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Electronically Filed
Jun 10 2022 03:41 p.m.
Case No. Elizabeth A. Brown
Clerk of Supreme Court

**RECORD OF DISCIPLINARY PROCEEDINGS,
PLEADINGS AND TRANSCRIPT OF HEARING**

Thomas S. Shaddix, Esq.
Nevada Bar No. 7905
2550 E. Desert Inn Rd., #181
Las Vegas, NV 89121
Respondent

IN THE MATTER OF)
DISCIPLINE OF)
THOMAS S. SHADDIX, ESQ.,)
Bar No. 7905)
)
)
)
)

1. Nature of the Case

THOMAS S. SHADDIX (“Respondent”) failed to appear before a Formal Hearing Panel (“Panel”) of the Southern Nevada Disciplinary Board on April 13, 2022, via “Zoom.” The Panel consisted of Chair Dana Oswalt, Esq., Farhan Naqvi, Esq., and lay member Anne Kingsley. Assistant Bar Counsel Bruce Hahn, Esq., represented the State Bar of Nevada (“State Bar”). No one appeared on Respondent’s behalf.

The underlying grievance involved Elizabeth Langstaff who retained Respondent in January, 2020 to defend her in a traffic citation matter. The Respondent thereafter did not respond to the client's requests for a case status. The Respondent did not advise the client that he entered a guilty plea to a traffic charge on her behalf, nor of her obligation to pay a fine to

1 the court. The Respondent thereafter did not timely or substantively
2 respond to the State Bar's three investigative inquiries nor provide the
3 update he represented he would.

4 **2. Number of Grievances**

5 This case arose from a single grievance.

6 **3. Rules of Professional Conduct**

7 The Panel found that Respondent violated RPC 1.4(a)
8 (Communication), and RPC 8.1(b) (Bar Disciplinary Matters) by default
9 and by proof.

10 **4. Mental State**

11 The Panel found that Respondent's mental state in committing the
12 two professional rule violations was Knowing.

13 **5. Injury**

14 The Panel found that Respondent's conduct caused minimal actual
15 harm, although potential harm was present.

1 **6. Discipline Baseline**

2 The Panel considered ABA Annotated Standards for Imposing
3 Lawyer Sanctions, (2nd Ed. 2019) argued by the State Bar for application of
4 baseline standard 4.42 for Count I, and standard 7.2 for Count II.

5 **7. Aggravation and Mitigation**

6 Pursuant to SCR 102.5(1), the Panel found the following aggravating
7 factors in considering the discipline to be imposed:

- 8 (a) Prior disciplinary offenses;
- 9 (e) Bad faith obstruction of the disciplinary proceeding by
10 intentionally failing to comply with rules or orders;
- 11 (i) Substantial experience in the practice of law.

12 Pursuant to SCR 102.5(2), the Panel found the following mitigating
13 factors.

- 14 (b) Absence of a dishonest or selfish motive.

15 **8. Summary of the Recommended Discipline**

16 The Panel recommended that Respondent be actually suspended
17 from the practice of law for 6 months and 1 day. The Panel also
18

1 recommended that this Court order the SCR 120(3) costs of \$2,500 and the
2 SCR 120(1) hearing costs against Respondent.

3
4 DATED this 10th day of June 2022.

5 **STATE BAR OF NEVADA**

6
7 By: Bruce Hahn
8 Bruce C. Hahn, Assistant Bar Counsel
9 Nevada Bar No. 5011
3100 W. Charleston Blvd. Suite 101
Las Vegas, Nevada 89102
10 (702) 382-2200
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Case No: OBC21-0567



FILED

JAN - 4 2022

STATE BAR OF NEVADA

BY: [Signature]
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.)
NV Bar No. 7905)
)
Respondent.)

COMPLAINT

TO: Thomas S. Shaddix Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121-3822
(SCR 79 permanent mailing)

AND

Thomas S. Shaddix, Esq.
shaddixts@ticketdefenders.net
(SCR 79 email address)

AND

Thomas S. Shaddix, Esq.
Thomas@shaddixlaw.com
(Non-SCR 79 address)

PLEASE TAKE NOTICE that pursuant to Supreme Court Rule ("SCR") 105(2) a
VERIFIED RESPONSE OR ANSWER to this Complaint must be filed with the Office of Bar
Counsel, State Bar of Nevada, 3100 W. Charleston Blvd., Ste. 100, Las Vegas, Nevada, 89102,

1 within twenty (20) days of service of this Complaint. Procedure regarding service is addressed
2 in SCR 109.

3 Complainant, State Bar of Nevada ("State Bar"), by and through its Assistant Bar
4 Counsel Bruce C. Hahn is informed and believes as follows:

5 1. Respondent Attorney Thomas Shaddix, Esq. ("Respondent"), Bar No. 7905 is
6 currently an active member of the State Bar of Nevada. At all times pertinent to this complaint
7 had his principal place of business for the practice of law located in Clark County, Nevada.

8 2. On or about September 23, 2019, Elizabeth Langstaff ("Grievant") was cited for
9 a traffic violation in the Las Vegas Justice Court ("LVJC") under case number X02245939.

10 3. On or about January 2, 2020, Grievant Langstaff retained the Law Office of
11 Thomas S. Shaddix, Esq., ("Respondent"), dba "Traffic Ticket Defenders" ("TD") to represent
12 her in the LVJC traffic citation. The Grievant spoke with TD office manager Alison Perelmen
13 ("Perelmen") who processed a \$100 charge to Grievant's credit card.

14 4. On or about January 16, 2020, Perelmen emailed the Grievant advising that an
15 "attorney session" was scheduled for February 20, 2020. The email stated that the hearing
16 results would be sent in 2-3 weeks. The email directed the Grievant to contact TD thereafter
17 if she did not hear from TD.

18 5. From February 21, 2020 through April 2021, the Grievant left several voicemail
19 messages with the TD office but did not receive return calls. The Grievant assumed the courts
20 and the TD office was closed due to the COVID-19 pandemic.

21 6. In early to mid-May 2021, the Grievant discovered that the TD phone number
22 was disconnected, despite the same number being actively displayed on the TD website of
23 www.ticketdefenders.net. On May 19, 2021, the Grievant filed an online grievance with the
24 State Bar, naming the Respondent.

25 ///

1 7. State Bar Senior Paralegal Investigator Dawn Meeks investigated the Langstaff
2 grievance against the Respondent to include a review of the LVJC record identified below:

3 8. On February 20, 2020, the Respondent entered a “Not Guilty” plea on Grievant
4 Langstaff’s behalf, thereafter, setting a “Pretrial Conference” with the court for March 13,
5 2020.

6 9. On March 13, 2020, the Respondent entered a “Guilty” plea on the Grievant’s
7 behalf to an amended charge of “Illegal Parking” with a commensurate fine of \$55.00.

8 10. The Respondent’s office did not timely communicate to the Grievant that they
9 had entered a guilty plea on her behalf or the obligation to pay the \$55 fine.

10 11. On July 12, 2021, the State Bar emailed Respondent’s office with a letter of
11 investigation seeking information on the Langstaff grievance by July 26. On July 14, 2021, the
12 Respondent replied with an email to the State Bar that he would “respond as soon as possible.”
13 The Respondent did not timely substantively respond.

14 12. On August 5, 2021, the Respondent emailed the State Bar stating he had no
15 record that the Langstaff matter was “billed” or that he was retained. The Respondent stated
16 he would “update” with his findings by tomorrow. The State Bar received no update from the
17 Respondent.

