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CASE NO: A-26-955191-W  
Department 29

8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 AMERICAN CIVIL LIBERTIES UNION OF  
11 NEVADA,

12 Petitioner,

13 vs.

14 NEVADA DEPARTMENT OF CORRECTIONS,  
15 LAS VEGAS METROPOLITCAN POLICE  
16 DEPARTMENT,

Respondents.

Case No.:

Department:

**Petition for Writ of Mandamus  
pursuant to NRS 239.001 et seq.**

**Expedited Matter Pursuant to  
NRS 239.011**

**Hearing requested**

17 Petitioner, American Civil Liberties Union of Nevada ("ACLUNV") hereby submits this  
18 Petition for Writ of Mandamus for declaratory and injunctive relief pursuant to the Nevada Public  
19 Records Act. NRS 239.001. Petitioner requests that the Court order Respondents Nevada  
20 Department of Corrections ("NDOC") and Las Vegas Metropolitan Police Department  
21 ("LVMPD") to provide ACLUNV with the public records detailed in this petition without delay,  
22 award all fees and costs associated with efforts to obtain the withheld public records pursuant to  
23 NRS 239.011(2), and assess statutory penalties against NDOC and LVMPD for each of the ways  
24

1 Respondents have willfully violated the Nevada Public Records Act pursuant to NRS 239.340.  
2 Lastly ACLUNV requests the Court expedite this matter pursuant to NRS 239.011(2).

3 This Petition is supported by Petitioner’s Brief in Support of Writ of Mandamus, and any  
4 other pleadings and papers filed with this Court.

5 Petitioner alleges:  
6

7 **NATURE OF THE ACTION**

8 1. ACLUNV brings this Petition pursuant to NRS 239.011 (“NPRA”) which states:  
9 “[i]f a request for inspection, copying or copies of a public book or record open to inspection and  
10 copying is denied or unreasonably delayed... the requester may apply to the district court in the  
11 county in which the book or record is located for an order: (a) Permitting the requester to inspect  
12 or copy the book or record; (b) Requiring the person who has legal custody or control of the public  
13 book or record to provide a copy to the requester; or (c) Providing relief relating to the amount of  
14 the fee.”

15 2. This action stems from public records requests submitted by ACLUNV to NDOC  
16 and LVMPD seeking records related to the in-custody death of Ryan Anthony Warren-Hunt on  
17 August 11, 2025, at Southern Desert Correctional Center (“SDCC”), an NDOC prison. Both  
18 agencies denied these requests in their entirety in violation of the NPRA.

19 3. This Petition for a Writ of Mandamus is the proper means to secure compliance  
20 with the NPRA. NRS 239.011; *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 884, 266 P.3d  
21 623, 630 n.4 (2011); *see also DR Partners v. Bd. of Cty. Comm’rs of Clark Cty.*, 116 Nev. 616,  
22 621, 6 P.3d 465, 468 (2000) (citing *Donrey of Nev. v. Bradshaw*, 106 Nev. 630, 798 P.2d 144  
23 (1990) (writ of mandamus is the appropriate procedural remedy to compel compliance with the  
24 NPRA).

4. ACLUNV is entitled to an expedited hearing on this matter. NRS 239.011(2) (“the court shall give this matter priority over other civil matters to which priority is not given by other statutes.”)

5. Should ACLUNV prevail in this matter, it is entitled to an award of fees and costs associated with pursuing this matter. NRS 239.011(2) (“If the requester prevails, the requester is entitled to recover from the governmental entity that has legal custody or control of the record his or her costs and reasonable attorney’s fees in the proceeding.”)

6. Should this Court find that NDOC and LVMPD willfully failed to comply with the NPRA, this Court must impose the requisite civil penalty. NRS 239.340.

**PARTIES**

7. Petitioner, ACLUNV is a domestic nonprofit corporation that works to defend and advance the civil liberties and civil rights of all Nevadans.

8. Respondent, NDOC, is a governmental entity of the State of Nevada subject to the Nevada Public Records Act. NRS 239.005(5)(b).

9. Respondent, LVMPD, is a governmental entity of the State of Nevada subject to the Nevada Public Records Act. NRS 239.005(5)(b).

## JURISDICTION AND VENUE

10. This Court has jurisdiction to issue writs of mandamus. Nev. Const. art. VI, § 6; NRS 34.160.

11. This Court has jurisdiction as the court of Clark County where all relevant public records sought are held. NRS 239.011.

12. Venue is proper in the Eighth Judicial District Court of Nevada as all parties and all relevant actions to this matter were and are in Clark County, Nevada. NRS 239.011.

## STANDING

13. ACLUNV has standing to pursue this Petition as public records requested by ACLUNV have been unjustly withheld. NRS 239.011.

## STATEMENT OF FACTS

14. On August 11, 2025, Ryan Anthony Warren-Hunt was stabbed and beaten to death while in NDOC's custody at SDCC.

15. SDCC staff reported the homicide to LVMPD, who investigated the incident under event #250800043242.

16. Mr. Warren-Hunt's death was one of a string of widely publicized homicides that occurred in NDOC facilities in under a month.<sup>1</sup>

<sup>1</sup> See, e.g. Vanessa Murphy, *Fourth suspected homicide at Las Vegas-area prison within 7 weeks*, 8 News Now Vegas (September 3, 2025, 12:53 PM), <https://www.8newsnow.com/investigators/fourth-suspected-homicide-at-las-vegas-area-prison-within-7-weeks/>; Michael Lyle, *NV prison system mortality report 'sounds like a lot of unexplained deaths,' legislator says*, Nevada Current, (July 17, 2026, 5:00 AM) <https://nevadacurrent.com/2026/07/17/nv-prison-system-mortality-report-sounds-like-a-lot-of-unexplained-deaths-legislator-says/>; Justin Walker, *Four Nevada prison deaths investigated as homicides; drug debt cited, officials say*, Fox 5 Las Vegas (August 12, 2025, 4:33 PM) <https://www.fox5vegas.com/2025/08/12/four-nevada-prison-deaths-investigated-homicides-drug-debt-cited-officials-say/>; Kenneth Dunn, *Nevada prisons tighten operations after four suspected homicides linked to drug debts*, News 4 (August 12, 2025, 6:00 PM) <https://mynews4.com/news/local/nevada-prisons-under-modified-operations-amid-investigation-into-four-inmate-deaths>; Neil Vigdor, *4 inmates are killed in less than a month at Nevada prisons, state says*, The New York Times (August 13, 2025) <https://www.nytimes.com/2025/08/13/us/nevada-prisons-inmate-homicides.html>; 2 News Nevada Digital Team, *Nevada Department of Corrections investigating four suspected inmate homicides across two state facilities*, 2 News Nevada (August 13, 2025) <https://www.2news.com/news/local/nevada-department-of-corrections-investigating-four->

1           17.       In response to these in-custody homicides, and the media attention they received,  
2 ACLUNV submitted public records requests to NDOC related to violence in prison facilities,  
3 safety protocols, and facility maintenance.

4           18.       After ACLUNV started its investigation into these incidents, two of Mr. Warren-  
5 Hunt's immediate family members, Rosalind Warren-Duvall, his mother, and Toni Duvall, his  
6 sister, retained ACLUNV to investigate the circumstances surrounding Mr. Warren-Hunt's murder  
7 specifically.

8           19.       On September 8, 2025, ACLUNV submitted a public records request to NDOC  
9 pursuant to NRS 239 ("NDOC Sept. 8 Request") seeking the following records:

- 10           1. All documents produced or collected by NDOC employees or contractors  
11           in connection with the investigation of the in-custody death of Mr. Ryan  
12           Anthony Warren-Hunt, DOB 6/12/1990, on 8/11/2025 at the Southern  
13           Desert Correctional Center
- 14           2. All video recordings of the stabbing incident that caused Mr. Warren-  
15           Hunt's death on 8/11/2025
- 16           3. Any toxicology, autopsy, medical examiner, or coroner's records connected  
17           to Mr. Warren-Hunt's death in NDOC's possession
- 18           4. All kites and grievances submitted by Mr. Warren-Hunt since his transfer  
19           to his maximum-security unit concerning his cellmate assignment,  
20           including but not limited to requests to transfer, requests for a different  
21           cellmate, reports of property stolen by cellmates
- 22           5. Any documentation of fighting between Mr. Warren-Hunt and other  
23           inmates in his housing unit on or around 6/12/2025
- 24           6. All kites or grievances reporting broken or defective locking mechanisms  
             on cell doors in maximum security units and records of tampering with  
             locking mechanisms at Southern Desert Correctional Center between  
             September 8, 2023, and the present
7. All documentation of repairs or inspections of locking mechanisms on cell  
             doors and records of tampering with locking mechanisms in maximum  
             security units at Southern Desert Correctional Center between September 8,  
             2023, and the present

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23 [suspected-inmate-homicides-across-two-state-facilities/article\\_0c906f7c-a835-4ab6-8421-  
f470c2f5b37c.html](https://www.usnews.com/news/best-states/nevada/articles/2025-10-21/nevada-lawmakers-question-claim-that-inmate-overdoses-are-driving-prison-overtime-costs); Associated Press, *Nevada lawmakers question claim that inmate overdoses  
are driving prison overtime costs*, U.S. News & World Report (October 21, 2025)  
24 [https://www.usnews.com/news/best-states/nevada/articles/2025-10-21/nevada-lawmakers-  
question-claim-that-inmate-overdoses-are-driving-prison-overtime-costs](https://www.usnews.com/news/best-states/nevada/articles/2025-10-21/nevada-lawmakers-question-claim-that-inmate-overdoses-are-driving-prison-overtime-costs).

- 1 8. Inventory list of all property in Mr. Warren-Hunt's possession at the time
- 2 of his death
- 3 9. Roster of all NDOC staff members and contractors stationed in Mr. Warren-
- 4 Hunt's unit on 8/11/2025, including their shift schedules
- 5 10. NDOC policies relating to staff-to-inmate ratios required in maximum-
- 6 security units
- 7 11. Reports of any inmates out of their cells without authorization in Mr.
- 8 Warren-Hunt's unit between the hours of 7:30 pm and 9:00 pm on
- 9 8/11/2025

10 NDOC Sept. 8 Request, attached as Exhibit 2.

11 20. On the same date, ACLUNV submitted a public records request ("Coroner Sept. 8

12 Request") to the Clark County Office of the Coroner/Medical Examiner ("Coroner"), seeking the

13 Investigative Report, Medical Examiner's Report, and Toxicology Report related to Mr. Warren-

14 Hunt's death. Coroner Sept. 8 Request, attached as Exhibit 3.

15 21. On September 23, 2025, NDOC responded via email to NDOC Sept. 8 Request,

16 instructing ACLUNV to direct all further correspondence to the Nevada Attorney General's

17 Office.

18 22. Later the same day, NDOC responded again to NDOC Sept. 8 Request, directing

19 ACLUNV to disregard the previous email, and provided the following response:

20 For items 7, 9, 10, and 11, the NDOC is conducting a search and review of

21 records in our custody to determine if any responsive records exist. The

22 NDOC is unable to complete this process and provide any responsive

23 records within five business days. The NDOC anticipates responding to this

24 request by December 23, 2025. Additionally, for items 1-6 and 8, the NDOC

has identified records that may not be released because the requested

records are part of an ongoing criminal proceeding and release would

jeopardize law enforcement information. *Donrey of Nevada, Inc. v.*

*Bradshaw*, 789 P.2d 1144 (1990); *Reno Newspapers, Inc. v. Gibbons*, 127

Nev. 873, 880, 266 P.3d 623, 628 (2011). Under these circumstances, the

NDOC must balance the interests of all affected individuals. *Id.* Because the

records are directly relevant to the anticipated criminal proceeding and

many will be introduced as evidence, the NDOC has concluded that release,

at this time, will undermine the constitutional rights of a defendant to a fair

trial. Thus, the balance of interests currently weighs in favor of non-

disclosure. Although the records are not releasable while the criminal

proceeding is pending, that status may change upon the matter's conclusion.

