

REV. MATTHEW TRAVIS HOUSTON, CHTD  
ABA No. 04662784

FILED

JUN 01 2023

IN THE COURT OF APPEALS  
THE STATE OF NEVADA

OF ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
*Elizabeth A. Brown*  
DEPUTY CLERK

1		
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4	MATTHEW TRAVIS HOUSTON	Case No.(s) 79408
5	v.	84885
6	THE STATE OF NEVADA ET AL	85351
7	MANDALAY BAY CORP. ET AL	80562
8		80562 → COA
9		84417
10		84418
11		84477
12		84887
13		85352
14		86080
15		86103
16	THE STATE OF NEVADA ET AL	84281
17		84478
18		84886
19		85353
20		86041
21	BRIAN P. CLARK ET AL	85354
22		85747-COA
23		86598

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EMERGENCY OBJECTION TO PAGE NUMBER

RESPONDENT'S ANSWERING BRIEF FILED

FEBRUARY 2023 28TH 2023, IN CASE NUMBER 84886

RECEIVED  
FEBRUARY 2023 28TH

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
DEPUTY CLERK

"HEARING REQUESTED"

23-17272

1 Appellant moves this Court to examine the  
2 fraudulent "GPA" that in fact was NOT signed  
3 by the Appellant, nor was this fraudulent and coercive  
4 document ever observed, read by or read to Mr. Houston  
5 until AFTER February 01, 2022, which was well  
6 after he had already been wrongfully convicted on  
7 December 06, 2022, by the malicious prosecution and  
8 false police reports made by Jason Lewis, Redenta Blacic,  
9 Jonathan Shockley, Dianne Ferrante, SEDGWICK CMS,  
10 and Rosemarie McMORRIS - Alexander et al,

11 SEE EXHIBIT 'A' most specifically Page  
12 Number Six, Lines 6-28:

13  
14 The Question for Our Lady Justice is,  
15 "How many more lies are being told by the  
16 Respondents in their Answering Briefs?"

17  
18 NOW SEE 'STATEMENT OF FACTS':

19  
20 CONCLUSION

21 Based on the FACTS including but NOT  
22 limited to the foregoing, the Appellant respectfully  
23 requests that this Court vacate the district court's  
24 denial of his motion to have him expeditiously remanded  
25 back to CCDC so that he may be provided with  
26 injunctive relief to prevent further manifest  
27 injustice.

28 DATED: May 26, 2023

BY: Matthew Travis Houston

REV. MATTHEW TRAVIS HOUSTON CHER

STATEMENT OF FACTS: Kidnapped from his home in

1  
2 Iowa City, On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter <sup>"Plaintiff-in-Error"</sup> Petitioner-Appellant)  
3 was abducted from his hotel room at the Best Western located at [REDACTED] 3041  
4 St. Rose Parkway in Henderson, Nevada, as he was not served with any sort of  
5 summons or WARRANT, nor was told or read that he had any kind of rights. This  
6 false arrest prevented Petitioner-Appellant from attending his appointment the very  
7 next day at Nevada Retina Specialists, with Dr. Tyson Ward on July 15, 2021, while  
8 this continued imprisonment of his person also prevented him from attending his medical  
9 disability rating in Reno, Nevada, on August 15, 2021, with Dr. Dwagleri. Both appointments  
10 of which had been scheduled by the abductors, SEDAWICK's Dianne Ferrante, and her  
11 alleged supervisor, Rosemarie McMorris-Alexander, as was the booking of his room.

12 The Petitioner-Appellant's attempt at release from CENC was intended so that he could  
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J. Wood  
14 and Bernard Little, provided misinformation regarding the lack of a directly related "City Jail  
15 Detainer Hold". Counsel had told Petitioner-Appellant, all the while coercing his client into a  
16 potential release from custody, that he "did not see a detainer hold" - when, in fact, there was.  
17 This coercion of the client by his previous representation created a second double-jeopardy -  
18 in LAS VEGAS MUNICIPAL COURT #1248354A + #C1237802A; with the first being by J. Wood

19, in the EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-035713. A. Goldstein NEVER visited Mr.  
20 Houston. <sup>(ALSO JUSTICE COURT, LAS VEGAS TOWNSHIP)</sup> These traumatic events are a cruel and unusual punishment being inflicted upon an abused  
21 and innocent man, who was forced into an involuntary relocation, with unnecessary hardships  
22 causing the eviction of his law office located at 435 South Lion Street #927, in Iowa  
23 City, Iowa (52240), \$36.5 million of property damage and the destruction of his K-9(s).

