

**FIRST JUDICIAL DISTRICT COURT OF NEVADA  
CARSON CITY**

2025 AUG 15 AM 9:13

AMERICAN CIVIL LIBERTIES UNION OF  
NEVADA,

Petitioner,

vs.

THE STATE OF NEVADA, DEPARTMENT OF  
MOTOR VEHICLES, a governmental entity,

Respondent.

Case No.: 25 EW 000261B

Department: II

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**APPENDIX FOR PETITION FOR WRIT OF MANDAMUS  
VOLUME II OF IV**

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**AMERICAN CIVIL LIBERTIES  
UNION OF NEVADA**

SADMIRA RAMIC, ESQ.

Nevada State Bar No. 15984

CHRISTOPHER M. PETERSON, ESQ.

Nevada State Bar No. 13932

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peterson@aclunv.org

*Attorneys for Petitioner*

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DATED this 15<sup>th</sup> day of August 2025

# **EXHIBIT 26**

June 6, 2025

Lori M. Story  
Chief Deputy Attorney  
Nevada Attorney General Transportation Division

***RE: ACLUNV Public Records Requests***

***Submitted via email***

Dear Ms. Story:

My name is Sadmira Ramic, and I am an attorney with American Civil Liberties Union of Nevada (ACLU of Nevada). I am reaching out regarding the production of documents in the custody and control of the Nevada Department of Motor Vehicles (DMV) pursuant to Nevada's Public Records Act (NPRa). To put it simply, the ACLU of Nevada requested documents from the DMV through public records requests, but the DMV refused to honor the request in a way that clearly violates the NPRa.

ACLU of Nevada submitted four separate but related public records requests to the DMV via the DMV's online "Public Records Center" portal. The requests were submitted on February 3, 2025, February 11, 2025, March 8, 2025, and April 10, 2025. To this date, the DMV has not provided any records that the ACLU of Nevada has requested. The DMV has not clarified whether it has in its possession documents responsive to the requests or asserted any privileges while citing applicable law as required by NRS 239.0107(1)(d) in response to the requests. Additionally, the DMV did not provide redacted, concealed, or separated records as required under NRS 239.010(3).

While ACLU of Nevada is prepared to fully vindicate its legal rights under the law, it is offering to resolve this dispute through a resolution that will spare the parties the expense of time, resources, and potential attorney fees in litigation.

#### **I. Nevada Public Records Act**

Nevada Revised Statute (NRS) § 239.010(1) mandates that, unless a record is confidential, all public books and public records of a governmental entity must be open at all times during office hours to inspection by any person, and may be fully copied[.]”

After receiving a public records request, NRS 239.0107 requires the governmental entity to either:

- provide copies of the records;
- notify the requestor that the entity does not have custody of the records and, if known, provide the entity that does;



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- provide a reason in writing that the record is not available and the earliest date the entity would be able to provide the record; or
- cite specific statutes or other legal authority that make the record confidential.

The governmental entity must respond to any “written or oral request” for public records within five (5) business days. NRS 239.0107(1). “Any exemption, exception or balancing of interests which limits or restricts access to public books and records by members of the public must be construed narrowly.” NRS 239.001(3).

When a government agency claims confidentiality of a record or a portion of a record, they must provide notice of the denial of the request and “a citation to the specific statute or other legal authority that makes . . . the records, or part thereof, confidential.” *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 885, 266 P.3d 623, 631 (2011); NRS 239.0107(1)(d). Only if the entirety of the record contains confidential information can a record be withheld entirely rather than redacted. *See Republican Att’ys Gen. Ass’n v. Las Vegas Metro. Police Dep’t*, 136 Nev. 28, 36, 458 P.3d 328, 335 (2020) (stating that redaction of records should be favored over withholding records unless all portions of the record is confidential).

## II. ACLUNV Public Records Requests

### A. February 3, 2025, Request

On February 3, 2025, the ACLU of Nevada submitted a request for public records to the DMV (“February 3 Request”). In this request, the ACLU of Nevada sought “[c]opies of any departmental policies and/or procedures relating to sharing information about an individual’s immigration status with federal or state agencies.”