1 9/23/25 Response to NDOC Sept. 8 Request, attached as Exhibit 4, at 4.

2 23. NDOC did not provide any statutory basis for withholding the requested records,  
3 evidence that a criminal proceeding was underway, or explanation as to why these records could  
4 not be released with appropriate redactions as required under NRS 239.010(3).

5 24. On December 9, 2025, NDOC responded to the request for items 7, 9, 10, and 11,  
6 denying the request and referencing the same “on-going criminal proceeding” as justification for  
7 non-disclosure. 12/9/25 Response to NDOC Sept. 8 Request, attached as Exhibit 5, at 2.

8 25. Again, NDOC did not provide any statutory basis for withholding the requested  
9 records, evidence that a criminal proceeding was underway, or explanation as to why these records  
10 could not be released with redactions as required under NRS 239.010(3).

11 26. On January 22, 2026, the Coroner responded to Coroner Sept. 8 Request, providing  
12 redacted copies of the “Summary of Investigation,” “Autopsy Report,” and “Toxicology Report.”  
13 Coroner’s Summary of Investigation, attached as Exhibit 1; Coroner Autopsy Report, attached as  
14 Exhibit 6; Coroner Toxicology Report, attached at Exhibit 7. The redacted information was labeled  
15 as either personally identifying information or protected health information.

16 27. The “Summary of Investigation” indicated that LVMPD had participated in the  
17 homicide investigation and included an event number for the case and the names of NDOC and  
18 LVMPD staff members involved in the investigation. With this new information, on March 2,  
19 2026, ACLUNV submitted a public records request to LVMPD (“LVMPD March 2 Request”)  
20 seeking the following records:  
21

- 22 1. Any and all records in LVMPD’s possession related to event  
23 #250800043242 (investigation into homicide of Ryan Anthony  
24 Warren-Hunt at Southern Desert Correctional Center on 8/11/2025),  
including but not limited to:  
a. Incident, investigation, and/or crime scene reports

- b. Transcript or recording of 911 call reporting the homicide
- c. Photographs documenting the crime scene
- d. Records of any communications with NDOC Inspector General Supervisor Shields, SDCC Sergeant Tate, or NDOC Inspector General Vanzant related to this event
- e. Witness statements taken at the scene
- f. Inventory of any of Mr. Warren-Hunt's property at the time of his death
- g. Records of any arrests or charges related to this event

LVMPD March 2 Request, attached as Exhibit 8.

28. On March 26, 2026, LVMPD responded to LVMPD March 2 Request with four separate documents, each broadly denying part of the request without identifying specific records to which each denial applied. LVMPD Response Inventory, attached as Exhibit 9; LVMPD Response Documents and Photos, attached as Exhibit 10; LVMPD Response Emails, attached as Exhibit 11; LVMPD Response 911 Calls, attached as Exhibit 12.

29. In the first document, labeled "Inventory," LVMPD denied the request and provided two justifications for withholding the records: (1) LVMPD is not the custodian of the records ACLUNV is seeking, and (2) the records are confidential. To support its contention that the records are not in its custody or control, LVMPD cited NRS 239.0107(1)(b), and directed ACLUNV to the Coroner's Office. To support its contention that the records are confidential, LVMPD cited NRS 239.010, which lists statutes declaring certain records confidential, and NRS 179A.070, which defines "records of criminal history," that have limitations placed on their dissemination by NRS 179A.100. LVMPD next cited NRS 179A.070(2)(j), which excludes records "originat[ing] in an agency other than an agency of criminal justice in this State" from the definition of "records of criminal history." LVMPD asserted that their exclusion from the definition means these records are confidential, however, there is nothing in the statute to support

1 this assertion. The statute simply states that such records are not “records of criminal history”  
2 subject to the dissemination restrictions detailed elsewhere in NRS 179A. Ex. 9.

3 30. The second document, labeled “Documents and Photos,” states, “[t]he record(s)  
4 you seek are law enforcement records that pertain to an open criminal investigation and/or criminal  
5 proceedings.” This claim is followed by four pages of irrelevant citations and a generic discussion  
6 of factors considered in determining whether to withhold a record as confidential. At no point did  
7 LVMPD identify specific records that are responsive to the request, explain how any of the cited  
8 authority justifies withholding those records, or explain why the records could not be released in  
9 redacted form. While LVMPD did acknowledge the NPRA’s presumption in favor of disclosure  
10 and reference interests a court might consider under a balancing test, it did not identify any specific  
11 interests implicated by the requested records or demonstrate how such interests clearly outweigh  
12 the public’s right of access. Ex. 10.

13 31. The third document, labeled “Emails,” states that there are no responsive records  
14 to this request. It is not clear which parts of the request this refers to. Ex. 11.

15 32. The fourth document, labeled “911 Calls,” states, “[h]ere, you are seeking records  
16 maintained by and in the custody of LVMPD Communications Bureau. Please submit your request  
17 to the Communications Research Office,” and provided a link to submit a separate request.  
18 LVMPD offered no explanation as to why the original request was insufficient to obtain these  
19 records. Based on the department’s name and the fact that the link provided directs ACLUNV to  
20 LVMPD’s website, presumably, the LVMPD Communications Bureau is part of LVMPD.<sup>2</sup>  
21

22  
23  
24 <sup>2</sup> Link provided by LVMPD: <https://www.lvmpd.com/about/bureaus/communications/research-office-procedures>

1 Therefore, any records in the department's custody and control are in the custody and control of  
2 LVMPD, and LVMPD is required to disclose them under NRS 239.010. Ex. 12.

3 33. To date, the only records ACLUNV has received in connection to Mr. Warren-  
4 Hunt's death are the reports provided by the Coroner.

5 34. ACLUNV has not received any documents from NDOC responsive to its NDOC  
6 Sep. 8 Request, including the same records that were requested and received from the Coroner.

7 35. ACLUNV has not received any documents from LVMPD responsive to its LVMPD  
8 March 2 Request.

9  
10 **LEGAL STANDARD AND AUTHORITY**

11 36. The Nevada Public Records Act's "purpose . . . is to foster democratic principles  
12 by providing members of the public with access to inspect and copy public books and records to  
13 the extent permitted by law." NRS 239.001.

14 37. The provisions mandating access to public records "must be construed liberally to  
15 carry out this important purpose[.]" NRS 239.001(1) and (2).

16 38. Any exemptions, exceptions, or balancing of interests which limits or restricts  
17 access to public books and records by members of the public must be construed narrowly. NRS  
18 239.001(3).

19 39. The burden of proving that a record is confidential is on the government agency.  
20 NRS 239.0113.

21 40. A government agency must prove the confidentiality of records by a preponderance  
22 of the evidence. NRS 239.0113(2).  
23  
24

1           41.       When a government agency claims confidentiality of a record or a portion of a  
2 record, they must provide a general factual description of the record to the requester. *Reno*  
3 *Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 885-86, 266 P.3d 623, 631 (2011).

4           42.       When a government agency claims confidentiality of a record or portion of a record,  
5 they must provide a specific explanation of what record or portion of a record is confidential to  
6 the requester. *Id.*

7           43.       When a government agency claims confidentiality of a record or portion of a record,  
8 they must state the specific laws or regulations that make the record confidential to the requester.  
9 *Id.*

10          44.       Only if the entirety of the record contains confidential information can a record be  
11 withheld entirely rather than redacted. NRS 239.010(3); *Las Vegas Review-Journal, Inc. v. Las*  
12 *Vegas Metro. Police Dep't*, 139 Nev. 69, 78, 526 P.3d 724, 734 (2023); *see also Republican Att'ys*  
13 *Gen. Ass'n v. Las Vegas Metro. Police Dep't*, 136 Nev. 28, 36, 458 P.3d 328, 335 (2020) (stating  
14 that redaction of records should be favored over withholding records unless all portions of the  
15 record are confidential).

16          45.       If a governmental entity seeks to withhold or redact a public record in its control, it  
17 must first prove by a preponderance of the evidence that the record or portion thereof that it seeks  
18 to redact is confidential. *See Nev. Rev. Stat. § 239.0113*; *see also Gibbons*, 127 Nev. at 880, 266  
19 P.3d at 629. If the government does not identify a statutory provision explicitly declaring a record  
20 confidential, it must engage in a broad balancing of interests to prove that the interest in  
21 withholding records or portions thereof “clearly outweighs the public’s right to access.” *Gibbons*,  
22 127 Nev. at 880, 266 P.3d at 628 (citation omitted) *see also id.* at 127 Nev. 873, 879, 266 P.3d  
23 623, 627 (holding there is, under the NPRA, a “general policy in favor of open government”); *Pub.*  
24

1 *Employees' Ret. Sys. of Nevada v. Nevada Policy Research Inst., Inc.*, 134 Nev. 669, 676, 429 P.3d  
2 280, 286 (2018) (noting "the strong presumption in favor of disclosure" of public records in  
3 Nevada).

4 46. A government agency's failure to comply with the NPRA allows the requesting  
5 party to recover attorney's fees and costs from the government agency. NRS 239.011.

6 47. A government agency's willful failure to adhere to the NPRA requires a court to  
7 impose a civil penalty upon that agency. NRS 239.340.

8 **FIRST CLAIM FOR RELIEF**

9 **Violation of the Nevada Public Records Act - Assertion of inapplicable confidentiality**  
10 **provisions and failure to show that agency privacy interests outweighed the public's**  
11 **interest in the records**  
12 **(Against NDOC)**

13 48. ACLUNV re-alleges and incorporates by reference each and every allegation  
14 contained in the paragraphs above as if fully set forth herein.

15 49. NDOC, in its responses to ACLUNV, cited boilerplate confidentiality provisions,  
16 without demonstrating how they apply to the records at issue.

17 50. Pursuant to NRS 239.0107(1)(d), if a governmental entity denies a request for  
18 public records on the grounds that the records or some part thereof are confidential, the  
19 governmental entity must provide the requester written notice of that fact along with citation to  
20 the specific statute or other legal authority that makes the public book or record, or a part thereof,  
21 confidential.

22 51. NDOC did not provide any statutory basis for withholding the requested records.

23 52. NDOC has not cited any authority explaining why the same records would be  
24 publicly available from one agency — the Coroner — but confidential in the hands of another  
agency — NDOC.

1           53.       Instead, NDOC claimed that balance of interests weighs in favor of nondisclosure  
2 and cited *Donrey v. Bradshaw*, 106 Nev. 630, 636, 798 P.2d 144, 148 (1990) and *Reno Newspapers*  
3 *v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 627 (2011) as justification for withholding the  
4 requested records.