18 13. On October 18, 2021, the State Bar emailed the Respondent seeking specific
19 responses on the Langstaff grievance by October 27 and for him to confirm receipt of the State
20 Bar inquiry. The letter advised the Respondent that a potential charge under RPC 8.1 would
21 be considered absent a timely reply. The State Bar’s email delivery system received a “read
22 receipt” prompt about 7 hours later.

23 14. On October 28, 2021, the Respondent emailed the State Bar seeking a time
24 extension to reply. The State Bar agreed to November 4.

1 15. On November 4, the Respondent emailed a response, stating that the Grievant's
2 "credit card was declined" and he hasn't had "a new client since April 2020." That same
3 afternoon, the State Bar emailed the Respondent again seeking his response to specific
4 questions concerning the Langstaff grievance. The Respondent did not timely reply.

5 **COUNT ONE - RPC 1.4(a) (Communication)**

6 16. RPC 1.4(a) states in relevant part: "A lawyer shall:...(3) Keep the client
7 reasonably informed about the status of the matter; (4) Promptly comply with reasonable
8 requests for information..."

9 17. About February 21, 2020 through April 2021, the Respondent failed to promptly
10 comply with reasonable requests for information by not responding to Grievant Langstaff's
11 voice mail messages for a case status and/or,

12 18. On and after March 13, 2020, the Respondent failed to keep Grievant Langstaff
13 reasonably informed about the status of a matter, to wit, her traffic ticket status change with
14 Las Vegas Justice Court, by not informing her of his entry of a guilty plea on her behalf and/or
15 her obligation to pay a fine associated with that change of plea.

16 **COUNT TWO - RPC 8.1 (Bar Disciplinary Matters)**

17 19. RPC 8.1 states in relevant part: "...a lawyer...in connection with a disciplinary
18 matter, shall not: (b) ...knowingly fail to respond to a lawful demand for information from [a]
19 ...disciplinary authority,..."

20 20. On and after July 12, 2021, the State Bar sought to communicate with the
21 Respondent concerning the Langstaff grievance, during which the Respondent failed to:

22 a) timely substantively respond to the State Bar's written inquiry of July 12, 2021,
23 and/or,

24 b) timely substantively provide the State Bar with the "update" he represented he would
25 provide by August 6, 2021, and/or,

1 c) timely substantively respond to the State Bar's written request of October 18, 2021,
2 and/or,

3 d) timely substantively respond to the State Bar's written request of November 4, 2021.

4 WHEREFORE, Complainant seeks relief as follows:

5 21. That a hearing be held pursuant to Nevada Supreme Court Rule 105;

6 22. That Respondent be assessed the costs of the disciplinary proceeding pursuant
7 to SCR 120; and

8 23. That pursuant to SCR 102, such disciplinary action be taken by the Southern
9 Nevada Disciplinary Board against Respondent as may be deemed appropriate under the
10 circumstances.

11
12 Dated this 4th day of January 2022.

13 **STATE BAR OF NEVADA**
14 DANIEL M. HOOGE, Bar Counsel

15 *Bruce Hahn*

16 By: _____
17 Bruce C. Hahn, Assistant Bar Counsel
18 Nevada Bar No. 5011
3100 W. Charleston Blvd., Ste. 100
Las Vegas, Nevada, 89102



FILED

JAN - 4 2022

STATE BAR OF NEVADA
BY: [Signature]
OFFICE OF BAR COUNSEL

Case No.: OBC21-0567

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.,)
NV BAR No. 7905)
)
Respondent.)

**DESIGNATION OF
HEARING PANEL MEMBERS**

TO: Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121
shaddixts@ticketdefenders.net
(SCR 79 address & email)

and
thomas@shaddixlaw.com
(Alternate email address)

The following are members of the Disciplinary Board for the Southern District of Nevada. Pursuant to Nevada Supreme Court Rule (SCR) 105, you may issue peremptory challenge to five (5) such individuals by delivering the same in writing to the Office of Bar Counsel within twenty (20) days of service of the complaint.

The Chair of the Southern Nevada Disciplinary Board will thereafter designate a hearing panel of three (3) members of the Disciplinary Board, including at least one member who is not an attorney, to hear the above-captioned matter.

- | | |
|----|---|
| 1 | 1. Russell E. Marsh, Esq., Chair |
| 2 | 2. Dana Palmer Oswalt, Esq., Vice Chair |
| 3 | 3. Christopher J. Lalli, Esq., Vice Chair |
| 4 | 4. Neil Beller, Esq. |
| 5 | 5. Annette L. Bradley, Esq. |
| 6 | 6. John E. Bragonje, Esq. |
| 7 | 7. Shemilly A. Briscoe, Esq. |
| 8 | 8. Amanda Brookyser, Esq. |
| 9 | 9. Robert J. Caldwell, Esq. |
| 10 | 10. Jacqueline B. Carman, Esq. |
| 11 | 11. Andrew A. Chiu, Esq. |
| 12 | 12. James P. Chrisman, Esq. |
| 13 | 13. Marc P. Cook, Esq. |
| 14 | 14. Ira W. David, Esq. |
| 15 | 15. Damon Dias, Esq. |
| 16 | 16. Sandra K. DiGiacomo, Esq. |
| 17 | 17. F. Thomas Edwards, Esq. |
| 18 | 18. Matthew S. Fox, Esq. |
| 19 | 19. Alan Freer, Esq. |
| 20 | 20. Adam Garth, Esq. |
| 21 | 21. Kelly Giordani, Esq. |
| 22 | 22. Robert G. Giunta, Esq. |
| 23 | 23. Angela Guingcangco, Esq. |
| 24 | 24. Parish D. Heshmati, Esq. |
| 25 | 25. Kenneth E. Hogan, Esq. |

- 1 26. Jennifer K. Hostetler, Esq.
- 2 27. David Kaplan, Esq.
- 3 28. Franklin J. Katschke, Esq.
- 4 29. James T. Leavitt, Esq.
- 5 30. Michael B. Lee, Esq.
- 6 31. Jennifer R. Lloyd, Esq.
- 7 32. Donald Lowrey, Esq.
- 8 33. Dawn M. Lozano, Esq.
- 9 34. Roger Madsen, Esq.
- 10 35. Jason R. Maier, Esq.
- 11 36. Farhan Naqvi, Esq.
- 12 37. Michael J. Oh, Esq.
- 13 38. Gary A. Pulliam, Esq.
- 14 39. Paul “Luke” Puschnig, Esq.
- 15 40. Michael D. Rawlins, Esq.
- 16 41. Jericho L. Remitio, Esq.
- 17 42. Jarrod L. Rickard, Esq.
- 18 43. Miriam E. Rodriguez, Esq.
- 19 44. Vincent J. Romeo, Esq.
- 20 45. Daniel F. Royal, Esq.
- 21 46. Maria V. Saladino, Esq.
- 22 47. Africa A. Sanchez, Esq.
- 23 48. Jen J. Sarafina, Esq.
- 24 49. Jay A. Shafer, Esq.
- 25 50. Thomas R. Sheets, Esq.

