

1  
2 IN THE SUPREME COURT OF THE STATE OF NEVADA

3 TONJA BROWN PRO SE

4  
5 Petitioner,

6 vs.

7 The State of Nevada,

8 The State Board of Pardons

9 Commissioners,

10 The Nevada Attorney General Aaron D.

11 Ford,

12 Respondents,

13 And

14 County of Washoe,

15 District Attorney Christopher Hicks,

16 Real Parties in Interest  
17

Case No.: Number

**PETITION FOR WRIT OF  
MANDAMUS**

**REQUEST FOR HEARING**

18  
19 **I. JURISDICTION and VENUE**

20 This court has jurisdiction pursuant to Nevada revise statues NRS 34.16 and NRS  
21 34.320, which authorizes the Nevada Supreme Court to issue Writ of Mandamus to  
22 compel the performance of an act that the law requires as a duty, resulting from an  
23 office, trust or station. Petitioner is without a plain speedy and adequate legal  
24 remedy. VENUE is proper in the court under article 6, section 4 of  
25 the Nevada constitution which granted the Supreme Court original jurisdiction  
26 over written petitions involving state offices and agencies.  
27

28 **II. STANDING**

1 1. Petitioner, Tonja Brown, acting in pro se, states she has standing to bring this  
2 action because she is directly and personally affected by the ongoing misconduct,  
3 misrepresentation, and discriminatory treatment by the Washoe County District  
4 Attorney's office and its conviction integrity committee (CIC), and by the former  
5 Public Defender currently the Reno Municipal Judge Shelly T. O'Neil.

6 2. Petitioner has been repeatedly discredited, retaliated against, and denied access  
7 to a fair review of her brother Nolan Klein's wrongful conviction. She has suffered  
8 emotional trauma, damage to her reputation, and deprivation of her constitutional  
9 rights by the State's failure to acknowledge wrong doings. *Souter vs Jones*, 395 F.  
10 3d 577 (6th Cir. 2005), *Chambers v. Sanders* 22-1446 (6th Cir)

11 3. The petitioner challenges illegal failures to act under a statutory mandate, there  
12 is no factual dispute, i.e. all parties agree to the facts of the matter. *Kyles v.*  
13 *Whitley*, 514 U.S. 419 (1995).  
14

## 15 **POINTS AND AUTHORITIES**

### 16 **III. INTRODUCTION**

17 4. Petitioner respectfully requests that the Nevada Supreme Court takes swift  
18 action to acknowledge this injustice, and for all the due process to be restored both  
19 in honor of petitioners brother's life, and to affirm the principal that factual  
20 innocence is never time barred, to grant Petitioners Writ of Mandamus and request  
21 for hearing, to grant such other and further relief as the court deems just and  
22 proper.

23 5. Recognize and address the discriminatory treatment of Tonja Brown by the CIC  
24 and Washoe County Officials.

25 6. Petitioner asks the court not to dismiss this matter in the event that the request  
26 for a Writ is not clear but to issue instructions and leave to amend.

27 7. Petitioner, Tonja Brown, sister of Nolan Klein, submits this petition seeking  
28

1 extraordinary relief in the form of a Writ of Mandamus. This petition arises from  
2 decades of prosecutor misconduct, violations, and discriminatory treatment by the  
3 Washoe County District Attorney's Conviction Integrity Committee (CIC), as well  
4 as retaliation against petitioner for her advocacy.

5 8. On October 10, 2018, during the Advisory Commission on the Administration of  
6 Justice, DDA Jennifer Noble testified and acknowledged to the Commission that  
7 the Washoe County District Attorney's Office had implemented the Conviction  
8 Integrity Committee to look at wrongful convictions.

9 9. On October 12, 2018, Petitioner submitted an application/documents to the  
10 DDA Jennifer Noble with Washoe County District Attorney's Conviction Integrity  
11 Committee CIC on her brother Nolan Klein's behalf. Deputy District Attorney  
12 Jennifer Noble was provided with the newly discovered evidence that had been  
13 withheld from the defense in violation of Brady v. Maryland and discovered in  
14 2009. The petitioner provided DDA Noble with exculpatory evidence. See  
15 appendix Ex.1, A 16-17.  
16

17 10. This exculpatory evidence came by way of a 2009 court order issued to  
18 Washoe County District Attorney Richard Gammick by the Second Judicial  
19 District Court Judge Brent Adams to turn over the entire file in Mr. Klein's case.  
20 CR88-1692.