On February 4, 2025, the DMV responded to the request with a screenshot of NRS 481.063(11). In its email, the DMV stated that it provided this screenshot because the information in NRS 481.063(11) “are the guidelines for release immigration information.” The screenshot of NRS 418.063(11) provided by the DMV via email states:

“The Director shall not release any personal information from a file or record relating to a license, identification card or title or registration of a vehicle to any person or to any federal, state or local governmental entity for any purpose relating to the enforcement of immigration laws unless the requester submits a written release from the person about whom the information is requested or the Director releases the personal information pursuant to a lawful order, subpoena or warrant issued by a court of competent jurisdiction. If the Director releases personal information pursuant to this subsection in response to an order, subpoena or warrant, the Director shall not release personal information beyond what is specifically required to comply with the order, subpoena or warrant.” *Id.*



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The DMV did not explain in this email whether it had responsive documentation that it intended to release at a later date or cite to applicable law as required by NRS 239.0107(1)(d) to justify withholding the records.

### **B. February 11, 2025 Request**

On February 11, 2025, the ACLU of Nevada submitted another request for public records to the DMV which sought:

- “1. Any memoranda, policies, trainings, or guidelines currently in effect related to NRS 481.063 and immigration-related information sharing;
2. Any memoranda, policies, trainings, or guidelines currently in effect related to cancellation of driver’s licenses due to a license holder’s immigration status;
3. Any memoranda, policies, trainings, or guidelines currently in effect related to collaborating with Immigration and Customs Enforcement (ICE) officers;
4. Any communications with ICE between January 1, 2024, to present relating to an individual’s immigration status. For help narrowing down the request, please utilize the following key words in your search: “ICE,” “ERO,” “DHS,” “Deportation Officer,” “illegal aliens,” “privilege card,” “immigration status,” “Driver Authorization Card,” “DAC,” “deport,” “illegally present,” “illegally in the United States,” “removal order,” “immigration judge.”
5. Any communications with ICE between January 1, 2024, to present relating to verifying information against a file or record including, but not limited to, current and previous address of an individual, names of family members, and license plate numbers.”

The DMV initially directed ACLU of Nevada to review the response to the February 3 Request and stated that the request had been completed and closed. After ACLU of Nevada spoke with a DMV representative on the phone, the request was reopened.

The DMV and ACLU of Nevada continued to correspond via email and telephone about the request. Throughout the correspondence, the DMV refused to provide responsive documents and failed to address clarifying requests from the ACLU of Nevada. This includes ACLU of Nevada’s supplemental request to the DMV for information on what documents are sent to the federal government once someone applies for a license due to the DMV stating: “We will receive the immigration document from the individuals that want to apply for a license, and we will send the documents to immigration. The federal government is who tells the department if they are allowed a license or not. DMV does not have any involvement with the status of a driver license immigration status.”

Additionally, the DMV did not indicate whether it had responsive documents within its custody that it intended to release at a later date, failed to cite to applicable Nevada law



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that would justify withholding the documents as required by NRS 239.0107(1)(d), and did not provide redacted, concealed, or separated records as required under NRS 239.010(3).

Ultimately the DMV closed out the request without turning over a single document stating: “The information that you are requesting was reviewed for ICE communications is not something that is not [sic] considered public information and cannot be released, any communication we have to ICE is only for investigations purposes.”

There is no “investigation purposes” privilege that justifies nondisclosure in any Nevada statute, regulation, or case law, and the DMV did not cite to any authority to support this assertion.

### **C. March 10, 2025 Request**

On March 10, 2025, ACLU of Nevada submitted another request for public records to the DMV (“March 10 Request”). After ACLU of Nevada provided clarification that it was seeking all current DMV policy and procedure manuals, the DMV closed out the request stating that it was a duplicative request. ACLU of Nevada continued to request the documents because the request differed from the February 3 and February 11 requests and even if it was duplicative, it is not a legal basis to deny a public records request. The DMV refused to turn over any documents claiming that the records are exempt from disclosure because “[t]he DMV policy and procedures are not public Records.”

Again, the DMV did not: 1) explain whether it had responsive documentation that it intended to release at a later date; 2) cite to a specific statute or other legal authority as required by NRS 239.0107(1)(d) that justifies its withholding of these records; and 3) provide redacted, concealed, or separated records as required under NRS 239.010(3).

