

FIRST JUDICIAL DISTRICT COURT OF NEVADA
CARSON CITY

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AMERICAN CIVIL LIBERTIES UNION OF
NEVADA,

Petitioner,

vs.

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

Respondent.

Case No.: 25 EW 00026 1B

Department: II

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APPENDIX FOR PETITION FOR WRIT OF MANDAMUS
VOLUME IV OF IV

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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Attorneys for Petitioner

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EXHIBIT 37

From: [Sadmira Ramic](#)
To: [Jared M. Frost](#)
Subject: RE: ACLU public record requests to DMV
Date: Tuesday, July 29, 2025 12:29:00 PM

Good afternoon,

The DMV has provided email communications with ICE through the DMV portal. I am reviewing the documents and want to flag a few preliminary concerns:

1. There are a lot of redactions, and the DMV has not cited to a specific statute or other legal authority rendering those parts confidential. Can you please have them provide the legal basis for all redactions?
2. Based on the content in the emails provided, it appears that there are outstanding communications that would be responsive to the public records requests, but the DMV has not produced the documents. This includes group emails with DMV employees and ICE. If these records exist, the DMV is required to disclose them or otherwise provide notice that the communications are privileged while citing to legal authority that serves as a basis to withhold the documents in their entirety.
3. Our original request sought all communications between the DMV and ICE, which would include more than just emails. During our meeting on 6/16/2025, ACLU of Nevada did narrow it down to all email communications between DMV employees and email addresses ending in "@ice.dhs.gov." However, the emails provided reference other communications such as Signal groups and faxes. Can you please inform the DMV that we are seeking those records as well with the date range of January 1, 2025 to present? Given the ongoing concerns about disclosure, we would ask that the DMV preserve these records and not allow the deletion of the communications.

I am available to hop on a call if necessary.

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Thursday, July 24, 2025 9:05 PM
To: Jared M. Frost <JFrost@ag.nv.gov>
Subject: Re: ACLU public record requests to DMV

Thank you. I appreciate it.

Get [Outlook for iOS](#)

From: Jared M. Frost <JFrost@ag.nv.gov>
Sent: Thursday, July 24, 2025 8:41:41 PM
To: Sadmira Ramic <ramic@aclunv.org>
Subject: RE: ACLU public record requests to DMV

This Message Is From an External Sender

EXHIBIT 38

From: [Adrianna Vela](#)
To: [Sadmira Ramic](#)
Cc: [Jared M. Frost](#)
Subject: RE: ACLU public record requests to DMV
Date: Thursday, July 31, 2025 2:03:39 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

This Message Is From an External Sender

This message came from outside your organization.

Good afternoon,

Thank you for your response. Let me take some time to explain the attachments we have sent to you. 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 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."*

The department cannot release personal information unless your agency has written consent from each individual, or specific individuals, that give you authorization to receive such information.

In regards to your other concern, the original request asks to provide "any and all email communications between any DMV email account and any email address ending in "@ice.dhs.gov." We have fulfilled this request since we have provided to you all email communications that our data team extracted. If you are looking for other means of communication, in which there are none, that would be a separate request that you would have to submit.

At this time, we have deemed this request fulfilled and it will be closed. Thank you for your cooperation and understanding.

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



From: Jared M. Frost <JFrost@ag.nv.gov>
Sent: Tuesday, July 29, 2025 12:51 PM
To: Adrianna Vela <AVela@dmv.nv.gov>
Subject: FW: ACLU public record requests to DMV

Hello Adrianna, please see below a follow up email from Attorney Ramic, let me know if you would like to discuss.

Jared M. Frost
Senior Deputy Attorney General
Transportation Division - DMV/DPS
702-486-3177
jfrost@ag.nv.gov

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Tuesday, July 29, 2025 12:29 PM
To: Jared M. Frost <JFrost@ag.nv.gov>
Subject: RE: ACLU public record requests to DMV

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

Good afternoon,

The DMV has provided email communications with ICE through the DMV portal. I am reviewing the documents and want to flag a few preliminary concerns:

1. There are a lot of redactions, and the DMV has not cited to a specific statute or other legal authority rendering those parts confidential. Can you please have them provide the legal basis for all redactions?
2. Based on the content in the emails provided, it appears that there are outstanding communications that would be responsive to the public records requests, but the DMV has not produced the documents. This includes group emails with DMV employees and ICE. If these records exist, the DMV is required to disclose them or otherwise provide notice that the communications are privileged while citing to legal authority that serves as a basis to withhold

EXHIBIT 39

From: [Sadmira Ramic](#)
To: [Adrianna Vela](#)
Cc: [Jared M. Frost](#)
Subject: Re: ACLU public record requests to DMV
Date: Friday, August 1, 2025 12:24:30 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good afternoon,

I appreciate the response, but it still does not address the issues raised in our July 29, 2025, email.

