special Investigations			
County Licenses			
Liquor	Per Person/Per License	\$ 350.00	\$ 350.00
Liquor/Gaming Key Employee	Per Key Employee	\$ 350.00	\$ 350.00
Non-Liquor	Per Person/Per License	\$ 300.00	\$ 300.00
City Licenses			
Privileged with Financial	Per Applicant	\$ 150.00	\$ 150.00
	Plus License	\$ 200.00	\$ 200.00
Privileged without Financial	Per Principal	\$ 150.00	\$ 150.00
Regulated	Per Principal	\$ 150.00	\$ 150.00
Investigative Services			
PHQ/FHQ License Investigations (8 hours)	Per Hour	\$ 80.00	\$ 80.00
PHQ License Investigations (6 hours)			
Update License (4 hours)			
Established by City and County Ordinances. Changes, if any, will correspond with actions of the Las Vegas City Council and/or Clark County Commission.			
5000146 SNCTC			
Crime Analysis Research For Public Records Requests and Subpoenas	Per Hour	\$ 73.00	\$ 71.00
5000147 Major Events Planning			
Captain	Per Hour	\$ 167.00	\$ 170.00
Lieutenant (Assignment Differential Pay)	Per Hour	\$ 147.00	\$ 150.00
Lieutenant	Per Hour	\$ 136.00	\$ 139.00
Resident Lieutenant	Per Hour	\$ 164.00	\$ 167.00
Sergeant (Assignment Differential Pay)	Per Hour	\$ 123.00	\$ 125.00
Sergeant	Per Hour	\$ 114.00	\$ 116.00
Resident Sergeant	Per Hour	\$ 136.00	\$ 139.00
Police Officer (Assignment Differential Pay)	Per Hour	\$ 92.00	\$ 95.00
Police Officer	Per Hour	\$ 85.00	\$ 88.00
Resident Officer	Per Hour	\$ 102.00	\$ 105.00
Deputy Sheriff	Per Hour	\$ 79.00	\$ 80.00
Cadet/Patrol Service Rep	Per Hour	\$ 44.00	\$ 44.00
Police Dispatcher Professional	Per Hour	\$ 78.00	\$ 78.00
Special Event Coordinator	Per Hour	\$ 69.00	\$ 69.00
Civilian - Overtime rate (Individual rate multiplied by 1.5 hours)	Per Hour	Varies	Varies
Note: Fees may be adjusted in accordance with established contract salaries.			
5000163 Labor Relations			
Copy of Employee Personnel Record*	Per Each	\$ 58.00	\$ 55.00
Copy of Employee Payroll Record*	Per Each	\$ 46.00	\$ 45.00
Copy of Employee Personnel AND Payroll Record*	Per Each	\$ 104.00	\$ 100.00
* May be subject to additional charges for additional personnel costs, as permitted by NRS 239.052(1) and NRS 239.005(1).			
5000171 Records & Fingerprint			
Employment Name Check	Per Each	\$ 6.00	\$ 6.00
Complete Record Check	Per Each	\$ 13.00	\$ 12.00
Record Search (to include No Record results)	Per Each	\$ 6.00	\$ 6.00
Incident Crime and Traffic Report Reproduction	Per Each (up to 20 pages)**	\$ 12.00	\$ 12.00
Research/Response by Subpoenas	Per Each	\$ 51.00	\$ 50.00
Research Fee (for records/information not readily available)*	Per Hour	\$ 47.00	\$ 46.00
Work Cards	Per Each	\$ 65.00	\$ 64.00
Reissue of Work Card	Per Each	\$ 65.00	\$ 64.00
Fingerprint Processing Gaming/Security Guard	Per Each	\$ 39.00	\$ 38.00
Misc. Fingerprints Only/No Submission Required	Per Each	\$ 19.00	\$ 18.00
Additional Fingerprint Card(s)	Per Each	\$ 2.00	\$ 2.00
Carry Concealed Weapon Permits			
Initial		\$ 60.00	\$ 60.00
Renewal/Additional Weapon/Name Change		\$ 25.00	\$ 25.00
Late Renewal		\$ 40.00	\$ 40.00
Duplicates/Lost/Stolen/Address Change		\$ 15.00	\$ 15.00
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Las Vegas Metropolitan Police Department
Service Charges
Effective July 1, 2025

A service charge is a set fee based upon the actual cost of providing the service.

		Charge	Was
5000173 Communications			
Event Computer Aided Dispatch (CAD) Search & Reproduction (incl. NO RECORD results)*	Per Each (up to 20 pages)**	\$ 29.00	\$ 29.00
Event Computer aided Dispatch (CAD) Print Redaction*	Per each 5 Minutes	\$ 5.00	\$ 5.00
Communications Record Report Search - Sharepoint or Analytics (incl. NO RECORD results)*	Per Each (up to 20 pages)**	\$ 30.00	\$ 29.00
Radio Audio Traffic and CAD Search & Reproduction (incl. Event Search & Reproduction and NO RECORD results)*	Per Each	\$ 113.00	\$ 111.00
Phone Audio Search & Reproduction (incl. Event Search & Reproduction and NO RECORD results)*	Per Each	\$ 58.00	\$ 57.00
Phone AND Radio Audio Search & Reproduction (incl. Event Search & Reproduction and NO RECORD results)*	Per Each	\$ 129.00	\$ 127.00
Research Fee (for records/information not readily available)***	Per Hour	\$ 65.00	\$ 63.00
* Subject to additional charges for additional personnel costs, as permitted by NRS 239.052(1) and NRS 239.005(1).			
** Printed reproduction requests over 20 pages will be charged the \$0.40 per page Copy Charge.			
*** Requests that require redaction, research of multiple systems, reproduction of multiple or bulk documents or statistical compilation of information will be charged a research fee.			
5000175 Crime Scene Investigations			
Crime Scene Analysis/Evidence Collection/Research/Response by Subpoenas*			
Crime Scene Analyst Supervisor (N48)	Per Hour/Per Analyst	\$ 82.00	\$ 80.00
Sr. Crime Scene Analyst (N42)	Per Hour/Per Analyst	\$ 71.00	\$ 69.00
Crime Scene Analyst II (N38)	Per Hour/Per Analyst	\$ 65.00	\$ 63.00
Photographic Print, Mug Shots*	Per Print	\$ 5.00	\$ 4.00
Photographic Prints*	Per Print	\$ 1.00	\$ 1.00
Photographic Line Up (6)*	Per Each	\$ 26.00	\$ 25.00
Digital Imaging Distribution*	Per Each	\$ 14.00	\$ 14.00
*Subject to additional charges for additional personnel costs, as permitted by NRS 239.052(1) and NRS 239.005(1).			
5000176 Forensic Laboratory			
Blood Alcohol (both positive and negative results)	Per Sample	\$ 117.00	\$ 112.00
Toxicology Screening Panel	Per Sample	\$ 130.00	\$ 125.00
Toxicology Screening Drug Confirmation (per each)	Per Sample	\$ 101.00	\$ 96.00
Biology/DNA Analysis	Per Sample	\$ 404.00	\$ 390.00
Biology/DNA Termination at Quantitation	Per Sample	\$ 282.00	\$ 273.00
Biology Screening Case - Negative Results	Per Case	\$ 149.00	\$ 145.00
Biology/DNA Database Processing	Per Sample	\$ 111.00	\$ 107.00
Administrative Costs for Other Disciplines (added to hourly rates below when billed through A/R)	Per Case	\$ 71.00	\$ 70.00
Other Disciplines/Analysis			
Seized Drug Analysis	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 82.00
Trace Materials Analysis/Fire Debris Analysis	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 82.00
Latent Print Analysis (to include AFIS and Latent Print Processing)	Per Hour + Admin Costs When Billed	\$ 65.00	\$ 63.00
Firearms Analysis	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 82.00
NIBIN firearm swabbing for DNA	Per Hour + Admin Costs When Billed	\$ 65.00	\$ 63.00
Toxicology Alcohol Calculations	Per Hour + Admin Costs When Billed	\$ 84.00	\$ 82.00
Non-Criminal Subpoenas/Research Requests			
Quality Manager (NF)	Per Hour	\$ 103.00	\$ 101.00
Forensic Scientist II (N49)	Per Hour	\$ 84.00	\$ 46.00
Expert Witness Testimony (portal to portal)	Per Hour	Varies***	Varies***
*** Charged at the actual hourly or overtime rate of the employee required to testify.			
Misc. Charges			
Copy Charge	Per Page	\$ 0.40	\$ 0.40
Mailing Charge	Per Package	Actual Cost	Actual Cost
Audio Reproduction of Fiscal Affairs Meeting	Per Each	\$ -	\$ -
Returned Check Fee	Per Each	\$ 25.00	\$ 25.00
Research Fee (for records/information not readily available)	Per Hour	Varies***	Varies***
Redaction Fee (LEST)	Per Hour	\$ 47.00	\$ 61.00
*** Charged at the hourly rate of the position required to conduct the research.			

EXHIBIT 5

LVMPD Email to ACLUNV
re: Calc. of Costs

General Police Records Request :: X000945-093025

From LVMPD Public Records Request Portal <lasvegasnvpd@govqa.us>

Date Thu 10/30/2025 1:35 PM

To Samantha Kroner <SKroner@aclunv.org>

This Message Is From an External Sender

This message came from outside your organization.

Attachments:

[NPR2025-0082588 Tabulation Sheet.xlsx](#)

[NPR2025-0072090 Tabulation Sheet.xlsx](#)

[Service Charges FY26.pdf](#)

--- Please respond above this line ---



RE: General Police Records Request of September 30, 2025, Reference # X000945-093025

Dear Ms. Kroner,

This responds to your October 23, 2025 message asking for your request to be reopened. You mentioned the following:

"I am reaching out to ask that this request be reopened, as the response provided was incomplete as to our first request. In addition, in our second request we asked for documents related to the calculation or estimation of costs for two specific public records requests (NPR # 2025-0072090 and# 2025-0082588) and received no response. Clarify that, as to the first request, I was not requesting the document reflecting the service charges for public records, but rather the policies, procedures, or other documents that informed the creation of the published services charges and that outline how the costs of individual requests are calculated".

LVMPD does not maintain a standalone "policy" or "procedure" document beyond our published Service Charge Schedule. In the most recent changes to the NPRA the Legislature specifically rejected proposed language to NRS 239.005 that would have barred public entities from ever charging for labor. See Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal, --- Nev.---, 458 P.3d 1048, 1053 (2020) (holding that when the Legislature considers language in a bill draft, but then specifically

declines to adopt that language, it must be presumed that the Legislature did not intend the language to be the law).

The Legislature also specifically added the phrase "including, without limitation" to NRS 239.005. See *Sims v. Eighth Judicial Dist. Court*, 125 Nev. 126, 130, 206 P.3d 980, 983 (2009) (holding that the phrase "without limitation" must be construed expansively and in a way that "no way limits" the list that follows).

Furthermore, the two senators who advanced these changes explained that the intent was to permit government agencies to charge for personnel costs when the records are burdensome to produce. See Testimony from the Assembly Committee on Government Affairs on June 3, 2019.

As such, it is clear NRS 239.052 and NRS 239.005 permit government agencies to charge labor costs when providing BWC.

We are providing the two internal tabulation worksheets PRU uses to record and calculate personnel time for invoicing. These are working tools—not policies.

If anything in the breakdown is still unclear after you review the documents, please tell us. You can also reach LVMPD Assistant General Counsel Matthew Christian at 702-828-3310 (per our October 15, 2025 note) for any questions.

Sincerely,
Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



EXHIBIT 6

Tabulation Worksheet:
ACLUNV BWC Req.

LVMPD Public Records Unit - Tabulation/Time Table Worksheet - Effective 7/1/25

NPRA#: 2025-0072090

Event# :LLV250600042201

All BWC Footage Total Minutes		1202
Cost		\$ 6,811.33
Specific BWC Footage Total Minutes		
Cost		\$ -
		Hours
Investigative Research		
Redactions		
Quality Assurance		
Video/Audio Case Preparation		
Total		82.06

EXHIBIT 7

Tabulation Worksheets: EFL
BWC Req.

LVMPD Public Records Unit - Tabulation/Time Table Worksheet - Effective 7/1/25

Standard Service \$85.00 per hour	
NPRA#: NPR2025-0082588	
Event# : LLV250700098662	
All BWC Footage Total Minutes	194
Cost	\$ 1,099.33
Specific BWC Footage Total Minutes	0
Cost	\$ -
	Hours
Investigative Research	1
Redactions	1
Quality Assurance	1
Video/Audio Case Preparation	1
Total	4

Expedited Service \$127.50 per hour	
NPRA#: S/A	
Event# : S/A	
All Expedited BWC Footage Total Minutes	194
3.25	
Cost	\$ 1,649.00
Specific Expedited BWC Footage Total Minutes	0
Cost	\$ -
	Hours
Investigative Research	1
Redactions	1
Quality Assurance	1
Video/Audio Case Preparation	1
Total	4

All BWC Payment Difference

\$ 549.67

Specific BWC Payment Difference

\$ -

LVMPD Public Records Unit - Tabulation/Time Table Worksheet - Effective 2/25/25					
NPRA#:					
Event# :					
All BWC Footage Total Minutes				120	
Cost				\$ 679.20	
Specific BWC Footage Total Minutes					
Cost				\$ -	
Investigative Research				Hours	
Redactions					
Quality Assurance					
Video/Audio Case Preparation					
Total				8	

EXHIBIT 8

Invoice: ACLUNV Arrest
BWC Req.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Jacob Valentine
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032

I**Invoice Summary**

Invoice No:
Request Reference Number:
Invoice Date:
Due Date:
Status:
Balance Due

INV26-X006517-1
X006517-020526
2/6/2026
N/A
Open
\$110.20

Category	Description	Details	Cost	Unit	Add Overhead	Total Quantity	Quantity Waived	Quantity Charged	Total
Body Worn Camera Section	BWC - STANDARD Video/Audio Rate by Minute	Video/Audio Case Preparation/Re As permitted by NRS 239.052(1) and NRS 179A.140.	\$5.80	Per Quantity	☐	19.00	0.00	19.00	\$110.20

Comments:**Totals:**

Total:	\$110.20
Payments:	\$0.00
Balance Due	\$110.20

EXHIBIT 9

ACLUNV Req. for Calc.
of Costs

September 30, 2025

Las Vegas Metropolitan Police Department
400 S. Martin L. King Blvd.
Las Vegas, NV 89106

Submitted via online portal

To whom it may concern:



4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
(702) 366-1226
aclunv.org

Angela Cook, Esq.
President

Athar Haseebullah, Esq.
Executive Director

Christopher Peterson, Esq.
Legal Director

Samantha Kroner, Esq.
Legal Fellow

This letter serves as a request under the Nevada Public Records Act, NRS § 239 et. seq., by the American Civil Liberties Union of Nevada (ACLUNV) for public records held by Las Vegas Metropolitan Police Department as detailed below.

A. The Requester

ACLUNV is a statewide affiliate of the American Civil Liberties Union, a national organization whose work protects the civil liberties and civil rights of all people. Our mission includes safeguarding the basic constitutional rights to due process, equal protection, and the civil rights of marginalized communities. One of ACLUNV's main functions is disseminating information to the public about issues of concern to ACLUNV and its members.

B. Definitions

For the purpose of this Request, the following definition shall apply:

- 1) The term "DOCUMENTS" means, without limiting the generality of their meaning, all written, printed, recorded, electronic, digital, video, or graphic matter, photographic matter or sound reproductions, however produced, reproduced, or maintained. "DOCUMENTS" specifically include but are not limited to orders, instructions, policies, communications, correspondence, letters, notes, minutes of meetings, memoranda, interoffice communications, database files, facsimile transmissions, email messages and files.

C. Request

ACLUNV requests, in electronic format where available and pursuant to NRS 239.010(3-5), any and all records in your custody or under your control of the following:

- 1) DOCUMENTS describing the policies, procedures, and practices related to the calculation or estimation of costs or fees charged for public records requests submitted to LVMPD, including but not limited to requests for body worn camera footage.

2) DOCUMENTS related to the calculation or estimation of costs for the following public records requests:

- a. NPR Number: 2025-0072090; and
- b. NPR Number: 2025-0082588.