24 Due to crimes both civil and criminal, not to mention the willful omissions of Rosemarie  
25 McMorris-Alexander and Dianne Ferrante, SEDAWICK and the prosecutions' most unlawful use  
26 of overreaching tactics ~~in~~ their exploitation of the innocent man has put the Petitioner-Appellant  
27 into an unmanageable state of duress, homelessness, and extensive incarceration. Not at any  
28 time did Mr. Houston threaten, harass, extort, or "aggravated stalking" any of the  
29 parties involved with his cases, neither did Mr. Houston act aggressively towards  
30 any other individual, business or entity. Mr. Houston is a victim of crime.

# Exhibit A

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I am not now under the influence of any intoxicating liquor, a controlled substance or other drug which would in any manner impair my ability to comprehend or understand this agreement or the proceedings surrounding my entry of this plea.

My attorney has answered all my questions regarding this guilty plea agreement and its consequences to my satisfaction and I am satisfied with the services provided by my attorney.

DATED this 3<sup>rd</sup> day of August, 2021. *Signature obtained with the express consent of:*

Matthew Houston  
MATTHEW HOUSTON, aka,  
Matthew Travis Houston  
Defendant

*By: Benard Little*

*Bar #12005*

*[Signature]*

AGREED TO BY:

*[Signature]* #9598

KRISTINA A. RHOADES  
Chief Deputy District Attorney  
Nevada Bar #012480

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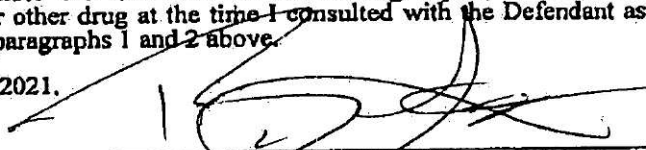
**CERTIFICATE OF COUNSEL:**

I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court hereby certify that:

1. I have fully explained to the Defendant the allegations contained in the charge(s) to which guilty pleas are being entered.
2. I have advised the Defendant of the penalties for each charge and the restitution that the Defendant may be ordered to pay.
3. I have inquired of Defendant facts concerning Defendant's immigration status and explained to Defendant that if Defendant is not a United States citizen any criminal conviction will most likely result in serious negative immigration consequences including but not limited to:
  - a. The removal from the United States through deportation;
  - b. An inability to reenter the United States;
  - c. The inability to gain United States citizenship or legal residency;
  - d. An inability to renew and/or retain any legal residency status; and/or
  - e. An indeterminate term of confinement, by with United States Federal Government based on the conviction and immigration status.

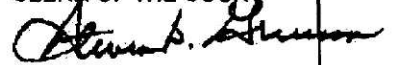
Moreover, I have explained that regardless of what Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.
4. All pleas of guilty offered by the Defendant pursuant to this agreement are consistent with the facts known to me and are made with my advice to the Defendant.
5. To the best of my knowledge and belief, the Defendant:
  - a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement,
  - b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily, and
  - c. Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the Defendant as certified in paragraphs 1 and 2 above.

Dated: This 3<sup>rd</sup> day of August, 2021.



\_\_\_\_\_  
ATTORNEY FOR DEFENDANT

erg/L-4



1 **GPA**  
2 **STEVEN B. WOLFSON**  
3 **Clark County District Attorney**  
4 **Nevada Bar #001565**  
5 **KRISTINA A. RHOADES**  
6 **Chief Deputy District Attorney**  
7 **Nevada Bar #012480**  
8 **200 Lewis Avenue**  
9 **Las Vegas, NV 89155-2212**  
10 **(702) 671-2500**  
11 **Attorney for Plaintiff**

7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 **THE STATE OF NEVADA,**  
10 **Plaintiff,**

11 **-vs-**

12 **MATTHEW HOUSTON, aka,**  
13 **Matthew Travis Houston,**

14 **Defendant.**

**CASE NO: C-21-357927-1**

**DEPT NO: X**

15 **GUILTY PLEA AGREEMENT**

16 I hereby agree to plead guilty to: **AGGRAVATED STALKING (Category B**  
17 **Felony - NRS 200.575 - NOC 50333)**, as more fully alleged in the charging document attached  
18 hereto as Exhibit "1".