NRS 481.063 is inapplicable to requested records that do not include "personal information from a file or record relating to a license, identification card or title or registration of a vehicle." It is unclear how the statute would apply to the majority of the redactions such as names of government officials.

Additionally, your email does not address the outstanding records that are clearly responsive to our requests but have not been provided. This includes group emails between ICE and DMV employees.

As to the additional communications, such as Signal chats and faxes, our original request sought all communications between the DMV and ICE, which would include more than just emails. During our meeting on June 16, 2025, ACLU of Nevada did narrow it down to all email communications between DMV employees and email addresses ending in "@ice.dhs.gov." However, the email sent to Mr. Frost on June 29, 2025, requested these additional communications. There is nothing that requires the public to file the request through the DMV portal. Is it the DMV's position that the request made by email on June 29, 2025 is denied because it was not submitted via the DMV portal? If so, please provide a legal basis for that position.

Failure to address these concerns by August 5, 2025, will likely result in litigation against the DMV.

From: Adrianna Vela <AVela@dmv.nv.gov>
Sent: Thursday, July 31, 2025 2:03 PM
To: Sadmira Ramic <ramic@aclunv.org>
Cc: Jared M. Frost <JFrost@ag.nv.gov>
Subject: RE: ACLU public record requests to DMV

EXHIBIT 40

From: [Adrianna Vela](#)
To: [Sadmira Ramic](#)
Cc: [Jared M. Frost](#)
Subject: RE: ACLU public record requests to DMV
Date: Monday, August 11, 2025 1:19:41 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

This Message Is From an External Sender

This message came from outside your organization.

Good afternoon,

Thank you for your response. Apologies for the delay as we have been reviewing our steps forward with this request. At this time, we have opened up an additional search with our data team to adhere to your statement of obtaining “all communications,” which include signal chats and faxes. Please allow us time to complete this search. We will be in contact with you if we do find any additional communications.

In regard to the redactions found on the attachments, we will stand by our reasoning to redact these files since federal law prohibits the DMV from disclosing certain personal information obtained in connection with state motor vehicle records.

18 U.S.C. 2721 is a law that specifically prohibits the DMV, or any “officer, employee, or contractor” of the DMV from sharing or misusing personal information obtained “in connection with state motor vehicle records,” except in manners permissible by law. Section 2721 prohibition on release and use of certain personal information from State motor vehicle records says, “A *State Department of motor vehicles, and any officer, employee, or contractor thereof, shall not knowingly disclose or otherwise make available to any person or entity:*

(1) personal information, as defined in 18 U.S.C. 2725(3), about any individual obtained by the department in connection with a motor vehicle record, except as provided in subsection (b) of this section; or

(2) highly restricted personal information, as defined in 18 U.S.C. 2725(4), about any individual obtained by the department in connection with a motor vehicle record, without the express consent of the person to whom such information applies, except uses permitted in subsections (b)(1), (b)(4), (b)(6), and (b)(9): Provided, That subsection (a)(2) shall not in any way affect the use of organ donation information on an individual's driver's license or affect the administration of organ donation initiatives in the States.”

This law aims to **protect people's privacy**, ensuring their personal data isn't accessed without permission. For purposes of this law, protected information includes any/all personally identifiable information about a person, including:

- Name and address,

- Photograph,
- Phone number,
- Social Security Number,
- Driver's License Number,
- Health, medical, or disability information

Because Nevada is a Real ID state, any ID / DL records fall under this federal rule.

Additionally, NRS 481.063 prohibits the release of any personal information from a file or record within the custody of DMV 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 pursuant to a lawful court order or subpoena. Since the attachments did include photographs, names and addresses, and social security numbers, we will not be releasing un-redacted attachments.

Our redactions do also include names of DMV's Compliance Enforcement Division (CED officers. In the example of the Nevada Transportation Authority, [their] enforcement officers work in an undercover capacity in order to disrupt and stop illegal transportation in the State of Nevada. Protecting their identity is paramount in facilitating their job duties. They use their assigned state vehicles in their investigations, stings and patrolling. Each Enforcement Investigator stores their state vehicle at their homes. NRS 289.025 protects a peace officer's home address. The potential for disclosing their names and as a follow up, which cars they are assigned to, has the potential to disclose their home address and it would be a violation of NRS 289.025.

Under similar circumstances, disclosing our officers' names would be a violation of their privacy and safety of not only themselves, but the wellbeing of their families. Personal Privacy Interest can also be used as a reasoning behind officer confidentiality, as there is a balancing test: **if disclosing a record would invade someone's personal privacy without serving a significant public interest, the record can be withheld.** Personal privacy interest often includes:

- Social security numbers
- Personal contact information (home address, phone, email)
- Medical records
- Financial account numbers

Our question to you would be, does having unredacted officer information serve a greater purpose to the public than keeping it confidential? What is the purpose of having unredacted information?

Thank you for your time and cooperation.