21 11. The application/documents and a one-hour conversation presented to Ms.  
22 Noble clearly outlined prosecutorial misconduct and suppression of exculpatory  
23 evidence. Ex.1, A 16-17.

24 12. Despite these serious allegations and documents, that petitioner provided to  
25 Ms. Noble where to find additional documents CR88P-1692, CV90-3087 the  
26 petitioner received a "No Review" from Deputy District Attorney Jennifer Noble.  
27 Ex. 1, A 16-19.  
28

1 13. In contrast, another applicant, Mr. Tyrone Wells, submitted their case for a  
2 review. He did not claim a Brady violation, nor did he produce any newly  
3 discovered evidence; however, he received a complete and thorough review and a  
4 written response from the DA's office. Ex. 1, A 32-33.

5 14. This clear disparity in treatment shows discrimination and unequal enforcement  
6 of the CIC's mandated written policies. The Petitioner had claimed a Brady  
7 violation and produced the exculpatory evidence per the CIC policy and the other  
8 applicant, Mr. Tyrone Wells did not claim a Brady violation, nor did he provide  
9 any newly discovered exculpatory evidence. DDA Noble went against their own  
10 written policy in order to deny petitioner a review for her brother's wrongful  
11 conviction Ex. 1, A 20, Ex. 1, B.

12 15. Petitioner then submitted her formal complaints to 3 law enforcement agencies,  
13 the Reno Police Department, the Sparks Police Department and the Washoe  
14 County Sheriff's Office who then referred petitioner's complaint to the Nevada  
15 Attorney General's Office. NRS 289.110, NRS 41.0397. Ex. 1, A 25-31

16 16. In the Attorney General's first response June 5, 2024, the complaint under the  
17 Pattern or Practice Division is still under investigation Ex.1, C 44-45.

18 17. In the Attorney General's second letter of September 3, 2024, their response to  
19 petitioner she is asked to refile with the Washoe County Sheriff's Office. Ex.1, A  
20 14-15.

21 18. If Petitioner had done as instructed to do so by the Attorney General's office,  
22 the Washoe County Sheriff's Office would have submitted petitioner's complaint  
23 to the Washoe County District Attorney, thereby having the district attorney  
24 investigate themselves. Petitioner refused to do so. This violates NRS 289.110,  
25 and the Practice or Pattern law NRS 41.0397. Ex. 1, A 6-8, 10-13

26 19. In 2025, petitioner refiled with the Attorney General's office Ex. 1, A 1-33.  
27  
28

1 20. On May 14, 2025, petitioner received a letter from Attorney General Ford, Ex.  
2 1, D 46-47.

3 21. On May 20, 2025, Petitioner received correspondence from the Attorney  
4 General's office informing petitioner her complaint is still under investigation and  
5 some pattern or practice investigations could take 5 to 15 years. Ex. 1, D 48-49

6 22. It has now been over three years since the petitioner's complaint was first  
7 submitted to the Attorney General's office.

8 23. Since the original filing of the 2018, CIC application/documents the petitioner  
9 has discovered more exculpatory evidence as recently as December 30, 2024,  
10 Exhibit E (1988, newspaper clipping of bank robber in which Det. Sherman Boxx  
11 intentionally destroyed and was later recovered in 2024). Ex. 1, E 55, Ex. 1, B41

12 24. Compounding the harm, as of 2021 the Washoe County DA's office has hired  
13 Mr. Hunter Heinrich, the son of a key individual, former public defender, now  
14 currently the Reno Municipal Judge Shelly T O'Neill involved in petitioner's  
15 brother's criminal case, resulting in a conflict of interest that further prevents a fair  
16 review of his case. Ex. 1, A,B,D,F,G,H,I,J,K,M.

17 25. Throughout this process, petitioner has been repeatedly denied the right to  
18 advocate for her brother's exoneration without some form or retaliation by the  
19 Washoe County District Attorney's Office and Judge Shelly T. O'Neill Ex. 1,  
20 A,B,D,F,G,H,I,J,M.