D. Waiver of Fees

The ACLUNV requests a waiver of any and all fees associated with this request.

In relation to both federal and state public records requests, fees are generally waived for nonprofit organizations seeking copies of materials without commercial interest and for the purpose of contributing to public understanding and education. *See Friends of the Coast Fork v. U.S. Dep't of the Interior*, 110 F.3d 53 (9th Cir. 1997); *Friends of Oceano Dunes, Inc. v. Salazar*, No. C-11-1476 EMC, 2011 WL 6748575 (N.D. Cal. Dec. 22, 2011); *North Cnty. Parents Org. for Children with Special Needs v. Dep't of Educ.*, 23 Cal. App. 4th 144 (Cal. Ct. App. 1994).

Here, the documents requested benefit the public's knowledge and provide oversight on how Las Vegas Metropolitan Police Department's processes impact peoples' access to public records. As a nonprofit 501(c)(3) organization, ACLUNV is well situated to disseminate information it gains from this request to the general public and other targeted communities. Dissemination of information to the public is a critical and substantial component of ACLUNV's mission and work.

E. Fulfillment of Request

The State of Nevada mandates that all state agency records are public unless declared confidential by law. NRS § 239.010. Recent changes to the Public Records Act reaffirm the state's commitment to transparency and maximizing the public's right of access to agency records. NRS § 239.001.

If all or any part of this request is denied, Nevada law requires that you provide the ACLUNV a written statement of the grounds for the denial, citing the law or regulations under which you believe you may deny access for each document. NRS 239.0107. Furthermore, if you determine that some portions of the requested records are exempt from disclosure, we expect that you provide us with any reasonable severable portion of the records sought.

Please be advised that if any refusal to disclose is based on confidentiality, then "[t]he public official or agency bears the burden of establishing the existence of privilege based upon confidentiality. It is settled that privileges, whether creatures of statute or the common law, should be interpreted and applied narrowly." *D.R Partners v. Board of County Com'rs of Clark County*, 116 Nev. 616, 622 (2000).



4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
(702) 366-1226
aclunv.org

Angela Cook, Esq.
President

Athar Haseebullah, Esq.
Executive Director

Christopher Peterson, Esq.
Legal Director

Samantha Kroner, Esq.
Legal Fellow



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aclunv.org

Angela Cook, Esq.
President

Athar Haseebullah, Esq.
Executive Director

Christopher Peterson, Esq.
Legal Director

Samantha Kroner, Esq.
Legal Fellow

Pursuant to state law, we request copies and/or access to these public records be forwarded to the ACLUNV within five (5) business days of this letter, by **October 7, 2025**. NRS 239.0107(1). If you are unable to make the records available by this date, you are statutorily required to state that fact in writing explaining why the book or record is unavailable and a date and time when the record will be available. NRS 239.0107(1)(c)(1).

The updated Public Records Act imposes a duty on governmental entities to "make a reasonable effort to assist the requester to focus the request in such a manner as to maximize the likelihood the requestor will be able to [access] the public book or record as expeditiously as possible." NRS 239.0107(1)(c)(2). Please contact me within the five (5) day statutory time frame if, for some reason, this request requires clarification.

Please forward copies of records as they are identified to **skroner@aclunv.org**, even if production is not fully complete. We appreciate your assistance with this request.

You may contact me directly at 725-231-0970 or skroner@aclunv.org with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Kroner".

Samantha Kroner, Esq.
Legal Fellow
American Civil Liberties Union of Nevada

EXHIBIT 10

ACLUNV Req. for BWC

Date: June 17, 2025

To: Las Vegas Metropolitan Police Department

Re: Public Records Request

To whom it may concern:

This letter serves as a request under the Nevada Public Records Act, NRS § 239 *et seq.*, by the American Civil Liberties Union of Nevada (ACLUNV) for public records held by the Las Vegas Metropolitan Police Department (LVMPD).

A. The Requester

The ACLUNV is a statewide affiliate of the American Civil Liberties Union, a national organization whose work protects the civil liberties and civil rights of all people. Our mission includes safeguarding the basic constitutional rights to due process, equal protection, and the civil rights of marginalized communities including individuals in the criminal legal system. One of the ACLUNV's main functions is disseminating information to the public about issues of concern to the ACLUNV and its members.

B. Request

The ACLUNV requests, in electronic format where available and pursuant to NRS 239.010(3-5):

- 1) Any and all body worn camera footage of any officer that issued a dispersal order on June 11, 2025, between 5:00 PM and 11:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard.
- 2) Any and all body worn camera footage of any officer that engaged in use of force, including but not limited to using a projectile and deploying chemical agents such as tear gas, on June 11, 2025, between 5:00 PM and 11:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard.
- 3) Any and all body worn camera footage of any officer that was



4362 W. CHEYENNE AVE.
NORTH LAS VEGAS, NV 89032
P/702.366.1536
F/702.366.1331
ACLUNV@ACLUNV.ORG

WWW.ACLUNV.ORG

involved in any arrest on June 11, 2025, between 5:00 PM and 11:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard.

C. Waiver of Fees

The ACLUNV requests a waiver of any and all fees associated with this request.



4362 W. CHEYENNE AVE.
NORTH LAS VEGAS, NV 89032
P/702.366.1536
F/702.366.1331
ACLUNV@ACLUNV.ORG

WWW.ACLUNV.ORG

In relation to both federal and state public records requests, fees are generally waived for nonprofit organizations seeking copies of materials without commercial interest and for the purpose of contributing to public understanding and education. *See Friends of the Coast Fork v. U.S. Dep't of the Interior*, 110 F.3d 53 (9th Cir. 1997); *Friends of Oceano Dunes, Inc. v. Salazar*, No. C-11-1476 EMC, 2011 WL 6748575 (N.D. Cal. Dec. 22, 2011); *North Cnty. Parents Org. for Children with Special Needs v. Dep't of Educ.*, 23 Cal. App. 4th 144 (Cal. Ct. App. 1994).

Here, the documents requested benefit the public's knowledge of LVMPD and are not sought for commercial interest. As a nonprofit 501(c)(3) and 501(c)(4) organization, ACLUNV is well situated to disseminate information it gains from this request to the general public as well as to other targeted communities. Dissemination of information to the public is a critical and substantial component of ACLUNV's mission and work.

D. Fulfillment of Request

The State of Nevada mandates that all state agency records are public unless declared confidential by law. NRS § 239.010. Recent changes to the Public Records Act reaffirm the state's commitment to transparency and maximizing the public's right of access to agency records. NRS § 239.001.

As of October 1, 2019, Nevada law imposes additional duties on governmental entities to fulfill requests. If a governmental entity willfully fails to comply with any provision of NRS § 239 *et seq.*, it is subject to up to \$10,000 in civil penalties "in addition to any other rights or remedies that may exist in law or in equity." NRS § 239.340.

If all or any part of this request is denied, Nevada law requires that you provide ACLUNV a written statement of the grounds for the denial, citing the law or regulations under which you believe you may deny access for each document. NRS 239.0107. Furthermore, if you determine that some portions of the

requested records are exempt from disclosure, we expect that you provide us with any reasonable severable portion of the records sought.

Please be advised that if any refusal to disclose is based on confidentiality, then “[t]he public official or agency bears the burden of establishing the existence of privilege based upon confidentiality. It is settled that privileges, whether creatures of statute or the common law, should be interpreted and applied narrowly.” *D.R. Partners v. Board of County Com’rs of Clark County*, 116 Nev. 616, 622 (2000).

Pursuant to state law, we request copies and/or access to these public records be forwarded to ACLUNV within five (5) business days of this letter, by June 24, 2025. NRS 239.0107(1). If you are unable to make the records available by this date, you are statutorily required to state that fact in writing explaining why the book or record is unavailable and a date and time when the record will be available. NRS 239.1007(1)(c)(1).

The updated Public Records Act imposes a duty on governmental entities to “make a reasonable effort to assist the requester to focus the request in such a manner as to maximize the likelihood the requestor will be able to [access] the public book or record as expeditiously as possible.” NRS 239.1007(1)(c)(2). Please contact ACLUNV within the five (5) day statutory time frame if, for some reason, this request requires clarification.

Please forward copies of documents as they are identified, even if production is not fully complete. We appreciate your assistance with this request. You may contact me directly at 319-325-7349 or tsmith@aclunv.org.

Best,

Tatiana Smith
Policy Attorney
American Civil Liberties Union of Nevada



4362 W. CHEYENNE AVE.
NORTH LAS VEGAS, NV 89032
P/702.366.1536
F/702.366.1331
ACLUNV@ACLUNV.ORG

WWW.ACLUNV.ORG

EXHIBIT 11

LVMPD Email: Invoice for
ACLUNV BWC Req.



Payment Information for 2025-0072090

From onbase@lvmpd.com <onbase@lvmpd.com>

Date Thu 9/4/2025 1:19 PM

To Tatiana Smith <TSmith@aclunv.org>

This Message Is From an External Sender

This message came from outside your organization.

Date: 9/4/2025

NPR Number: 2025-0072090

Dear Requester:

Please note that we are in receipt of the above referenced request. Pursuant to our research, please click on the attached link to view the fees associated with your request and select the line items you wish to receive.

<https://wa2.lvmpd.com/AppNetProd/docpop/formpop.aspx?clienttype=html&docid=106660941&chksum=86f8e7eea3cad4f4248ba61d50c530037fa52298e83d4b46f3083a1809f503b4>

Full payment for this request is required prior to work being initiated. Requests are processed in the order payment is received.

Payment must be made within **30 days**, or the request will be **closed**.

Please be aware that we are estimating requests for BWC footage to be completed and sent out in approximately 6-9 months, currently. For photos, you should expect to receive them within 1 to 2 weeks from the paid-on date. If you find that the invoice you received for the BWC footage is higher than expected, please contact us via phone or by email. To help reduce the cost, you can provide us the officer's name and/or badge number, or specify the exact footage you are seeking.

We recognize that this fee estimate may represent a significant cost to you. However, the law requires certain information is redacted, to include criminal history, personal identifiers (such as social security numbers), images that give rise to privacy interests (footage inside homes, injuries, statements about personal conduct, etc.). Officers' faces must also be redacted. Therefore all video must be thoroughly reviewed. This process of reviewing video and redacting is very labor-intensive.

Public Records Unit

400 S Martin L King Blvd, Bldg. A Las Vegas, NV 89106

702-828-7485

****PLEASE DO NOT REPLY TO THIS MESSAGE****

It is an automated email response. It is for your information and records only.

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EXHIBIT 12

ACLUNV-LVMPD Emails re:
Req. for BWC



Re: Follow-Up Response - NPR2025-0072090

From Tatiana Smith <TSmith@aclunv.org>
Date Mon 8/25/2025 9:23 AM
To Sergio Felix <S15242F@LVMPD.COM>
Cc BWC Records Request <bwcrecordsrequest@lvmpd.com>

Good morning,

Thank you for following up. Apologies for the confusion. We are specifically seeking the body-worn camera footage capturing the deployment of the weapons.

Please let me know if you need any additional details. Thanks again!

Best,
Tia Smith, Esq.
Policy Attorney
(she/her/hers)
ACLU of Nevada
4362 W. Cheyenne Ave | North Las Vegas, Nevada 89032
www.aclunv.org | [Facebook](#) | [Twitter](#)

ACLU Nevada

This message may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply email that this message has been inadvertently transmitted to you and delete this email from your system.

From: Sergio Felix <S15242F@LVMPD.COM>
Sent: Thursday, August 14, 2025 10:02 AM
To: Tatiana Smith <TSmith@aclunv.org>
Cc: BWC Records Request <BWCRecordsRequest@LVMPD.COM>
Subject: RE: Follow-Up Response - NPR2025-0072090

This Message Is From an External Sender

This message came from outside your organization.

Hi Tatiana,

I hope you're doing well. I wanted to follow up regarding your request for "any and all body-worn camera footage associated with" the following item:

"Any and all inventory records related to 'projectile weapons' and associated ammunition, as provided in LVMPD Policy 3.110, including but not limited to pepper balls, that were deployed on June 11, 2025, between 5:00 PM and 9:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area

surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard."

Could you please clarify what you mean by "associated with" in this context? Are you seeking body-worn camera footage of officers actively deploying these weapons, or actual log records documenting the inventory of projectile weapons and associated ammunition?

Your clarification will help us ensure that we accurately and efficiently respond to your request.

Best regards,

Det. Sergio Felix

Office of General Counsel - Body Worn Camera Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Blvd. Las Vegas, NV 89106

702-828-7485 office

S15242F@lvmpd.com



****CONFIDENTIALITY NOTICE****

This email is intended only for the person(s) indicated. The email may contain information that is privileged, confidential, law enforcement related or otherwise exempt from disclosure under applicable law. This email may not be copied, reproduced, referenced, or utilized without the express permission of the sender. The author of this email reserves any copyright privileges as granted under state and federal law. This email may contain discussions and work product as part of the deliberative process. If you are not the addressee, or it appears from the context or otherwise that you have received this email in error, please advise me immediately by reply email, keep the contents confidential, and immediately delete the message and any attachments from your system.

From: BWC Records Request <BWCRecordsRequest@LVMPD.COM>

Sent: Wednesday, July 30, 2025 11:56 AM

To: Sergio Felix <S15242F@LVMPD.COM>

Subject: FW: Follow-Up Response - NPR2025-0072090

From: Tatiana Smith <TSmith@aclunv.org>

Sent: Wednesday, July 30, 2025 11:53 AM

To: BWC Records Request <BWCRecordsRequest@LVMPD.COM>

Subject: Re: Follow-Up Response - NPR2025-0072090

You don't often get email from tsmith@aclunv.org. [Learn why this is important](#)

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.**

Good morning,

This message is intended for Detective Felix.

Following our discussion yesterday, where you noted that there are no records identifying which officers issued a dispersal order, I am narrowing the scope of my request as follows:

1. I am requesting any and all body worn camera footage associated with:
 - a. Any and all "Use of Force Reports" created in connection with any use of force incidents, as required by LVMPD Policy 3.110.3, on June 11, 2025, between 5:00 PM and 11:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard.
 - b. Any and all inventory records related to "projectile weapons" and associated ammunition, as provided in LVMPD Policy 3.110, including but not limited to pepper balls, that were deployed on June 11, 2025, between 5:00 PM and 9:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard..

Please confirm receipt of this clarification and let me know whether this scope allows for a targeted search. If not, I would appreciate a specific explanation so I can further refine the request if necessary. Thank you!

Best,

Tia Smith, Esq.

Policy Attorney

(she/her/hers)

ACLU of Nevada

4362 W. Cheyenne Ave | North Las Vegas, Nevada 89032

www.aclunv.org | [Facebook](#) | [Twitter](#)

ACLU Nevada

This message may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply email that this message has been inadvertently transmitted to you and delete this email from your system.

From: Tatiana Smith <TSmith@aclunv.org>

Sent: Wednesday, July 16, 2025 4:38 PM

To: bwcrecordsrequest@lvmpd.com <bwcrecordsrequest@lvmpd.com>

Cc: Chris Peterson <peter@aclunv.org>

Subject: Fw: Follow-Up Response - NPR2025-0072090

Good afternoon,

I have received your response to the initial records request in the email below. To make the search easier, I would like to narrow the scope of my request as follows:

1. Any and all body worn camera footage of any officer that issued an order to disperse as required by NRS 193.307 associated with Event # LLV250600046535, or that otherwise occurred on June 11, 2025, between 5:00 PM and 11:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard.
2. Any and all body worn camera footage of any officer that deployed any projectile as meant in LVMPD Use of Force Policy 3.110 associated with Event # LLV250600046535, or that otherwise occurred on June 11, 2025, between 5:00 PM and 11:00 PM and June 14, 2025, between 5:00 PM and 9:00 PM within the area surrounding the Federal Courthouse, specifically between Fremont Street and Hoover Avenue, and between 7th Street and South Casino Center Boulevard.

Please let me know if you need any additional clarification, and when I can expect a response to this request. Thank you.

Best,

Tia Smith, Esq.