### **D. April 8, 2025 Request**

On April 8, 2025, the ACLU of Nevada submitted another request for public records to the DMV. The request sought “all email communications between DMV employees and email addresses ending in “@ice.dhs.gov.” The DMV refused to turn over any documents and provided the following responses via email through its communications with ACLU of Nevada regarding the request:

- 1) “It is a duplicative request”;
- 2) “The information that you are requesting was reviewed for ICE communications is not something that is not [sic] considered public information and cannot be released, any communication we have to ICE is only for investigations purposes”;
- 3) “According to NRS 481.063: ‘The Director shall not release any personal information from a file or record relating to a license, identification card or title or registration of a vehicle to any person or to any federal, state or local government entity for any purpose relating to the enforcement of immigration laws unless the requester submits a written release from the person about whom the information is



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- requested or the Director releases the personal information pursuant to a lawful order, subpoena or warrant issued by a court of competent jurisdiction"; and
- 4) "We have also taken legal advice where we've asked if we can share any communication regarding immigration, and we were advised that we cannot proceed in doing so. Please consider this case denied."

The DMV did not explain in these emails whether it had responsive documents and none of the responses justify withholding the records. There is no "investigation purposes" privilege that justifies nondisclosure in any Nevada statute, regulation, or case law, and the DMV did not cite to a specific statute or other legal authority as required by NRS 239.0107(1)(d) indicating as such. Additionally, NRS 481.063 is inapplicable because the request did not seek personal information relating to a license, identification card or title or registration of a vehicle and ACLU of Nevada did not request the information for immigration enforcement purposes.

Even if the DMV had sufficient legal justification for withholding these records, it did not provide redacted, concealed, or separated records as required under NRS 239.010(3).

### **III. Necessary remedial action**

ACLU of Nevada will seek legal action unless the DMV makes available all documents requested by the ACLU of Nevada and otherwise come into compliance with the NPRA as described above within 10 days of this letter.

If I can be of further assistance in explaining this demand do not hesitate to call or email me at your earliest convenience. We look forward to your response to this letter by June 10, 2025. If you do not provide a response, we will pursue other avenues to ensure that the DMV complies with its statutory obligations.

Sincerely,



Sadmira Ramic  
Senior Staff Attorney  
ACLU of Nevada  
[Ramic@aclunv.org](mailto:Ramic@aclunv.org)  
702-550-9324



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# **EXHIBIT 27**

**From:** [Lori M. Story](#)  
**To:** [Sadmira Ramic](#)  
**Subject:** RE: ACLU of Nevada Demand Letter  
**Date:** Monday, June 9, 2025 8:27:24 AM

**This Message Is From an External Sender**

This message came from outside your organization.

Ms. Ramic,

I am in receipt of your correspondence and will reach out to my client in regard to this correspondence.

*Best,*

*Lori*

Lori M. Story  
Chief Deputy Attorney General  
Transportation | DMV/DPS  
775-888-7516

Notice of Confidentiality:

This preceding e-mail message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. SS 2510-2521, and contain information intended for the specific individual(s) only or constitute non-public information. This information may be confidential. If you are not the intended recipient you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify me immediately by E-mail, and delete the original message. Use, dissemination, distribution or reproduction of this message by unintended recipients is not authorized and may be unlawful.

**From:** Sadmira Ramic <ramic@aclunv.org>  
**Sent:** Friday, June 6, 2025 11:17 AM  
**To:** Lori M. Story <LStory@ag.nv.gov>  
**Subject:** ACLU of Nevada Demand Letter

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Good morning,

My name is Sadmira Ramic, and I am the senior staff attorney with the ACLU of Nevada.

Please see the attached demand letter concerning public record requests submitted by the ACLU of Nevada to the Nevada Department of Transportation.

For your convenience, I attached an exhibits list which contains the submitted public record requests and all correspondence between the ACLU of Nevada and the DMV.

My understanding is that you are general counsel for the DMV. If this letter should be sent to someone else, please let me know.

Thank you,

Sadmira Ramic, Esq. (*she/her*)

Senior Staff Attorney

ACLU of Nevada

Phone: 775-828-2210

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

# **EXHIBIT 28**

**From:** [Sadmira Ramic](#)  
**To:** [Jared M. Frost](#)  
**Subject:** RE: ACLU public record requests to DMV  
**Date:** Monday, June 16, 2025 3:12:00 PM

---

Hi Jared,

Your summary is correct.

I would add two things:

1. The DMV will provide supplemental responses including any redacted documents; and
2. Regarding the discrepancy in the DMV's responses concerning information sharing with ICE, we would like to see the documents that are sent to the federal government, including ICE, once someone applies for a license and any policies and procedures related to this practice due to the DMV stating: "We will receive the immigration document from the individuals that want to apply for a license, and we will send the documents to immigration. The federal government is who tells the department if they are allowed a license or not. DMV does not have any involvement with the status of a driver license immigration status."