21 26. From the early 1990s through to the present, petitioner Tonja Brown has been  
22 subjected to factually inaccurate and misleading assertions advanced by the  
23 District Attorney's Office. These false claims have been repeatedly presented  
24 before the legislature, the courts, the media, and the Nevada Pardons Board on  
25 October 29,2008. Evidence of this misconduct includes the October 29, 2008,  
26 Pardons Board CD submitted by counsel Robert Hager of Nolan Klein, containing  
27  
28

1 “The Dunbar Report” interview with Tonja Brown and Washoe County District  
2 Attorney Richard Gammick. Further corroboration is found in the minutes of July  
3 26, 2024 legislative meeting. Ex. 1, K 145-148, Ex. 1, F 56-71, Ex. 1, L 150-153.  
4 27. The CIC has made factually inaccurate claims regarding petitioner’s  
5 application/documents and the evidence submitted. It’s unclear who DDA Noble  
6 has discussed the Nolan Klein’s Conviction Integrity Committee’ results with. Ex.  
7 1, L 150-153, Ex. 1, B 36-37.

8 28. The refusal to acknowledge or correct past misconduct has prevented petitioner  
9 from achieving justice for her brother and for herself as a member of his surviving  
10 family. Petitioner has and continues to suffer emotional distress, reputational harm,  
11 and a continued sense of powerlessness, knowing that the  
12 truth of her brother's innocence remains unacknowledged and that the law is being  
13 selectively and unjustly applied.

#### 14 **IV. VERIFEID STATEMENT OF FACTS**

15 29. Prosecutors withheld exculpatory evidence, a violation of Brady v. Maryland.  
16 Which included Detective Sherman Boxx’s statements, victims’ statements, state’s  
17 witnesses whose statements contradicts their testimony. These statements were  
18 exculpatory evidence for the defense. These were all found in the DA’s file in  
19 2009. This information was provided to DDA Noble.

20 30. Since the 2019, letter denying petitioner a “No Review” from the CIC, newly  
21 discovered exculpatory evidence has been found. This would include an August  
22 18, 1988, newspaper clipping Det. Boxx found in Klein’s car. Ex. 1, N 72. Boxx  
23 believed that Mr. Klein was responsible for a rash of bank robberies in the  
24 Washington state area only to be confirmed by the FBI Klein was not their suspect.  
25 Boxx and other officers had mistaken Klein for a bank robber. Ex. 1, E 55, Ex. 1,  
26 M 169. This would have supported Klein's case of mistaken identity that others  
27  
28

1 look like him. Klein had five defense witnesses testify placing Mr. Klein in Carson  
2 City, NV some 30+ miles away at the time of the crime.

3 31. Ms. Annemarie Grant had put in a public records request with the Sparks PD.  
4 The newspaper was not there, but a September 16, 1988, statement made by Boxx  
5 and other officers in which Boxx states “We believe the picture is that of Nolan  
6 Klein” quote unquote. This newspaper article was recovered on December 30,  
7 2024, 36 years after the bank robbery. Ex. 1, B 34-39, Ex. 1, N 172.

8 32. The CIC refused to review petitioner’s application/documents, while fully  
9 reviewing another applicant with petitioner’s claim- constituting discriminatory  
10 treatment (United States v. Armstrong). Ex. 1, A 16-33.

11 33. Petitioner filed complaints with multiple law-enforcement agencies in 2022,  
12 which were forwarded to the Attorney General’s office, but never acted upon. Ex.  
13 1, A 25-31.

14 34. In 2025, petitioner filed a follow-up complaint demanding action. The AG’s  
15 office responded that practice or pattern investigations may take 5 to 15 years. Ex.  
16 1, D 48-49.

17 35. Petitioner acknowledges that judge Shelly, T O’Neill, in 1993, personally  
18 admitted to petitioner that she had committed perjury during Mr. Klein ‘s1991  
19 post-conviction hearing. Ex.1, A 16-17, 21-22, Ex. 1, F 56-71, Ex. 1, G 72-82, Ex.  
20 1, H 83-87, Ex. 1, I 88-93, Ex. 1, J 94-143, Ex. 1, M 151-171. Judge O’Neill’s son  
21 is now employed as a deputy district attorney, a perceived conflict of interest for  
22 the foreseeable future creating a permanent conflict of interest.

23 36. Petitioner has been repeatedly discredited by public officials, including but not  
24 limited to Reno Municipal Judge, Shelly T. O’Neill, DDA Jennifer Noble who  
25 made false, misleading public statements about the case. Ex. 1,  
26 K 144-147, Ex. 1, L 150, see Ex. Listed in # 35 above. DDA John Helzer during  
27  
28

1 the October 29, 2008, Pardons Board meeting stated to the board he had heard  
2 things, and he looked in Mr. Klein's file and there was nobody else. Helzer  
3 absolutely knew there was another suspect, Mr. Zarsky. Mr. Helzer did not mislead  
4 the board he lied to the board when he said there was no one else and to send Mr.  
5 Klein a message and deny Mr. Klein a pardon and the board did. There have been  
6 numerous interviews given by Washoe County DA Richard Gammick regarding  
7 this case and he has fabricated and lied about this case.