Policy Attorney

(she/her/hers)

ACLU of Nevada

4362 W. Cheyenne Ave | North Las Vegas, Nevada 89032

www.aclunv.org | [Facebook](#) | [Twitter](#)

ACLU Nevada

This message may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply email that this message has been inadvertently transmitted to you and delete this email from your system.

From: Do Not Reply <DoNotReply@LVMPD.COM>

Sent: Tuesday, July 8, 2025 4:35 PM

To: Tatiana Smith <TSmith@aclunv.org>

Subject: Follow-Up Response - NPR2025-0072090

This Message Is From an External Sender

This message came from outside your organization.

Greeting,

We are following up on our initial response to your request for all video of recent protests. We have confirmed that your request involves voluminous video that will be burdensome to produce since it must be reviewed for redactions. See, e.g., *Conrad v. Reno Police Dep't*, --- Nev. ---, 530 P.3d 851, 856 (2023) (officer faces are confidential pursuant to NRS 289.025); *Clark County Sch. Dist. v. Las Vegas Review-Journal*, 134 Nev. 700, 706-707, 429 P.3d 313, 319-20 (2018) (privacy interests can be protected); See *Donrey v. Bradshaw*, 106 Nev. 630, 798 P.2d 144, fn. 4 (1990) (law enforcement interests can be protected).

Moreover, the way your request is phrased, we will have to go through every video to find what you are

looking for, and we believe there are many hundreds if not thousands. A public entity need not produce records that are not readily available and would require research, compilation and redaction to produce. See *Lunney v. State*, 418 P.3d 943, 954 (Ariz. Ct. App. 2017) (recognizing that the agency was not required to respond to the burdensome request); *Shehadeh v. Madigan*, 996 N.E.2d 1243, 1249 (Ill. App. Ct. 2013) (holding that the Attorney General satisfied its burden by explaining that its staff members would have to go through all of the 9,200 potentially responsive documents by hand); *Beckett v. Serpas*, 112 So.3d 348, 353 (La. App. Ct. 2013) (determining that segregating 10-years worth of files is unreasonably burdensome); *Community Youth Athletic Ctr. v. City of Nat'l City*, 164 Cal.Rptr.3d 644, 676, 220 Cal.App.4th 1385, 1425 (2013) (generally, an agency is not required to undertake extraordinarily extensive or intrusive searches, and in general, the scope of an agency's search for public records need only be reasonably calculated to locate responsive documents) . To determine if producing documents "poses an unreasonable administrative burden," courts consider whether the general presumption in favor of disclosure is overcome by: "(1) the resources and time it will take to locate, compile, and redact the requested materials; (2) the volume of materials requested; and, (3) the extent to which compliance with the request will disrupt the agency's ability to perform its core functions." *Lunney*, 418 P.3d at 954; cf. NAC 239.860 (defining "readily available" for purposes of State agencies as records that are "easily retrievable," "not confidential," and having a "nature...such that an officer, employee or agent of the agency...is not required to review the record to determine whether the record includes confidential information").

Given the number of videos, and the way you have phrased your request, there is no way to even provide a sound estimate of the number of hours it would take to fulfil this request, other than say that it could months, diverting us from our daily requests.

With this said, if you can narrow or limit the request in some way, then we can consider sending you a cost estimate.

Sincerely,

Body Worn Camera Public Records Unit
Las Vegas Metropolitan Police Department

400-A South Martin L. King Boulevard, Las Vegas, Nevada 89106
702.828.7485 office

bwcrecordsrequest@lvmpd.com



EXHIBIT 13

ACLUNV-LVMPD Email
Update re: Req. for BWC



Re: BWC Video Request - NPR2025-0072090

From Tatiana Smith <TSmith@aclunv.org>

Date Thu 8/28/2025 9:55 AM

To Sergio Felix <s15242f@lvmpd.com>; BWC Records Request <bwcrecordsrequest@lvmpd.com>

Good morning,

Thank you for your update regarding our public records request. We are only seeking body-worn camera footage from officers who deployed or used projectile weapons during the provided timeframe.

Could you please let me know if limiting the request in this way still results in a voluminous amount of material? Thank you.

Best,

Tia Smith, Esq.

Policy Attorney

(she/her/hers)

ACLU of Nevada

4362 W. Cheyenne Ave | North Las Vegas, Nevada 89032

www.aclunv.org | [Facebook](#) | [Twitter](#)

ACLU Nevada

This message may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply email that this message has been inadvertently transmitted to you and delete this email from your system.

From: Do Not Reply <DoNotReply@LVMPD.COM>

Sent: Wednesday, August 27, 2025 4:05 PM

To: Tatiana Smith <TSmith@aclunv.org>

Subject: BWC Video Request - NPR2025-0072090

This Message Is From an External Sender

This message came from outside your organization.

Greetings Tatiana,

We are writing to provide an update regarding your recent public records request submitted to the Las Vegas Metropolitan Police Department (LVMPD). Our Public Records Unit is currently in the process of gathering all available body-worn camera (BWC) footage responsive to your request.

Due to the voluminous amount of video associated with the scope of your inquiry, we anticipate

that the cost for processing and producing these materials will be significant. In light of this, we would like to offer a recommendation that may help reduce the overall cost and processing time.

We suggest that you first review the corresponding use of force reports and identify which specific incidents or videos are most pertinent to your request. Narrowing the scope in this way will allow us to focus our efforts on the most relevant footage and potentially alleviate a substantial portion of the anticipated cost.

Please let us know how you would like to proceed or if you would like to discuss options in more detail. We remain committed to providing you with the information requested in the most efficient and cost-effective manner possible.

Sincerely,

Body Worn Camera Public Records Unit
Las Vegas Metropolitan Police Department

400-A South Martin L. King Boulevard, Las Vegas, Nevada 89106

☎ 702.828.7485 office

✉ bwcrecordsrequest@lvmpd.com



EXHIBIT 14

LVMPD Portal Messages re:
ACLUNV BWC Req.

X006325-020326 - Body Worn Camera Request

Message History (7)

On 3/18/2026 1:55:42 PM, Jacob Valentine wrote:

Good Afternoon,

We have still not received an update. Please provide as soon as possible.

Thanks,
Jacob

On 3/18/2026 1:55:36 PM, Jacob Valentine wrote:

TO: "LVMPD Public Records Request Portal"[lasvegasnvpd@govqa.us]

Good Afternoon,

We are still requesting a breakdown of fees as detailed below. We have not received any updates since February 24, 2026. Please provide as soon as possible.

Thanks,
Jacob

Jacob T. S. Valentine(he/him)

ACLU of Nevada, Staff Attorney

4362 W. Cheyenne Ave.
N. Las Vegas, NV 89032
725.235.3119

From: Jacob Valentine

Sent: Thursday, March 5, 2026 12:49 PM

To: 'LVMPD Public Records Request Portal'

Subject: RE: INVOICE - Body Worn Camera Request:: X006325-020326

Good Afternoon,

I am flagging the below email I sent on Febrauray 24, 2025.

Thank you,
Jacob

Jacob T. S. Valentine(he/him)

ACLU of Nevada, Staff Attorney

4362 W. Cheyenne Ave.
N. Las Vegas, NV 89032
725.235.3119

From: Jacob Valentine

Sent: Tuesday, February 24, 2026 3:25 PM
To: LVMPD Public Records Request Portal
Subject: RE: INVOICE - Body Worn Camera Request:: X006325-020326

Good Evening,

An ex-coworker of mine sent in a request (reference number NPR2025-0072090) for BWC footage of a protest. Our office was quoted approximately \$6,800 for the BWC footage of the protest. I took over this request and in an effort to limit the request I met with two LVMPD detectives to review the videos in person to determine specific video segments for disclosure. Your office has indicated that it will not provide video segments and I must instead request the entire video. Your office has also provided me with an invoice for \$2,766.60 for the two BWC videos.

At this time the ACLU of Nevada would no longer be interested in limiting the request to the two BWC videos and instead requests disclosure of all videos (originally quoted at approximately \$6,800). Please provide my office with an invoice of the current costs for all BWC originally requested. Please also provided a detailed breakdown of all costs charged.

Please let me know if you disagree with any of the above observations.

Thank you,

Jacob

Jacob T. S. Valentine(he/him)

ACLU of Nevada, Staff Attorney

4362 W. Cheyenne Ave.
N. Las Vegas, NV 89032
725.235.3119

From: LVMPD Public Records Request Portal

Sent: Monday, February 9, 2026 12:37 PM

To: Jacob Valentine

Subject: INVOICE - Body Worn Camera Request:: X006325-020326

Attachments: INV26-X006325-1.pdf

RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326. Dear Jacob Valentine, Your invoice is ready to be viewed. Please login to the LVMPD Public Records Request Portal to view, or find

Attachments:

INV26-X006325-1.pdf

RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the LVMPD Public Records Request Portal to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we do not accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the
LVMPD Public Records Request Portal.

On 3/5/2026 12:59:45 PM, Jacob Valentine wrote:

TO: "LVMPD Public Records Request Portal"[lasvegasnvpd@govqa.us]

Good Afternoon,

I am flagging the below email I sent on February 24, 2025.

Thank you,
Jacob

Jacob T. S. Valentine(he/him)

ACLU of Nevada, Staff Attorney

4362 W. Cheyenne Ave.
N. Las Vegas, NV 89032
725.235.3119

From: Jacob Valentine

Sent: Tuesday, February 24, 2026 3:25 PM
To: LVMPD Public Records Request Portal
Subject: RE: INVOICE - Body Worn Camera Request:: X006325-020326

Good Evening,

An ex-coworker of mine sent in a request (reference number NPR2025-0072090) for BWC footage of a protest. Our office was quoted approximately \$6,800 for the BWC footage of the protest. I took over this request and in an effort to limit the request I met with two LVMPD detectives to review the videos in person to determine specific video segments for disclosure. Your office has indicated that it will not provide video segments and I must instead request the entire video. Your office has also provided me with an invoice for \$2,766.60 for the two BWC videos.

At this time the ACLU of Nevada would no longer be interested in limiting the request to the two BWC videos and instead requests disclosure of all videos (originally quoted at approximately \$6,800). Please provide my office with an invoice of the current costs for all BWC originally requested. Please also provided a detailed breakdown of all costs charged.

Please let me know if you disagree with any of the above observations.

Thank you,
Jacob

Jacob T. S. Valentine(he/him)

ACLU of Nevada, Staff Attorney

4362 W. Cheyenne Ave.
N. Las Vegas, NV 89032
725.235.3119

From: LVMPD Public Records Request Portal

Sent: Monday, February 9, 2026 12:37 PM

To: Jacob Valentine

Subject: INVOICE - Body Worn Camera Request:: X006325-020326

Attachments: INV26-X006325-1.pdf

RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326. Dear Jacob Valentine, Your invoice is ready to be viewed. Please login to the LVMPD Public Records Request Portal to view, or find

Attachments:

INV26-X006325-1.pdf

RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the LVMPD Public Records Request Portal to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we do not accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need

to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the
LVMPD Public Records Request Portal.

On 2/24/2026 3:27:20 PM, Jacob Valentine wrote:

TO: "LVMPD Public Records Request Portal"[lasvegasnvpd@govqa.us]

Good Evening,

An ex-coworker of mine sent in a request (reference number NPR2025-0072090) for BWC footage of a protest. Our office was quoted approximately \$6,800 for the BWC footage of the protest. I took over this request and in an effort to limit the request I met with two LVMPD detectives to review the videos in person to determine specific video segments for disclosure. Your office has indicated that it will not provide video segments and I must instead request the entire video. Your office has also provided me with an invoice for \$2,766.60 for the two BWC videos.

At this time the ACLU of Nevada would no longer be interested in limiting the request to the two BWC videos and instead requests disclosure of all videos (originally quoted at approximately \$6,800). Please provide my office with an invoice of the current costs for all BWC originally requested. Please also provided a detailed breakdown of all costs charged.

Please let me know if you disagree with any of the above observations.

Thank you,
Jacob

Jacob T. S. Valentine(he/him)

ACLU of Nevada, Staff Attorney

4362 W. Cheyenne Ave.
N. Las Vegas, NV 89032
725.235.3119

From: LVMPD Public Records Request Portal

Sent: Monday, February 9, 2026 12:37 PM

To: Jacob Valentine

Subject: INVOICE - Body Worn Camera Request:: X006325-020326

Attachments: INV26-X006325-1.pdf

RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326. Dear Jacob Valentine,
Your invoice is ready to be viewed. Please login to the LVMPD Public Records Request Portal to view, or find

Attachments:

INV26-X006325-1.pdf

RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the LVMPD
Public Records Request Portal to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to
Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we do not accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the

LVMPD Public Records Request Portal.

On 2/9/2026 12:36:36 PM, LVMPD Public Records Request Portal wrote:

Attachments: [INV26-X006325-1.pdf](#)

Subject: INVOICE - Body Worn Camera Request:: X006325-020326

Body:



RE: Body Worn Camera Request of February 03, 2026, Reference # X006325-020326.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we **do not** accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



On 2/3/2026 12:13:31 PM, LVMPD Public Records Request Portal wrote:



Hello Jacob Valentine,

Request Type: Body Worn Camera Request

Reference Number: X006325-020326

Name of Requestor: Jacob Valentine

Status: Submitted

Request Submitted Date: 2/3/2026 12:13:26 PM

Records Requested: Last year the ACLU of Nevada requested BWC footage from a protest which occurred on 6/11/2025. On January 28, 2026, we met with Detective Felix (15242) and Detective Endoza (13146) in order to limit the request to specific BWC footage pursuant to the NPRA's mandate that government agencies work with sequesters to limit requests when relevant. Together, we determined that we would like to request the following segments of BWC footage:

Cavalaro video (total length 3h55m) at the time stamps of 01:23:00-02:07:00

Chambers video (video appears to start around 8:56 pm) at the time stamps of 00:00:00-00:02:00; 00:35:00-00:57:00; 01:07:00-01:47:00; 02:12:00-02:37:00

Please feel free to reach out with any questions or concerns.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](https://lvmpd.com)

Thank you,

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](#)



On 2/3/2026 12:13:30 PM, Jacob Valentine wrote:

Request Created on Public Portal

EXHIBIT 15

Invoice: ACLUNV Narrowed
Req. for BWC

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Jacob Valentine
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032

**Invoice Summary**

Invoice No:
Request Reference Number:
Invoice Date:
Due Date:
Status:
Balance Due

INV26-X006325-1
X006325-020326
2/9/2026
N/A
Open
\$2,766.60

Category	Description	Details	Cost	Unit	Add Overhead	Total Quantity	Quantity Waived	Quantity Charged	Total
Body Worn Camera Section	BWC - STANDARD Video/Audio Rate by Minute	Video/Audio Case Preparation/Re As permitted by NRS 239.052(1) and NRS 179A.140.	\$5.80	Per Quantity	☐	477.00	0.00	477.00	\$2,766.60

Comments:

Invoice for two videos. Officer Chambers 4 hours and Officer Tlatenchi 3hours 54 minutes (Not Cavalaro). This invoice covers two videos in full. We are unable to create new records (video clips).

Totals:

Total:	\$2,766.60
Payments:	\$0.00
Balance Due	\$2,766.60

EXHIBIT 16

LVMPD Portal Messages re:
ACLUNV Req. for Projectiles
BWC

X006326-020326 - Body Worn Camera Request

Message History (4)

On 2/5/2026 9:33:58 AM, LVMPD Public Records Request Portal wrote:

Attachments: [INV26-X006326-2.pdf](#)

Subject: INVOICE - Body Worn Camera Request:: X006326-020326

Body:



RE: Body Worn Camera Request of February 03, 2026, Reference # X006326-020326.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we **do not** accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



On 2/5/2026 9:17:21 AM, LVMPD Public Records Request Portal wrote:

Attachments: [INV26-X006326-1.pdf](#)

Subject: INVOICE - Body Worn Camera Request:: X006326-020326

Body:



RE: Body Worn Camera Request of February 03, 2026, Reference # X006326-020326.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we **do not** accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



On 2/3/2026 12:24:42 PM, LVMPD Public Records Request Portal wrote:



Hello Jacob Valentine,

Request Type: Body Worn Camera Request

Reference Number: X006326-020326

Name of Requestor: Jacob Valentine

Status: Submitted

Request Submitted Date: 2/3/2026 12:24:39 PM

Records Requested: At the protests on 6/11/2025 Sophia Snow was struck by projectiles fired by LVMPD. This occurred near the intersection of Bonneville ave and either 6th street, 7th street, or the alley in between 6th and 7th. Snow collapsed after during this incident and an ambulance was eventually called. We are requesting BWC footage showing the deployment of less than lethal rounds in Sophia Snows direction, any BWC footage of the ambulance, and any BWC of officers who were nearby Mrs. Snow as she laid on the ground and was assisted by others. I briefly discussed this request with Detective Felix (15242) and Detective Endoza (13146) when I met with them on January 28, 2026, however the records depicting this incident had not been in the list of records to review (due to a miscommunication between a member of my team who is no longer with the ACLU of Nevada and LVMPD). The incident likely occurred at around 9:30 pm. I am happy to review any potential responsive records in person or under protective order prior to the release of the most responsive records under the NPRA.