5           54.       NDOC has the burden of showing that its interest in non-disclosure outweighs the  
6 public's interest in disclosure in order to withhold public records. *Gibbons*, 127 Nev. at 880.

7           55.       *Donrey* and *Gibbons* do not create a blanket NPRA exception for "ongoing criminal  
8 proceedings" or "law enforcement information." *Las Vegas Review-Journal, Inc. v. Las Vegas*  
9 *Metro. Police Dep't*, 139 Nev. 69, 78-82, 526 P.3d 724, 734-36 (2023) (Hereinafter "*LVRJ v.*  
10 *LVMPD*").

11          56.       NDOC stated that the unidentified records are relevant to an anticipated criminal  
12 proceeding but failed to satisfy the *Gibbons* balancing test that could justify non-disclosure of the  
13 requested records.

14          57.       Any interests NDOC may have in non-disclosure of the records are severely  
15 undercut by the fact that no law enforcement agency has notified ACLUNV's clients, Ms. Warren-  
16 Duvall and Ms. Duvall, who are victims of any crimes NDOC may be investigating in this matter,  
17 of any pending or anticipated criminal proceeding related to Mr. Warren-Hunt's murder.

18          58.       Any interests NDOC may have in non-disclosure of the records are severely  
19 undercut by the fact that the Coroner disclosed records that NDOC claims are confidential. NDOC  
20 has provided no explanation for why these records would be public in the hands of one agency and  
21 confidential in the hands of another.

22          59.       Any interests NDOC may have in non-disclosure of the records are severely  
23 undercut by the fact that NDOC officials have apparently spoken to media outlets and indicated  
24

1 that Mr. Warren-Hunt's death was related to drug debt.<sup>3</sup>

2 60. Any interests NDOC may have in non-disclosure of the records at most warrants  
3 production of a redacted copy of the records. *See LVRJ v. LVMPD*, 139 Nev. at 83 (internal citation  
4 omitted).

5 61. ACLUNV has several compelling interests in the records such as the oversight of  
6 NDOC operations, the safety of incarcerated people, transparency about conditions in Nevada  
7 prisons, and accountability of NDOC officials.

8 62. ACLUNV has an even greater interest in the records as ACLUNV seeks to inform  
9 its clients on their rights related to the investigation into Mr. Warren-Hunt's murder.

10 **SECOND CLAIM FOR RELIEF**

11 **Violation of the Nevada Public Records Act - Assertion of inapplicable confidentiality**  
12 **provisions and failure to show that agency privacy interests outweighed the public's**  
13 **interest in the records**  
14 **(Against LVMPD)**

15 63. ACLUNV re-alleges and incorporates by reference each and every allegation  
16 contained in the paragraphs above as if fully set forth herein.

17 64. Pursuant to NRS 239.0107(1)(d), if a governmental entity denies a request for  
18 public records on the grounds that the records or some part thereof are confidential, the  
19 governmental entity must provide the requester written notice of that fact along with citation to  
20 the specific statute or other legal authority that makes the public book or record, or a part thereof,  
21 confidential.

22 65. LVMPD cited the following provisions and cases as justification for withholding  
23 the requested records: NRS 179A.070 - 179A.100, *Donrey v. Bradshaw*, 106 Nev. 630, 636, 798  
24 P.2d 144, 148 (1990), *Reno Newspapers v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 627 (2011),

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<sup>3</sup> Vanessa Murphy, *Fourth suspected homicide at Las Vegas-area prison within 7 weeks*, 8 News Now Vegas (September 3, 2025, 12:53 PM), <https://www.8newsnow.com/investigators/fourth-suspected-homicide-at-las-vegas-area-prison-within-7-weeks/>

1 NRS 49.335 - 49.355, *Las Vegas Metro. Police Dep't v. Anderson (In re 12067 Oakland Hills, Las*  
2 *Vegas)*, 134 Nev. 799, 806, 435 P.3d 672, 678 (Nev. Ct. App. 2018), Att. Gen. Op. 83-3, Nev.  
3 Const. art. I, § 8A, NRS 174.235, *Tennessean v. Metro. Gov't of Nashville & Davidson Cty.*, 485  
4 S.W.3d 857 (Tenn. 2016), *Wilson v. Layne*, 526 U.S. 603, 119 S. Ct. 1692 (1999), NRS 179.045(4),  
5 *In re Search Warrants Regarding Seizure of Documents*, 2023 WL 2861201 (Nev. Ct. App. 2023)  
6 (unpublished), NRS 172.245, *Houston v. County of Maricopa*, \_\_ F.4th \_\_, 2024 U.S. App. LEXIS  
7 22564, 2024 WL 4048897 (9<sup>th</sup> Cir. Sep. 5, 2024).

8 66. LVMPD failed to identify which records each confidentiality provision applies to.

9 67. LVMPD, in its responses to ACLUNV, cited confidentiality provisions which are  
10 inapplicable to the requested records.

11 68. The provisions listed in the previous paragraph do not apply to ACLUNV, do not  
12 apply to the requested records, or at most warrant redacting a copy of the records, not withholding  
13 any records in their entirety.

14 69. LVMPD has the burden of showing that its interest in non-disclosure outweighs the  
15 public's interest in disclosure in order to withhold public records. *Gibbons*, 127 Nev. at 880.

16 70. LVMPD has asserted no viable interests to ACLUNV that would justify non-  
17 disclosure of the requested records.

18 71. Any interests LVMPD may have in non-disclosure of the records are severely  
19 undercut by the fact that no law enforcement agency has notified ACLUNV's clients, Ms. Warren-  
20 Duvall and Ms. Duvall, who are victims of any crimes LVMPD may be investigating in this matter,  
21 nor of any pending or anticipated criminal proceeding related to Mr. Warren-Hunt's murder.  
22  
23  
24

1       72. Any interests LVMPD may have in non-disclosure of the records are severely  
2 undercut by the fact that speculation about the circumstances of Mr. Warren-Hunt's death has been  
3 discussed in the media.<sup>4</sup>

4       73. Any interests LVMPD may have in non-disclosure of the records are severely  
5 undercut by the fact that ACLUNV's clients, Ms. Warren-Duvall and Ms. Duvall, who are victims  
6 of any crimes LVMPD may be investigating in this matter, want these records released to the  
7 public.

8       74. ACLUNV has several compelling interests in the records such as the oversight of  
9 law enforcement, the safety of incarcerated people, transparency about conditions in Nevada  
10 prisons, and the accountability of law enforcement agencies.

11       75. ACLUNV has an even greater interest in the records as ACLUNV seeks to inform  
12 its clients on their rights related to the investigation into Mr. Warren-Hunt's murder.

13  
14                   **THIRD CLAIM FOR RELIEF**  
15       **Violation of the Nevada Public Records Act – Failure to provide records in agency's**  
16                   **custody**  
17                   **(Against LVMPD)**

18       76. ACLUNV re-alleges and incorporates by reference each and every allegation  
19 contained in the paragraphs above as if fully set forth herein.

20       77. Pursuant to NRS 239.0107(1), the person who has legal custody or control of a  
21 public book or record of a governmental entity must provide a copy of the public book or record  
22 upon receipt of a written or oral request.

23       78. In its document titled, "911 Calls," LVMPD directs ACLUNV to submit a new  
24 request for any 911 calls related to Mr. Warren-Hunt's murder to the LVMPD Communications  
Bureau.

---

<sup>4</sup> Murphy, *supra* n.2.

79. As discussed above, the link to submit this request provided by LVMPD directs ACLUNV to a page on LVMPD's website. There is no indication on the webpage the LVMPD Communications Bureau is a separate organization from LVMPD. There is no indication that records maintained by the Communications Bureau are in the custody or control of an agency other than LVMPD.

80. LVMPD's failure to release the requested records that are in its custody to ACLUNV violates the NPRA.

**FOURTH CLAIM FOR RELIEF**  
**Nevada Public Records Act - requirement that government agency must pay attorney's fees  
and costs  
(Against NDOC and LVMPD)**

81. ACLUNV re-alleges and incorporates by reference each and every allegation contained in the paragraphs above as if fully set forth herein.

82. The records sought by ACLUNV were and still are subject to disclosure.

83. NDOC's and LVMPD's failure to release the requested records to ACLUNV violates the NPRA.

84. NDOC and LVMPD are required to pay ACLUNV's attorney's fees and costs if ACLUNV succeeds on any of these claims.

**FIFTH CLAIM FOR RELIEF**  
**Nevada Public Records Act - penalties pursuant to NRS 239.340**  
**(Against NDOC and LVMPD)**

85. ACLUNV re-alleges and incorporates by reference each and every allegation contained in the paragraphs above as if fully set forth herein.

86. "If a court determines that a governmental entity willfully failed to comply with the provisions of this chapter concerning a request to inspect, copy or receive a copy of a public book

1 or record, the court must impose on the governmental entity a civil penalty” for each violation.  
2 NRS 239.340.

3 87. A \$1,000 penalty is imposed for the first willful violation of the NPRA within a 10-  
4 year period; a \$5,000 penalty is imposed for the second willful violation of the NPRA within a 10-  
5 year period; and a \$10,000 penalty is imposed for each subsequent willful violation after the second  
6 of the NPRA within a 10-year period.

7 88. NDOC has committed multiple willful violations of the NPRA, and each violation  
8 warrants a civil penalty be levied against NDOC.

9 89. LVMPD has committed multiple willful violations of the NPRA, and each violation  
10 warrants a civil penalty be levied against LVMPD.

11  
12 **PRAYER FOR RELIEF**

13 Petitioner requests relief in the following forms:

14 90. That the Court resolve this matter on an expedited basis as mandated by NRS  
15 239.011(2);

16 91. An order directing NDOC to fulfill ACLUNV’s public records request submitted  
17 on September 8, 2025;

18 92. And order directing LVMPD to fulfill ACLUNV’s public records request submitted  
19 on March 2, 2026;

20 93. An order finding that NDOC has willfully violated the Nevada Public Records Act  
21 and therefore must pay the applicable civil penalties for each violation as outlined in NRS 239.340;

22 94. An order finding that LVMPD has willfully violated the Nevada Public Records  
23 Act and therefore must pay the applicable civil penalties for each violation as outlined in NRS  
24 239.340;

95. Reasonable costs and attorney's fees pursuant to NRS 239.011(2);

96. All relief necessary to secure ACLUNV's access to records and NDOC's and LVMPD's current and future compliance with the Nevada Public Records Act; and

97. Any further relief the Court deems appropriate.

Dated this 24<sup>th</sup> day of August, 2026.