19 My decision to plead guilty is based upon the plea agreement in this case which is as  
20 follows:

21 The State has no opposition to probation for a twenty-four (24) month period. The  
22 parties stipulate to recommend a two (2) to five (5) year suspended sentence. Parties agree  
23 Defendant will receive a mental health evaluation and any treatment as a condition of  
24 probation, and retain the right to argue any other terms and conditions. The State will not  
25 oppose dismissal of Case No. 21CR033713 after rendition of sentence. Defendant is to stay  
26 away and have no contact with Redenta Blacic, Rosemarie McMorris, and/or Jonathan  
27 Shockely. Defendant is to also stay away from 9930 West Cheyenne Avenue, Las Vegas,  
28 Nevada. The State will not oppose Defendant's own recognizance release with low-level

\\CLARKCOUNTYDA.NET\CRM\CASE2\2021\15878021\158780-GPA-(MATTHEW TRAVIS HOUSTON)-001.DOCX

1 electronic monitoring after entry of plea with all of the above stated no contact and stay away  
2 orders. If I successfully complete probation and receive an honorable discharge, I may  
3 withdraw my plea and plead guilty to AGGRAVATED STALKING (Gross Misdemeanor -  
4 NRS 200.575(1), waiving any defects in that pleading, with credit for time served.

5 Defendant agrees and understands that he is ineligible for the reduction in his  
6 sentence if one or more of the following events occur:

- 7 1. Defendant fails to interview for the presentence investigation;
- 8 2. Defendant fails to make any subsequent court appearance;
- 9 3. An independent magistrate, by affidavit review, confirms probable cause against him for  
10 new criminal charges including reckless driving or DUI, but excluding minor traffic  
11 violations;
- 12 4. Defendant fails to pay restitution in full; or
- 13 5. Defendant has been found by the Court to be in violation of his probation, regardless of  
14 whether the Defendant is revoked or not.

15 I agree to the forfeiture of any and all weapons or any interest in any weapons seized  
16 and/or impounded in connection with the instant case and/or any other case negotiated in  
17 whole or in part in conjunction with this plea agreement.

18 I understand and agree that, if I fail to interview with the Department of Parole and  
19 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,  
20 by affidavit review, confirms probable cause against me for new criminal charges including  
21 reckless driving or DUI, but excluding minor traffic violations, the State will have the  
22 unqualified right to argue for any legal sentence and term of confinement allowable for the  
23 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have  
24 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without  
25 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite  
26 twenty-five (25) year term with the possibility of parole after ten (10) years.

27 Otherwise I am entitled to receive the benefits of these negotiations as stated in this  
28 plea agreement.



CONSEQUENCES OF THE PLEA

1  
2 I understand that by pleading guilty I admit the facts which support all the elements of  
3 the offense(s) to which I now plead as set forth in Exhibit "1".

4 I understand that as a consequence of my plea of guilty the Court must sentence me to  
5 imprisonment in the Nevada Department of Corrections for a minimum term of not less than  
6 TWO (2) years and a maximum term of not more than FIFTEEN (15) years. The minimum  
7 term of imprisonment may not exceed forty percent (40%) of the maximum term of  
8 imprisonment. I understand that I may also be fined up to \$5,000.00. I understand that the  
9 law requires me to pay an Administrative Assessment Fee.

10 I understand that, if appropriate, I will be ordered to make restitution to the victim of  
11 the offense(s) to which I am pleading guilty and to the victim of any related offense which is  
12 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to  
13 reimburse the State of Nevada for any expenses related to my extradition, if any.

14 I understand that I am eligible for probation for the offense to which I am pleading  
15 guilty. I understand that, except as otherwise provided by statute, the question of whether I  
16 receive probation is in the discretion of the sentencing judge.

17 I understand that I must submit to blood and/or saliva tests under the Direction of the  
18 Division of Parole and Probation to determine genetic markers and/or secretor status.

19 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,  
20 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or  
21 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation  
22 and may receive a higher sentencing range.

23 I understand that if more than one sentence of imprisonment is imposed and I am  
24 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order  
25 the sentences served concurrently or consecutively.

26 I understand that information regarding charges not filed, dismissed charges, or charges  
27 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

28 ///

1 I have not been promised or guaranteed any particular sentence by anyone. I know that  
2 my sentence is to be determined by the Court within the limits prescribed by statute.

3 I understand that if my attorney or the State of Nevada or both recommend any specific  
4 punishment to the Court, the Court is not obligated to accept the recommendation.

5 I understand that if the offense(s) to which I am pleading guilty was committed while I  
6 was incarcerated on another charge or while I was on probation or parole that I am not eligible  
7 for credit for time served toward the instant offense(s).

8 I understand that if I am not a United States citizen, any criminal conviction will likely  
9 result in serious negative immigration consequences including but not limited to:

- 10 1. The removal from the United States through deportation;
- 11 2. An inability to reenter the United States;
- 12 3. The inability to gain United States citizenship or legal residency;
- 13 4. An inability to renew and/or retain any legal residency status; and/or
- 14 5. An indeterminate term of confinement, with the United States Federal  
15 Government based on my conviction and immigration status.