Please reach out with any questions or concerns.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](https://lvmpd.com)

Thank you,

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](#)



On 2/3/2026 12:24:40 PM, Jacob Valentine wrote:

Request Created on Public Portal

EXHIBIT 17

Invoice 1: ACLUNV Req. for
Projectiles BWC

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Jacob Valentine
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032

**Invoice Summary**

Invoice No:	INV26-X006326-1
Request Reference Number:	X006326-020326
Invoice Date:	2/5/2026
Due Date:	N/A
Status:	Open
Balance Due	\$1,723.68

Category	Description	Details	Cost	Unit	Add Overhead	Total Quantity	Quantity Waived	Quantity Charged	Total
Body Worn Camera Section	BWC - STANDARD Video/Audio Rate by Minute	Video/Audio Case Preparation/Re As permitted by NRS 239.052(1) and NRS 179A.140.	\$5.67	Per Quantity	☐	304.00	0.00	304.00	\$1,723.68

Comments:

Three videos/300 minutes. These videos capture Snow standing and moving away.

Totals:

Total:	\$1,723.68
Payments:	\$0.00
Balance Due	\$1,723.68

EXHIBIT 18

Invoice 2: ACLUNV Req. for
Projectiles BWC

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Jacob Valentine
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032

**Invoice Summary**

Invoice No:
Request Reference Number:
Invoice Date:
Due Date:
Status:
Balance Due

INV26-X006326-2
X006326-020326
2/5/2026
N/A
Open
\$85.05

Category	Description	Details	Cost	Unit	Add Overhead	Total Quantity	Quantity Waived	Quantity Charged	Total
Body Worn Camera Section	BWC - STANDARD Video/Audio Rate by Minute	Video/Audio Case Preparation/Re As permitted by NRS 239.052(1) and NRS 179A.140.	\$5.67	Per Quantity	☐	15.00	0.00	15.00	\$85.05

Comments:

3 videos 15 minutes. These videos are from the hospital.

Totals:

Total:	\$85.05
Payments:	\$0.00
Balance Due	\$85.05

EXHIBIT 19

LVMPD Portal Messages re:
ACLUNV Req. for Arrest BWC

X006517-020526 - Body Worn Camera Request

Message History (3)

On 2/6/2026 10:03:10 AM, LVMPD Public Records Request Portal wrote:

Attachments: [INV26-X006517-1.pdf](#)

Subject: INVOICE - Body Worn Camera Request:: X006517-020526

Body:



RE: Body Worn Camera Request of February 05, 2026, Reference # X006517-020526.

Dear Jacob Valentine,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we **do not** accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



On 2/5/2026 2:52:27 PM, LVMPD Public Records Request Portal wrote:



Las Vegas Metropolitan Police Department

Hello Jacob Valentine,

Request Type: Body Worn Camera Request

Reference Number: X006517-020526

Name of Requestor: Jacob Valentine

Status: Submitted

Request Submitted Date: 2/5/2026 2:52:25 PM

Records Requested: Any and all body worn camera footage involving this citation and arrest.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](#)



On 2/5/2026 2:52:27 PM, Jacob Valentine wrote:

Request Created on Public Portal

EXHIBIT 20

ACLUNV Req. for Trainings

September 30, 2025

Las Vegas Metropolitan Police Department
400 S. Martin L. King Blvd.
Las Vegas, NV 89106

Submitted via online portal

To whom it may concern:



4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
(702) 366-1226
aclunv.org

Angela Cook, Esq.
President

Athar Haseebullah, Esq.
Executive Director

Christopher Peterson, Esq.
Legal Director

Samantha Kroner, Esq.
Legal Fellow

This letter serves as a request under the Nevada Public Records Act, NRS § 239 et. seq., by the American Civil Liberties Union of Nevada (ACLUNV) for public records held by Las Vegas Metropolitan Police Department as detailed below.

A. The Requester

ACLUNV is a statewide affiliate of the American Civil Liberties Union, a national organization whose work protects the civil liberties and civil rights of all people. Our mission includes safeguarding the basic constitutional rights to due process, equal protection, and the civil rights of marginalized communities. One of ACLUNV's main functions is disseminating information to the public about issues of concern to ACLUNV and its members.

B. Request

ACLUNV requests, in electronic format where available and pursuant to NRS 239.010(3-5), the following powerpoint presentations:

- 1) MFF examples of prohibited items and use of vehicles
- 2) MFF handout
- 3) MFF Movements, Formations and Vehicles PP (02242025)
- 4) MFF Squad Tactics
- 5) 1st Quarter 2025 Commanders Circle
- 6) Command and Control for Supervisors MMF Revised 05-24-22
- 7) Protest Briefing 2-15-25
- 8) All powerpoint presentations used in the Mobile Field Force Squad Based Tactics training, if not mentioned above.

C. Waiver of Fees

The ACLUNV requests a waiver of any and all fees associated with this request.

In relation to both federal and state public records requests, fees are generally waived for nonprofit organizations seeking copies of materials without commercial interest and for the purpose of contributing to public understanding and education. *See Friends of the Coast Fork v. U.S. Dep't of the Interior*, 110 F.3d 53 (9th Cir. 1997); *Friends of Oceano Dunes, Inc. v. Salazar*, No. C-11-1476 EMC, 2011 WL 6748575 (N.D. Cal. Dec. 22, 2011); *North Cnty. Parents Org. for Children with Special Needs v. Dep't of Educ.*, 23 Cal. App. 4th 144 (Cal. Ct. App. 1994).

Here, the documents requested benefit the public's knowledge of LVMPD and are not sought for commercial interest. As a nonprofit 501(c)(3) organization, ACLUNV is well situated to disseminate information it gains from this request to the general public and other targeted communities. Dissemination of information to the public is a critical and substantial component of ACLUNV's mission and work.

D. Fulfillment of Request

The State of Nevada mandates that all state agency records are public unless declared confidential by law. NRS § 239.010. Recent changes to the Public Records Act reaffirm the state's commitment to transparency and maximizing the public's right of access to agency records. NRS § 239.001.

If all or any part of this request is denied, Nevada law requires that you provide the ACLUNV a written statement of the grounds for the denial, citing the law or regulations under which you believe you may deny access for each document. NRS 239.0107. Furthermore, if you determine that some portions of the requested records are exempt from disclosure, we expect that you provide us with any reasonable severable portion of the records sought.

Please be advised that if any refusal to disclose is based on confidentiality, then "[t]he public official or agency bears the burden of establishing the existence of privilege based upon confidentiality. It is settled that privileges, whether creatures of statute or the common law, should be interpreted and applied narrowly." *D.R Partners v. Board of County Com'rs of Clark County*, 116 Nev. 616, 622 (2000).

Pursuant to state law, we request copies and/or access to these public records be forwarded to the ACLUNV within five (5) business days of this letter, by **October 7, 2025**. NRS 239.0107(1). If you are unable to make the records available by this date, you are statutorily required to state that fact in writing explaining why the book or record is unavailable and a date and time when the record will be available. NRS 239.0107(1)(c)(1).

The updated Public Records Act imposes a duty on governmental entities to "make a reasonable effort to assist the requester to focus the request in such a manner as to maximize the likelihood the requestor will be able to [access] the public book or record as



4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
(702) 366-1226
aclunv.org

Angela Cook, Esq.
President

Athar Haseebullah, Esq.
Executive Director

Christopher Peterson, Esq.
Legal Director

Samantha Kroner, Esq.
Legal Fellow

expeditiously as possible." NRS 239.0107(1)(c)(2). Please contact me within the five (5) day statutory time frame if, for some reason, this request requires clarification.

Please forward copies of records as they are identified to **skroner@aclunv.org**, even if production is not fully complete. We appreciate your assistance with this request.

You may contact me directly at 725-231-0970 or skroner@aclunv.org with any questions or concerns.

Sincerely,



Samantha Kroner, Esq.
Legal Fellow
American Civil Liberties Union of Nevada

4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
(702) 366-1226
aclunv.org

Angela Cook, Esq.
President

Athar Haseebullah, Esq.
Executive Director

Christopher Peterson, Esq.
Legal Director

Samantha Kroner, Esq.
Legal Fellow

EXHIBIT 21

LVMPD Confirmation Email re:
ACLUNV Req. for Trainings

General Police Records Request :: X000934-093025

From LVMPD Public Records Request Portal <lasvegasnvpd@govqa.us>

Date Tue 9/30/2025 2:38 PM

To Samantha Kroner <SKroner@aclunv.org>

This Message Is From an External Sender

This message came from outside your organization.



Hello Samantha Kroner,

Request Type: General Police Records Request

Reference Number: X000934-093025

Name of Requestor: Samantha Kroner

Status: Submitted

Request Submitted Date: 9/30/2025 2:37:35 PM

Records Requested: Please see attached public records request for training Powerpoint presentations.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](https://lvmpd.com)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](#)



EXHIBIT 22

LVMPD Email to
ACLUNV re: Invoice for
Req. for Trainings

INVOICE - General Police Records Request:: X000934-093025

From LVMPD Public Records Request Portal <lasvegasnvpd@govqa.us>

Date Fri 10/17/2025 9:19 AM

To Samantha Kroner <SKroner@aclunv.org>

This Message Is From an External Sender

This message came from outside your organization.

Attachments:

[INV25-X000934-3.pdf](#)



RE: General Police Records Request of September 30, 2025, Reference # X000934-093025.

Dear Samantha Kroner,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view and make a payment online, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department
Attn: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Your Public Record Service request has been invoiced and will be marked as "waiting for payment" in our system, and at this time no documents will be uploaded. Once payment is received, work on your request will be resumed.

Thank you,

Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



EXHIBIT 23

Invoice: ACLUNV Req. for
Trainings



LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Samantha Kroner



Invoice Summary

Invoice No:	INV25-X000934-3
Request Reference Number:	X000934-093025
Invoice Date:	10/17/2025
Due Date:	N/A
Status:	Open
Balance Due	\$329.00

Category	Description	Details	Cost	Unit	Add Overhea	Total Quantit	Quantity War	Quantity Cha	Total
Public Records Section	General PRR - Public Records Hourly Rate	Case Preparation/Re As permitted by NRS 239.052(1) and NRS 179A.140. See uploaded invoice letter.	\$47.00	Per Hour		7.00	0.00	7.00	\$329.00

Comments:

Totals:

Total:	\$329.00
Payments:	\$0.00
Balance Due	\$329.00

EXHIBIT 24

ACLUNV Email to LVMPD
re: Explanation of Trainings
Req. Costs

Re: INVOICE - General Police Records Request:: X000934-093025

From Samantha Kroner <SKroner@aclunv.org>

Date Mon 10/27/2025 11:40 AM

To LVMPD Public Records Request Portal <lasvegasnvpd@govqa.us>

Good afternoon,

Could you please clarify the basis for this charge and explain how it was calculated?

Thank you,

Samantha Kroner, Esq.* (*she/her*)

Legal Fellow, ACLU of Nevada

Phone: 725-231-0970

Address: 4362 W Cheyenne Ave | North Las Vegas, Nevada 89032

www.aclunv.org | [Facebook](#) | [Twitter](#)

*Licensed in Colorado

From: LVMPD Public Records Request Portal <lasvegasnvpd@govqa.us>

Sent: Friday, October 17, 2025 9:19 AM

To: Samantha Kroner <SKroner@aclunv.org>

Subject: INVOICE - General Police Records Request:: X000934-093025

This Message Is From an External Sender

This message came from outside your organization.

Attachments:

[INV25-X000934-3.pdf](#)



RE: General Police Records Request of September 30, 2025, Reference # X000934-093025.

Dear Samantha Kroner,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view and make a payment online, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department
Attn: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Your Public Record Service request has been invoiced and will be marked as "waiting for payment" in our system, and at this time no documents will be uploaded. Once payment is received, work on your request will be resumed.

Thank you,

Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



EXHIBIT 25

LVMPD Letter to ACLUNV
Explaining Costs for Training
Req.



**LAS VEGAS METROPOLITAN
POLICE DEPARTMENT**

Kevin McMahon, Sheriff

October 17, 2025

Samantha Kroner
ACLU of Nevada
skroner@aclunv.org

Dear Ms. Kroner:

This follows your request for the following PowerPoint files:

- (1) MFF — Examples of Prohibited Items and Use of Vehicles;*
- (2) MFF — Handout;*
- (3) MFF — Movements, Formations, and Vehicles (02/24/2025);*
- (4) MFF — Squad Tactics;*
- (5) 1st Quarter 2025 Commanders Circle;*
- (6) Command and Control for Supervisors — MFF (Revised 05/24/2022);*
- (7) Protest Briefing (02/15/2025); and*
- (8) all PowerPoint presentations used in the Mobile Field Force Squad-Based Tactics training, if not mentioned above.*

As noted in my 10/14/2025 email, several of the requested PowerPoints are already encompassed within lesson plans previously produced. Specifically:

- *MFF — Examples of Prohibited Items and Use of Vehicles → included in Protests and Civil Disorder Incidents for Supervisors (Lesson Plan)*
- *Command and Control for Supervisors — MFF → included in Protests and Civil Disorder Incidents for Supervisors (Lesson Plan)*
- *MFF — Handout → included in MFF Squad-Based Tactics (Lesson Plan)*
- *MFF — Movements, Formations, and Vehicles → included in MFF Squad-Based Tactics (Lesson Plan)*
- *MFF — Squad Tactics → included in MFF Squad-Based Tactics (Lesson Plan)*

In that message I offered two paths—either proceed only with the non-overlapping PowerPoints (1st Quarter 2025 Commanders Circle and Protest Briefing — 02/15/2025) at no anticipated cost, or proceed with all requested PowerPoints, including materials that duplicate lesson-plan content, with fees confirmed before release.

On October 17, 2025, you confirmed that the ACLU wishes to proceed with *all* PowerPoints. The collected files total over 300 pages.

We have determined that the labor required to process your request is 7 personnel hours.

Partners with the Community

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the governmental entity to provide a copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public record, including, without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history indicates that public entities may charge for labor and personnel costs when compilation and redaction are required.

Pursuant to the published rate of \$47.00 per hour, the total cost for review and redaction is \$329.00. If the actual time is less, we will reduce the charge and refund any overage; if additional time appears necessary, we will notify you in advance.

To move forward with processing your request, please provide payment in the amount of **\$329.00** which has been invoiced to you via the Public Records Portal. If you prefer to pay by check, you can pay in the form of a money order, cashier’s check, or business check made payable to **Las Vegas Metropolitan Police Department** or **LVMPD**. Personal checks *will not* be accepted. Payments may be sent by mail or hand delivered to:

Attn: Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Blvd., A-4
Las Vegas, NV 89106

Once invoiced, the portal request will be marked “complete—awaiting payment” and reactivated upon receipt of payment.

We do not expect these files to include criminal-history info or personal identifiers. Where required, we’ll make redactions—for example, redacting photos of identifiable people to protect privacy, law-enforcement tactics and operational details that could compromise officer safety. This list of potential privileges is not meant to be exhaustive. Once records are reviewed, specific privileges can be stated.

If you would like to narrow your focus to specific PowerPoints, we can research the reformulated request and determine if payment would still be necessary. We would like to assist you in obtaining the information you seek **without** substantial additional charge, however, your request as worded is burdensome. If you have any questions or concerns, please feel free to contact us.