8  
9 37. The petitioner formally requested a meeting with the Washoe County District  
10 Attorney to address the Conviction Integrity Committee's policy and its failure to  
11 review clear Brady violations committed by one of their Deputy District Attorneys.  
12 Additionally, the petitioner sought to raise concerns regarding the perjury of  
13 former public defender Shelly T. O'Neill. Despite these efforts, the request has  
14 been ignored, leaving the petitioner without recourse.

15 38. Petitioner has received newly discovered exculpatory evidence since the CIC  
16 2019, letter from DDA Noble. This newly discovered exculpatory evidence was  
17 discovered on December 30, 2024. It was a newspaper clipping dated August 24,  
18 1988. This Washington newspaper clipping showed a bank surveillance camera  
19 photograph of the person suspected of several bank robberies, and the September  
20 16, 1988, statement made by Detective Sherman Boxx found in the State's and  
21 Sparks PD file of Nolan Klein. Sparks PD statement, confirming Boxx and other  
22 officers had mistaken Mr. Klein for a bank robber in Washington state bank  
23 robberies, only to have the FBI clear Mr. Klein. Additional exculpatory evidence  
24 has been found as well. Ms. Annemarie Grant has discovered newly discovered  
25 evidence since 2019 Ex. 1, B 37,41. Some of this evidence has been presented to  
26 the pardons board by the petitioner and Ms. Annemarie Grant over several years.

27 39. It has now become a conflict of interest for the petitioner to get justice to have  
28

1 her innocent brother exonerated and for the retaliation to stop the ongoing  
2 harassment and defamation against her and her brother because she cannot  
3 exonerate her brother due to the conflict of interest within the Washoe County  
4 District Attorney's Office. Ex. 1, A-N, 1-172.

5 40. For years, the petitioner has been subjected to a relentless cycle of deflection.  
6 First directed to one office, then another, she has been caught in a revolving door  
7 with no exit. Each agency transfers responsibility elsewhere: the state refers her  
8 back to the Sheriff's Office. This endless back-and-forth has denied petitioner any  
9 meaningful resolution. Throughout these years, petitioner has filed police reports,  
10 pursued legislative remedies, and fought tirelessly to exonerate her innocent  
11 brother. Yet despite every effort, justice remains out of reach. The petitioner has  
12 been given nothing but delays, diversions, and excuses, proof of a system that fails  
13 those who seek truth and accountability.

14 41. Petitioner has taken every available legal remedy to no avail. There is no  
15 legal remedy unless a law is created to Establish a Petition for Factual Innocence  
16 Posthumously for the petitioner. The only other recourse petitioner has is through a  
17 Writ of Mandamus.

#### 18 **IV. LEGAL ARGUMENT BASIS FOR MANDAMUS**

19 42. Nevada Revised Statute 289.110, Nevada Revised Statute 41.0397.

20 A. Anthony v. Miller, 137 Nev. 276 (2021), mandamus is appropriate when a  
21 public officer fails to perform a clear legal duty.

22 B. Under Miller v. Burk, 124 Nev. 579 (2008), courts may compel action when  
23 discretion is abused or used to avoid statutory obligations.

24 C. NRS 289.110 requires independent investigation of law enforcement  
25 misconduct. The AG's office has failed to act within a reasonable time frame,  
26 violating this statutory duty.  
27  
28

1 D. Mandamus is appropriate when a public official fails to perform a clear legal  
2 duty (Miller v. French) Nevada Attorney General has a duty to investigate credible  
3 allegations of criminal, misconduct and pattern or practice violations NRS  
4 41.0397. The CIC has a duty to review wrongful conviction claims fairly and in  
5 accordance with its own policies.

6 E. Brady violations and the suppression of exculpatory evidence, including witness  
7 statements and alternative suspect information, violate the constitutional standard  
8 established in Brady v. Maryland<sup>1</sup>, Kyle's v. Whitley, & Banks v Dreke.