- 1 51. Jeffrey G. Sloane, Esq.
- 2 52. Sarah E. Smith, Esq.
- 3 53. James R. Sweetin, Esq.
- 4 54. Stephen L. Titzer Esq.
- 5 55. Jacob J. Villani, Esq.
- 6 56. Marni Watkins, Esq.
- 7 57. Dan R. Waite, Esq.
- 8 58. Joseph Went, Esq.
- 9 59. Reed J. Werner, Esq.
- 10 60. Natalie Ann Allred, Laymember
- 11 61. Afeni Banks, Laymember
- 12 62. Brian Catlett, Laymember
- 13 63. Alexander Falconi, Laymember
- 14 64. Brittany Falconi, Laymember
- 15 65. Joelyne Gold, Laymember
- 16 66. Elizabeth A. Hanson, Laymember
- 17 67. Jack S. Hegeduis, Laymember
- 18 68. Julia D. Hesmati, Laymember
- 19 69. William M. Holland, Laymember
- 20 70. Nicholas Kho, Laymember
- 21 71. Annette Kingsley, Laymember
- 22 72. Gale Kotlikova, Laymember
- 23 73. Todd Krome, Laymember
- 24 74. Benjamin S. Lurie, Laymember
- 25 75. Jo Kent McBeath, Laymember

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- 76. Steve Moore, Laymember
- 77. Kellie C. Rubin, Laymember
- 78. Danny Lee Snyder, Jr., Laymember
- 79. Harvey Weatherford, Laymember

DATED this 4th day of January 2022.

STATE BAR OF NEVADA
Daniel M. Hooge, Bar Counsel

Bruce Hahn

By: _____
Bruce C. Hahn, Assistant Bar Counsel
3100 W. Charleston Blvd, Ste. 100
Las Vegas, Nevada 89102
Phone: (702) 382-2200

Case No.: OBC21-0567



FILED

JAN - 4 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.,)
NV Bar No. 7905)
)
Respondent.)

DECLARATION OF MAILING

Sonia Del Rio, under penalty of perjury, being first and duly sworn, deposes and says as follows:

1. That Declarant is employed with the State Bar of Nevada and, in such capacity, Declarant is Custodian of Records for the Discipline Department of the State Bar of Nevada.
2. That Declarant states that the enclosed documents are true and correct copies of the **COMPLAINT, FIRST DESIGNATION OF HEARING PANEL MEMBERS, and STATE BAR OF NEVADA'S PEREMPTORY CHALLENGES** in the matter of the *State Bar of Nevada vs. Thomas S. Shaddix, Esq.*, Case No. OBC21-0567.

///

1 3. That pursuant to Supreme Court Rule 109, the Complaint, First Designation of
2 Hearing Panel Members, and State Bar of Nevada's Peremptory Challenges
3 were served on the following placing copies in an envelope which was then
4 sealed and postage fully prepaid for regular and certified mail, and deposited
5 in the United States mail at Las Vegas, Nevada on **January 4, 2022**, to:

6 Thomas S. Shaddix, Esq.
7 2550 E. Desert Inn Rd. #181
8 Las Vegas, NV 89121
9 **CERTIFIED MAIL RECEIPT: 7021 2720 0000 9932 7944**

9 **And via electronic mail on January 4, 2022 to:**

10 Thomas S. Shaddix, Esq. (SCR 79 Email): shaddixts@ticketdefenders.net
11 (Alternate Email): thomas@shaddixlaw.com

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Dated this 4th day of January 2022.

14
15 *Sonia Del Rio*
16 _____
17 Sonia Del Rio, an employee
18 of the State Bar of Nevada
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Case No: OBC21-0567



FILED

FEB - 2 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.,)
Nevada Bar No. 7905,)
Respondent.)

**NOTICE OF INTENT TO PROCEED
ON DEFAULT BASIS**

TO: Thomas S. Shaddix Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121-3822
(SCR 79 permanent mailing)

AND

Thomas S. Shaddix, Esq.
shaddixts@ticketdefenders.net
(SCR 79 email address)

AND

Thomas S. Shaddix, Esq.
Thomas@shaddixlaw.com
(Non-SCR 79 address)

PLEASE TAKE NOTICE THAT unless the State Bar receives a responsive pleading in the above-captioned matter by February 25, 2022, it will proceed on a default basis and ***the charges against you shall be deemed admitted.*** Supreme Court Rule 105 (2) states in relevant part:

1 A copy of the complaint shall be served on the attorney and it shall
2 direct that a verified response or answer be served on bar counsel within 20
3 days of service. In the event the attorney fails to plead, **the charges shall be**
4 **deemed admitted**; provided, however, that an attorney who fails to respond
within the time provided may thereafter obtain permission of the appropriate
disciplinary board chair to do so, if failure to file is attributable to mistake,
inadvertence, surprise, or excusable neglect. (Emphasis added.)

5 Additional copies of the Complaint previously served upon you, and the First
6 Designation of Hearing Panel Members, accompanies this Notice.

7 DATED this 2 day of February 2022.

8
9 **STATE BAR OF NEVADA**
10 **DANIEL M. HOOGE, BAR COUNSEL**

11 *Bruce Hahn*

12
13 _____
14 Bruce C. Hahn, Assistant Bar Counsel
15 Nevada Bar No. 5011
16 3100 W. Charleston Blvd., Ste. 100
17 Las Vegas, Nevada 89102
18 (702) 382-2200
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Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd., #181
Las Vegas, NV 89121
Certified Mail Receipt: 7021 1970 0000 0350 4153

1. Thomas S. Shaddix, Esq. (SCR 79 Email): shaddixts@ticketdefenders.net
thomas@shaddixlaw.com

Sonia Del Rio
Sonia Del Rio, an employee of
the State Bar of Nevada.



FILED

MAR - 4 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No.: OBC21-0567

**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,

NV BAR NO. 7905

Respondent.

**ORDER APPOINTING HEARING
PANEL CHAIR**

IT IS HEREBY ORDERED that the following member of the Southern Nevada Disciplinary Board has been designated and as the Hearing Panel Chair.

1. Dana Oswalt, Esq.,

DATED this 2 day of March, 2022

SOUTHERN NEVADA DISCIPLINARY BOARD

By: *Christopher Lalli*
Christopher Lalli (Mar 2, 2022 14:03 PST)
Christopher J. Lalli, Esq.
Nevada Bar No. 5398
Vice-Chair, Southern Nevada Disciplinary Board

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **ORDER APPOINTING**
3 **HEARING PANEL CHAIR** was electronically served upon:

- 4 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
5 2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
6 thomas@shaddixlaw.com
7 3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

8 DATED this 4th day of March 2022.
9

10 Sonia Del Rio
11 Sonia Del Rio an employee of
12 the State Bar of Nevada.
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FILED

MAR - 7 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No. OBC21-0567

**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,
Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,
Nevada Bar No. 7905,

Respondent.

**NOTICE OF TELEPHONIC INITIAL
CASE CONFERENCE**

PLEASE TAKE NOTICE, the telephonic Initial Case Conference in the above-entitled matter is set for **March 8, 2022, at 3:00 p.m.** The State Bar conference call number is 1-877-594-8353, participant passcode is 46855068#.

Dated this 7 day of March 2022.

STATE BAR OF NEVADA
Daniel M. Hooge, Bar Counsel

Bruce Hahn

Bruce C. Hahn, Assistant Bar Counsel
3100 W. Charleston Boulevard, Suite 100
Las Vegas, Nevada 89102
(702) 382-2200
Attorney for Complainant

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1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net; thomas@shaddixlaw.com
3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

Sonia Del Rio
Sonia Del Rio, an employee
of the State Bar of Nevada

Case No.: OBC21-0567



STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)	<u>SCHEDULING ORDER AFTER</u>
)	<u>INITIAL CASE CONFERENCE</u>
Complainant,)	
)	
vs.)	
)	
THOMAS S. SHADDIX, ESQ.,)	
NV Bar No. 7905)	
Respondent.)	