Sincerely,

Public Records Unit
Las Vegas Metropolitan Police Department

EXHIBIT 26

LVMPD Email to Edgar Flores

Law re: Req. for BWC

Payment Information for 2025-0082588

From onbase@lvmpd.com <onbase@lvmpd.com>

Date Sat 8/30/2025 7:36 AM

To Samantha Rainy <Injury@edgarfloreslaw.com>

Date: 8/30/2025

NPR Number: 2025-0082588

Dear Requester:

Please note that we are in receipt of the above referenced request. Pursuant to our research, please click on the attached link to view the fees associated with your request and select the line items you wish to receive.

<https://wa2.lvmpd.com/AppNetProd/docpop/formpop.aspx?clienttype=html&docid=106605983&chksum=2371ad1b427c4fa24bca4f7116b80c87db52c3c1d04373b66f6995b39439ad4a>

Full payment for this request is required prior to work being initiated. Requests are processed in the order payment is received.

Payment must be made within **30 days**, or the request will be **closed**.

Please be aware that we are estimating requests for BWC footage to be completed and sent out in approximately 6-9 months, currently. For photos, you should expect to receive them within 1 to 2 weeks from the paid-on date. If you find that the invoice you received for the BWC footage is higher than expected, please contact us via phone or by email. To help reduce the cost, you can provide us the officer's name and/or badge number, or specify the exact footage you are seeking.

We recognize that this fee estimate may represent a significant cost to you. However, the law requires certain information is redacted, to include criminal history, personal identifiers (such as social security numbers), images that give rise to privacy interests (footage inside homes, injuries, statements about personal conduct, etc.). Officers' faces must also be redacted. Therefore all video must be thoroughly reviewed. This process of reviewing video and redacting is very labor-intensive.

Public Records Unit

400 S Martin L King Blvd, Bldg. A Las Vegas, NV 89106

702-828-7485

****PLEASE DO NOT REPLY TO THIS MESSAGE****

It is an automated email response. It is for your information and records only.

*****LVMPD Security Notice***** This email is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and/or exempt from disclosure under applicable law NRS 179A. If the reader of this message is not the intended recipient, or employee, or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

EXHIBIT 27

LVMPD Confirmation Email re:
TMP June Req. for Officer
Reports and Affidavits



Public Record Request Submitted for Public Record Request - Alysia Santo

2 messages

Do Not Reply <DoNotReply@lvmpd.com>
To: Alysia Santo <asanto@themarshallproject.org>

Mon, Jun 2, 2025 at 3:59 PM

Hello Alysia Santo,

Public Record Request Title	Public Record Request - Alysia Santo
Public Record Request #	NPR2025-0078519
Name of Requestor	Alysia Santo
Status	Submitted
Request Submitted Date	6/2/2025 5:00 PM

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is completed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

[Public Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

Do Not Reply <DoNotReply@lvmpd.com>
To: Alysia Santo <asanto@themarshallproject.org>

Mon, Jun 2, 2025 at 4:04 PM

Hello Alysia Santo,

Public Record Request Title	Public Record Request - Alysia Santo
Public Record Request #	NPR2025-0078520
Name of Requestor	Alysia Santo
Status	Submitted
Request Submitted Date	6/2/2025 5:00 PM

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is completed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

[Public Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard

EXHIBIT 28

LVMPD Letter to TMP re: Cost
for June Reqs.



June 9, 2025

SENT VIA PORTAL:

Alysia Santo

Email: asanto@themarshallproject.org

RE: Nevada Public Records Act Request NPR2025-0078519 & NPR2025-0078520

Dear Alysia Santo,

This correspondence is in response to your Nevada Public Records Act request NPR2025-0078519 & NPR2025-0078520 received 06/02/2025. You are requesting “*arrest warrants and/or supporting affidavits and homicide investigation reports for 15 events*”.

Research and preliminary retrieval of the requested documents were immediately started upon receipt of your request. We were able to locate over 200 pages of *potentially* responsive records that would need to be reviewed for redaction and subsequent release. We have determined that the labor required to process your request is 10 personnel hours.

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the governmental entity to provide a copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public record, including, without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history indicates that public entities may charge for labor and personnel costs when compilation and redaction are required.

Pursuant to the published rate of \$46.00 per hour, **the total cost for redaction and review is \$460.00.** In the event it takes less time to process this request, we will refund any excess monies owed.

To move forward with processing your request as is, please provide payment in the amount of **\$460.00** in the form of a money order, cashier’s check, or business check made payable to **The Las Vegas Metropolitan Police Department** or **LVMPD**. Personal checks *will not* be accepted. Payments may be sent by mail or hand delivered to:

Attn: Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Blvd., A-4
Las Vegas, NV 89106

Please be advised there could also be privileged confidential criminal history information that cannot be redacted and will be withheld. NRS 239.001 provides that public records are open to inspection. However, NRS 239.010(1) expressly creates exemptions to the disclosure of records falling under various statutes, including NRS 179A.070. There may be other privileges that apply once records are gathered. For instance, personal identifiers must be redacted. NRS 239B.030; NRS 603A.040. Information about victims and witnesses may be confidential. *Donrey v. Bradshaw*, 106 Nev. 630, 798 P.2d 144, fn. 4 (1990) (referring to Exemption 7 of the federal Freedom of Information Act); 5 USC § 552(b)(7)(Subparts (C) and (F) of Exemption 7 make law enforcement records confidential if disclosure “could reasonably be expected to constitute an unwarranted invasion of personal privacy” or “could reasonably be expected to endanger the life or physical safety of an individual”). Other privacy concerns may also warrant redactions. *Clark County Sch. Dist. v. Las Vegas Review-Journal*, ---Nev. ---, 429 P.3d 313, 319-20 (2018).

This list of potential privileges is not meant to be exhaustive. Once the records are gathered and reviewed, specific privileges can be stated.

Please submit payment following the directions above if you would still like to proceed with the request as written. **Your request in the LVMPD Public Records Portal will be marked as “complete” while we await payment. Once payment is received, your request will be reactivated.** Again, we will not continue to process this request until we have received payment.

Respectfully,

Public Records Unit
Las Vegas Metropolitan Police Department
400-A South Martin L. King Boulevard, Las Vegas, Nevada 89106
(702) 828.7489 office

EXHIBIT 29

LVMPD Email to TMP
Confirming Payment for
June Reqs.



Alysia Santo <asanto@themarshallproject.org>

Correspondence to Nevada Public Records Act Request NPR2025-78519

Do Not Reply <DoNotReply@lvmpd.com>

Mon, Jun 23, 2025 at 11:25 AM

To: Alysia Santo <asanto@themarshallproject.org>

Dear Alysia Santo,

This correspondence is in reference to your Nevada Public Records Act request submitted via portal on 06/02/2025, ref request #: **NPR2025-0078519**.

The Public Records Unit is in receipt of your payment for \$460.00. Your request has been placed back "in progress" and we will now begin processing your request. We anticipate that your records will be available to you by July 31, 2025.

However, you can expect an update on the progress of your request by **07/18/2025**.

Thank you in advance for your patience regarding this request. If you have any questions, please contact our office.

Respectfully,

Public Records Unit
Las Vegas Metropolitan Police Department
400-A South Martin L. King Boulevard, Las Vegas, Nevada 89106
702.828.7489 office

EXHIBIT 30

LVMPD Email to TMP re:
Cost of CAD Req.



Alysia Santo <asanto@themarshallproject.org>

Calls for Service

Communications Research Request <CommResearchRequest@lvmpd.com>

Thu, Sep 11, 2025 at 1:40 PM

To: "asanto@themarshallproject.org" <asanto@themarshallproject.org>

Good morning,

We have been approved to release the list of calls for service at [9145 S Las Vegas Blvd #3105](#). The fee is \$30.00 and this would provide a list of all the event numbers. There were 9 events and each event would need to be requested. The fee for CAD is \$29.00 each and if anything needs to be redacted the fee is \$34.00 each. If you have any questions feel free to contact us. Thank you.

Amy Corn P# 8481

LVMPD Communications

Dispatch Professional II/COR

702-828-3871

EXHIBIT 31

LVMPD Email to TMP re:
Payment Receipt for CAD Req.



Alysia Santo <asanto@themarshallproject.org>

Your Transaction Receipt

1 message

CyberSource Business Center <donotreply@support.cybersource.com>
Reply-To: CyberSource Business Center <Accounting@lvmpd.com>
To: asanto@themarshallproject.org

Thu, Sep 11, 2025 at 1:50 PM

Las Vegas Metropolitan Police Department 400 S. Martin L. King Blvd Las Vegas, NV 89106

702-828-3596

Accounting@lvmpd.com

Merchant Name LVMPD

Return Codes

Request ID 7576129929466280903040
Result Code SOK-Request was processed successfully.
Authorization Code 041787
CVN Result M - Card verification number matched.

Order Information

Order or Merchant Reference Number 1757612992939
Subtotal Amount 30.00 USD
Total Amount 30.00 USD
Transaction Type Sale
Transaction Date Sep 11 2025 10:49:52 AM PDT
Authorization Date Sep 11 2025 10:49:52 AM PDT
Comment CFS [9145 S Las Vegas Blvd #3105](#)

Merchant Defined Data

[1]P# 8481
[2]Bureau Name Communications

Customer Information

Name ALYSIA SANTO
Credit Card Type MasterCard
Credit Card Number XXXX-XXXX-XXXX-1507
Phone Number 5186693126
Email Address asanto@themarshallproject.org

Billing Information

ALYSIA SANTO
33 Western Dr
Ardsley
NY
10502
US

EXHIBIT 32

LVMPD Letter to TMP re:
Costs for Oct. Reqs.



October 14, 2025

VIA PORTAL

Alysia Santo
33 Western Dr.
Ardsley, NY 10502
asanto@themarshallproject.org

Re: Public Records Requests

Dear Alysia Santo,

This correspondence is in response to the current thirteen (13) requests you submitted to the Public Records Portal on October 09, 2025.

- X001343-100925
- X001344-100925
- X001345-100925
- X001347-100925
- X001348-100925
- X001349-100925
- X001350-100925
- X001351-100925
- X001352-100925
- X001353-100925
- X001354-100925
- X001358-100925
- X001359-100925

As of now, you have submitted 52 public records requests since June 2, 2025. We have processed 39 of them. 13 are currently in the queue. It has also been determined that you have submitted 10% of the media requests received by LVMPD PRU since the launch of the new portal on September 16, 2025. Several of them have been very burdensome because they sought voluminous records requiring significant redactions. On one occasion, we charged you because the records you were seeking were not readily available and required an exceptional amount of time to process. After that time, you started submitting requests one at a time, but now more recently, you are submitting several requests a day. By submitting this many requests with voluminous work, our other customers cannot be served in a timely manner because our time is being taken up by the amount of requests you are submitting.

Our responses to you have ranged from furnishing a variety of documents such as Incident Crime Reports, Declaration of Arrest, Declaration of Warrant, Officer Reports, Contact Cards, Property Reports and Voluntary Statements, Etc.

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the governmental entity to provide the copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public record, including, without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). In Nevada, the

phrasing “without limitation” requires an expansive construction; i.e., a narrow construction is error. *Sims v. Eighth Judicial Dist. Court*, 125 Nev. 126, 130, 206 P.3d 980, 983 (2009).

The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history strongly indicates that public entities may charge for labor and personnel costs when compilation and redaction are required. I base this on at least of couple of reasons. First, the language of the original bill would have been absolutely clear that public entities would never be able to charge for labor or personnel costs. *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, 136 Nev. Adv. Op. 5, --- P.3d --- (2020) (rejecting the media’s argument that a public entity waives privileges by not naming them within five days, since the Legislature specifically rejected a bill draft that would have codified such a waiver). Second, the two senators who worked out compromise language explained the amendments that became law as permitting public entities to charge when the requests are unduly burdensome, causing the public entity, for instance, to pay employees overtime.

Pertaining to the requests submitted to the portal on October 09, 2025, and any additional requests submitted in the future, the Public Records Unit will be invoicing each request individually. We will not provide documents for a request until an invoice is paid in the order they are received from you. Additionally, the 13 pending requests will be processed on a rolling basis. Due to the upcoming holiday season and reduced staffing levels, we expect delay in completion, however, we still expect all 13 to be completed by end of day January 28, 2026, unless otherwise specified.

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the government entity to provide the copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public records, including without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history indicates that public entities may charge for labor and personnel costs when compilation and redaction are required.

Please be advised there could also be privileged confidential criminal history information that cannot be redacted and will be withheld. NRS 239.001 provides that public records are open to inspection. However, NRS 239.010(1) expressly creates exemptions to the disclosure of records falling under various statutes, including NRS 179A.070. Pursuant to NRS 179A.070, a “record of criminal history” is “information contained in records collected and maintained by agencies of criminal justice, the subject of which is a natural person, consisting of descriptions which identify the subject and notations of summons in a criminal action, warrants, arrests, citations for misdemeanors..., detentions, decisions of a district attorney or the Attorney General not to prosecute the subject, indictments, informations or other formal criminal charges and dispositions of charges....” NRS 179A.070(1).

There may be other privileges that apply once records are gathered. For instance, personal identifiers must be redacted. NRS 239B.030; NRS 603A.040. Information about victims and witnesses may be confidential. *Donrey v. Bradshaw*, 106 Nev. 630, 798 P.2d 144, fn. 4 (1990) (referring to Exemption 7 of the federal Freedom of Information Act); 5 USC § 552(b)(7)(Subparts (C) and (F) of Exemption 7 make law enforcement records confidential if disclosure “could reasonably be expected to constitute an unwarranted invasion of personal privacy” or “could reasonably be expected to endanger the life or physical safety of an individual”). Other privacy concerns may also warrant redactions. *Clark County Sch. Dist. v. Las Vegas Review-Journal*, ---Nev. ---, 429 P.3d 313, 319-20 (2018). Evidence is not a public record. BLACK’S LAW DICT., 7th ed. ab., at p. 1023 (2000) (defining “public record” as a document “made by public officer in pursuance of duty, the immediate purpose of which is to disseminate the information to

the public or to serve as a memorial of official transaction for public reference”); *Id.* at p. 457 (defining “evidence” as “[s]omething (including testimony, documents, and tangible objects) that tends to prove or disprove the existence of an alleged fact.” Moreover, providing evidence obtained through legal process, including consent, would exceed the authority granted either by the court or by the owner. *See e.g., Wilson v. Layne*, 526 U.S. 603, 119 S. Ct. 1692 (1999) (holding that when balancing a person’s Fourth Amendment right to be secure in their persons, houses, papers, and effects, probable cause may justify a police entry and seizure but it does not justify the media’s entry and/or seizure).

This list of potential privileges is not meant to be exhaustive. Once the records are gathered and reviewed, specific privileges can be stated. Again, once we receive payment, we will begin processing the requests listed on an individual basis. We will not proceed with your other requests until the pending requests are FULLY COMPLETED.

Your current requests in the LVMPD Public Records Portal will remain “on-hold” while we await payment and process each request in the order they were received.

If you have any further questions or concerns, please direct them to the Office of General Counsel at 702-828-3310.

Thank you,

Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

EXHIBIT 33

TMP's Paid Invoices for Oct.
Reqs.



