

EXHIBIT 1

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Rene L. Valladares
Federal Public Defender
District of Nevada

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First Assistant



**FEDERAL PUBLIC
DEFENDER**

— District of Nevada —

411 E. Bonneville Ave.
Suite #250
Las Vegas, NV 89101
Tel: 702-388-6577

July 15, 2021

Information requested on the following individual:

WESLEY COONCE
DOB: -1980
REG. NO.: 30011-039

Dear Custodian of Records:

The Federal Public Defender for the District of Nevada is in the process of obtaining records for death row inmate Wesley Coonce in his federal habeas corpus proceedings.

This letter constitutes a formal request for any and all records, documents, files, notes, and tangible things maintained by you or in the legal or physical custody of the Bureau of Prisons (BOP), from the time it was collected including, but not limited to:

1. Central File;
2. Medical Records including, but not limited to, psychological/psychiatric records, medication records and MRI film;
3. DHO records;
4. Sentry System records;
5. Privacy folder;
6. Mini Parole Folder;
7. Correctional Emergent Response Team (CERT) files;
8. Classification & Planning Division files
9. Central Monitoring System (CMS) files including, but not limited to, CMS Status Sheet;
10. All photographs taken upon intake in any BOP facility;
11. All documents referring, relating, or reflecting conditions of confinement;
12. Culinary Logs/Files/Reports;
13. CMU reports from Central Administration;
14. Monthly CMU privileges report;
15. Classification change sheets for classification hearings;

16. Classification change sheets for housing/custody changes;
17. Transportation:
 - a. Memoranda
 - b. Priority transfer list
 - c. Transportation manifest logs
 - d. Transportation Orders
 - e. Transportation check off list
18. Scheduling Records for local court/medical or teleconferences;
19. Movement Logs for each designated location within the institution;
20. Daily movement sheet;
21. Unit Logs;
22. Unit Shift Reports;
23. Sergeant's Daily Shift Reports;
24. Daily institutional report;
25. Gatehouse logs (visitors);
26. Institutional count logs and records;
27. Education Department logs and files including, but not limited to, GED exams and GED practice exams;
28. Property file;
29. Inmate Grievances:
 - a. Inmate grievance log
 - b. Inmate grievance file
30. Cell search logs/reports;
31. Visiting files and logs;
32. Disciplinary hearing logs;
33. Drug testing logs/reports;
34. Incident files/reports;
35. Any and all condition, care, confinement, custody and/or incarceration documents generated by, received from and/or forwarded to or from any law enforcement authorities;
36. Any and all communications regarding care, confinement, custody and/or incarceration for any individuals identified above;
37. A list of any and all purged, deleted, or destroyed documents, and documents transferred to storage;
38. Electronic data regarding all above to include: voicemail messages and files; back-up voicemail files; e-mail messages and files; back-up e-mail files; deleted e-mails; data files; program files; backup and archival tapes; temporary files; system history files; web site information stored in textual, graphical or audio format; website log files; cache files; cookies; and other electronically recorded information. The disclosing party shall take reasonable steps to ensure that it discloses any back-up copies of files or archival tapes that will provide information about any "deleted" electronic data. This list is not exhaustive.
39. All documents and records relating, referring, or reflecting the relative

dangerousness of prisoners convicted of capital crimes to that of the general population of inmates in the BOP.

If you are claiming that any of the documents described above have been destroyed or purged, please provide a copy of Certificate of Destruction, evidencing what was destroyed and the date. Otherwise, please complete a Certificate of Custodian of Records and send the certificate with the records.

If you cannot comply with this request, please provide a letter stating your requirements for compliance, i.e., subpoena, different release form, etc. If the documents have been destroyed, please provide a copy of the statute or records retention policy under which authority for destruction was had, and a description of the documents destroyed. If you require pre-payment of copying expense, please notify me in writing of the number of pages and the amount due.

A release signed by Mr. Coonce is enclosed. We greatly appreciate your assistance in this matter. Please call me at (702) 388-5188 or email me at lauren_conklin@fd.org if you have any questions or require additional information.

Sincerely,

/s/ Lauren Conklin

Lauren Conklin
Paralegal

Enclosure