**AMERICAN CIVIL LIBERTIES  
UNION OF NEVADA**

/s/ Danielle Bennett

DANIELLE P. BENNETT (17163)  
CHRISTOPHER M. PETERSON (13932)  
4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
Telephone: (702) 366-1226  
Facsimile: (702) 718-3213  
Email: bennett@aclunv.org  
peterson@aclunv.org  
*Attorneys for Petitioner*

| <b>Exhibits Index</b> |                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <i>Exhibit 1</i>      | Clark County Coroner/Medical Examiner's Summary of Investigation into the homicide of Ryan Anthony Warren-Hunt                         |
| <i>Exhibit 2</i>      | Public Records Request submitted to the Nevada Department of Corrections by the ACLU of Nevada on 9/8/2025                             |
| <i>Exhibit 3</i>      | Public Records Request submitted to the Clark County Coroner/Medical Examiner by the ACLU of Nevada on 9/8/2025                        |
| <i>Exhibit 4</i>      | 9/23/25 Response from the Nevada Department of Corrections to ACLU of Nevada's 9/8/2025 public records request                         |
| <i>Exhibit 5</i>      | 12/9/25 Response from the Nevada Department of Corrections to ACLU of Nevada's 9/8/2025 public records request                         |
| <i>Exhibit 6</i>      | Clark County Coroner/Medical Examiner's Autopsy Report on the post-mortem examination of the body of Ryan Anthony Warren-Hunt          |
| <i>Exhibit 7</i>      | Clark County Coroner/Medical Examiner's Toxicology Report for Ryan Anthony Warren-Hunt                                                 |
| <i>Exhibit 8</i>      | Public Records Request submitted to the Las Vegas Metropolitan Police Department by the ACLU of Nevada on 3/2/2026                     |
| <i>Exhibit 9</i>      | Las Vegas Metropolitan Police Department's response to ACLU of Nevada's 3/2/2026 public records request titled, "Inventory"            |
| <i>Exhibit 10</i>     | Las Vegas Metropolitan Police Department's response to ACLU of Nevada's 3/2/2026 public records request titled, "Documents and Photos" |
| <i>Exhibit 11</i>     | Las Vegas Metropolitan Police Department's response to ACLU of Nevada's 3/2/2026 public records request titled, "Emails"               |
| <i>Exhibit 12</i>     | Las Vegas Metropolitan Police Department's response to ACLU of Nevada's 3/2/2026 public records request titled, "911 Calls"            |

# EXHIBIT 1



**CLARK COUNTY**  
**Office of the Coroner/Medical Examiner**

1704 Pinto Lane  
Las Vegas, Nevada 89106 - (702) 455-3210

**Decedent Name:** Warren-Hunt, Ryan A.

**Date Of Birth:** PII

**Also Known as:**

**Age:** 35 y

**Location of Death:** Southern Desert Correctional Center

**SSN:** PII

**Date of Death:** 8/11/2025

**Time of Death:** 21:11:00

**Case Num:** 2025-05604

**SUMMARY OF INVESTIGATION**

**Reason for Coroner Jurisdiction:**

Homicide/ Reported as Multiple Incised Wounds and Blunt Trauma  
Southern Desert Correctional Center (SDCC)/ Nevada Department of Corrections  
(NDOC) #2025-SDCC-003160  
Las Vegas Metropolitan Police Department (LVMPD) Event #250800043242

**Circumstances of Death:**

Per SDCC Sergeant Tate and NDOC Inspector General Shields, on 08/11/25, the decedent was reportedly stabbed multiple times and "battered" in Unit 2B Wing. The decedent was transported to the prison infirmary and death was pronounced on 08/11/25 at 2111 hours, via telemetry.

**Medical History:**

The decedent's medical history was unknown at the time of this report.

**Scene:**

Location of Death: SDCC, 22010 Cold Creek Road, Indian Springs, Nevada, 89018

**Body:**

A body examination was not performed by this investigator.

**Property:**

No property was impounded by investigative staff.

**Forensic Issues and Reasons for Seal:**

NDOC Inspector General Vanzant and an LVMPD Crime Scene Analyst (CSA) will attend exam.  
Per SDCC Sergeant Tate, the decedent was attacked by "numerous assailants." The doors were reportedly open, and the inmates were able to roam around freely. The cameras reportedly don't reach the "tier" where the incident occurred so there is no video available.

**Witnesses and Information Sources:**

SDCC Sergeant Tate  
NDOC Inspector General S. Vanzant  
NDOC Inspector General Supervisor B. Shields

**Narrative:**

On 08/11/25, NDOC Inspector General Supervisor Shields advised the Clark County Office of the Coroner/ Medical Examiner (CCOCME) of an in-custody homicide. I spoke with SDCC Sergeant Tate and Inspector General Vanzant who provided limited additional information. Giddens Funeral Home was contacted for removal, per NDOC contract, and the decedent was transported to the CCOCME.

**Special Requests:**

None

**Tissue/Organ Donation:**

Nevada Donor Network (NDN) protocol was followed.  
MRO



**CLARK COUNTY**  
**Office of the Coroner/Medical Examiner**

1704 Pinto Lane  
Las Vegas, Nevada 89106 - (702) 455-3210

**Supplemental:**

*Dissemination is restricted.  
Secondary dissemination of this document is prohibited.*

Report Authored By: *Am*

Vecera, Amanda, Medicolegal Death Investigator

# EXHIBIT 2



STATE OF NEVADA

# Public Records Request

Deliver, Mail, or Fax to: Nevada Department of Corrections (NDOC)  
5500 Snyder Ave.

Email: NDOCpio@doc.nv.gov

Carson City, Nevada 89701

Fax: 775-887-3253

Attention: Public Records Officer,

|                                      |                                          |
|--------------------------------------|------------------------------------------|
| Date of Request                      | September 8, 2025                        |
| <b>Requestor Contact Information</b> |                                          |
| Name:                                | Danielle Bennett                         |
| Organization:                        | American Civil Liberties Union of Nevada |
| Address:                             | 4362 W. Cheyenne Ave.                    |
| City, State, Zip:                    | North Las Vegas, Nevada 89032            |
| Phone:                               | 310-922-7739                             |
| E-mail:                              | bennett@aclunv.org                       |

|                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Records Requested:</b>                                                                                                                                                                        |
| Check one: <input type="checkbox"/> Paper copies <input checked="" type="checkbox"/> Electronic copies <input type="checkbox"/> Certified copies <input type="checkbox"/> Inspection (in person) |
| Please be specific and include as much detail as possible regarding the records you are requesting.                                                                                              |
| Please see the attached page for requested records. We request electronic documents, but will inspect documents on site if necessary.                                                            |
| The American Civil Liberties Union of Nevada, a 501(c)(3) and 501(c)(4) nonprofit organization, requests a waiver of all fees related to this request.                                           |

|                                                                          |                                                                 |                                           |                                                                                     |
|--------------------------------------------------------------------------|-----------------------------------------------------------------|-------------------------------------------|-------------------------------------------------------------------------------------|
| To complete an estimate, the agency will need the following information: |                                                                 |                                           |                                                                                     |
| <input type="checkbox"/> I will pick up                                  | <input type="checkbox"/> Please FedEx<br>Fed Ex billing number: | <input type="checkbox"/> Please send USPS | <input checked="" type="checkbox"/> E-mail (if format allows)<br>bennett@aclunv.org |

|                                                                                                                                                                                                                                                                                                                                                                      |                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| <b>Statement</b>                                                                                                                                                                                                                                                                                                                                                     |                    |
| <input checked="" type="checkbox"/> I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over \$25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days. |                    |
| <b>Requester Signature</b>                                                                                                                                                                                                                                                                                                                                           | _____<br>Signature |

|                                |                                                                                                                                                 |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Office Use Only                |                                                                                                                                                 |
| <b>Request status:</b>         | <b>Estimate:</b>                                                                                                                                |
| Date                           |                                                                                                                                                 |
| Request received               | Estimate: \$ _____                                                                                                                              |
| Receipt acknowledgement issued | Date deposit received _____                                                                                                                     |
| Request filled                 | Actual (if different): \$ _____                                                                                                                 |
| Estimated completion           | Date final payment received _____                                                                                                               |
| Estimate provided              | Completed by _____                                                                                                                              |
| Request denied in whole        |                                                                                                                                                 |
| Other:                         | Retain request form for three (3) calendar years from the end of the calendar year in which the response was completed according to RDA 2015013 |

Date: 9/8/2025

To: Nevada Department of Corrections  
Submitted via email to NDOCpio@doc.nv.gov on 9/8/2025

Re: Public records request – Investigation Records re: Warren-Hunt Death

To whom it may concern:



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

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 Nevada Department of Corrections (NDOC) and its associated subdivisions as detailed below.

This request is submitted in connection to the in-custody death of Mr. Ryan Anthony Warren-Hunt, DOB 6/12/1990, on 8/11/2025, at the Southern Desert Correctional Center. A preservation letter was sent to Mr. D. Randall Gilmer at the Attorney General's Office on 9/4/2025, with a follow-up letter sent on 9/8/2025, requesting preservation of all evidence related to this incident.

This is a request for a substantial number of records, so ACLUNV kindly requests that records be released as they individually become available.

#### **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. All documents produced or collected by NDOC employees or contractors in connection with the investigation of the in-custody death of Mr. Ryan Anthony Warren-Hunt, DOB 6/12/1990, on 8/11/2025 at the Southern Desert Correctional Center
2. All video recordings of the stabbing incident that caused Mr. Warren-Hunt's death on 8/11/2025



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

3. Any toxicology, autopsy, medical examiner, or coroner's records connected to Mr. Warren-Hunt's death in NDOC's possession
4. All kites and grievances submitted by Mr. Warren-Hunt since his transfer to his maximum-security unit concerning his cellmate assignment, including but not limited to requests to transfer, requests for a different cellmate, reports of property stolen by cellmates
5. Any documentation of fighting between Mr. Warren-Hunt and other inmates in his housing unit on or around 6/12/2025
6. All kites or grievances reporting broken or defective locking mechanisms on cell doors in maximum security units and records of tampering with locking mechanisms at Southern Desert Correctional Center between September 8, 2023 and the present
7. All documentation of repairs or inspections of locking mechanisms on cell doors and records of tampering with locking mechanisms in maximum security units at Southern Desert Correctional Center between September 8, 2023 and the present
8. Inventory list of all property in Mr. Warren-Hunt's possession at the time of his death
9. Roster of all NDOC staff members and contractors stationed in Mr. Warren-Hunt's unit on 8/11/2025, including their shift schedules
10. NDOC policies relating to staff-to-inmate ratios required in maximum-security units
11. Reports of any inmates out of their cells without authorization in Mr. Warren-Hunt's unit between the hours of 7:30 pm and 9:00 pm on 8/11/2025

### **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 and are not sought for commercial interest. As a nonprofit 501(c)(3) and 501(c)(4) organization, the 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 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 9/15/2025. 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 the ACLUNV within the five (5) day statutory time frame if, for some reason, this request requires clarification.



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

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 [bennett@aclunv.org](mailto:bennett@aclunv.org).

Best,

Danielle Bennett  
Legal Fellow  
American Civil Liberties Union of Nevada



4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
702-366-1226  
[aclunv.org](http://aclunv.org)

# EXHIBIT 3



# Office of the Coroner/Medical Examiner

1704 Pinto Lane · Las Vegas NV 89106  
(702) 455-3210 · Administration Fax: (702) 455-0416 · Investigations Fax: (702) 455-3101

Melanie Rouse, Coroner  
Tami Sedivy-Schroder, Assistant Coroner

## Medical Examiners

Lisa Gavin, MD · Timothy Dutra, MD, PhD · Jan Gorniak, DO · Ben Murie, DO · Nathan Shaller, MD

## PUBLIC RECORDS REQUEST

I, Danielle Bennett, am requesting the following reports regarding  
Please Print

Ryan Anthony Warren-Hunt Date of Death: 08/11/2025 Date of Birth: 06/12/1990  
Decedent's Name

Case No: \_\_\_\_\_

Are you related to the decedent: YES (NO)

If yes, please advise relationship to the decedent: \_\_\_\_\_

If no, please advise reasoning for request: Legal representative requesting on behalf of his family

Contact Phone Number: 310-922-7739

Please select the method you would like to obtain the reports:

☐ U.S. Mail

Address: \_\_\_\_\_

☒ Email

Email Address: bennett@aclunv.org

**\*Please mark which reports you are requesting below.\***

☒ Investigative Report

☒ Medical Examiner's Report

☒ Toxicology Report

Signature Danielle Bennett

Date 09/08/2025

**\*Please note, not all cases include all reports listed above.\***

**\*If you are authorizing someone to obtain reports on your behalf, please complete the portion below.\***

I, \_\_\_\_\_, authorize \_\_\_\_\_ to obtain  
Please Print Please Print

reports regarding \_\_\_\_\_, Case No. \_\_\_\_\_  
Decedent's Name

Should there be any concerns, I may be contacted at \_\_\_\_\_.