9 F. Discriminatory review and equal protection. The CIC's refusal to review  
10 petitioner's application/documents, while reviewing another applicant's, we are  
11 claiming, constitutes discriminatory treatment under the United States v.  
12 Armstrong and Mazzan v. Warden, 116 Nev. 48 (2000), Jimenez v. State, 112 Nev.  
13 610 (1996), Reinforced that failure to disclose Brady material undermines the  
14 integrity of the trial. NRS 289.110: Prohibits agencies from investigating  
15 themselves-supports petitioner's argument that the Attorney General must  
16 investigate the District Attorney and his CIC.

17 G. Retaliation and misrepresentation by Judge Shelly T. O'Neill, DDA Jennifer  
18 Noble, Washoe District Attorney Richard Gammick combined with the destruction  
19 of evidence by public officials and refusal to investigate, near the misconduct  
20 condemned Napier v. Illinois and Giglio v. United States.

21 H. Newly Discovered Evidence the recovered newspaper clipping and statements  
22 from Detective Sherman Boxx, the exculpatory evidence that had been hidden by  
23 the prosecutor, Ronald Rachow, including locating the Sparks police department  
24 prime suspect, Mr. Zarsky, his interview given in 2011 supports Mr. Klein's claims  
25 of innocence and meet the threshold for reconsideration (Turner v. United States,  
26 582 U.S. (2017).  
27  
28

1 I. The Attorney General failed to act where the law requires action *Reno*  
2 *Newspapers v. Gibbons*, 127 Nev. 873 (2011). The Court issued writ relief where  
3 the government failed to comply with statutory transparency obligations-  
4 regardless of policy preferences or internal disputes.

5 J. Conflict of Interest judge Shelley T O’Neill’s son, Hunter Heinrich works as a  
6 Washoe County Deputy District Attorney.

7 K. Mandamus Relief and Government Accountability *Miller v. French*, 530 U.S.  
8 390 (1993) mandamus is appropriate when a public official fails to perform a clear  
9 legal duty. *Turner v. United States*, 582 U.S. (2017).

## 10 **V. LEGAL AUTHORITIES AND CASE CITATIONS**

### 11 43. A. Brady Violations and Prosecutorial Misconduct

12 *Brady v. Maryland*, 373 U.S. 83 (1963) – Established that suppression of material  
13 exculpatory evidence by the prosecution violates due process.

14 *Giglio v. United States*, 405 U.S. 150 (1972) – Held that nondisclosure of promises  
15 or benefits to key witnesses undermines the fairness of a trial.

- 16 1. *Kyles v. Whitley*, 514 U.S. 419 (1995) – Clarified that the prosecution  
17 must disclose all favorable evidence known to any government actor.
- 18 2. *Banks v. Dretke*, 540 U.S. 668 (2004) – Reversed a death sentence due to  
19 suppression of evidence affecting witness credibility.
- 20 3. *Napue v. Illinois*, 360 U.S. 264 (1959) – Found that a conviction based  
21 on false testimony—even if not solicited by the prosecution—violates  
22 due process.
- 23 4. *United States v. Bagley*, 473 U.S. 667 (1985) – Defined the materiality  
24 standard for Brady violations as a “reasonable probability” of a different  
25 outcome.
- 26 5. *Miller v. Pate*, 386 U.S. 1 (1967) – Reversed a conviction where the  
27  
28

1 prosecution knowingly misrepresented physical evidence.

2 **44. B. DISCRIMINATORY REVIEW AND EQUAL PROTECTION**

3 1. *United States v. Armstrong*, 517 U.S. 456 (1996) – Held that selective  
4 enforcement claims require showing that similarly situated individuals were  
5 treated differently.

6 2. *Thomas v. Eighth Judicial District Court*, 133 Nev. Adv. Op. 195 (2017) –  
7 Nevada Supreme Court barred retrial due to egregious prosecutorial misconduct  
8 and Brady violations.

9 3. *Mazzan v. Warden*, 116 Nev. 48 (2000) – Reversed conviction based on  
10 withheld exculpatory evidence and emphasized the importance of post-  
11 conviction review.

12 **45.C. MANDAMUS RELIEF AND GOVERNMENT ACCOUNTABILITY**

13 1. *Miller v. French*, 530 U.S. 327 (2000) – Affirmed that mandamus is  
14 appropriate when a public official fails to perform a clear legal duty.

15 2. *Turner v. United States*, 582 U.S. \_\_\_\_ (2017) – Reaffirmed Brady obligations  
16 and the importance of cumulative evidence in wrongful conviction cases.