Pursuant to Rule 17 of the Disciplinary Rules of Procedure (“DRP”), on March 8, 2022, 2021, at 3:00 p.m., Dana Oswalt, Esq., the Formal Hearing Panel Chair, met telephonically with Bruce Hahn, Esq., Assistant Bar Counsel, on behalf of the State Bar of Nevada (“SBN”), assisted by Sonia Del Rio, SBN Hearing Paralegal. Respondent did not appear. Respondent made no advance contact with the State Bar or the Chair advising of any scheduling or appearance difficulty.

During the Case Conference the parties discussed disclosures, discovery issues, the potential for resolution of this matter prior to the hearing, a status conference, and the hearing date.

The Chair finds and rules as follows:

1. The State Bar consents to service. The Chair orders that service to all parties and the Chair will occur by electronic means of all documents pursuant to SCR 109(2), NRCP

1 5, and DRP 11(b)(3) with the understanding that **all documents need to be submitted by**
2 **5:00 p.m. to be file stamped timely.**

3 **2.** The State Bar consents that venue is proper in Clark County, Nevada. The Chair
4 finds Clark County venue proper.

5 **3.** The Formal Hearing for this matter is hereby set for **one half (1/2) day**
6 **starting at 9:00 a.m. on April 13, 2022**, and shall take place virtually via Zoom
7 Conferencing until further notice.

8 **4.** On or before **March 15, 2022, at 5:00 p.m.**, the State Bar of Nevada's
9 initial disclosures shall be served on all parties. The documents provided by the State Bar
10 shall be bates stamped with numerical designations. *See* DRP 17 (a).

11 **5.** On or before **March 23, 2022, at 5:00 p.m.**, Respondent's initial
12 disclosures shall be served on all parties. The documents provided by the Respondent shall
13 be bates stamped with alphabetical exhibit designations. *See* DRP 17 (a).

14 **6.** On or before **April 7, 2022, at 5:00 p.m.**, the parties shall serve a Final
15 Designation of witnesses expected to testify and exhibits expected to be presented at the
16 Formal Hearing in this matter, pursuant to SCR 105(2)(d), DRP 17(a) and DRP 21.

17 **7.** All documents disclosed shall be bates stamped, the State Bar will use
18 numerical exhibit designations and Respondent will use alphabetical exhibit designations,
19 pursuant to DRP 17.

20 **8.** On **March 30, 2022, at 10:00 a.m.**, the parties shall meet telephonically
21 with Dana Oswalt, Esq. for the Pre-hearing Conference. Any pending issues, including
22 pending Motions, will be addressed at the Pre-hearing Conference. The parties shall use the
23 State Bar conference bridge (877) 594-8353 and the passcode is 46855068#. Pursuant to
24 DRP 23, at the Pre-hearing conference (i) the parties shall discuss all matters needing
25 attention prior to the hearing date, (ii) the Chair may rule on any motions or disputes

including motions to exclude evidence, witnesses, or other pretrial evidentiary matter, and (iii) the parties shall discuss and determine stipulated exhibits proffered by either the State Bar or Respondent as well as a stipulated statement of facts, if any.

9. The State Bar stipulates to waive SCR 105(2)(d) to allow for the formal appointment of the remaining hearing panel members on a date that is greater than 45 days prior to the scheduled hearing.

10. Based upon the State Bar's oral motion and offer of proof at ICC to support a finding of Default against the Respondent, the Chair made a provisional ruling that the charges filed against the Respondent are deemed admitted based upon the following findings: The Chair finds that the Respondent has not filed a timely responsive pleading to the State Bar Complaint filed January 4, 2022, and the Respondent has not provided any objection to the State Bar's Notice of Intent to Proceed on a Default Basis filed on or about February 2, 2022. The Chair further finds that the Respondent failed to appear at ICC without notice or excuse.

Based on the proffer of the State Bar to the foregoing during the telephonic Initial Conference and good cause appearing, **IT IS SO ORDERED.**

Dated this 10 day of March 2022.

SOUTHERN NEVADA DISCIPLINARY BOARD

Dana P. Oswalt

Dana P. Oswalt (Mar 10, 2022 14:36 PST)

By:

Dana Oswalt, Esq.

Hearing Panel Chair

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **SCHEDULING ORDER**
3 **AFTER INITIAL CASE CONFERENCE** were deposited in the United States Mail at Las Vegas,
4 Nevada, postage fully pre-paid thereon for first-class regular mail addresses to:

5 Thomas S. Shaddix, Esq.
6 2550 E. Desert Inn Rd., #181
7 Las Vegas, NV 89121
(SCR 79 Address)

8 And via email to:

- 9 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
10 2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
11 thomas@shaddixlaw.com
12 3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

13 DATED this 11th day of March 2022.
14

15 *Sonia Del Rio*
16 _____
Sonia Del Rio an employee of
the State Bar of Nevada.

Case No.: OBC21-0567



**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.)
Nevada Bar No. 7905)
Respondent.)

**NOTICE OF
FORMAL HEARING**

PLEASE TAKE NOTICE that the formal hearing in the above-entitled action has been scheduled for **one day on April 13, 2022, at the hour of 9:00 a.m.,** The hearing will be conducted virtually through **ZOOM video conference, until further notice.** The parties have stipulated to the hearing date set forth above.

Please be further advised that you are entitled to be represented by counsel, to cross-examine witnesses, and to present evidence.

DATED this 11 day of March 2022.

STATE BAR OF NEVADA
Daniel M. Hooge, Bar Counsel

Bruce Hahn

By: _____
Bruce C. Hahn, Assistant Bar Counsel
3100 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89102
(702) 382-2200
Attorney for State Bar of Nevada

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Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd., #181
Las Vegas, NV 89121
(SCR 79 Address)
CERTIFIED MAILING: 7021 1970 0000 0350 4276

1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
thomas@shaddixlaw.com
3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

Sonia Del Rio
Sonia Del Rio an employee of
the State Bar of Nevada.



FILED

MAR 15 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

Case Nos: OBC21-0567

**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.

NV BAR No. 7905

Respondent.

**ORDER APPOINTING
FORMAL HEARING PANEL**

IT IS HEREBY ORDERED that the following members of the Southern Nevada Disciplinary Board have been designated as members of the formal hearing panel in the above-entitled action. The hearing will be convened on the 13th day of April, 2022 starting at 9:00 a.m. via Zoom Video Conferencing.

1. Dana Oswalt, Esq., Chair;
2. Farhan Naqvi, Esq.
3. Anne Kingsley, Laymember

DATED this 14 day of March, 2022

SOUTHERN NEVADA DISCIPLINARY BOARD

By: Christopher Lalli
Christopher Lalli (Mar 14, 2022 06:41 PDT)
Christopher Lalli, Esq.
Nevada Bar No. 5398
Vice-Chair, Southern Nevada Disciplinary Board

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **ORDER APPOINTING**
3 **FORMAL HEARING PANEL** were served electronically to:

- 4 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
5 2. Farhan Naqvi, Esq. (Panel Member): Naqvi@naqvilaw.com
6 3. Anne Kingsley (Panel Lay Member): Anne.kingsley@unlv.edu
7 4. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
8 thomas@shaddixlaw.com
9 5. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

10 DATED this 15th day of March 2022.

11
12 *Sonia Del Rio*

13 Sonia Del Rio an employee of
14 the State Bar of Nevada.
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FILED

MAR 15 2022

STATE BAR OF NEVADA
BY: 
OFFICE OF BAR COUNSEL

Case No: OBC21-0567

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,
Nevada Bar No. 7905,

Respondent.