Signature \_\_\_\_\_ Date \_\_\_\_\_

## BOARD OF COUNTY COMMISSIONERS

JAMES B GIBSON, Chair · JUSTIN JONES, Vice-Chair  
MICHAEL NAFT · TICK SEGERBLOM · ROSS MILLER · MARILYN KIRKPATRICK · WILLIAM McCURDY II  
YOLANDA T. KING, County Manager

# EXHIBIT 4

---

**RE: Public Record Request**

---

**From** NDOC Public Records Request <publicrecords3286@nv.onmicrosoft.com>

**Date** Tue 9/23/2025 3:48 PM

**To** Danielle Bennett <bennett@aclunv.org>; NDOC Public Records Request <publicrecords3286@nv.onmicrosoft.com>

 1 attachment (198 KB)

NDOC\_NPRA\_Corrected\_Response\_Danielle\_Bennett.pdf;

---

**This Message Is From an Untrusted Sender**

You have not previously corresponded with this sender.

Please disregard the last email, and please see this attached response to your Public Records Request.

---

**From:** Danielle Bennett <bennett@aclunv.org>

**Sent:** Friday, September 19, 2025 12:09 PM

**To:** NDOC Public Records Request <publicrecords3286@nv.onmicrosoft.com>; Teri Vance <tvance@doc.nv.gov>

**Subject:** FW: Public Record Request

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

---

**From:** Danielle Bennett <[bennett@aclunv.org](mailto:bennett@aclunv.org)>

**Date:** Monday, September 8, 2025 at 2:24 PM

**To:** [NDOCpio@doc.nv.gov](mailto:NDOCpio@doc.nv.gov) <[NDOCpio@doc.nv.gov](mailto:NDOCpio@doc.nv.gov)>

**Subject:** Public Record Request

Hello,

Please see attached for public records request.

Thank you,

Danielle Bennett (She/Her)

Legal Fellow

ACLU of Nevada

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

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

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unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. If you are the intended recipient but do not wish to receive communications through this medium, please so advise the sender immediately.

Joe Lombardo  
*Governor*

James Dzurenda  
*Director*

W.C "Bill" Quenga  
*Public Information  
Officer*



**STATE OF NEVADA**  
**Department of Corrections**

Northern Administration  
5500 Snyder Ave.  
Carson City, NV 89701  
(775) 977-5500

Southern Administration  
3955 W. Russell Rd.  
Las Vegas, NV 89118  
(725) 216-6000

---

September 23, 2025

Thank you for contacting the Nevada Department of Corrections ("NDOC") to submit a public records request. This request seeks the following specific records:

1. All documents produced or collected by NDOC employees or contractors in connection with the investigation of the in-custody death of Mr. Ryan Athony Warren-Hunt, DOB 06/12/1990, on 08/11/2025 at Southern Desert Correctional Center.
2. All video recordings for the stabbing incident that caused Mr. Warren-Hunt's death on 08/11/2025.
3. Any toxicology, autopsy, medical examiner, or coroner's records connected to Mr. Warren-Hunt's death in NDOC's possession.
4. All kites and grievances submitted by Mr. Warren-Hunt since his transfer to his maximum-security unit concerning his cellmate assignment, including but not limited to requests to transfer, requests for a different cellmate, reports if property stolen by cellmates.
5. Any documentation of fighting between Mr. Warren-Hunt and other inmates in his housing unit on or around 6/12/2025.
6. All kites or grievances reporting broken or defective locking mechanisms on cell doors in maximum security units and records of tampering with locking mechanisms at Southern Desert Correctional Center between September 8, 2023, and the present.
7. All documentation of repairs or inspections of locking mechanisms on cell doors and records of tampering with locking mechanisms in maximum security units at Southern Desert Correctional Center between September 8, 2023, and the present.
8. Inventory list of all property in Mr. Warren-Hunt's possession at the time of his death.
9. Roster of all NDOC staff members and contractors stationed in Mr. Warren-Hunt's unit on 8/11/2025, including their shift schedules.
10. NDOC policies relating to staff-to-inmate ratios required in maximum security units.
11. Reports of any inmates out of their cells without authorization in Mr. Warren-Hunt's unit between the hours of 7:30 pm and 9:00 pm on 8/11/2025.

For items 7, 9, 10 and 11, the NDOC is conducting a search and review of records in our custody to determine if any responsive records exist. The NDOC is unable to complete this process and provide any responsive records within five business days.<sup>1</sup> The NDOC anticipates responding to this request by December 23, 2025. Additionally, for items 1-6 and 8, the NDOC the NDOC has identified records that may not be released because the requested records are part of an ongoing criminal proceeding and release would jeopardize law enforcement information.<sup>2</sup> Under these circumstances, the NDOC must balance the interests of all affected individuals.<sup>3</sup> Because the records are directly relevant to the anticipated criminal proceeding and many will be introduced as evidence, the NDOC has concluded that release, at this time, will undermine the constitutional rights of a defendant to a fair trial. Thus, the balance of interests currently weighs in favor of non-disclosure. Although the records are not releasable while the criminal proceeding is pending, that status may change upon the matter's conclusion.

---

<sup>1</sup> NRS 239.0107(1) (c) (1) (any governmental entity unable to make a record available within five business days must provide the requester with written notice and include the “earliest date and time after which the governmental entity reasonably believes the public book or record will be available”).

<sup>2</sup> *Donrey of Nevada, Inc. v. Bradshaw*, 798 P.2d 144 (1990); *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 880, 266 P.3d 623, 628 (2011).

<sup>3</sup> *Id.*

# EXHIBIT 5

Joe Lombardo  
*Governor*

James Dzurenda  
*Director*

W.C "Bill" Quenga  
*Public Information  
Officer*



**STATE OF NEVADA**  
**Department of Corrections**

Northern Administration  
5500 Snyder Ave.  
Carson City, NV 89701  
(775) 977-5500

Southern Administration  
3955 W. Russell Rd.  
Las Vegas, NV 89118  
(725) 216-6000

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December 9, 2025

Thank you for contacting the Nevada Department of Corrections ("NDOC") to submit a public records request. This request seeks the following specific records:

1. All documents produced or collected by NDOC employees or contractors in connection with the investigation of the in-custody death of Mr. Ryan Athony Warren-Hunt, DOB 06/12/1990, on 08/11/2025 at Southern Desert Correctional Center.
2. All video recordings for the stabbing incident that caused Mr. Warren-Hunt's death on 08/11/2025.
3. Any toxicology, autopsy, medical examiner, or coroner's records connected to Mr. Warren-Hunt's death in NDOC's possession.
4. All kites and grievances submitted by Mr. Warren-Hunt since his transfer to his maximum-security unit concerning his cellmate assignment, including but not limited to requests to transfer, requests for a different cellmate, reports if property stolen by cellmates.
5. Any documentation of fighting between Mr. Warren-Hunt and other inmates in his housing unit on or around 6/12/2025.
6. All kites or grievances reporting broken or defective locking mechanisms on cell doors in maximum security units and records of tampering with locking mechanisms at Southern Desert Correctional Center between September 8, 2023, and the present.
7. All documentation of repairs or inspections of locking mechanisms on cell doors and records of tampering with locking mechanisms in maximum security units at Southern Desert Correctional Center between September 8, 2023, and the present.
8. Inventory list of all property in Mr. Warren-Hunt's possession at the time of his death.
9. Roster of all NDOC staff members and contractors stationed in Mr. Warren-Hunt's unit on 8/11/2025, including their shift schedules.
10. NDOC policies relating to staff-to-inmate ratios required in maximum security units.
11. Reports of any inmates out of their cells without authorization in Mr. Warren-Hunt's unit between the hours of 7:30 pm and 9:00 pm on 8/11/2025.

For item numbers 1-6 and 8, the NDOC responded to your request on September 23, 2025.

For numbers 7, 9, 10 and 11, the NDOC the NDOC has identified records that may not be released because the requested records are part of an on-going criminal proceeding and release would jeopardize law enforcement information.<sup>1</sup> Under these circumstances, the NDOC must balance the interests of all affected individuals.<sup>2</sup> Because the records are directly relevant to the anticipated criminal proceeding and many will be introduced as evidence, the NDOC has concluded that release, at this time, will undermine the constitutional rights of a defendant to a fair trial. Thus, the balance of interests currently weighs in favor of non-disclosure. Although the records are not releasable while the criminal proceeding is pending, that status may change upon the matter's conclusion.

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<sup>1</sup> *Donrey of Nevada, Inc. v. Bradshaw*, 798 P.2d 144 (1990); *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 880, 266 P.3d 623, 628 (2011).

<sup>2</sup> *Id.*

# EXHIBIT 6

Clark County Coroner  
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## AUTOPSY REPORT

Case Number: 25-05604

August 12, 2025

### POSTMORTEM EXAMINATION ON THE BODY OF

**Ryan A. Warren-Hunt**

**DATE AND TIME OF DEATH:** August 11, 2025 9:11 p.m.

**DATE AND TIME OF AUTOPSY:** August 12, 2025 9:32 a.m.

**FORENSIC PATHOLOGIST:** Mark J. Shuman, M.D.

---

### IDENTIFICATION

The body is identified by Medical Examiner's identification tag on the right great toe bearing the decedent's name, case number, and demographics.

### CLOTHING AND PERSONAL EFFECTS

PII [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### EVIDENCE OF MEDICAL INTERVENTION

PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### EXTERNAL EXAMINATION

PHI [REDACTED]  
[REDACTED]

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## AUTOPSY REPORT

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PHI [REDACTED]  
[REDACTED]

Injuries of the head are described below. PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Injuries of the neck, chest, abdomen, back, and extremities are described below. PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### TATTOOS

PHI [REDACTED]  
[REDACTED]  
[REDACTED]

### RADIOLOGY

Anterior-to-posterior and lateral, full body radiographs reveal PHI [REDACTED]  
[REDACTED] diffuse haziness of both lungs, PHI [REDACTED]  
[REDACTED]

### EVIDENCE OF INJURY

#### SHARP FORCE INJURIES:

##### Stab Wound "A" of Head:

A stab wound (labeled "A" in notes) in in the right temporal aspect of the scalp. It is 1.6 x 0.3 cm, nearly horizontal defect that is 1.9 cm with the skin edges apposed. The posterior corner is sharp and the anterior corner is rectangular. The wound extends 2.6 cm

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## **AUTOPSY REPORT**

**Case Number: 25-05604**

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right to left and downward through the right temporalis muscle and into the outer table of the right temporal bone.