We look forward to hearing from 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



From: Sadmira Ramic <ramic@aclunv.org>
Sent: Friday, August 1, 2025 12:24 PM
To: Adrianna Vela <AVela@dmv.nv.gov>
Cc: Jared M. Frost <JFrost@ag.nv.gov>
Subject: Re: ACLU public record requests to DMV

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Good afternoon,

I appreciate the response, but it still does not address the issues raised in our July 29, 2025, email.

NRS 481.063 is inapplicable to requested records that do not include "personal information from a file or record relating to a license, identification card or title or registration of a vehicle." It is unclear how the statute would apply to the majority of the redactions such as names of government officials.

Additionally, your email does not address the outstanding records that are clearly responsive to our requests but have not been provided. This includes group emails between ICE and DMV employees.

As to the additional communications, such as Signal chats and faxes, our original request sought all communications between the DMV and ICE, which would include more than just emails. During our meeting on June 16, 2025, ACLU of Nevada did narrow it down to all email communications between DMV employees and email addresses

EXHIBIT 41

From: [Adrianna Vela](#)
To: [Sadmira Ramic](#)
Cc: [Jared M. Frost](#)
Subject: FW: ACLU public record requests to DMV
Date: Tuesday, August 12, 2025 3:42:40 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Good afternoon,

After conducting a thorough review of our records, we have confirmed that there are no faxes or Signal messages responsive to your request. Our research indicates that Signal is not a DMV-managed application and one of which our agency has never had access to, therefore no additional communications would be stored there. In regard to faxes, our investigations team does not use fax, so it cannot be considered a source of normal DHS communications (other than the email conversations we have supplied to you). Please let us know if you have any further questions

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



From: Adrianna Vela
Sent: Monday, August 11, 2025 1:19 PM
To: [Sadmira Ramic <ramic@aclunv.org>](mailto:ramic@aclunv.org)
Cc: [Jared M. Frost <JFrost@ag.nv.gov>](mailto:JFrost@ag.nv.gov)
Subject: RE: ACLU public record requests to DMV

Good afternoon,

Thank you for your response. Apologies for the delay as we have been reviewing our steps forward with this request. At this time, we have opened up an additional search with our data team to adhere to your statement of obtaining "all communications,"

EXHIBIT 42

From: [Clark, Christopher C](#)
To: [Tami Clark](#)
Cc: [Frontino, Tiffanie L](#)
Subject: New VCO for ICE - ERO Las Vegas
Date: Monday, June 9, 2025 9:06:33 AM

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

Good Morning Tami,

We have a new VCO in Las Vegas, I cc'd her on this email. Her name is Tiffanie Frontino, she is the Mission Support Specialist for our office. I will still be available to help with anything if needed. But future emails and faxes for registration will be coming from her.

Respectfully,

Christopher Clark

Deportation Officer, Detained Unit
Salt Lake City Field Office, Las Vegas Sub-Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
desk: 702-388-5817 **cell:** 702-278-0891
501 South Las Vegas Blvd, Suite 200
Las Vegas, Nevada 89101

EXHIBIT 43

From:
To:

[Redacted]

Subject:
Date:

Introduction
Tuesday, August 6, 2024 10:26:58 AM

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

I want to introduce our new investigative specialist, Lexi Cina. Please include her in future group emails and Signal groups.

Lexi can also assist with administrative subpoenas, grand jury subpoenas, NV Energy request, etc.

[Redacted]

[Redacted]

Thank you,

[Redacted]

EXHIBIT 44

From: [Jared M. Frost](#)
To: [Sadmira Ramic](#)
Subject: RE: ACLU public record requests to DMV
Date: Tuesday, July 29, 2025 3:50:18 PM

This Message Is From an External Sender
This message came from outside your organization.

Hello Sadmira,

I've forwarded this to the DMV records team and am told they intend to provide a response tomorrow.

Thanks,

Jared M. Frost
Senior Deputy Attorney General
Transportation Division - DMV/DPS
702-486-3177
jfrost@ag.nv.gov

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Tuesday, July 29, 2025 12:29 PM
To: Jared M. Frost <JFrost@ag.nv.gov>
Subject: RE: ACLU public record requests to DMV

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Good afternoon,

The DMV has provided email communications with ICE through the DMV portal. I am reviewing the documents and want to flag a few preliminary concerns:

1. There are a lot of redactions, and the DMV has not cited to a specific statute or other legal authority rendering those parts confidential. Can you please have them provide the legal basis for all redactions?
2. Based on the content in the emails provided, it appears that there are outstanding communications that would be responsive to the public records requests, but the DMV has not produced the documents. This includes group emails with DMV employees and ICE. If these records exist, the DMV is required to disclose them or otherwise provide notice that the communications are privileged while citing to legal authority that serves as a basis to withhold the documents in their entirety.
3. Our original request sought all communications between the DMV and ICE, which would include more than just emails. During our meeting on 6/16/2025, ACLU of Nevada did narrow it down to all email communications between DMV employees and email addresses ending in "@ice.dhs.gov." However, the emails provided reference other communications such as