**From:** Jared M. Frost <JFrost@ag.nv.gov>  
**Sent:** Monday, June 16, 2025 2:33 PM  
**To:** Sadmira Ramic <ramic@aclunv.org>  
**Subject:** ACLU public record requests to DMV

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Hello Sadmira and thank you for speaking with me this afternoon about your June 6, 2025 letter concerning DMV compliance with the NPRA. Here is a brief summary of what I understand to be the key points of agreement reached during the call:

- DMV will provide supplemental responses to the February 3, February 11 and April 8 public records requests outlined in the June 6 letter through its GovQA records platform, responses will at minimum confirm whether DMV identified records responsive to the requests and provide legal citation for any withholdings/redactions
- You agreed to narrow the March 10 request for "all DMV current DMV policy and procedure manuals" to the requests for "memoranda, policies, trainings, or guidelines" related to specific topics set forth in parts 1-3 of the February 11 request, DMV's supplemental response to the February 11 request will accordingly satisfy the March 10 request
- You agreed to narrow the February 11 and April 8 requests for email communications to a single record set comprised of all email communications between DMV employees and email addresses ending in "@ice.dhs.gov" for the time period January 1, 2024 to the date the DMV records team runs an email

search to gather potentially-responsive emails

You also pointed out a possible discrepancy in the DMV's responses concerning information sharing with ICE and expressed interest in reviewing related policies or examples of communication exchanges. You further asked that DMV provide you with an estimate of when the agency can provide the supplemental responses. Does that sound about right?

Thanks and please let me know if this comports with your recollection of the call and whether I've omitted any important information.

Kind regards,

Jared M. Frost  
Senior Deputy Attorney General  
Transportation Division - DMV/DPS  
702-486-3177  
[jfrost@ag.nv.gov](mailto:jfrost@ag.nv.gov)

# **EXHIBIT 29**

**From:** [Sadmira Ramic](#)  
**To:** [Jared M. Frost](#)  
**Subject:** RE: ACLU public record requests to DMV  
**Date:** Thursday, June 26, 2025 9:16:00 AM

---

Good morning,

I am following up to see if DMV has provided a timeline for when the documents will be produced.

Thank you.

**From:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>  
**Sent:** Monday, June 16, 2025 3:16 PM  
**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Subject:** RE: ACLU public record requests to DMV

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Copy that and thanks. I'll follow up with the DMV and do what I can to keep this moving forward.

Jared M. Frost  
Senior Deputy Attorney General  
Transportation Division - DMV/DPS  
702-486-3177  
[jfrost@ag.nv.gov](mailto:jfrost@ag.nv.gov)

**From:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Sent:** Monday, June 16, 2025 3:12 PM  
**To:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>  
**Subject:** RE: ACLU public record requests to DMV

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Hi Jared,

Your summary is correct.

I would add two things:

1. The DMV will provide supplemental responses including any redacted documents; and
2. Regarding the discrepancy in the DMV's responses concerning information sharing with ICE, we would like to see the documents that are sent to the federal government, including ICE, once someone applies for a license and any policies and procedures related to this practice due to the DMV stating: "We will receive the immigration document from the individuals that want to apply for a license, and we will send the documents to immigration. The federal government is who tells the department if they are allowed a license or not. DMV does not

# **EXHIBIT 30**

**From:** [Jared M. Frost](#)  
**To:** [Sadmira Ramic](#)  
**Subject:** RE: ACLU public record requests to DMV  
**Date:** Thursday, June 26, 2025 1:09:23 PM

---

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Hi Sadmira,

I spoke with the DMV records group and am informed they sent out a status update on June 16 stating they were processing the requests and would follow up “in about two weeks.” The communication I was forwarded appears to have been sent to Danielle Bennett; I assume this was before we requested that you be added as a recipient. Based on my conversation today DMV will likely need additional time to review potentially-responsive records beyond the two weeks and it is my understanding they will provide another status update in the coming days.