Associated with the wound are right temporal, parietal, and occipital subgaleal hemorrhage, hemorrhage in the right temporalis muscles, and a nick in the outer table of the right temporal bone.

### **Stab Wound "B" of Head:**

A stab wound (labeled "B" in notes) is in the left side of the forehead. It is a 0.5 x 0.5 cm, irregular defect that extends 2.3 cm from back to front, right to left, and downward into the left temporalis muscle.

Associated with the wound are left temporal subgaleal hemorrhage and hemorrhage in the left temporalis muscle.

### **Incised Wound "C" of Neck:**

An incised wound (labeled "C" in notes) is in the left side of the neck. It is 2 cm in length, nearly horizontal, and extends into the dermis.

### **Incised Wound "D" of Chest:**

An incised wound (labeled "D" in notes) is on the upper aspect of the chest to the right of the midline. It is a 1.8 by up to 0.2 cm, vertical defect that extends to the dermis.

### **Incised and Stab Wounds "E" of Torso:**

An incised wound and a stab wound (labeled "E" in notes) are on the right mid aspect of the chest. The incised wound is 4.1 x 0.1 cm, nearly horizontal, and is very superficial. The stab wound is 6.8 cm in length, oriented from 8 o'clock to 3 o'clock, and consists of a superficial incised wound laterally and a 1.8 x 0.5 cm stab wound medially. The stab wound extends 10.5 cm from front to back and right to left, through anterior aspect of the costal cartilage of

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## **AUTOPSY REPORT**

**Case Number: 25-05604**

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the right 6<sup>th</sup> rib, heart, right hemidiaphragm, and into the right lobe of the liver. It extends 2 cm deep into the liver.

Associated with the wound are hemorrhage in the right chest wall, defects in the costal cartilage of the right 6<sup>th</sup> rib, right ventricle of the heart, and liver, 200 mL of liquid and clotted blood in the pericardial sac, 250 mL of liquid and clotted blood in the right pleural cavity, 50 mL of liquid blood in the left pleural cavity, and 30 mL of liquid and clotted blood in the peritoneal cavity.

### **Stab Wound "F" of Torso:**

A stab wound (labeled "F" in notes) is in the mid anterolateral aspect of the right side of the chest. It is a 2 x 0.6 cm, horizontal defect that has slightly irregular edges. It extends 2.1 cm from left to right, downward, and front to back through the anterolateral aspect of the right 7<sup>th</sup> intercostal space and into a segment of small intestine.

Associated with the wound are hemorrhage in the right chest wall and 30 mL of liquid and clotted blood in the peritoneal cavity.

### **Stab Wound "G" of Chest:**

A stab wound (labeled "G" in notes) is in the lateral aspect of the right side of the chest. It is a 0.6 x 0.4 cm, irregular defect with a 2.5 cm, superficial incised wound "tail" that extends downward and posteriorly from the stab defect. The stab wound probes 1 cm from right to left and slightly upward into subcutaneous tissue.

### **Stab Wound "H" of Abdomen:**

A stab wound (labeled "H" in notes) is in the lateral aspect of the left side of the abdomen, above the left hip. It is a 1.8 x 0.9 cm oblique defect that is oriented from 7 o'clock to 1 o'clock. The wound edges are dry and both corners are rounded. The wound extends 1.8 cm from left to right and slightly downward into subcutaneous tissue.

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### **Incised Wound "I" of Abdomen:**

A stab wound (labeled "I" in notes) is in the left upper quadrant of the abdomen below the costal margin. It is a 0.5 x 0.1 cm, oblique defect that is oriented from 7 o'clock to 2 o'clock and is 0.6 cm in length with the skin edges apposed. The 7 o'clock corner is sharp and the 2 o'clock corner is rounded. The wound extends into the dermis.

### **Incised and Stab Wounds "J" of Right Shoulder:**

Four, oblique, sharp force injuries (labeled "J" in notes) are on top of the right shoulder. They range from 0.4 x 0.1 cm to 0.8 x 0.3 cm and extend up to 0.5 cm deep from front to back, right to left, and downward into subcutaneous tissue. One of the wounds has an approximately 2 cm, associated linear abrasion "tail" that extends anteriorly and left to right and a few small adjacent abrasions.

### **Stab Wounds "K" of Right Forearm:**

Three stab wounds (labeled "K" in notes) are on the right forearm. Two of the wounds are on the anterior aspect of the right forearm, are approximately 1.7 by up to 0.7 cm and approximately 1.7 by up to 0.8 cm and connect to each other through the superficial subcutaneous tissue. The third stab wound is on the medial aspect of the right forearm, is approximately 1.5 by up to 0.7 cm and extends 3.3 cm from back to front, left to right and upward into soft tissue.

### **Incised Wound "L" of Right Arm:**

An incised wound (labeled "L" in notes) is in the lateral aspect of the right arm. It is a 0.4 x 0.2 cm, superficial wound with an adjacent, 4.8 cm, linear abrasion that extends front to back and downward.

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### **Incised Wound "M" of Right Hand:**

An incised wound (labeled "M" in notes) is in the posterior aspect of the right hand. It is a 3.8 cm oblique, superficial, incised wound that extends into the dermis.

### **Stab Wound "N" of Left Shoulder:**

A stab wound (labeled "N" in notes) is in the posterolateral aspect of the left shoulder. It is a 1.9 by up to 1.1 cm defect that is approximately 2.1 cm in length with the skin edge apposed and both corners of the wound are sharp. The wound probes 3 cm from left to right, back to front and downward into soft tissue of the left shoulder.

### **Incised Wound "O" of Left Shoulder:**

An incised wound (labeled "O" in notes) is in the anterolateral aspect of the left shoulder. It is a 0.6 x 0.5 cm, irregular defect that appears to extend through the dermis.

### **Stab Wound "P" of Left Forearm:**

A stab wound (labeled "P" in notes) is in the posteromedial aspect of the left forearm. It is a 1.8 by up to 0.6 cm, nearly horizontal defect that extends 2.5 cm from left to right, back to front, and downward into soft tissue of the left forearm.

### **Stab Wound "Q" of Left Forearm:**

A stab wound (labeled "Q" in notes) is in the left antecubital fossa. It is a 1 x 0.5 cm, nearly horizontal defect that extends 1.6 cm from front to back, left to right, and downward into soft tissue of the left forearm.

### **Stab Wounds "R" of Left Wrist:**

Two stab wounds are in the left wrist. A stab wound in the lateral aspect of the left wrist is 1.5 x 0.5 cm, horizontally oriented, and

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## **AUTOPSY REPORT**

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extends 3.1 cm from left to right, back to front and downward. A stab wound in the anterolateral aspect of the right wrist is 1.1 x 0.7 cm, irregular, and extends 2.8 cm, from right to left, upward, and front to back.

### **Incised Wound "S" of Left Forearm:**

An incised wound (labeled "S" in notes) is in the anterolateral aspect of the left forearm. It is a 1.3 by up to 0.6 cm, horizontal defect that has slightly irregular edges and is 1.6 cm in length with the skin edges apposed. The wound extends 0.5 cm from front to back, right to left and downward into subcutaneous tissue.

### **Stab Wound "T" of Head:**

A stab wound (labeled "T" in notes) is in the upper posterior aspect of the scalp to the right of the midline. It is a 1.5 cm, slit-like, oblique defect that is oriented from 11 o'clock to 5 o'clock and extends 1.7 cm from front to back, right to left, and downward through the scalp to the skull.

### **Incised Wounds "U" of Head:**

Two incised wounds (labeled "U" in notes) are in the mid posterior aspect of the scalp. They consist of a 2 cm, nearly vertical wound that intersects a 2.1 cm, horizontal wound. The wounds are limited to the scalp and create a 1.2 cm flap in the scalp that extends to the left.

Associated with these wounds is a small amount of subgaleal hemorrhage in the right posterior aspect of the scalp.

### **Incised Wound "V" of Head:**

An incised wound (labeled "V" in notes) is in the left posterior aspect of the scalp. It is a 4.6 cm, vertical defect that curves to the right at its superior end. The wound extends 2 cm into the scalp from back to front, downward, and right to left.

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Associated with the wound are left posterior subgaleal hemorrhage and a vertical nick in the outer table of the left side of the occipital bone.

### **Stab Wound "W" of Neck:**

Three superficial incised wounds (labeled "W" in notes) are in the mid and right posterior aspect of the neck. Two, 0.3 by up to 0.1 cm, horizontal, superficial incised wounds are in the mid posterior aspect of the neck, and a 2 cm nearly horizontal, superficial incised wound is in the right posterior aspect of the neck at the hairline.

### **Stab Wound "X" of Neck:**

A stab wound (labeled "X" in notes) is in the base of the right posterior aspect of the neck. It is a 1.2 by up to 0.8 cm, irregular defect that extends approximately 5 cm from back to front, right to left, and downward through the posterior aspects of the right 1<sup>st</sup> and 2<sup>nd</sup> ribs near the vertebrae.

Associated with the wound are soft tissue hemorrhage, a 2 cm defect in the posterior aspects of the right 1<sup>st</sup> and 2<sup>nd</sup> ribs, and 250 mL of liquid and clotted blood in the right pleural cavity.

### **Stab Wound "Y" of Back:**

A stab wound (labeled "Y" in notes) is in the upper aspect of the back to the right of the midline. It is a 2 by up to 0.5 cm, nearly horizontal defect. The wound 3.3 cm from back to front, right to left and downward, through the spinous process of the 2<sup>nd</sup> thoracic vertebra and between the posterior and right aspects of the intervertebral disc between the 2<sup>nd</sup> and 3<sup>rd</sup> thoracic vertebrae.

Associated with the wound are hemorrhage in the muscles of the back, injury of the spinous process of the 2<sup>nd</sup> thoracic vertebra, a small amount of epidural hemorrhage of the upper aspect of the thoracic spinal cord, and hemorrhages in the right side and anterior aspect of the neck. The spinal cord is not injured.

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## **AUTOPSY REPORT**

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### **Stab Wound "Z" of Back:**

A stab wound (labeled "Z" in notes) is on the upper aspect of the back to the left of the midline. It is a 1.3 by up to 0.5 cm, horizontal defect that extends 2.3 cm from back to front, downward, and right to left into skeletal muscle of the back.

### **Stab Wounds "AA" of Right Shoulder:**

Three stab wounds (labeled "AA" in notes) are on top of the right shoulder. They include a 1 by up to 0.6 cm defect, a 0.5 x 0.4 cm, rectangular defect, and an up to 0.4 cm defect with a thin linear abrasion "tail" that extends downward and back to front. The deepest of these wounds extend 1.4 cm from back to front, right to left, and slightly upward into the soft tissue of the right shoulder.

### **Stab Wound "BB" of Right Shoulder:**

A stab wound (labeled "BB" in notes) is in the posterior aspect of the right shoulder. It is a 2 x 0.5 cm defect in the posterior axillary line near the axilla. It extends 3.5 cm from back to front, upward into the soft tissues of the right shoulder.

### **Stab Wounds "CC" of Left Shoulder:**

Two stab wounds (labeled "CC" in notes) are in the top of the left shoulder. One of the wounds is a 0.3 x 0.2 cm, oval, superficial defect with a 5 cm, linear superficial incised wound "tail" that extend anteriorly. The other is a 0.4 x 0.2 cm defect that extends approximately 0.8 cm deep from front to back, right to left, and downward into the soft tissue of the left shoulder.