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV26-X001354-1
Request Reference Number: X001354-100925
Invoice Date: 1/15/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		3.50	0.00	3.50	\$164.50

Comments:

Totals:

Total: \$164.50
Payments: \$164.50
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001352-1
Request Reference Number: X001352-100925
Invoice Date: 1/14/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

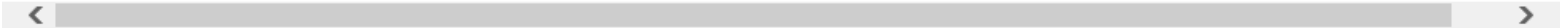
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

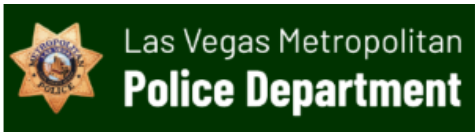
Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		1.00	0.00	1.00	\$47.00

Comments:

Totals:

Total: \$47.00
Payments: \$47.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV26-X001348-1
Request Reference Number: X001348-100925
Invoice Date: 1/6/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		1.50	0.00	1.50	\$70.50

Comments:

Totals:

Total: \$70.50
Payments: \$70.50
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV26-X001350-1
Request Reference Number: X001350-100925
Invoice Date: 1/13/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

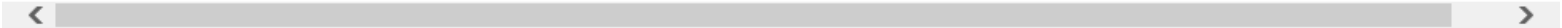
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		1.00	0.00	1.00	\$47.00

Comments:

Totals:

Total: \$47.00
Payments: \$47.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001351-1
Request Reference Number: X001351-100925
Invoice Date: 1/15/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

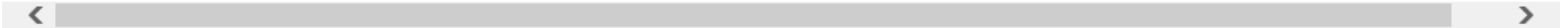
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.00	0.00	2.00	\$94.00

Comments:

Totals:

Total: \$94.00
Payments: \$94.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV25-X001347-1
Request Reference Number: X001347-100925
Invoice Date: 11/19/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

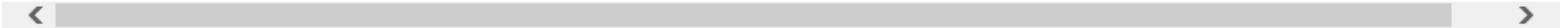
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.00	0.00	2.00	\$94.00

Comments:

Totals:

Total: \$94.00
Payments: \$94.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV25-X001345-1
Request Reference Number: X001345-100925
Invoice Date: 11/5/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

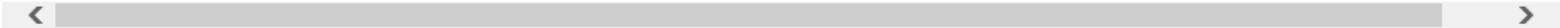
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

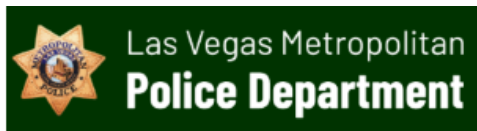
Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.50	0.00	2.50	\$117.50

Comments:

Totals:

Total: \$117.50
Payments: \$117.50
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV25-X001344-1
Request Reference Number: X001344-100925
Invoice Date: 10/21/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

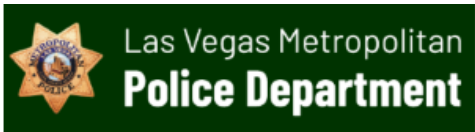
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total	
Public Records - Media	Media - Public Records Hourly Rate	Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour	☐	1.50	0.00	1.50	\$70.50	...

Comments:

Totals:

Total: \$70.50
Payments: \$70.50
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV25-X001353-1
Request Reference Number: X001353-100925
Invoice Date: 12/30/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

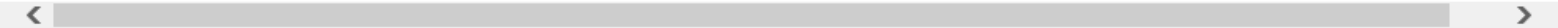
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.00	0.00	2.00	\$94.00

Comments:

Totals:

Total: \$94.00
Payments: \$94.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:
Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001343-1
Request Reference Number: X001343-100925
Invoice Date: 1/6/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		3.00	0.00	3.00	\$141.00

Comments:

Totals:

Total: \$141.00
Payments: \$141.00
Balance Due **\$0.00**

EXHIBIT 34

TMP's Paid Invoice for FIT Report



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV26-X001349-1
Request Reference Number: X001349-100925
Invoice Date: 1/6/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		5.00	0.00	5.00	\$235.00

Comments:

Totals:

Total: \$235.00
Payments: \$235.00
Balance Due **\$0.00**

EXHIBIT 35

LVMPD Confirmation Email re:
TMP Oct. Req. for Homicide
Investigation Report



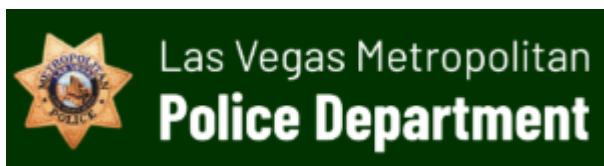
Alysia Santo <asanto@themarshallproject.org>

Media Request :: X001349-100925

1 message

LVMPD Public Records Request Portal <lasvegasnvpd@govqa.us>
To: "asanto@themarshallproject.org" <asanto@themarshallproject.org>

Thu, Oct 9, 2025 at 3:01 PM



Hello Alysia Santo,

Request Type: Media Request**Reference Number:** X001349-100925**Name of Requestor:** Alysia Santo**Status:** Submitted**Request Submitted Date:** 10/9/2025 12:00:23 PM

Records Requested: A copy of the homicide investigation report, or officers report, regarding the homicide of Delia Luna-Rojo, killed by Miguel Gallarzo on or around 7/4/2022.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](https://lvmpd.com/public-records-request-portal)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](https://lvmpd.com/public-records-request-portal)



EXHIBIT 36

Invoice: TMP Oct. Req. for
Transcripts



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn: Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

I Invoice Summary

Invoice No: INV26-X001359-1
Request Reference Number: X001359-100925
Invoice Date: 1/14/2026
Due Date: N/A
Status: Open
Balance Due \$540.50

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		11.50	0.00	11.50	\$540.50

Comments:

Totals:
Total: \$540.50
Payments: \$0.00
Balance Due **\$540.50**

EXHIBIT 37

TMP Letter to LVMPD re:
Costs of Public Records

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
30 Hudson Yards
New York, NY 10001-2170
T +1 212 841 1000

By Electronic Mail

February 4, 2026

Las Vegas Metropolitan Police Department
Public Records Unit
400 S. Martin L. King Blvd.
Las Vegas, NV 89106

Re: Fees Charged for Responding to Public Records Requests by The Marshall Project

To Whom It May Concern:

We write on behalf of our client The Marshall Project (“TMP”) in connection with fees charged by the Las Vegas Metropolitan Police Department (“LVMPD”) for its responses to Nevada Public Records Act (“NPRA”) requests by TMP reporter Alysia Santo. As detailed below, LVMPD has taken positions regarding fees that are in violation of the NPRA: Fees for labor and personnel costs associated with redaction and compilation in processing requests are not recoverable under the fee provisions of the NPRA. Nor are fees for records already publicly available for free online. Moreover, singling out Ms. Santo alone to charge for otherwise freely accessible records violates the Equal Protection Clause of the Fourteenth Amendment. Accordingly, LVMPD should refund TMP for fees it has charged TMP in excess of “actual costs” recognized by the NPRA that LVMPD has incurred.

A. Background

TMP is a nonpartisan, nonprofit news organization whose reporters have produced award-winning journalism on the United States criminal justice system. In connection with her reporting, Ms. Santo began submitting public records requests to LVMPD on June 2, 2025. The first request, NPR2025-0078519, was for “Officer’s Reports,” documents that serve as the official report of investigatory findings, in fifteen homicide cases. (Exhibit A). The second request, NPR2025-0078520, was for arrest affidavits and/or declarations of warrant for the same fifteen cases. (Exhibit B).

On June 9, 2025, LVMPD sent Ms. Santo an invoice, accompanied by a letter describing the fees charged, for these requests. (Exhibit C). The letter indicated that the hourly rate to process Ms. Santo’s requests would be \$46 and that ten hours would be necessary for “redaction and review.” (*Id.*). LVMPD estimated that the total charge to TMP would be \$460 but assured Ms. Santo that “any excess monies” would be refunded if the request took less time than the estimated ten hours to process. (*Id.*). To justify this charge, LVMPD claimed that, although the NPRA does not expressly include labor and personnel costs in its definition of “actual costs” that may be recovered, the legislative history of the 2019 amendments to the NPRA “strongly

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Las Vegas Metropolitan Police Department
Public Records Unit
February 4, 2026
Page 2

indicates” that these costs may be charged “when compilation and redaction are required.” (*Id.*). TMP promptly paid the invoice on June 13, 2025. On July 31, 2025, LVMPD produced 312 pages of records responsive to these requests.

On September 4, 2025, Ms. Santo submitted requests for Officer’s Reports in twenty-one homicide cases.¹ Ms. Santo subsequently cancelled one of these requests, NPR2025-0082809, and between September 5, 2025 and October 9, 2025, she received records responsive to nineteen of the remaining twenty requests. LVMPD did not charge TMP any fees associated with these requests. Nor did LVMPD charge TMP any fees to respond to Ms. Santo’s September 22, 2025 request for two incident reports, both filed under request X000589-092225 and both produced on September 24, 2025. The lone outlier during this period was an invoice for \$30 to process a Computer-Aided Dispatch (“CAD”) report that Ms. Santo requested on September 10, 2025. (Exhibit D). TMP promptly paid this invoice and later received the CAD report.

LVMPD resumed charging Ms. Santo fees after she submitted requests on October 9, 2025 for eleven Officer’s Reports from homicide cases and two homicide files.² On October 14, 2025, LVMPD sent a letter to Ms. Santo claiming that her requests had become too burdensome and informing her that, moving forward, she would be invoiced separately for each individual request; and that an individual request would only be processed once payment was remitted for that request. (Exhibit E). The letter recited the same NPRA legislative history that LVMPD previously invoked to justify charging for labor and personnel costs, but now for \$47 per hour, not \$46. (*Id.*).

Between October 28, 2025 and January 16, 2026, TMP paid for and received responsive records for ten of the eleven Officer’s Reports requested on October 9, 2025. The fees for these 215 pages of records totaled \$940, a marked increase from the \$460 that TMP paid for 312 pages of Officer’s Reports in June. (Exhibit F). As for the eleventh and final Officer’s Report from Ms. Santo’s October 9, 2025 requests, LVMPD instead produced a Force Investigation Team (“FIT”) report, which is the investigation conducted when an officer uses deadly force. (Exhibit G). Not only was this FIT report not responsive to Ms. Santo’s request for an Officer’s Report, but the report was also already publicly available online for download.³ The only

¹ Those requests were NPR2025-0082785, NPR2025-0082787, NPR2025-0082788, NPR2025-0082790, NPR2025-0082791, NPR2025-0082792, NPR2025-0082793, NPR2025-0082794, NPR2025-0082795, NPR2025-0082797, NPR2025-0082798, NPR2025-0082799, NPR2025-0082802, NPR2025-0082803, NPR2025-0082804, NPR2025-0082806, NPR2025-0082808, NPR2025-0082809, NPR2025-0082810, NPR2025-0082812, and NPR2025-0082813.

² Those requests were X001343-100925, X001344-100925, X001345-100925, X001351-100925, X001350-100925, X001349-100925, X001348-100925, X001347-100925, X001352-100925, X001353-100925, X001354-100925, X001358-100925, and X001359-100925.

³ See Las Vegas Metro. Police Dep’t, *Force Investigation Team Report: Fatal Officer-Involved Shooting* (Aug. 30, 2022), <https://www.lvmpd.com/home/showpublisheddocument/1724/638326183794770000>.

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Las Vegas Metropolitan Police Department
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February 4, 2026
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difference between the FIT report produced to Ms. Santo for \$235 and the report free online to the public were redactions unique to Ms. Santo's copy.

As of this letter's date, the only LVMPD invoice that TMP has not paid is an invoice for \$540 to produce transcripts and witness statements from a murder investigation, a task that LVMPD has estimated would require 11.5 hours of work. (Exhibit H). This prohibitively high cost has forced TMP to explore alternatives to obtain information that it is entitled to receive from LVMPD under the NPRA.

B. The NPRA's Plain Language Does Not Authorize LVMPD to Charge for Labor and Personnel Costs.

The NPRA allows governmental entities to charge a fee not exceeding the "actual cost" in providing a particular record. NEV. REV. STAT. ANN. § 239.052. "Actual cost" means the direct cost incurred by a governmental entity in the provision of a public record, including "without limitation" costs of "ink, toner, paper, media and postage," and excluding costs incurred regardless of whether a person requests a copy of a particular record. § 239.005(1). The only other fees authorized by the NPRA are specific to particular types of documents not relevant here. *See* § 239.053 (transcripts of administrative proceedings); § 239.054 (use of geographic information systems). The NPRA previously provided authority to charge a "reasonable" fee, based on the cost "actually incur[red]" and not to exceed 50 cents per page, for providing a copy of a public record when "extraordinary use" of personnel or resources was required. § 239.055 (repealed 2019). However, the Legislature removed this authority in 2019. S.B. 287, 80th Leg., Reg. Sess. (Nev. 2019).

When a statute's language is clear on its face, courts in Nevada must adhere to that plain meaning. *Las Vegas Review-Journal v. Las Vegas Metro. Police Dep't*, 526 P.3d 724, 733 (Nev. 2023) (relying on plain language of statute to interpret scope of "identity" protected under informant privilege where distinctions as to "identity" drawn elsewhere in statute and ordinary meaning of "identity" rendered statute unambiguous). A statute is ambiguous when it is capable of being understood in two or more senses by reasonably informed persons or does not speak to the matter at issue. *Clark Cnty. Off. of Coroner/Med. Exam'r v. Las Vegas Review-Journal*, 458 P.3d 1048, 1052 (Nev. 2020) (finding NPRA ambiguous as to waiver of legal basis for withholding records because statute was entirely silent as to issue). Although phrases like "without limitation" generally require an expansive construction, the Nevada Supreme Court has instructed that statutes must be construed harmoniously and as a whole. *Sims v. Eighth Jud. Dist. Ct.*, 206 P.3d 980, 983 (Nev. 2009); *Field Effect Sec. Inc. v. Eighth Jud. Dist. Ct.*, 580 P.3d 111, 114 (Nev. 2025). The Nevada Supreme Court also has instructed that NPRA must be liberally construed to maximize the public's right of access; any limitations or restrictions on that access must be narrowly construed. *Reno Newspapers, Inc. v. Gibbons*, 266 P.3d 623, 626 (Nev. 2011).

Although the NPRA's fee provision does not expressly include or foreclose labor and personnel costs, the provision does provide examples of what is a permissible "actual cost." "Actual costs" include "ink, toner, paper, media and postage," and the statute states that expenses incurred "regardless of whether or not a person requests a copy of a particular public

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record” are *not* “actual costs.” NEV. REV. STAT. ANN. § 239.005(1). These examples are listed “without limitation,” but the examples of permitted costs and the express exclusion of costs incurred regardless of a request make clear that the NPRA allows recovery of costs of supplies directly attributable to responding to the request, but prohibits recovery of ongoing costs like power bills, software subscriptions, or, as relevant here, labor and personnel. “Without limitation,” then, accounts for the many other one-off fees associated with printing and mailing records, like staples or folders. But it would defy the plain meaning of the NPRA and the Nevada Supreme Court’s instruction that limitations on the public’s right to access records must be narrowly construed to expand the provision to cover overhead costs like those for labor and personnel, which differ greatly in kind and in magnitude from office supplies and are generally incurred regardless of a request.

Stepping back, the NPRA’s plain language allows an agency to charge for the cost of retrieving certain specified categories of documents, like transcripts, but not all types of documents. *See, e.g.*, § 239.053. At one point in time, the “extraordinary use” provision might have authorized charging fees for time in processing the types of documents TMP has requested, but that provision was removed by the Legislature. *See* S.B. 287, 80th Leg., Reg. Sess. (Nev. 2019). Therefore, it is clear that the Legislature intended to disallow agencies from charging for requests like those made by TMP. *See McKay v. Bd. of Supervisors of Carson City*, 102 Nev. 644, 650 (Nev. 1986) (applying presumption that the legislature, by deleting an express portion of a law, intended a substantial change in the law).

Because the text of the NPRA’s fee provision makes clear that “actual costs” include only direct costs like office supplies and not continuing costs of operation, LVMPD may not charge TMP for labor and personnel costs, even when “compilation and redaction are required.”

C. The Legislative History Does Not Support Recovery of Routine Labor and Personnel Costs, Even Where Compilation and Redaction Are Required.

Even if the NPRA’s fee provision was ambiguous (and it is not), evidence of legislative intent would still lead to the conclusion that LVMPD cannot charge TMP for most personnel costs. In 2019, a provision expressly prohibiting recovery of labor and personnel costs was removed from the final bill because the Legislature did not want to foreclose recovery for “incredibly onerous or incredibly large” requests, such as those for “tens of thousands of documents” requiring overtime work or large investments. *Hearing on S.B. 287 Before the A. Comm. on Gov’t Affs.*, 80th Reg. Sess. (Nev. 2019) (statement of Sen. Melanie Scheible). One of the “major issues” the bill was aimed at solving, however, was “the use of excessive fees.” *Id.* One senator remarked that while it may be appropriate in “some cases” for “overhead, personnel, and labor costs” to be included in “actual costs,” “in a lot of cases it is not.” *Id.* This senator further observed that it would be inappropriate for an agency to “depend on fees for providing public records in order to pay their power bill [or] make up any portion of their annual budget.” *Id.* The legislators did not discuss compilation and redaction as activities justifying fees. *Id.*

This history indicates that personnel costs should be included in “actual costs,” if at all, as the exception, not the rule. When employees are required to work overtime to process

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requests, the legislature left open the possibility of recovery of the cost of that overtime. However, for employees simply handling a request during regular working hours, fee recovery for the time spent on that request would “certainly” not be “appropriate.”