Jared M. Frost  
Senior Deputy Attorney General  
Transportation Division - DMV/DPS  
702-486-3177  
[jfrost@ag.nv.gov](mailto:jfrost@ag.nv.gov)

---

**From:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Sent:** Thursday, June 26, 2025 9:17 AM  
**To:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>  
**Subject:** RE: ACLU public record requests to DMV

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Good morning,

I am following up to see if DMV has provided a timeline for when the documents will be produced. Thank you.

---

**From:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>  
**Sent:** Monday, June 16, 2025 3:16 PM  
**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Subject:** RE: ACLU public record requests to DMV

Copy that and thanks. I'll follow up with the DMV and do what I can to keep this moving forward.

Jared M. Frost  
Senior Deputy Attorney General

# **EXHIBIT 31**

**From:** [Sadmira Ramic](#)  
**To:** [Jared M. Frost](#)  
**Subject:** RE: ACLU public record requests to DMV  
**Date:** Tuesday, July 8, 2025 10:52:00 AM

---

Good morning,

We still have not received any records from the DMV and no update has been provided to us concerning the timeline.

Can you please provide the date that the DMV reasonably anticipates to have the records available?

**From:** Sadmira Ramic  
**Sent:** Thursday, June 26, 2025 5:06 PM  
**To:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>  
**Subject:** RE: ACLU public record requests to DMV

Thanks.

Typically we would be more amendable to giving more time, but these are requests we made back in February, March, and April. We put in the effort throughout that time to work with the DMV and they produced nothing.

My understanding of the statute is that the entity is supposed to provide the records as they become available, and given the lapse in time, that is what we would ask.

**From:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>  
**Sent:** Thursday, June 26, 2025 2:47 PM  
**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Subject:** RE: ACLU public record requests to DMV

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Hi again,

I reiterated today the importance of copying you on communications related to the request so I think we should be good in that respect. My understanding is that DMV staff will need more time to gather additional communications per our agreement, review the record set for confidentiality and privilege, apply redactions as may be needed, and finalize the disclosure package. I don't know how much more time but the DMV should provide another status update by June 30. I typically advise against providing disclosures on a rolling basis for consistency and administrative reasons but understand you are anxious about delay and will continue to do what I can to move the process forward.

Jared M. Frost  
Senior Deputy Attorney General  
Transportation Division - DMV/DPS  
702-486-3177

# **EXHIBIT 32**

**From:** [Adrianna Vela](#)  
**To:** [Sadmira Ramic](#)  
**Cc:** [Jared M. Frost](#); [Amanda Manzo](#); [Brenda Witt](#); [Roseann Smith](#); [Hailey Foster](#)  
**Subject:** PRR  
**Date:** Thursday, July 10, 2025 11:08:18 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[DMV 2.10.1 Media Access.doc](#)

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Good morning,

My team and I have been working diligently on the current ACLU PRRs, and I tried CC'ing you on GOVQA however it is saying the email is invalid. I am responding in GOVQA and here in email so everyone is aware of the progress of the requests.

Responses are in Blue.

**Request number - R001750-020325** – “ACLU Copies of any departmental policies and/or procedures relating to sharing information about an individual’s immigration status with federal or state agencies” – **Our departments policy and procedure is attached, please review.**

**Request number- R001770-021125**

1. “Any memoranda, policies, trainings, or guidelines currently in effect related to NRS 481.063 and immigration-related information sharing;” **Addressed in Tonya’s responses yesterday- This is also related to the attachment.**

2. “Any memoranda, policies, trainings, or guidelines currently in effect related to cancellation of driver’s licenses due to a license holder’s immigration status;” **No specific provisions that speak directly about canceling a DL due to immigration status; DL issuance and withdrawals are already conducted under established procedure and practice for DL’s, REAL ID’s and DAC’s covered under PnP’s DL 1.13 and DL 6.09.**

3. “Any memoranda, policies, trainings, or guidelines currently in effect related to collaborating with Immigration and Customs Enforcement

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4. “Any communications with ICE between January 1, 2024 to present relating to an individual’s immigration status.” This is still in review, the department is informing you that we will need addition all, I will keep you in the loop and provide an update on July 25<sup>th</sup>, 2025

**Request number - R001968-040825** “Any and all email communications between any DMV email account and any email address ending in “@ice.dhs.gov” This is the same response as above - This is still in review, the department is informing you that we will need addition all, I will keep you in the loop and provide an update on July 25<sup>th</sup>, 2025

Warm regards,



Adrianna Vela | Tech IV  
Nevada Department of Motor Vehicles  
555 Wright Way, Carson City, NV 89711  
Work: (775)684-4590  
Email: [avela@dmv.nv.gov](mailto:avela@dmv.nv.gov)



# **EXHIBIT 33**

**From:** [Sadmira Ramic](#)  
**To:** [Adrianna Vela](#)  
**Cc:** [Jared M. Frost](#); [Amanda Manzo](#); [Brenda Witt](#); [Roseann Smith](#); [Hailey Foster](#)  
**Subject:** RE: PRR  
**Date:** Thursday, July 10, 2025 1:48:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Good afternoon,

Thank you for the update.