### **Incised Wound "DD" of Left Shoulder:**

An incised wound (labeled "DD" in notes) is in the top of the left shoulder. It is a 2.3 x 0.2 cm, sagittal defect that extends through the dermis.

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## **AUTOPSY REPORT**

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### **Stab Wound "EE" of Left Shoulder:**

A stab wound (labeled "EE" in notes) is in the top of the left shoulder. It is a 0.5 x 0.3 cm defect with an approximately 2 by up to 0.7 cm abrasion that extends anteriorly and left to right from the wound. The wound extends 1.1 cm deep from back to front, right to left, and downward into the soft tissue of the left shoulder.

### **Superficial Incised Wounds of Chest:**

An approximately 4.5 x 2.5 cm area of curvilinear and irregular, superficial incised wounds is on the left side of the chest below the left nipple.

### **Superficial Incised Wounds of Back:**

Two, 0.5 to 0.7 cm, superficial incised wounds are on the mid upper aspect of the back, and an up to 1 cm, irregular, superficial incised wound is on the upper aspect of the back to the right of the midline.

A 4.2 x 0.3 cm, nearly vertical, superficial incised wound is on the left upper aspect of the back.

### **BLUNT FORCE INJURIES:**

A 1.7 by up to 0.8 cm abrasion is on the mid aspect of the forehead. Two, up to approximately 0.4 cm abrasions are above the medial aspect of the left eyebrow. An up to 0.2 cm abrasion is on the right side of the nose. An up to 0.6 cm abrasion is on the right naris. An up to approximately 0.5 cm abrasion is on the right earlobe. A 2.6 x 0.6 cm oblique abrasion, a 0.7 cm, linear oblique abrasion, a 1 x 0.3 cm, oblique abrasion, an up to 0.3 cm abrasion, and a 1.6 cm, oblique, linear abrasion are below the left side of the mandible. An up to approximately 5.5 x 0.2 cm, sagittal abrasion is on the base of the left side of the neck.

A few up to 2 cm, linear abrasions, up to approximately 1.8 cm, irregular abrasions, and an up to approximately 0.5 cm superficial wound are on the lower lateral aspect of the right side of the chest.

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## AUTOPSY REPORT

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A 5.2 x 0.2 cm, oblique abrasion is on the left upper aspect of the back below the scapula.

A 3.5 x 1 cm abrasion is on top of the right shoulder. A 10 x 0.2 cm, sagittal abrasion is on top of the left shoulder. A few, up to 2 cm abrasions are on the lateral and posterolateral aspects of the left arm. A 12.5 cm oblique abrasion is in the posterior aspect of the left forearm.

Up to approximately 0.5 cm abrasions are on the inferior aspect of the right knee and below the left knee.

### INTERNAL EXAMINATION

#### BODY CAVITIES:

PHI [REDACTED]  
[REDACTED]  
[REDACTED]

#### CARDIOVASCULAR SYSTEM:

PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

#### RESPIRATORY SYSTEM:

PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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## AUTOPSY REPORT

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PHI [REDACTED]

### DIGESTIVE/HEPATOBIILIARY SYSTEM:

PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### GENITOURINARY SYSTEM:

PHI [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### HEMATOPOIETIC SYSTEM:

PHI [REDACTED]  
[REDACTED]

### ENDOCRINE SYSTEM:

PHI [REDACTED]

### NECK:

A layered dissection of the anterior muscles of the neck reveals hemorrhages as previously described. PHI [REDACTED]  
[REDACTED]

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## AUTOPSY REPORT

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### MUSCULOSKELETAL SYSTEM:

PHI [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] Injuries of ribs have been previously described. PHI [REDACTED]  
[REDACTED] [REDACTED]

### NERVOUS SYSTEM:

Injuries of the scalp and skull have been previously described. PHI [REDACTED]  
[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

There is focal posterior epidural hemorrhage of the spinal cord at the levels of the first and second thoracic vertebrae. PHI [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

### MICROSCOPIC EXAMINATION

PHI [REDACTED] [REDACTED]

### TOXICOLOGY SPECIMENS

Samples of peripheral blood, vitreous fluid, and urine are collected and submitted for toxicology testing. The results are reported separately.

### OTHER SPECIMENS

Representative sections of major organs are retained in formalin.

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## **AUTOPSY REPORT**

**Case Number: 25-05604**

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### **ADDITIONAL PROCEDURES**

Photographic and radiographic images, fingerprints, and a DNA card are obtained at the time of the autopsy.

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## **AUTOPSY REPORT**

**Case Number: 25-05604**

August 12, 2025

### **AUTOPSY REPORT**

**PATHOLOGICAL EXAMINATION ON THE BODY OF**

**RYAN ANTHONY WARREN-HUNT**

### **FINAL ANATOMIC DIAGNOSES**

1. Six sharp force injuries of head:
  - a. Scalp and subgaleal hemorrhages
  - b. Right and left temporalis muscle hemorrhages
  - c. Nicks in outer table of right temporal bone and left side of occipital bone
2. Five sharp force injuries of neck:
  - a. Hemorrhages in anterior and posterior aspects of neck
3. Nine sharp force injuries of torso:
  - a. Sharp force injury defects of costal cartilage of right 6<sup>th</sup> rib, right ventricle of heart, liver, small intestine, posterior aspects of right 1<sup>st</sup> and 2<sup>nd</sup> ribs, spinous process of 2<sup>nd</sup> thoracic vertebra, and disc between 2<sup>nd</sup> and 3<sup>rd</sup> thoracic vertebrae
  - b. Hemopericardium (200 mL)
  - c. Right hemothorax (250 mL)
  - d. Left hemothorax (50 mL)
  - e. Hemoperitoneum (30 mL)
4. Twenty-four sharp force injuries of extremities
5. Abrasions of face, right earlobe, neck, chest, back, shoulders, left upper extremity, right knee, and left leg
6. Toxicology: ethanol (0.011%) and caffeine (presumptive) in peripheral blood

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## AUTOPSY REPORT

Case Number: 25-05604

**CAUSE OF DEATH:** Multiple Sharp Force Injuries

**MANNER OF DEATH:** HOMICIDE

**CIRCUMSTANCES OF DEATH:** Assaulted by other person(s)

  
\_\_\_\_\_  
Mark J. Shuman, M.D.

DATE: 1/17/2026

*NOTICE: Dr. Stacey Simons, the pathologist who performed the autopsy examination, is no longer with the Office of the Clark County Coroner/Medical Examiner. The medical examiner whose signature appears on this page did not perform the autopsy. This report was generated by Dr. Mark Shuman based on photographs and Dr. Simon's notes obtained at the time of the autopsy examination. Following review of the investigative report, photographs, toxicology, and histology, this Forensic Pathologist, Dr. Mark J. Shuman agrees with the cause of death and manner of death as determined by Dr. Simons.*

# EXHIBIT 7



## NMS Labs

CONFIDENTIAL

200 Welsh Road, Horsham, PA 19044-2208

Phone: (215) 657-4900 Fax: (215) 657-2972

e-mail: nms@nmslabs.com

Robert A. Middleberg, PhD, F-ABFT, DABCC-TC, Laboratory Director

### Toxicology Report

Report Issued 08/20/2025 16:48

To: 10294

Clark County Coroner's Office  
Attn: Forensic Supervisor  
1704 Pinto Lane  
Las Vegas, NV 89106

Patient Name WARREN-HUNT, RYAN (TENT) A  
Patient ID 2025-05604  
Chain 25350660  
DOB Not Given  
Sex Male  
Workorder 25350660

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### Positive Findings:

| Analyte                           | Result      | Units    | Matrix Source          |
|-----------------------------------|-------------|----------|------------------------|
| Ethanol                           | 11          | mg/dL    | 001 - Peripheral Blood |
| Blood Alcohol Concentration (BAC) | 0.011       | g/100 mL | 001 - Peripheral Blood |
| Caffeine                          | Presump Pos | mcg/mL   | 001 - Peripheral Blood |

See Detailed Findings section for additional information

Physician/Pathologist Name: S. SIMONS

### Testing Requested:

| Test  | Test Name                              |
|-------|----------------------------------------|
| 8052B | Postmortem, Expanded, Blood (Forensic) |

### Specimens Received:

| ID  | Tube/Container          | Volume/<br>Mass | Collection<br>Date/Time | Matrix Source    | Labeled As    |
|-----|-------------------------|-----------------|-------------------------|------------------|---------------|
| 001 | Gray Stopper Glass Tube | 10.75 mL        | 08/12/2025 09:32        | Peripheral Blood | 2025-05604 /A |
| 002 | Gray Stopper Glass Tube | 5 mL            | 08/12/2025 09:32        | Peripheral Blood | 2025-05604 /B |
| 003 | Red Stopper Glass Tube  | 4 mL            | 08/12/2025 09:32        | Vitreous Fluid   | 2025-05604 /C |
| 004 | Clear Cap Plastic Tube  | 9 mL            | 08/12/2025 09:32        | Urine            | 2025-05604 /D |

All sample volumes/weights are approximations.

Specimens received on 08/13/2025.

### Detailed Findings:

| Analysis and Comments                                                                           | Result      | Units    | Rpt. Limit | Specimen Source        | Analysis By  |
|-------------------------------------------------------------------------------------------------|-------------|----------|------------|------------------------|--------------|
| Ethanol                                                                                         | 11          | mg/dL    | 10         | 001 - Peripheral Blood | Headspace GC |
| Blood Alcohol Concentration (BAC)                                                               | 0.011       | g/100 mL | 0.010      | 001 - Peripheral Blood | Headspace GC |
| Caffeine                                                                                        | Presump Pos | mcg/mL   | 0.20       | 001 - Peripheral Blood | LC/TOF-MS    |
| This test is an unconfirmed screen. Confirmation by a more definitive technique is recommended. |             |          |            |                        |              |
| Ethanol                                                                                         | Confirmed   | mg/dL    | 10         | 001 - Peripheral Blood | Headspace GC |

**Examination of the specimen(s) submitted did not reveal any reportable findings by procedure(s) outlined in the accompanying Analysis Summary, other than those listed above. Interpretation of reported findings should be based on the totality of available case information. Reference information is not case-specific but is provided as a general guide.**

### Reference Comments:

1. Ethanol (Ethyl Alcohol) - Peripheral Blood:

Ethyl alcohol (ethanol, drinking alcohol) is a central nervous system depressant and can cause effects such as impaired judgment, reduced alertness and impaired muscular coordination. Ethanol can also be a product of decomposition or degradation of biological samples.

Unless alternate arrangements are made by you, the remainder of the submitted specimens will be discarded thirteen (13) months from the date of this report; and generated data will be discarded five (5) years from the date the analyses were performed. Chain of custody documentation has been maintained for the analyses performed by NMS Labs.

Workorder 25350660 was electronically signed on 08/20/2025 15:33 by:

*Brianna Peterson*

Brianna L. Peterson, Ph.D., F-ABFT  
Forensic Toxicologist

### Analysis Summary and Reporting Limits:

The following test(s) were performed for this case; the scope of each test includes the analyte(s) listed along with the associated reporting limit(s). The reporting limit is the lowest concentration of the analyte that will be reported as positive. Only results that meet reporting criteria at or above the reporting limit appear in the Positive Findings section of the report.