Because the legislative history of the NPRA reveals, at most, an intent to allow governmental entities to recover exceptional labor and personnel costs for responses requiring those entities to incur overtime costs, even if the fee provision is ambiguous (and it is not), LVMPD is not allowed to recover routine personnel costs. Therefore, LVMPD must refund the fees it charged TMP for labor and personnel costs unless LVMPD can document that it actually incurred overtime costs for its responses to TMP’s requests.

D. LVMPD May Not Charge TMP for Records Freely Available Online.

As described above, a government agency may only charge for specified costs actually incurred in responding to a particular public records request. NEV. REV. STAT. ANN. § 239.005(1). The Equal Protection Clause of the Fourteenth Amendment requires that all similarly situated persons be treated alike and secures individuals against intentional and arbitrary discrimination by the improper execution of state statutes. U.S. CONST. amend. XIV, § 1; *Village of Willowbrook v. Olech*, 528 U.S. 562, 565 (2000) (per curiam) (finding equal protection claim stated where plaintiff was singled out for larger easement demand than similarly situated residents with no rational basis to justify disparity).

The FIT report produced in response to Ms. Santo’s request for an Officer’s Report was unresponsive to her request and readily available online for download. Even if Ms. Santo had requested the FIT report, LVMPD incurred no “actual cost” in providing that report to her, as it had already been prepared and produced online. Thus, any cost was “incurred regardless” of Ms. Santo’s request. The additional redactions added to Ms. Santo’s copy alone could not have been costs necessarily incurred in responding to her request, as LVMPD had previously reviewed the report and made the redactions it deemed necessary.

Because the FIT report was not responsive to Ms. Santo’s request and was freely available online, and because singling out Ms. Santo for a fee not required of the public violates the Equal Protection Clause, LVMPD must refund the \$235 it charged TMP for this record.

E. Conclusion

For the reasons set forth above, TMP requests that the LVMPD refund fees charged in excess of the NPRA’s statutory authorization for recovery of “actual costs,” including the \$235 charged for the FIT report that was publicly available online. As for the fees charged for labor and personnel costs associated with producing records that were not publicly available, TMP does not have sufficient information in its possession to determine the amount of a refund it is entitled to, but LVMPD does have this information, and should provide TMP with an accounting

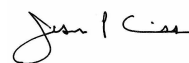
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and resulting refund. Finally, going forward, LVMPD must not charge TMP for labor and personnel costs that are not authorized by the NPRA.

Please provide a response to this letter by February 16, 2026. This response is without prejudice to TMP's rights, all of which are expressly preserved.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason P. Criss".

Jason P. Criss
Cecile Duncan

EXHIBIT A



Public Record Request Submitted for Public Record Request - Alysia Santo

2 messages

Do Not Reply <DoNotReply@lvmpd.com>
To: Alysia Santo <asanto@themarshallproject.org>

Mon, Jun 2, 2025 at 3:59 PM

Hello Alysia Santo,

Public Record Request Title	Public Record Request - Alysia Santo
Public Record Request #	NPR2025-0078519
Name of Requestor	Alysia Santo
Status	Submitted
Request Submitted Date	6/2/2025 5:00 PM

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is completed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

[Public Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

Do Not Reply <DoNotReply@lvmpd.com>
To: Alysia Santo <asanto@themarshallproject.org>

Mon, Jun 2, 2025 at 4:04 PM

Hello Alysia Santo,

Public Record Request Title	Public Record Request - Alysia Santo
Public Record Request #	NPR2025-0078520
Name of Requestor	Alysia Santo
Status	Submitted
Request Submitted Date	6/2/2025 5:00 PM

[Quoted text hidden]

EXHIBIT B



Public Record Request Submitted for Public Record Request - Alysia Santo

2 messages

Do Not Reply <DoNotReply@lvmpd.com> Mon, Jun 2, 2025 at 3:59 PM
To: Alysia Santo <asanto@themarshallproject.org>

Hello Alysia Santo,

Public Record Request Title	Public Record Request - Alysia Santo
Public Record Request #	NPR2025-0078519
Name of Requestor	Alysia Santo
Status	Submitted
Request Submitted Date	6/2/2025 5:00 PM

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is completed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

[Public Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

Do Not Reply <DoNotReply@lvmpd.com> Mon, Jun 2, 2025 at 4:04 PM
To: Alysia Santo <asanto@themarshallproject.org>

Hello Alysia Santo,

Public Record Request Title	Public Record Request - Alysia Santo
Public Record Request #	NPR2025-0078520
Name of Requestor	Alysia Santo
Status	Submitted
Request Submitted Date	6/2/2025 5:00 PM

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is completed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

[Public Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard

EXHIBIT C



June 9, 2025

SENT VIA PORTAL:

Alysia Santo

Email: asanto@themarshallproject.org

RE: Nevada Public Records Act Request NPR2025-0078519 & NPR2025-0078520

Dear Alysia Santo,

This correspondence is in response to your Nevada Public Records Act request NPR2025-0078519 & NPR2025-0078520 received 06/02/2025. You are requesting “*arrest warrants and/or supporting affidavits and homicide investigation reports for 15 events*”.

Research and preliminary retrieval of the requested documents were immediately started upon receipt of your request. We were able to locate over 200 pages of *potentially* responsive records that would need to be reviewed for redaction and subsequent release. We have determined that the labor required to process your request is 10 personnel hours.

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the governmental entity to provide a copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public record, including, without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history indicates that public entities may charge for labor and personnel costs when compilation and redaction are required.

Pursuant to the published rate of \$46.00 per hour, **the total cost for redaction and review is \$460.00.** In the event it takes less time to process this request, we will refund any excess monies owed.

To move forward with processing your request as is, please provide payment in the amount of **\$460.00** in the form of a money order, cashier’s check, or business check made payable to **The Las Vegas Metropolitan Police Department** or **LVMPD**. Personal checks *will not* be accepted. Payments may be sent by mail or hand delivered to:

Attn: Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Blvd., A-4
Las Vegas, NV 89106

Please be advised there could also be privileged confidential criminal history information that cannot be redacted and will be withheld. NRS 239.001 provides that public records are open to inspection. However, NRS 239.010(1) expressly creates exemptions to the disclosure of records falling under various statutes, including NRS 179A.070. There may be other privileges that apply once records are gathered. For instance, personal identifiers must be redacted. NRS 239B.030; NRS 603A.040. Information about victims and witnesses may be confidential. *Donrey v. Bradshaw*, 106 Nev. 630, 798 P.2d 144, fn. 4 (1990) (referring to Exemption 7 of the federal Freedom of Information Act); 5 USC § 552(b)(7)(Subparts (C) and (F) of Exemption 7 make law enforcement records confidential if disclosure “could reasonably be expected to constitute an unwarranted invasion of personal privacy” or “could reasonably be expected to endanger the life or physical safety of an individual”). Other privacy concerns may also warrant redactions. *Clark County Sch. Dist. v. Las Vegas Review-Journal*, ---Nev. ---, 429 P.3d 313, 319-20 (2018).

This list of potential privileges is not meant to be exhaustive. Once the records are gathered and reviewed, specific privileges can be stated.

Please submit payment following the directions above if you would still like to proceed with the request as written. **Your request in the LVMPD Public Records Portal will be marked as “complete” while we await payment. Once payment is received, your request will be reactivated.** Again, we will not continue to process this request until we have received payment.

Respectfully,

Public Records Unit
Las Vegas Metropolitan Police Department
400-A South Martin L. King Boulevard, Las Vegas, Nevada 89106
(702) 828.7489 office

EXHIBIT D



Alysia Santo <asanto@themarshallproject.org>

Calls for Service

Communications Research Request <CommResearchRequest@lvmpd.com>

Thu, Sep 11, 2025 at 1:40 PM

To: "asanto@themarshallproject.org" <asanto@themarshallproject.org>

Good morning,

We have been approved to release the list of calls for service at [9145 S Las Vegas Blvd #3105](#). The fee is \$30.00 and this would provide a list of all the event numbers. There were 9 events and each event would need to be requested. The fee for CAD is \$29.00 each and if anything needs to be redacted the fee is \$34.00 each. If you have any questions feel free to contact us. Thank you.

Amy Corn P# 8481

LVMPD Communications

Dispatch Professional II/COR

702-828-3871

EXHIBIT E



October 14, 2025

VIA PORTAL

Alysia Santo
33 Western Dr.
Ardsley, NY 10502
asanto@themarshallproject.org

Re: Public Records Requests

Dear Alysia Santo,

This correspondence is in response to the current thirteen (13) requests you submitted to the Public Records Portal on October 09, 2025.

- X001343-100925
- X001344-100925
- X001345-100925
- X001347-100925
- X001348-100925
- X001349-100925
- X001350-100925
- X001351-100925
- X001352-100925
- X001353-100925
- X001354-100925
- X001358-100925
- X001359-100925

As of now, you have submitted 52 public records requests since June 2, 2025. We have processed 39 of them. 13 are currently in the queue. It has also been determined that you have submitted 10% of the media requests received by LVMPD PRU since the launch of the new portal on September 16, 2025. Several of them have been very burdensome because they sought voluminous records requiring significant redactions. On one occasion, we charged you because the records you were seeking were not readily available and required an exceptional amount of time to process. After that time, you started submitting requests one at a time, but now more recently, you are submitting several requests a day. By submitting this many requests with voluminous work, our other customers cannot be served in a timely manner because our time is being taken up by the amount of requests you are submitting.

Our responses to you have ranged from furnishing a variety of documents such as Incident Crime Reports, Declaration of Arrest, Declaration of Warrant, Officer Reports, Contact Cards, Property Reports and Voluntary Statements, Etc.

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the governmental entity to provide the copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public record, including, without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). In Nevada, the

phrasing “without limitation” requires an expansive construction; i.e., a narrow construction is error. *Sims v. Eighth Judicial Dist. Court*, 125 Nev. 126, 130, 206 P.3d 980, 983 (2009).

The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history strongly indicates that public entities may charge for labor and personnel costs when compilation and redaction are required. I base this on at least of couple of reasons. First, the language of the original bill would have been absolutely clear that public entities would never be able to charge for labor or personnel costs. *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, 136 Nev. Adv. Op. 5, --- P.3d --- (2020) (rejecting the media’s argument that a public entity waives privileges by not naming them within five days, since the Legislature specifically rejected a bill draft that would have codified such a waiver). Second, the two senators who worked out compromise language explained the amendments that became law as permitting public entities to charge when the requests are unduly burdensome, causing the public entity, for instance, to pay employees overtime.

Pertaining to the requests submitted to the portal on October 09, 2025, and any additional requests submitted in the future, the Public Records Unit will be invoicing each request individually. We will not provide documents for a request until an invoice is paid in the order they are received from you. Additionally, the 13 pending requests will be processed on a rolling basis. Due to the upcoming holiday season and reduced staffing levels, we expect delay in completion, however, we still expect all 13 to be completed by end of day January 28, 2026, unless otherwise specified.

The Nevada Public Records Act permits public entities to “charge a fee for providing a copy of a public record” as long as the fee does “not exceed the actual cost to the government entity to provide the copy of the public record.” NRS 239.052(1). “Actual cost” is defined broadly as “the direct cost related to the reproduction incurred by a governmental entity in the provision of a public records, including without limitation, the cost of ink, toner, paper, media and postage.” NRS 239.005(1). The latter statute was amended in 2019 by the Nevada Legislature via Senate Bill 287. The legislative history indicates that public entities may charge for labor and personnel costs when compilation and redaction are required.

Please be advised there could also be privileged confidential criminal history information that cannot be redacted and will be withheld. NRS 239.001 provides that public records are open to inspection. However, NRS 239.010(1) expressly creates exemptions to the disclosure of records falling under various statutes, including NRS 179A.070. Pursuant to NRS 179A.070, a “record of criminal history” is “information contained in records collected and maintained by agencies of criminal justice, the subject of which is a natural person, consisting of descriptions which identify the subject and notations of summons in a criminal action, warrants, arrests, citations for misdemeanors..., detentions, decisions of a district attorney or the Attorney General not to prosecute the subject, indictments, informations or other formal criminal charges and dispositions of charges....” NRS 179A.070(1).

There may be other privileges that apply once records are gathered. For instance, personal identifiers must be redacted. NRS 239B.030; NRS 603A.040. Information about victims and witnesses may be confidential. *Donrey v. Bradshaw*, 106 Nev. 630, 798 P.2d 144, fn. 4 (1990) (referring to Exemption 7 of the federal Freedom of Information Act); 5 USC § 552(b)(7)(Subparts (C) and (F) of Exemption 7 make law enforcement records confidential if disclosure “could reasonably be expected to constitute an unwarranted invasion of personal privacy” or “could reasonably be expected to endanger the life or physical safety of an individual”). Other privacy concerns may also warrant redactions. *Clark County Sch. Dist. v. Las Vegas Review-Journal*, ---Nev. ---, 429 P.3d 313, 319-20 (2018). Evidence is not a public record. BLACK’S LAW DICT., 7th ed. ab., at p. 1023 (2000) (defining “public record” as a document “made by public officer in pursuance of duty, the immediate purpose of which is to disseminate the information to

the public or to serve as a memorial of official transaction for public reference”); *Id.* at p. 457 (defining “evidence” as “[s]omething (including testimony, documents, and tangible objects) that tends to prove or disprove the existence of an alleged fact.” Moreover, providing evidence obtained through legal process, including consent, would exceed the authority granted either by the court or by the owner. *See e.g., Wilson v. Layne*, 526 U.S. 603, 119 S. Ct. 1692 (1999) (holding that when balancing a person’s Fourth Amendment right to be secure in their persons, houses, papers, and effects, probable cause may justify a police entry and seizure but it does not justify the media’s entry and/or seizure).

This list of potential privileges is not meant to be exhaustive. Once the records are gathered and reviewed, specific privileges can be stated. Again, once we receive payment, we will begin processing the requests listed on an individual basis. We will not proceed with your other requests until the pending requests are FULLY COMPLETED.

Your current requests in the LVMPD Public Records Portal will remain “on-hold” while we await payment and process each request in the order they were received.

If you have any further questions or concerns, please direct them to the Office of General Counsel at 702-828-3310.

Thank you,

Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

EXHIBIT F



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001354-1
Request Reference Number: X001354-100925
Invoice Date: 1/15/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

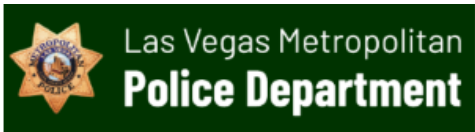
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		3.50	0.00	3.50	\$164.50

Comments:

Totals:

Total: \$164.50
Payments: \$164.50
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV26-X001352-1
Request Reference Number: X001352-100925
Invoice Date: 1/14/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

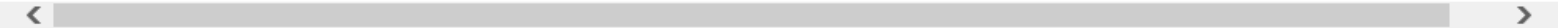
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

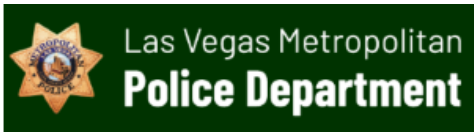
Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		1.00	0.00	1.00	\$47.00

Comments:

Totals:

Total: \$47.00
Payments: \$47.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV26-X001348-1
Request Reference Number: X001348-100925
Invoice Date: 1/6/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		1.50	0.00	1.50	\$70.50

Comments:

Totals:

Total: \$70.50
Payments: \$70.50
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001350-1
Request Reference Number: X001350-100925
Invoice Date: 1/13/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

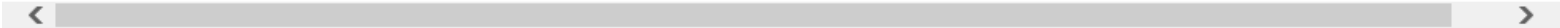
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		1.00	0.00	1.00	\$47.00

Comments:

Totals:

Total: \$47.00
Payments: \$47.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001351-1
Request Reference Number: X001351-100925
Invoice Date: 1/15/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

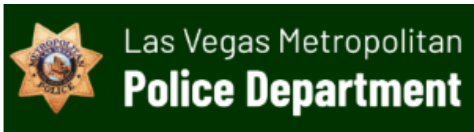
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.00	0.00	2.00	\$94.00

Comments:

Totals:

Total: \$94.00
Payments: \$94.00
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV25-X001347-1
Request Reference Number: X001347-100925
Invoice Date: 11/19/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.00	0.00	2.00	\$94.00

Comments:

Totals:

Total: \$94.00
Payments: \$94.00
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV25-X001345-1
Request Reference Number: X001345-100925
Invoice Date: 11/5/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

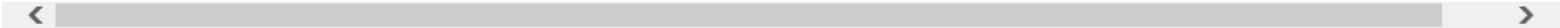
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

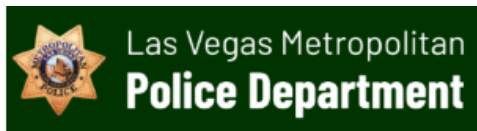
Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.50	0.00	2.50	\$117.50

Comments:

Totals:

Total: \$117.50
Payments: \$117.50
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV25-X001344-1
Request Reference Number: X001344-100925
Invoice Date: 10/21/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total	
Public Records - Media	Media - Public Records Hourly Rate	Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour	☐	1.50	0.00	1.50	\$70.50	...