17 **46. D. SUPPORTING**

18 **Principles for Posthumous Pardon and Pattern/Practice Investigations**

19 1. *Herrera v. Collins*, 506 U.S. 390 (1993) – Recognized that claims of actual  
20 innocence based on newly discovered evidence may warrant extraordinary  
21 relief.

22 2. *District Attorney’s Office v. Osborne*, 557 U.S. 52 (2009) – Acknowledged  
23 the role of post-conviction procedures in ensuring justice, even after trial.

24 47. If the agency responsible for the original injustice refuses, then by law, the  
25 duty falls to the Nevada Attorney General under NRS 289.110. It's not too late to  
26 correct this. But it's already far too late to pretend this was. *Kyles v. Whitley*, 514  
27  
28

1 U.S. 419 (1995):

2 1. Courts must evaluate the cumulative effect of all favorable evidence, not  
3 rely solely on past rulings. *Strickler v. Greene*, 527 U.S. 263 (1999):

4 2. A Brady violation arises when exculpatory material is known to the State  
5 and not disclosed; that duty *Milke v. Ryan*, 711 F.3d 998 (9th Cir. 2013):

6 Failure to meaningfully engage with Brady evidence is a constitutional violation  
7 warranting federal relief. *Thomas v. Eighth Jud. Dist. Ct.*, 133, Nev. Adv. Op.  
8 95 (2017): Mandamus relief granted where prosecutorial misconduct rendered  
9 procedural channels ineffective.

10 3. The CIC's refusal to consider the evidence on the merits underscores the  
11 need for independent review. The Attorney General's duty to investigate under  
12 NRS 289.110 becomes operative when the accused agency cannot provide a  
13 neutral forum for review.

14 4. Posthumous Harm and Family Standing Petitioner, as a surviving family  
15 member, has standing to seek justice on behalf of her deceased brother. She has  
16 suffered emotional trauma, reputational damage, and constitutional deprivation  
17 from the State's refusal to acknowledge wrongdoing. See *Souter v. Jones*, 395  
18 F.3d 577 (6th Cir. 2005).

19 48. Petitioner is not asking for a favor. She's asking for the law to apply equally.  
20 In cases of wrongful conviction and misconduct, when newly discovered evidence  
21 emerges, there is both a moral and legal imperative to conduct a review.

## 22 **VI First Claim for Relief**

23 49. Relief requested for the AG: issuance of a writ directing the Attorney General  
24 to accept and evaluate petitioner's complaint and, within a reasonable time (or a  
25 shorter period ordered by the Court if exigent circumstances exist), to issue a  
26 reasoned written determination stating whether an investigation will proceed,  
27  
28

1 whether charges will be pursued, or why the matter will not be pursued (subject to  
2 lawful confidentiality protections). The requested relief is procedural and seeks a  
3 duty- performance order, not a judicial finding on the merits of underlying  
4 performance order

#### 5 **VII. Second Claim for Relief**

6 50. Mandamus directing the Board of Pardons Commissioners to consider factual  
7 innocence posthumous submissions. The pardons board is charged by statute with  
8 considering pardons and related clemency matters. Petitioner asks this court to  
9 issue a writ, directing the board to docket and consider a factual innocence  
10 posthumous pardon, relating to Nolan Klein and to issue a reasoned disposition,  
11 including whether a hearing is warranted. This request seeks to ensure the board  
12 treats merits in a timely manner while preserving the boards, discretionary  
13 authority.  
14

#### 15 **VIII PRAYER FOR RELIEF**

16 51. WHEREFORE, Petitioner respectfully request that the Nevada Supreme  
17 Court takes Swift action to acknowledge this injustice, and for all due process to be  
18 restored both in honor of petitioner's brother's life, and to affirm the principal that  
19 factual innocence is never time barred, to grant Petitioner's Writ of mandamus and  
20 Request For Hearing, To grant such other and further relief as the court deem just  
21 and proper.

22 52. Recognize and address discriminatory treatment of Tonja Brown by the  
23 Conviction Integrity Committee and Washoe County Officials.

24 53. Petitioner asks the court not to dismiss this matter in the event that the request  
25 for a writ is not clear but to issue instructions and leave to amend.

26 54. Petitioner asks the court grant to set for hearing.  
27  
28

1 Dated this \_\_ day of \_\_\_\_\_,2025.  
2  
3  
4

---

6 Tonja Brown  
7

8 2907

9 Lukens Lane

10 Carson City, NV 89706

11 775-671-5037

12 [Nvmemorialfund@aol.com](mailto:Nvmemorialfund@aol.com)  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28