Test 52250B - Alcohols and Acetone Confirmation, Blood (Forensic): 001 - Peripheral Blood

-Analysis by Headspace Gas Chromatography (GC) for:

| Analyte | Rpt. Limit | Analyte     | Rpt. Limit |
|---------|------------|-------------|------------|
| Acetone | 5.0 mg/dL  | Isopropanol | 5.0 mg/dL  |
| Ethanol | 10 mg/dL   | Methanol    | 10 mg/dL   |

Test 8052B - Postmortem, Expanded, Blood (Forensic): 001 - Peripheral Blood

-Analysis by Enzyme-Linked Immunosorbent Assay (ELISA) for:

| Analyte      | Rpt. Limit   | Analyte     | Rpt. Limit |
|--------------|--------------|-------------|------------|
| Barbiturates | 0.040 mcg/mL | Salicylates | 120 mcg/mL |
| Cannabinoids | 10 ng/mL     |             |            |



CONFIDENTIAL

Workorder 25350660  
Chain 25350660  
Patient ID 2025-05604

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### Analysis Summary and Reporting Limits:

-Analysis by Headspace Gas Chromatography (GC) for:

| <u>Analyte</u> | <u>Rpt. Limit</u> | <u>Analyte</u> | <u>Rpt. Limit</u> |
|----------------|-------------------|----------------|-------------------|
| Acetone        | 5.0 mg/dL         | Isopropanol    | 5.0 mg/dL         |
| Ethanol        | 10 mg/dL          | Methanol       | 10 mg/dL          |

-Analysis by High Performance Liquid Chromatography/Time of Flight-Mass Spectrometry (LC/TOF-MS) for: The following is a general list of analyte classes included in this screen. The detection of any specific analyte is concentration-dependent. Note, not all known analytes in each specified analyte class are included. Some specific analytes outside of these classes are also included. For a detailed list of all analytes and reporting limits, please contact NMS Labs. Amphetamines, Anticonvulsants, Antidepressants, Antihistamines, Antipsychotics, Benzodiazepines, CNS Stimulants, Cocaine and Metabolites, Hallucinogens, Hypnosedatives, Muscle Relaxants, Non-Steroidal Anti-Inflammatory Agents, Opiates and Opioids.

This test is not approved by New York State.

# EXHIBIT 8

Date: March 2, 2026

To: Las Vegas Metropolitan Police Department  
Submitted via online portal on 3/2/2026

Re: Public records request – Event #250800043242

To whom it may concern:



4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
702-366-1226  
[aclunv.org](http://aclunv.org)

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) and its associated subdivisions as detailed below.

#### **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 records in LVMPD's possession related to event #250800043242 (investigation into homicide of Ryan Anthony Warren-Hunt at Southern Desert Correctional Center on 8/11/2025), including but not limited to:
  - a. Incident, investigation, and/or crime scene reports
  - b. Transcript or recording of 911 call reporting the homicide
  - c. Photographs documenting the crime scene
  - d. Records of any communications with NDOC Inspector General Supervisor Shields, SDCC Sergeant Tate, or NDOC Inspector General Vanzant related to this event
  - e. Witness statements taken at the scene
  - f. Inventory of any of Mr. Warren-Hunt's property at the time of his death
  - g. Records of any arrests or charges related to this event



4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
702-366-1226  
[aclunv.org](http://aclunv.org)

### 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 and are not sought for commercial interest. As a nonprofit 501(c)(3) and 501(c)(4) organization, the 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 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 3/9/2026. 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 the 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 [bennett@aclunv.org](mailto:bennett@aclunv.org).

Best,

Danielle Bennett  
Staff Attorney  
American Civil Liberties Union of Nevada



4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
702-366-1226  
[aclunv.org](http://aclunv.org)

# EXHIBIT 9

# OJ

## Other Jurisdiction's Record

LVMPD is not the custodian of record for the records you seek.

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, which defines “records of criminal history.” Pursuant to NRS 179A.070(2)(j), “[r]ecords which originated in an agency other than an agency of criminal justice in this State” are excluded from the definition and thus confidential.

The record you seek is not within LVMPD's custody and control. Rather, the record is within the custody and control of a different governmental entity. In particular, and pursuant to NRS 239.0107(1)(b), please contact the Clark County Coroner's Office at 702-455-3210.

# EXHIBIT 10

# LEP

## Law Enforcement Privilege WITHHELD

The record(s) you seek are law enforcement records that pertain to an open criminal investigation and/or criminal proceedings.

A law enforcement agency may withhold records under the Nevada Public Records Act when its interest in nondisclosure clearly outweighs the public's presumed right to access. *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 880, 266 P.3d 623, 628 (2011). There is a presumption that records are not confidential, that exceptions must be narrowly construed, that redactions are preferred over withholding, and that the purpose of the Nevada Public Records Act is to facilitate government transparency. However, Nevada law and public policy recognize the importance of maintaining the integrity of open and active criminal investigations. See, for example:

- NRS 179A.070 – 179A.100 (strictly regulating the dissemination of records of criminal history; in particular, there is no requirement to disseminate records of criminal history to the general public; moreover, records of criminal history are not public records pursuant to NRS 239.010(1) (listing statutes that are exempted from the Nevada Public Records Act, including NRS 179A.070).
- *Donrey v. Bradshaw*, 106 Nev. 630, 636, 798 P.2d 144, 148 (1990) (in a public records case, recognizing that law enforcement files could be confidential when pertaining to a “pending or anticipated criminal proceeding” or if there is a danger of “denying someone a fair trial” and concluding that records could be made public because there was “no pending or anticipated criminal proceeding; there [were] no confidential sources or investigative techniques to protect; there was no possibility of denying someone a fair trial; and there was no potential jeopardy to law enforcement personnel.” *Id.* at 636, 798 P.2d at 148.
- *Reno Newspapers v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 627 (2011) (recognizing that the balancing test first announced in *Donrey* had been modified by legislative changes to the Nevada Public Records Act, but nonetheless noting that the result in *Donrey* was “based on the facts that no criminal proceeding was pending or anticipated, no confidential sources or investigative techniques were contained in the

report, there was no possibility of denying anyone a fair trial, and disclosure did not jeopardize law enforcement personnel”).

- NRS 49.335 – 49.355 (making the identity of informants who provide information to law enforcement confidential until they testify).
- *Las Vegas Metro. Police Dep't v. Anderson (In re 12067 Oakland Hills, Las Vegas)*, 134 Nev. 799, 806, 435 P.3d 672, 678 (Nev. Ct. App. 2018) (noting that, generally, the police do not need to return evidence seized from its owner if the “property [is] related to an ongoing criminal investigation”).
- Att. Gen. Op. 83-3 (recognizing the “legitimate public policy interests in maintaining confidentiality of criminal investigation records and criminal reports”).
- Nev. Const., art. I, § 8A (Marsy’s Law, constitutionalizing victims’ rights to privacy, safety, and a diligent pursuit of justice).
- NRS 174.235 (making the disclosure of police files and evidence collected subject to strict discovery rules in open criminal prosecutions); see also *Tennessean v. Metro. Gov't of Nashville & Davidson Cty.*, 485 S.W.3d 857 (Tenn. 2016) (interpreting criminal rule of procedure similar to NRS 174.235 and holding that discovery of materials gathered by state for use in criminal prosecution may be obtained by defendant pursuant to rules of discovery, not by newspaper through a public records request); *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).
- NRS 179.045(4) (making search warrant applications, which regularly contain detailed facts gathered in open criminal investigations, confidential upon a showing of good cause).
- *In re Search Warrants Regarding Seizure of Documents*, 2023 WL 2861201 (Nev. Ct. App. 2023) (unpublished) (holding that good cause existed to keep search warrant application under seal because dissemination would threaten the integrity of an active and ongoing criminal investigation).
- NRS 172.245. Evidence and information obtained by grand juries during their investigations are confidential. The purposes of confidentiality include: (1) To prevent the escape of those whose indictment may be contemplated. (2) To insure the utmost freedom to the grand jury in its deliberations and to prevent persons subject to indictment, or their friends, from importuning the grand jurors. (3) To prevent subornation of perjury or tampering with the witnesses who may testify before the grand jury and later appear at the trial of those indicted by it. (4) To encourage free and untrammelled disclosures by persons who have information with respect to the

commission of crimes. (5) To protect an innocent accused, who is exonerated, from disclosure of the fact that he has been under investigation. *Shelby v. Sixth Judicial Dist. Court*, 82 Nev. 204, 210, 414 P.2d 942, 945 (1966).

- *Houston v. County of Maricopa*, — F.4th —, 2024 U.S. App. LEXIS 22564, 2024 WL 4048897 (9th Cir. Sep. 5, 2024) (holding that dissemination of a pretrial detainees' booking photo to the public is generally unconstitutional under the substantive due process clause of the 14<sup>th</sup> Amendment because it constitutes punishment without due process).

Given the totality of the law governing the disclosure of information concerning open investigations, the following non-exclusive factors are considered in evaluating whether law enforcement interests in confidentiality clearly outweigh the public's presumed interest in access:

- Whether premature disclosure of information about the open investigation may allow individuals to ascertain that they are or were the subject of the investigation, as well as the focus of the investigation. This may lead an individual to alter behavior, conceal evidence of wrongdoing, delete or destroy evidence, or attempt to influence witnesses or adjust communication methods or content to avoid further collection of evidence or to avoid apprehension.
- Whether premature disclosure of information may provide bad actors with the ability to falsify or misrepresent information, such as encounters, activities, or associations that pose evidence. This may impact testimony and representations of future witnesses and/or suspects, which would disable or hinder the ability to fully evaluate such evidence and, therefore, obstruct enforcement, implementation, and application of the law.
- Whether protecting the integrity of the investigation better enables detectives and prosecutors to evaluate the credibility of any information that may come in the future. If a future witness were to know what other witnesses have said, or what other evidence has revealed, the future witness' statements will not be as reliable.
- Whether witnesses and informants have provided information that, if disclosed, could create danger or at least embarrassment to them.
- Whether any privacy interests and/or constitutional rights of any victims, witnesses, or subjects would be impacted by disclosure.
- Whether premature disclosure would have a chilling effect on future witnesses coming forward to provide information in this or other cases.
- Whether law enforcement officers have acted in an undercover capacity, or whether any witnesses have provided information as confidential informants.

- Whether premature disclosure poses a risk to any future prosecution. Criminal defendants have significant constitutional rights, like the right to receive exculpatory and impeachment material and the right to a fair trial. A criminal defendant should generally obtain information against them before the public or any third party.
- Whether disclosure would reveal confidential techniques or tactics that would risk enabling subjects to circumvent the law in the future.

In this case, after a careful examination of all factors, law enforcement's interest in nondisclosure clearly outweighs the public's presumed interest in access. Therefore, the records you seek are confidential, at least at this time, and must be withheld. As the investigation proceeds, it is anticipated that records will become more available, and we therefore encourage you to submit a new request in the future.

# EXHIBIT 11

# No Record(s) Responsive

We have researched your request with the information provided and determined that there are no responsive records.

# EXHIBIT 12

# Communications

Here, you are seeking records maintained by and in the custody of LVMPD Communications Bureau. Please submit your request to the Communications Research Office by following the link below:

[Communications Research Office Procedures | Las Vegas Metropolitan Police Department \(lvmpd.com\)](#)