Comments:

Totals:

Total: \$70.50
Payments: \$70.50
Balance Due **\$0.00**



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106



Invoice Summary

Invoice No: INV25-X001353-1
Request Reference Number: X001353-100925
Invoice Date: 12/30/2025
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

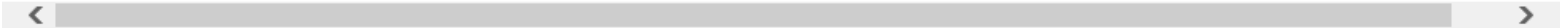
Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		2.00	0.00	2.00	\$94.00

Comments:

Totals:

Total: \$94.00
Payments: \$94.00
Balance Due **\$0.00**





**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001343-1
Request Reference Number: X001343-100925
Invoice Date: 1/6/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		3.00	0.00	3.00	\$141.00

Comments:

Totals:

Total: \$141.00
Payments: \$141.00
Balance Due **\$0.00**

EXHIBIT G



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:
Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001349-1
Request Reference Number: X001349-100925
Invoice Date: 1/6/2026
Due Date: N/A
Status: Paid
Balance Due \$0.00

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		5.00	0.00	5.00	\$235.00

Comments:

Totals:

Total: \$235.00
Payments: \$235.00
Balance Due **\$0.00**

EXHIBIT H



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**
Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X001359-1
Request Reference Number: X001359-100925
Invoice Date: 1/14/2026
Due Date: N/A
Status: Open
Balance Due \$540.50

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total
Public Records - Media	Media - Public Records Hourly Rate	Case Preparation/Research/Redaction. As permitted by NRS 239.052(1) and NRS 179A.140.	\$47.00	Per Hour		11.50	0.00	11.50	\$540.50

Comments:

Totals:

Total: \$540.50
Payments: \$0.00
Balance Due **\$540.50**

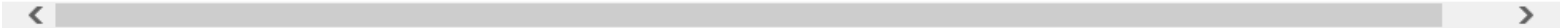


EXHIBIT 38

LVMPD Portal Messages re:
TMP Req. for BWC

X009575-041726 - Body Worn Camera Request

Message History (4)

On 4/17/2026 9:44:02 AM, LVMPD Public Records Request Portal wrote:

Subject: Body Worn Camera Request :: X009575-041726

Body:

Greetings,

You were emailed an invoice for payment of BWC regarding event number LLV221100040337. We do want you to be aware ahead of time before any payment is made, that due to this taking place at a private residence, any footage INSIDE of the home would be blacked out and muted due to privacy reasons. This can be avoided if you are able to obtain a notarized release from the homeowner/victim stating that they are allowing you to have access to the inside of the home. Another way to obtain the footage from inside is if we receive a letter from the homeowner stating the same AND a copy of their ID or driver's license. Both the notarized letter or letter from homeowner need to include this event number as well as the address of where the incident took place and that they are okay with BWC footage from inside their home being released to you.

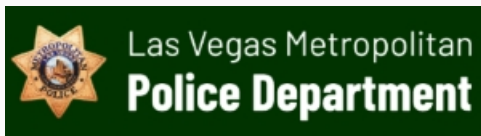
Please also be advised we are currently 9 months behind on getting BWC to requestor(s). If you are needing these videos sooner, please reach out to us regarding our Expedited process for an additional charge and we will send you the Expedited BWC quote.

On 4/17/2026 9:30:59 AM, LVMPD Public Records Request Portal wrote:

Attachments: [INV26-X009575-1.pdf](#)

Subject: INVOICE - Body Worn Camera Request:: X009575-041726

Body:



RE: Body Worn Camera Request of April 17, 2026, Reference # X009575-041726.

Dear Alysia Santo,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view, or find it attached to this email.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Please note we **do not** accept personal checks.

Payment is due within 30 days of receipt of this invoice. Once payment is received, your request will be placed in the queue to be processed in order of receipt of payment. If no payment is received in 30 days, this request will be closed and you will need to submit another records request.

Thank you,

Body Worn Camera Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

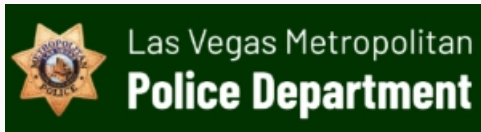
702-828-7485

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



On 4/17/2026 9:17:16 AM, LVMPD Public Records Request Portal wrote:



Hello Alysia Santo,

Request Type: Body Worn Camera Request

Reference Number: X009575-041726

Name of Requestor: Alysia Santo

Status: Submitted

Request Submitted Date: 4/17/2026 9:17:14 AM

Records Requested: A copy of all body-worn camera footage associated with the following incident:

Date of Incident: 11/11/2022

Event Number: LLV221100040337

Individual(s) Involved: Rizza Abrera, Steven Evans

I have attached LVMPD's declaration of warrant/summons in this case for your reference.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](https://lvmpd.com/public-request)

Thank you,

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](#)



On 4/17/2026 9:17:15 AM, Alysia Santo wrote:

Request Created on Public Portal

EXHIBIT 39

Invoice: TMP Req. for BWC

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

Bill To:

Alysia Santo
33 Western Dr.
Ardsley, NY 10502

**Invoice Summary**

Invoice No:
Request Reference Number:
Invoice Date:
Due Date:
Status:
Balance Due

INV26-X009575-1
X009575-041726
4/17/2026
N/A
Open
\$1,473.20

Category	Description	Details	Cost	Unit	Add Overhead	Total Quantity	Quantity Waived	Quantity Charged	Total
Body Worn Camera Section	BWC - STANDARD Video/Audio Rate by Minute	Video/Audio Case Preparation/Re As permitted by NRS 239.052(1) and NRS 179A.140.	\$5.80	Per Quantity	☐	254.00	0.00	254.00	\$1,473.20

Comments:**Totals:**

Total:	\$1,473.20
Payments:	\$0.00
Balance Due	\$1,473.20

EXHIBIT 40

LVMPD Portal Messages re:
Indy Req. for Homicide Data

X005441-011326 - Media Request

Message History (7)

On 2/25/2026 5:19:46 PM, LVMPD Public Records Request Portal wrote:

Subject: Media Request :: X005441-011326

Body: Thank you for your response, we have forwarded your concerns to our Office of Legal Counsel.

On 2/11/2026 2:05:47 PM, LVMPD Public Records Request Portal wrote:

Subject: Media Request :: X005441-011326

Body:

RE: Media Request of January 13, 2026, Reference # X005441-011326

Dear Isabella Aldrete,

Good afternoon, unfortunately requests once closed are not monitored nor do they have push alerts. That said, I wanted to update you and let you know that I have forwarded your most recent inquiry to our CIURA Crime Analyst Group. As soon as they provide me with a response or (hopefully) the data you seek I will make sure to forward or produce. I cannot at this time provide you an estimated date/time of response. I can at least let you know that I have forwarded your original request along with follow-up request to the responsive unit. Thank you for your patience as we attempt to provide you with the data you seek. I will reach back out to you next week with an update or a responsive record, if any.

Thank you,

Public Records Unit
Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, Nevada 89106
702-828-7489
Monday-Friday 8am to 5pm

On 2/5/2026 1:23:47 PM, Isabella Aldrete wrote:

TO: "LVMPD Public Records Request Portal"[lasvegasnvpd@govqa.us]

Hi,

I hope all is well and thank you so much for the update. Please correct me if this is wrong, but it's my understanding that this homicide data would have already been collected by the police department for reporting required by the federal government. The homicide data I am seeking would have previously been submitted via Uniform Crime Reporting (UCR). That changed, and it is now submitted via the National Incident-Based Reporting System (NIBRS). This request is for an export of the data collected for these federal reporting requirements regarding homicides in Las Vegas. I'd be happy to talk with someone about how I could narrow this in a way that makes it easier to provide. Thanks again!

Best, Isabella

On Wed, Jan 21, 2026 at 7:59 AM LVMPD Public Records Request Portal wrote:

Attachments:

INV26-X005441-1.pdf

RE: Media Request of January 13, 2026, Reference # X005441-011326.

Dear Isabella Aldrete,

Your invoice is ready to be viewed. Please login to the LVMPD Public Records Request Portal to view and make a payment online or find it attached to this email. Please make sure to view all attachments located under "View File(s)". Instructions to view attachments: Click "My Request Center". Click "View My Requests". Locate your request. Click "View File(s)". Click the blue link of the attached file to view OR click "download all" to download the file.

If you would rather pay by money order, cashier's check or business check, you can make a check payable to Las Vegas Metropolitan Police Department and mail or drop off to:

Las Vegas Metropolitan Police Department

Attn: Public Records Unit

400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Your Public Record Service request has been invoiced and will be marked as "waiting for payment" in our system, and at this time no documents will be uploaded. Once payment is received, work on your request will be resumed. Thank you,

Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the LVMPD Public Records Request Portal.

On 1/29/2026 9:31:43 AM, Isabella Aldrete wrote:

Hi, thanks so much for the update. Please correct me if this is wrong, but it's my understanding that this homicide data would have already been collected by the police department for reporting required by the federal government. The homicide data I am seeking would have been submitted via Uniform Crime Reporting (UCR). That changed, and it is now submitted via the National Incident-Based Reporting System (NIBRS). This request is for an export of the data collected for these federal reporting requirements regarding homicides in Las Vegas. I'd be happy to talk with someone about how I could narrow this in a way that makes it easier to provide. Thank you.

On 1/21/2026 7:59:00 AM, LVMPD Public Records Request Portal wrote:

Attachments: [INV26-X005441-1.pdf](#)

Subject: INVOICE - Media Request:: X005441-011326

Body:



RE: Media Request of January 13, 2026, Reference # X005441-011326.

Dear Isabella Aldrete,

Your invoice is ready to be viewed. Please login to the [LVMPD Public Records Request Portal](#) to view and make a payment online or find it attached to this email. Please make sure to view all attachments located under "View File(s)".

Instructions to view attachments:

1. Click "My Request Center".
2. Click "View My Requests".
3. Locate your request.
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400 S. Martin L. King Boulevard HQ-A

Las Vegas, Nevada 89106

Your Public Record Service request has been invoiced and will be marked as "waiting for payment" in our system, and at this time no documents will be uploaded. Once payment is received, work on your request will be resumed.

Thank you,

Public Records Unit

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [LVMPD Public Records Request Portal](#).



On 1/13/2026 10:00:26 AM, LVMPD Public Records Request Portal wrote:



Hello Isabella Aldrete,

Request Type: Media Request

Reference Number: X005441-011326

Name of Requestor: Isabella Aldrete

Status: Submitted

Request Submitted Date: 1/13/2026 10:00:17 AM

Records Requested: Under the Nevada Open Records Act § 239 et seq., I am requesting an opportunity to inspect or obtain copies of the following records. The Nevada Independent hereby requests disclosure of records on homicides in your agency's jurisdiction since Jan. 1, 2015 and through the latest available data. This request is for an electronic copy or extract of data describing all homicides in a standard, machine-readable data format (such as delimited or fixed text, Excel or other spreadsheet) that can be readily imported by database software.

The items of information requested for each homicide include:

Incident ID or case number (Department identifier for this homicide)

Date (Date of occurrence)

Victim last name

Victim first name

Victim age

Victim gender

Victim race

Victim ethnicity (Hispanic or not Hispanic)

Weapon used

Relationship (victim relationship to offender)

Clearance status (Open / Cleared by arrest / Exceptionally cleared)

Clearance date (Date or year, if cleared)

Address (Street address of the homicide location)

City (City of the homicide location)

Circumstances (Examples: rape, robbery, burglary, larceny-theft, arson, prostitution and commercialized vice, other sex offenses, narcotic drug laws, gambling, romantic triangle, child killed by babysitter, brawl due to influence of alcohol, brawl due to influence of narcotics, argument over money or property, other arguments, gangland killings, juvenile gang killings, institutional killings, sniper attack, other / not specified, unknown)

This request includes an electronic copy of all code tables or lookup tables needed to interpret values in the data.

Per state law, I request that these public records be made available to The Nevada Independent within five business days of this letter. If the records cannot be provided within that timeframe, please inform me in writing of the reason for the delay and the date when the records will be made available.

I request that responsive records be provided in a digital format and delivered on a rolling basis as they become available, even if the request has not yet been fully completed.

I am a journalist with The Nevada Independent, and this request is made as part of newsgathering. If you expect the cost of providing these documents will exceed \$25, please contact me before proceeding.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information. Please let me know if you have any questions or need any clarification.

Thank you for handling my request.

Your Public Record Service Request has been successfully submitted. You will be notified by email if more information or payment is required and when your request is processed. The Las Vegas Metropolitan Police Department - Public Records Unit hours of operation are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays, Juneteenth, Nevada Day, the day after Thanksgiving and December 24th. Any public record requests made outside of normal business hours will be deemed received the next business day. At any time, you may monitor the status of your request by logging into your Public Records portal account.

***Please note that holidays that fall on a Saturday or Sunday will be observed the preceding Friday or the following Monday. There are 13 holidays that LVMPD observes throughout the year. Based on this information, adjust your request accordingly.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been processed.

[Public Request Request Portal | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)

Thank you,

Las Vegas Metropolitan Police Department

400 S. Martin L. King Boulevard

Las Vegas, Nevada 89106

702-828-7489

Monday-Friday 8am to 5pm

To monitor the progress or update this request please log into the [Public Records Request Portal](#)

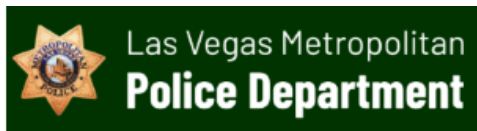


On 1/13/2026 10:00:21 AM, Isabella Aldrete wrote:

Request Created on Public Portal

EXHIBIT 41

Invoice: Indy Req. for
Homicide Data



**LAS VEGAS METROPOLITAN POLICE
DEPARTMENT**

Attn:Public Records Unit
400 S. Martin L. King Boulevard, HQ-A
Las Vegas, Nevada 89106

Remit To:

Las Vegas Metropolitan Police Department
ATTN: Public Records Unit
400 S. Martin L. King Boulevard HQ-A
Las Vegas, Nevada 89106

I Invoice Summary

Invoice No: INV26-X005441-1
Request Reference Number: X005441-011326
Invoice Date: 1/21/2026
Due Date: N/A
Status: Open
Balance Due \$584.00

Bill To:

Isabella Aldrete
455 Arroyo Crossing Pkwy Suite 220
Las Vegas, NV 89113

Category	Description	Details	Cost	Unit	Add Overhead	Total Qty.	Qty. Waived	Qty. Charged	Total	
Public Records - Media	Media - Crime Analysis Research Hourly Rate	Crime Analysis Research for Public Records Requests and Subpoenas	\$73.00	Per Hour	☐	8.00	0.00	8.00	\$584.00	...

Comments:

Totals:

Total: \$584.00
Payments: \$0.00
Balance Due **\$584.00**