**STATE BAR OF NEVADA'S
INITIAL DISCLOSURE OF
DOCUMENTS AND WITNESSES**

PLEASE TAKE NOTICE that the following is a list of witnesses and a summary of evidence which may be offered against Respondent at the time of the Formal Hearing, in the above-entitled complaint.

A. Documentary Evidence

Any and all documentation contained in the State Bar of Nevada's file including but not limited to, correspondence, emails, memorandums, text messages, notes, payments, invoices, bank records, receipts, billing entries and pleadings regarding grievance file number OBC21-0567.

Any and all documentation contained in records of the State Bar of Nevada regarding Respondent's licensure, compliance with reporting requirements, and disciplinary history.

The State Bar reserves the right to supplement this list as necessary.

Exhibit#	Document	Bates Stamped
1.	Formal Hearing Packet	will be produced prior to hearing
2.	Affidavit of Prior Discipline	will be produced at the time of hearing
3.	Traffic Citation and Case Summary regarding Case No. X02245939	SBN 001-004
4.	Grievance Dated May 19, 2021	SBN 001-007
5.	Email from Respondent to Dawn Meeks Dated July 14, 2021	SBN 001-002
6.	Email from Dawn Meeks to Respondent Dated October 18, 2021	SBN 001-004

The State Bar incorporates by reference all documents identified by Respondent in these matters.

B. Witnesses and Brief Statement of Facts

1. Respondent, Thomas S. Shaddix, Esq., will be called and would be expected to testify regarding his conduct and communications surrounding the events related to, and any and all documents pertinent to, each of the charged violations of the Rules of Professional Conduct, including but not limited to facts pertaining to the breach of his professional responsibilities as an attorney, his mental state pursuant to ABA Standards, the harm resulting from his conduct, and any aggravating and mitigating factors pursuant to Supreme Court Rule 102.5. Respondent is expected to provide testimony regarding the facts and circumstances in OBC21-0567 including all correspondence and conversations with State Bar personnel.

2. Dawn Meeks, an investigator with the State Bar of Nevada Office of Bar Counsel, is expected to provide testimony regarding her investigation of OBC21-0567, including but not limited to, information and documents provided by Respondent and

1 Grievant, communications with Respondent and Grievant, and Respondent's disciplinary
2 history.

3 3. Elizabeth Langstaff, is expected to offer testimony regarding the facts and
4 circumstances regarding Case No. OBC21-0567, including but not limited to, the facts and
5 circumstances surrounding the allegations contained in said grievance.

6 4. Louise Watson, Legal Administrator with the State Bar of Nevada Office of Bar
7 Counsel, is expected to offer testimony regarding the facts and circumstances regarding Case
8 No. OBC21-0567, including but not limited to, the facts and circumstances surrounding the
9 allegations contained in said grievance including Respondent's disciplinary history.

10 DATED this 15th day of March 2022.

11
12 **STATE BAR OF NEVADA**

13 *Bruce Hahn*

14
15 **Bruce C. Hahn, Assistant Bar Counsel**

16 Nevada Bar No. 5011

17 3100 West Charleston Boulevard, Suite 100
18 Las Vegas, Nevada 89102

19 (702) 382-2200
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1. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net; thomas@shaddixlaw.com
2. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

By: Sonia Del Rio
Sonia Del Rio,
An employee of the State Bar of Nevada



FILED

APR -6 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No: OBC21-0567

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,
Nevada Bar No. 7905,

Respondent.

STATE BAR OF NEVADA'S
FINAL DISCLOSURE OF
DOCUMENTS AND WITNESSES

PLEASE TAKE NOTICE that the following is a list of witnesses and a summary of evidence which may be offered against Respondent at the time of the Formal Hearing, in the above-entitled complaint.

A. Documentary Evidence

Any and all documentation contained in the State Bar of Nevada's file including but not limited to, correspondence, emails, memorandums, text messages, notes, payments, invoices, bank records, receipts, billing entries and pleadings regarding grievance file number OBC21-0567.

Any and all documentation contained in records of the State Bar of Nevada regarding Respondent's licensure, compliance with reporting requirements, and disciplinary history.

The State Bar reserves the right to supplement this list as necessary.

Exhibit#	Document	Bates Stamped
1.	Formal Hearing Packet	will be produced prior to hearing
2.	Affidavit of Prior Discipline	will be produced at the time of hearing
3.	Traffic Citation and Case Summary regarding Case No. X02245939	SBN 001-004
4.	Grievance Dated May 19, 2021	SBN 001-007
5.	Email from Respondent to Dawn Meeks Dated July 14, 2021	SBN 001-002
6.	Email from Dawn Meeks to Respondent Dated October 18, 2021	SBN 001-004
7.	Declaration of Service According to SCR 109(1) in Support of Entry of Default Dated April 6, 2022	SBN 001-030
8.	Affidavits of Due Diligence from Nationwide Legal Filed March 29, 2022	SBN 001-003
9.	Email chain from Dawn Meeks to Respondent Dated July 12, 2021-November 4, 2021	SBN 001-005

The State Bar incorporates by reference all documents identified by Respondent in these matters.

B. Witnesses and Brief Statement of Facts

1. Respondent, Thomas S. Shaddix, Esq., will be called and would be expected to testify regarding his conduct and communications surrounding the events related to, and any and all documents pertinent to, each of the charged violations of the Rules of Professional Conduct, including but not limited to facts pertaining to the breach of his professional responsibilities as an attorney, his mental state pursuant to ABA Standards, the harm resulting from his conduct, and any aggravating and mitigating factors pursuant to Supreme Court Rule 102.5. Respondent is expected to provide testimony regarding the facts and

circumstances in OBC21-0567 including all correspondence and conversations with State Bar personnel.

2. Dawn Meeks, an investigator with the State Bar of Nevada Office of Bar Counsel, is expected to provide testimony regarding her investigation of OBC21-0567, including but not limited to, information and documents provided by Respondent and Grievant, communications with Respondent and Grievant, and Respondent's disciplinary history.

3. Elizabeth Langstaff, is expected to offer testimony regarding the facts and circumstances regarding Case No. OBC21-0567, including but not limited to, the facts and circumstances surrounding the allegations contained in said grievance.

4. Louise Watson, Legal Administrator with the State Bar of Nevada Office of Bar Counsel, is expected to offer testimony regarding the facts and circumstances regarding Case No. OBC21-0567, including but not limited to, the facts and circumstances surrounding the allegations contained in said grievance including Respondent's disciplinary history.

DATED this 6 day of April 2022.