I am not sure why GOVQA is not permitting my email to be added. This is the correct email. Can you please make sure that any documents or communications that are uploaded in the portal are relayed to me through email?

To avoid any misunderstanding, I will respond using the same format as your email. My responses are in red.

**Request number - R001750-020325** – “ACLU Copies of any departmental policies and/or procedures relating to sharing information about an individual’s immigration status with federal or state agencies” – **Our departments policy and procedure is attached, please review.**

The policy attached relates to sharing information with the media. Can you please confirm whether there are other policies or procedures responsive to the request, and if so, whether you are claiming they are privileged? If it is DMV’s position that the records are privileged, please provide the relevant legal authority to support that position.

**Request number- R001770-021125**

1. “Any memoranda, policies, trainings, or guidelines currently in effect related to NRS 481.063 and immigration-related information sharing;” **Addressed in Tonya’s responses yesterday- This is also related to the attachment.**

Can you clarify what responses Tonya provided yesterday? I have not received anything. Again, the policy attached relates to sharing information with the media.

2. “Any memoranda, policies, trainings, or guidelines currently in effect

related to cancellation of driver's licenses due to a license holder's immigration status;" **No specific provisions that speak directly about canceling a DL due to immigration status; DL issuance and withdrawals are already conducted under established procedure and practice for DL's, REAL ID's and DAC's covered under PnP's DL 1.13 and DL 6.09.**

If I am understanding correctly, you are stating that the DMV only relies on PnP's DL 1.13 and 6.09 when determining whether to cancel someone's driver's license due to immigration related issues. If so, can you please provide copies of those policies/documents?

3. "Any memoranda, policies, trainings, or guidelines currently in effect related to collaborating with Immigration and Customs Enforcement (ICE) officers" **Spoke with Director's office, Contract staff and ISO staff, no agreements or contracts currently being discussed with federal Homeland Security agencies or Immigration/Customs Enforcement regarding information-sharing or collaboration**

The request extends beyond just formal agreements and contracts with ICE. Can you confirm whether there are any memoranda, policies, trainings, or guidelines currently in effect related to collaborating with Immigration and Customs Enforcement officers, and if so, produce the documents?

Of course, feel free to reach out if you have any questions or need clarification.

Thanks,  
Sadmira

**From:** Adrianna Vela <AVela@dmv.nv.gov>

**Sent:** Thursday, July 10, 2025 11:04 AM

**To:** Sadmira Ramic <ramic@aclunv.org>

**Cc:** Jared M. Frost <JFrost@ag.nv.gov>; Amanda Manzo <AManzo@dmv.nv.gov>; Brenda Witt <BWitt@dmv.nv.gov>; Roseann Smith <RoseannSmith@dmv.nv.gov>; Hailey Foster <HFoster@dmv.nv.gov>

**Subject:** PRR

**This Message Is From an External Sender**

This message came from outside your organization.

# **EXHIBIT 34**

**From:** [Adrianna Vela](#)  
**To:** [Sadmira Ramic](#)  
**Cc:** [Jared M. Frost](#); [Amanda Manzo](#); [Hailey Foster](#)  
**Subject:** RE: PRR  
**Date:** Monday, July 14, 2025 1:17:02 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[DL 1.13 Acceptable Documents and Identification Verification final \(2\) - signed.pdf](#)  
[DL-7.15 Renewals, Duplicate, Changes and Reprints - signed 1.pdf](#)  
[NCDL 3.13 Original Issuance 11.24 - signed.pdf](#)  
[CDL 2.07 Commercial Learner Permits \(CLP\).pdf](#)  
[DL-3.03 Identification Cards 02.2024 - signed.pdf](#)  
[CDL 3.13 Original Issuance 11.24 - signed.pdf](#)

**This Message Is From an External Sender**

This message came from outside your organization.