16 Regardless of what I have been told by any attorney, no one can promise me that this  
17 conviction will not result in negative immigration consequences and/or impact my ability to  
18 become a United States citizen and/or a legal resident.

19 I understand that the Division of Parole and Probation will prepare a report for the  
20 sentencing judge prior to sentencing. This report will include matters relevant to the issue of  
21 sentencing, including my criminal history. This report may contain hearsay information  
22 regarding my background and criminal history. My attorney and I will each have the  
23 opportunity to comment on the information contained in the report at the time of sentencing.  
24 Unless the District Attorney has specifically agreed otherwise, the District Attorney may also  
25 comment on this report.

26 WAIVER OF RIGHTS

27 By entering my plea of guilty, I understand that I am waiving and forever giving up the  
28 following rights and privileges:

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1. The constitutional privilege against self-incrimination, including the right to refuse to testify at trial, in which event the prosecution would not be allowed to comment to the jury about my refusal to testify.
2. The constitutional right to a speedy and public trial by an impartial jury, free of excessive pretrial publicity prejudicial to the defense, at which trial I would be entitled to the assistance of an attorney, either appointed or retained. At trial the State would bear the burden of proving beyond a reasonable doubt each element of the offense(s) charged.
3. The constitutional right to confront and cross-examine any witnesses who would testify against me.
4. The constitutional right to subpoena witnesses to testify on my behalf.
5. The constitutional right to testify in my own defense.
6. The right to appeal the conviction with the assistance of an attorney, either appointed or retained, unless specifically reserved in writing and agreed upon as provided in NRS 174.035(3). I understand this means I am unconditionally waiving my right to a direct appeal of this conviction, including any challenge based upon reasonable constitutional, jurisdictional or other grounds that challenge the legality of the proceedings as stated in NRS 177.015(4). However, I remain free to challenge my conviction through other post-conviction remedies including a habeas corpus petition pursuant to NRS Chapter 34.

VOLUNTARINESS OF PLEA

I have discussed the elements of all of the original charge(s) against me with my attorney and I understand the nature of the charge(s) against me.

I understand that the State would have to prove each element of the charge(s) against me at trial.

I have discussed with my attorney any possible defenses, defense strategies and circumstances which might be in my favor.

All of the foregoing elements, consequences, rights, and waiver of rights have been thoroughly explained to me by my attorney.

I believe that pleading guilty and accepting this plea bargain is in my best interest, and that a trial would be contrary to my best interest.

I am signing this agreement voluntarily, after consultation with my attorney, and I am not acting under duress or coercion or by virtue of any promises of leniency, except for those set forth in this agreement.



CERTIFICATE OF SERVICE BY MAILING

I, Matthew Travis Houston, hereby certify, pursuant to NRCP 5(b), that on this 26 day of May, 2023, I mailed a true and correct copy of the foregoing, "EMERGENCY OBJECTION TO PAGE NUMBER ELEVEN OF RESPONDENT'S ANSWERING BRIEF FILED FEBRUARY 28TH, 2023, IN CASE # 84086" by placing document in a sealed pre-postage paid envelope and deposited said envelope in the United State Mail addressed to the following:

JOHN T. AFSHAR  
dba STEVEN B. WOLFSON  
J. Hall  
200 Lewis Avenue  
Po Box 552212  
Las Vegas, NV 89155-2212

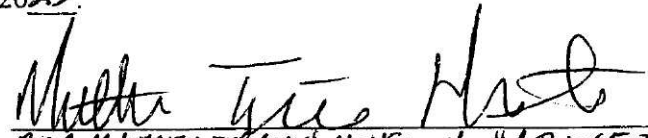
AARON D. FORD dba  
NEVADA ATTORNEY GENERAL  
555 East Washington Avenue  
Ste. 3900  
Las Vegas, NV  
89101-7068

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dba  
SUPREME COURT OF NEVADA  
201 South Carson Street, Ste 201  
Carson City, NV  
89701-4702

CLARK MCLCOURT LLC  
7371 Prairie Falcon Rd  
Ste. No. 120  
Las Vegas, NV  
89128

CC:FILE

DATED: this 26 day of May, 2023.

  
REV. MATTHEW TRAVIS HOUSTON #1210652  
Appellant /In Propria Personam  
Post Office Box 208,S.D.C.C.  
Indian Springs, Nevada 89018  
IN FORMA PAUPERIS:  
ABA No. 04662784