STATE BAR OF NEVADA

Bruce Hahn

Bruce C. Hahn, Assistant Bar Counsel
Nevada Bar No. 5011
3100 West Charleston Boulevard, Suite 100
Las Vegas, Nevada 89102
(702) 382-2200

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1. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net; thomas@shaddixlaw.com
2. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

By: Sonia Del Rio
Sonia Del Rio,
An employee of the State Bar of Nevada

1 Thomas S. Shaddix, ESQ
2 Nevada Bar No. 7905
3 2550 E. Desert Inn Rd. #181
4 Las Vegas, Nevada 89121
5 702.238.9738

6 STATE BAR OF NEVADA
7 SOUTHERN NEVADA DISCIPLINARY BOARD



FILED

APR 13 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

9 STATE BAR OF NEVADA,

Case No. : OBC 21-0567

11 COMPLAINANT,

13 Vs.

15 THOMAS S. SHADDIX, ESQ.
16 Nevada Bar No. 7905,

18 RESPONDENT,
19 _____

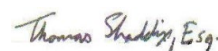
21 MOTION FOR EXTENSION OF TIME AND REQUEST FOR IN PERSON HEARING

23 COMES NOW the Respondent, Thomas S. Shaddix, ESQ, and especially moves to continue the
24 currently scheduled "Zoom Hearing" and Respondent requests an in person hearing to be set in its place
25 at a later date. All parties have been previously notified by Respondent of his intent to seek such a
26 setting per e-mail on April 7, 2022 and there have been no objections or other communications during
27 the interim period.

28
29 This request is made without intent to hinder these proceedings and for good cause.
30 Respondent has previously participated in a disciplinary hearing via the "Zoom" application and found it
31 to be unduly burdensome as well as prejudicial to the Respondent. The State of Nevada Covid-19
32 protocols have been modified allowing for In Person hearings for other types of judicial proceedings in
33 both the Justice and District Courts of the State of Nevada to proceed as well as for litigants to apply for
34 same in certain cases should that be necessary. Such an accommodation in this matter should be
35 granted due to the seriousness of the possible outcomes of this matter as well as for basic fairness and
36 due process concerns for both the Complainant and Respondent. Although there may have been a time
37 where such video or telephonic appearances have been justified, that time is well past.

38
39 I hereby request the above matter to be assigned an "In Person" hearing date and for any
40 individuals subject to that date to appear personally, or alternatively submit a declaration for
41 appearance by audiovisual transmission for approval.

43 Dated this _13th_ day of April, 2022

45 

46 Thomas S. Shaddix, Esq.

Case No: OBC21-0148



FILED

MAY 17 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant

THOMAS S. SHADDIX, ESQ.,

Bar No. 7905

Respondent.

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND RECOMMENDATION
AFTER FORMAL HEARING

This matter came before a Formal Hearing Panel of the Southern Nevada Disciplinary Board ("Panel") on April 13, 2022, at 9:00 am conducted by simultaneous audio-visual transmission platform "Zoom." The Panel consisted of Chair Dana Oswalt, Esq., Farhan Naqvi, Esq., and lay member Anne Kingsley. Assistant Bar Counsel, Bruce Hahn, Esq., represented the State Bar of Nevada ("State Bar" or "SBN"). The *pro se* Respondent did not appear.

The Panel submits the following Findings of Fact, Conclusions of Law and Recommendation in a unanimous decision,¹ based upon the pleadings, testimony, documentary evidence presented and argument of the State Bar.

///

///

¹ Transcript of Proceedings of April 13, 2022 ("TOP") 35:1 – 41:20.

1 **FINDINGS OF FACT**

2 **The Panel finds the following:**

3 1. The Panel proceeded with an uncontested matter involving the State Bar's
4 complaint filed January 4, 2022, alleging two violations of the Nevada Rules of Professional
5 Conduct ("RPC") to wit: Count I – 1.4(a) (Communication) and Count II – 8.1 (Bar
6 Disciplinary Matters). Respondent failed to provide an Answer or responsive pleading to
7 the charges. The matter proceeded on a default basis consistent with the Panel Chair's
8 finding of default in the Scheduling Order of March 10, 2022. The charges were deemed
9 admitted against the Respondent for his failure to plead.

10 2. The Panel Chair considered Respondent's "Motion to Extend Time and
11 Request for In-Person Hearing" that was first submitted by email to the Chair and State
12 Bar at 8:01 am the morning of hearing.² The State Bar orally opposed the Respondent's
13 motion. TOP 5:14 – 9:1. Respondent made no appearance in support, nor offered evidence
14 to support his argument that a virtual hearing was unduly burdensome and prejudicial.
15 The Panel Chair denied Respondent's motion based upon i) Respondent's failure to argue
16 his position, ii) Respondent's lack of support for his contentions, iii) Respondent's waiver
17 of an in-person hearing by his non-appearances at Initial Conference and Pre-Hearing
18 Conference, iv) Respondent's motion was untimely as it was due before March 30, along
19 with the arguments offered by the State Bar. TOP 9:2 – 10:23.

20 3. The Panel considered no sworn testimony.

21 4. The Panel considered documentary evidence admitted along with argument
22
23
24

25

² This document was filed at 8:37 am and admitted as Exhibit 10. TOP 41:3-11.

1 of counsel. The State Bar offered Exhibits 1³ - 9.⁴ TOP 11:3 – 15:11. Respondent tendered
2 no advance disclosures or hearing exhibits. TOP 29:6 – 12; 25:9 – 20.

3 5. The State Bar proved all the elements of Count I - RPC 1.4(a) (Communi-
4 cation) and Count II - RPC 8.1(b) (Bar Disciplinary Matters), by default taken and by proof
5 offered via Exhibits 3-9 to the standard of clear and convincing evidence at Formal
6 Hearing. TOP 35:1 – 9; 10:24 – 11:2.

7 6. The Respondent's mental state in committing the two professional rule
8 violations was Knowing, resulting in Minimal Actual Harm although Potential Harm was
9 present. TOP 35:20 – 36:19; 39:14 – 41:2.

10 7. The Panel considered ABA Annotated Standards for Imposing Lawyer
11 Sanctions (2nd Ed. 2019) ("Standards") with the application of baselines of: i) Section 4.42
12 (Violation of Duties Owed to Clients) for Count I - RPC 1.4(a), and ii) Section 7.2 (Violation
13 of Duties Owed as a Professional) for Count II – RPC 8.1(b). TOP 35:14 - 36:19. Both
14 baselines provide for a term of legal practice suspension.

15 8. Three aggravating circumstances found under SCR 102.5(1) were: a) Prior
16 disciplinary offenses,⁵ e) Bad faith obstruction of the disciplinary proceeding by
17 intentionally failing to comply with rules or orders and i) Substantial experience in the
18 practice of law. TOP 36:20 – 38:7.

19
20 ³ Exhibit 1 containing the case pleadings in the "Hearing Packet" (SBN 001-027) consisted of: i) The
21 Complaint, Panel Designation, and Mailing Declaration of January 4, 2022 (001-012); ii) Notice of Intent to
Proceed on a Default Basis (013-015); iii) Order Appointing Hearing Panel Chair (016-017); iv) Notice of
Telephonic Initial Case Conference (018-019); v) Scheduling Order (020-023); vi) Notice of Formal Hearing
(024-025); vii) Order Appointing Hearing Panel (026-27). TOP 11:3 - 25.

22 ⁴ The Exhibits were as follows: Ex. 2 Affidavit of prior discipline and "sub-exhibits" (SBN 001-020), Ex. 3
23 Grievant Citation and Court docket (SBN 001-004), Ex 4 Grievances, Engagement email and payment
24 (SBN001-007), Ex. 5 SBN-Respondent email thread (SBN 001-002), Ex 6 SBN-Respondent email thread
(SBN 001-004), Ex 7 SBN Declaration of Service and "Sub-exhibits" (SBN 001-030), Ex 8 Due Diligence
Affidavits (SBN 001-003), SBN-Respondent email thread (SBN 001-005).