Hi,

Please let me clarify, when it says “Tonya response” that was the email with the Policy and Procedure stating that is for number one, that I had asked her. That is the correct policy and procedure, as it is for “Media and Sharing Information” which is what was requested. Now number 2 and 3 are attached, I did not include those the first time around my apologies. These Policies and Procedures are now also included in GOVQA-reference number R001770-021125

Lastly, I will not know if the ICE emails will be completed at that time on the 25<sup>th</sup>, I will keep you updated if we need more time or not.

Thank you!

Warm regards,



Adrianna Vela | Tech IV  
Nevada Department of Motor Vehicles  
555 Wright Way, Carson City, NV 89711  
Work: (775)684-4590  
Email: [avela@dmv.nv.gov](mailto:avela@dmv.nv.gov)



**From:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>

**Sent:** Thursday, July 10, 2025 3:08 PM

**To:** Adrianna Vela <AVela@dmv.nv.gov>

**Cc:** Jared M. Frost <JFrost@ag.nv.gov>; Amanda Manzo <AManzo@dmv.nv.gov>; Brenda Witt <BWitt@dmv.nv.gov>; Roseann Smith <RoseannSmith@dmv.nv.gov>; Hailey Foster <HFoster@dmv.nv.gov>

**Subject:** RE: PRR

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

Apologies for the back-to-back emails but I realized that I left one thing off.

For the emails between the DMV and ICE, you stated that you will have an update by July 25. Does that mean you believe the records will be available at that time?

**From:** Sadmira Ramic

**Sent:** Thursday, July 10, 2025 1:48 PM

**To:** Adrianna Vela <AVela@dmv.nv.gov>

**Cc:** Jared M. Frost <JFrost@ag.nv.gov>; Amanda Manzo <AManzo@dmv.nv.gov>; Brenda Witt <BWitt@dmv.nv.gov>; Roseann Smith <RoseannSmith@dmv.nv.gov>; Hailey Foster <HFoster@dmv.nv.gov>

**Subject:** RE: PRR

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I am not sure why GOVQA is not permitting my email to be added. This is the correct email. Can you please make sure that any documents or communications that are uploaded in the portal are relayed to me through email?

To avoid any misunderstanding, I will respond using the same format as your email. My responses are in red.

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are privileged, please provide the relevant legal authority to support that position.

**Request number- R001770-021125**

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Thanks,  
Sadmira

**From:** Adrianna Vela <[AVela@dmv.nv.gov](mailto:AVela@dmv.nv.gov)>

**Sent:** Thursday, July 10, 2025 11:04 AM

**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>

**Cc:** Jared M. Frost <[JFrost@ag.nv.gov](mailto:JFrost@ag.nv.gov)>; Amanda Manzo <[AManzo@dmv.nv.gov](mailto:AManzo@dmv.nv.gov)>; Brenda Witt <[BWitt@dmv.nv.gov](mailto:BWitt@dmv.nv.gov)>; Roseann Smith <[RoseannSmith@dmv.nv.gov](mailto:RoseannSmith@dmv.nv.gov)>; Hailey Foster <[HFoster@dmv.nv.gov](mailto:HFoster@dmv.nv.gov)>

**Subject:** PRR

Good morning,

My team and I have been working diligently on the current ACLU PRRs, and I tried CC'ing you on GOVQA however it is saying the email is invalid. I am responding in GOVQA and here in email so everyone is aware of the progress of the requests.

Responses are in Blue.

**Request number - R001750-020325** – “ACLU Copies of any departmental policies and/or procedures relating to sharing information about an individual’s immigration status with federal or state agencies” – **Our departments policy and procedure is attached, please review.**

**Request number- R001770-021125**

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Warm regards,



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555 Wright Way, Carson City, NV 89711  
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Email: [avela@dmv.nv.gov](mailto:avela@dmv.nv.gov)



# **EXHIBIT 35**

**From:** [NV DMV Records Division](#)  
**To:** [Danielle Bennett](#)  
**Cc:** [Sadmira Ramic](#)  
**Subject:** [Records Center] Public Records Request :: R001968-040825  
**Date:** Wednesday, July 23, 2025 2:38:15 PM

**This Message Is From an External Sender**

This message came from outside your organization.

--- Please respond above this line ---



Good afternoon,

Please review the attachments, as this completes the ticket for any and all ICE communications.

Thank you kindly,  
Adrianna

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