25 ⁵ Exhibit 2 of April 13, 2022 revealed Respondent's disciplinary history: i) Letter of Private Reprimand,
3/12/07 for RPCs 5.5(1) and 8.1(b); ii) Public Reprimand, 6/6/11 for RPCs 1.3, 1.4 and 8.1(b); iii) Public
Reprimand, 7/10/14 for RPCs 1.4 & 8.1(b), and iv) Suspension stayed for 18 months, 5/14/21 for RPCs 1.4,
5.3 and 8.1. Exhibit 2 was considered after the Panel ruled upon liability for the two counts.

9. One mitigating circumstances found under SCR 102.5(2) was b) absence of a dishonest or selfish motive. TOP 38:8 - 16.

CONCLUSIONS OF LAW

Based upon the foregoing Findings of Fact, the Panel hereby issues the following
Conclusions of Law:

1. The Southern Nevada Disciplinary Board has jurisdiction over Petitioner and the subject matter of these proceedings. SCR 99.

2. Venue is proper in Clark County, Nevada. State Bar consent and Respondent waiver. TOP 9:9 – 12; Exhibit 1 (Scheduling Order filed March 10, 2022, pp.020-023).

3. Respondent was practicing law in the State of Nevada from 2001. Exhibit 2.
TOP 35:4 – 9; 30:1 – 5; 38:2 – 7.

4. The State Bar must prove by clear and convincing evidence that Respondent violated any Rules of Professional Conduct. SCR 105(2)(f). *In re Stuhff*, 108 Nev. 629, 633-634, 837 P.2d 853, 856 (1992); *Gentile v. State Bar*, 106 Nev. 60, 62, 787 P.2d 386, 387 (1990).

5. Charges are deemed admitted if default is taken when an attorney fails to plead. SCR 105(2).

6. Default was properly taken and the two professional rule violations involving RPC 1.4(a) (Communication) and 8.1 (Bar Disciplinary Matters) are deemed admitted. Exhibit 1 (Scheduling Order filed March 10, 2022, pp.020-023); TOP 10:24 – 11:22.

RECOMMENDATION

Based upon the foregoing Findings of Fact and Conclusions of Law, the Panel unanimously hereby recommends that:

1. Respondent be actually suspended from the practice of law for 6 months and

1 1 day. TOP 38:17 - 19.

2 2. Respondent to pay administrative costs of \$2,500. SCR 120(3). TOP 38:19 -
3 20.

4 3. Respondent to pay costs of the Formal Hearing proceedings including the
5 reporter's appearance and transcript expense to the State Bar of Nevada, within 30 days of
6 the Supreme Court's order approving the Formal Hearing Panel's recommendation. SCR
7 120(1). TOP 38:19 - 22.

8 **DATED** this 17 day of May 2022.

9
10 *Dana P. Oswalt*

Dana P. Oswalt (May 17, 2022 08:13 PDT)

11 **DANA P. OSWALT, Esq.**

12 Hearing Panel Chair

13 Southern Nevada Disciplinary Panel
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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **FINDINGS OF FACT,**
3 **CONCLUSIONS OF LAW AND RECOMMENDATION AFTER FORMAL HEARING** were
4 served electronically to:

- 5 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
6 2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
7 thomas@shaddixlaw.com
8 3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

9
10 DATED this 17th day of May 2022.

11 *Sonia Del Rio*
12 _____
13 Sonia Del Rio an employee of
14 the State Bar of Nevada.
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FILED

JUN - 1 2022

STATE BAR OF NEVADA

BY:

OFFICE OF BAR COUNSEL

Case No.: OBC21-0567

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.,)
NV Bar No. 7905)
)
Respondent.)

STATE BAR OF NEVADA'S
MEMORANDUM OF COSTS

Description	Amount
Court Reporter Fee & Transcript Fee Hearing Held on April 13, 2022	\$422.50
Nation Wide Legal Services Invoice No. 41137	\$225.00
SCR 120	\$2,500.00
Certified Mail Costs (3 x \$6.78)	\$20.34
TOTAL	\$3,167.84

1. I am Assistant Bar Counsel with the State Bar of Nevada. I have personal knowledge of the above-referenced costs and disbursements expended.

2. The costs set forth above are true and correct to the best of my knowledge and belief and were necessary and reasonably incurred and paid in connection with this matter. True and correct copies of invoices supporting these costs are attached to this Memorandum of Costs.

1 3. As stated in the Findings of Fact, Conclusions of Law and Recommendation,
2 Respondent shall be ordered to pay the fees and costs of these proceedings within thirty (30)
3 days of the Supreme Court's Order in this matter pursuant to Supreme Court Rule 120(1).

4 Dated this 1st day of June 2022.

5 **STATE BAR OF NEVADA**
6 Daniel M. Hooge, Bar Counsel

7 *Bruce Hahn*

8 By: _____
9 Bruce C. Hahn, Assistant Bar Counsel
10 3100 W. Charleston Boulevard, Ste. 100
11 Las Vegas, Nevada 89102
12 Attorney for State Bar of Nevada

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Job Date	Witness Name	Case Name	Case No.
4-13-22	Thomas Shaddix	State Bar v Shaddix	OBC21-0567

Description	Amount
Half Day Appearance Fee	\$100.00
Transcript - 43 Pages @ 7.50	\$322.50

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Customer No.	Invoice No.	Period Ending	Amount Due	Page
21191	00000041137	3/31/2022	\$ 225.00	2

Date	Order No	Service Detail	Charges	Units	Total
3/15/2022 NV255333 030 - STANDARD PROCESS (48)		STATE BAR OF NEVADA 3100 W. Charleston 100 Las Vegas, NV 89102 Caller: Sonia Del Rio Case Title: STATE BAR OF NEVADA, vs. THOMA Docs: Deliver Documents; Complaint, Designation of Hearing Panel Members, Declaration of Mailing Attorney Name: Bruce C, Hahn Esq.,	Thomas S. Shaddix, Esq. 2550 E Desert Inn R Las Vegas, NV 891213611 Case Number: OBC21-0567 Client/Matter: OBC21-0567 Description: Please serve Respondent, Thomas Shaddix, Esq., with attached pleadings. We will need an Affidavit of Service or Affidavit of Due Diligence upon completion.	Base Charge : Total:	\$ 65.00 \$ 65.00
3/18/2022 NV255463 030 - STANDARD PROCESS (48)		STATE BAR OF NEVADA 3100 W. Charleston 100 Las Vegas, NV 89102 Caller: Sonia Del Rio Case Title: STATE BAR OF NEVADA, vs. THOMA Docs: Deliver Documents; Complaint, Designation of Hearing Panel Members, Declaration of Mailing Attorney Name: Bruce C, Hahn Esq.,	Thomas Shaddix, Esq 6166 Sandhill Road, Suite 146 Las Vegas, NV 89120 Case Number: OBC21-0567 Client/Matter: OBC21-0567 Description: Please serve Respondent, Thomas Shaddix, Esq., with attached pleadings. We will need an Affidavit of Service or Affidavit of Due Diligence upon completion.	Base Charge : Total:	\$ 65.00 \$ 65.00
3/22/2022 NV255592 030 - STANDARD PROCESS (48)		STATE BAR OF NEVADA 3100 W. Charleston 100 Las Vegas, NV 89102 Caller: Sonia Del Rio Case Title: STATE BAR OF NEVADA, vs. THOMA Docs: Deliver Documents; Complaint, Designation of Hearing Panel Members, Declaration of Mailing Attorney Name: Bruce C, Hahn Esq.,	Thomas Shaddix, Esq 3126 Asoleado Cir Las Vegas, NV 89121 Case Number: OBC21-0567 Client/Matter: OBC21-0567 Description: Please serve Respondent, Thomas Shaddix, Esq., with attached pleadings. We will need an Affidavit of Service or Affidavit of Due Diligence upon completion.	Base Charge : Total:	\$ 65.00 \$ 65.00
Total Charges for Ref. - OBC21-0567: Total					\$ 195.00 \$ 225.00
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **RECORD ON APPEAL** was placed in a sealed envelope and sent by U.S. certified mail in Las Vegas, Nevada, postage fully prepaid thereon for certified mail addressed to:

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DATED this 10th day of June 2022.

Sonia Del Rio
Sonia Del Rio, an Employee
of the State Bar of Nevada

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 IN RE: DISCIPLINE OF)
4 THOMAS S. SHADDIX, ESQ.)
5 NEVADA BAR NO. 7905)
6)
7 _____

Case No. _____

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11 **VOLUME II**

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13 **RECORD OF DISCIPLINARY PROCEEDINGS,**
14 **PLEADINGS AND TRANSCRIPT OF HEARING**
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20 Bruce C. Hahn, Esq.
21 Nevada Bar No. 5011
22 State Bar of Nevada
23 3100 W. Charleston Blvd., Ste. 100
24 Las Vegas, NV 89102
25 Counsel for the State Bar of Nevada

Thomas S. Shaddix, Esq.
Nevada Bar No. 7905
2550 E. Desert Inn Rd., #181
Las Vegas, NV 89121
Respondent

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STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA)	
)	Case No.
Complainant,)	OBC21-0567
)	
vs.)	
)	
THOMAS S. SHADDIX, ESQ.,)	
Nevada Bar No. 7905)	
)	
Respondent.)	
)	

CERTIFIED
TRANSCRIPT

FORMAL HEARING OF THOMAS S. SHADDIX, ESQ.

Taken at the State Bar of Nevada Via Zoom Videoconference
3100 W. Charleston Boulevard, Suite 100
Las Vegas, Nevada

On Wednesday, April 13, 2022
At 9:05 a.m.

Reported by: Deborah Ann Hines, CCR #473, RPR

Appearances (via Zoom videoconference):

Commission Panel:

DANA OSWALT, ESQ.
Panel Chairman

FARHAN NAQVI, ESQ.
Panel Member

ANNE KINGSLEY
Laymember

For the Complainant:

BRUCE HAHN, ESQ.
Assistant Bar Counsel
State Bar of Nevada
3100 W. Charleston Boulevard
Suite 100
Las Vegas, NV 89102
(702) 382-2200

For the Respondent:

(None)

Also Present:

SONIA DEL RIO
Hearing Paralegal

E X H I B I T S

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1 CHAIR OSWALT: This is State Bar of Nevada
2 versus Thomas Shaddix, Nevada Bar Number 7905, Case
3 Number OBC21-0567. This is the time set for the
4 formal hearing. It is April 13th, 2022 at
5 approximately 9:05 a.m. Present we have the panel,
6 the court reporter and Bar Counsel. Mr. Shaddix has
7 not logged in yet; however, he did file a motion this
8 morning objecting to the hearing to proceed via
9 virtual means.

10 At this point I would have given Mr. Shaddix
11 a chance to argue his motion, but it doesn't appear
12 that he is present. And prior to going on the record
13 I confirmed with the Bar that they have not heard
14 anything from Mr. Shaddix since this motion was filed
15 this morning, or aside from another email that came
16 through it looks like last week also objecting to the
17 motion by virtual means. But for the record that
18 email from Mr. Shaddix went to my spam, and so I did
19 not see it until after I received the motion this
20 morning that was forwarded to me from the Bar.

21 Mr. Hahn, I guess I'll give you a moment to
22 respond to the motion that was filed this morning by
23 Mr. Shaddix, since he is not here to argue the
24 motion.

25 MR. HAHN: Very well. Thank you, Chair.

1 Good morning, panel. Bruce Hahn on behalf of the
2 Bar. For our record it appears that the email that
3 you had referenced that went out from Mr. Shaddix, if
4 the email address was from ShaddixTS@TicketDefenders.net
5 it was issued by Mr. Shaddix's location on Thursday,
6 April 7 at 11:56 a.m. where it indicated he did not
7 consent to another hearing by Zoom. I will be filing
8 a motion shortly to voice my objection. I insist
9 upon an in-person hearing and encourage all parties
10 involved to prepare for the same.

11 So for our record that was the
12 communication. There was no additional information
13 that I'm aware of that Ms. Del Rio has offered.

14 I have nine reasons why you should not
15 entertain and grant the motion. First of all, with
16 regard -- the first one is is that the objection to
17 audiovisual presentation, he waived it by virtue of
18 refusing to participate at the initial case
19 conference on May 8th. In fact, he did not appear.
20 That's where the Bar still had a concern, and still
21 does to some extent, with regard to potential safety
22 of our members of appearing. So, first of all, it
23 was waived when he didn't participate at the ICC on
24 March 8th.

25 The second reason is is that there was no

1 objection that he offered to the scheduling order
2 that you issued on March 10th when it was emailed to
3 his SCR 79 email address on March 11. So not only
4 did he not appear, he offered no objection to your
5 scheduling order where you ruled that the Zoom was
6 appropriate.

7 The third reason is is that he had no
8 objection when the Bar emailed to Mr. Shaddix on
9 March 11 the notice of formal hearing. The notice of
10 formal hearing specifically says "Zoom," just like
11 your scheduling order says "Zoom." Again, he offered
12 no objection.

13 Fourth, his motion is untimely. The motion
14 was due on March 30, at the time of our prehearing
15 conference, which of course he didn't attend. So
16 that's the fourth reason. It was due. It's past due
17 by at least two weeks.

18 Fifth is is the motion is unsupported by
19 good cause. Any motion that you consider to
20 entertain, Chair, has to supported by good cause, and
21 he's not offered. He just says, I found it unhelpful
22 on the last occasion. There's no context, there's no
23 reference. And because it's unsupported by good
24 cause, you don't even have to hear it.

25 The next reason is is that the prejudice, if

1 any, is minimal to Mr. Shaddix because the charges
2 against him are deem admitted. He's failed to plead.
3 So any benefit that he might gain by having an
4 in-person would be minimal, because there's not
5 really going to be any meaningful examination of
6 witnesses, because the charges against are deemed
7 admitted, the two charges. This is a very simple
8 hearing.

9 The next reason that you shouldn't consider
10 it is is that it's against the disciplinary rules of
11 procedure, which have been adopted by our board of
12 governors. DRP 1(b) says that the policy and the
13 purpose of the rules is to expedite disciplinary
14 hearings through procedures designed to facilitate
15 coordination of discovery and scheduling of hearing
16 panels. The panel's already assembled. We're here
17 in front of God and everybody ready to go.

18 And if you were to consider -- if you were
19 to entertain this motion, everybody's cleared their
20 schedules really for kind of an empty exercise this
21 morning. And the purpose of the DRP rules is to
22 expedite the panels, because this is all volunteer.
23 And we're very appreciative of everyone assembling
24 here.

25 With regard to the last two reasons, number

1 eight, it's unduly burdensome on me, specifically Bar
2 Counsel, because I'm based out of Reno. And to just
3 appear in Las Vegas this morning was just
4 nonsensical. Even when he said he was going to file
5 a motion, I've had about one business hour to
6 contemplate it, but it's unsupported by good cause,
7 so I'm not terribly concerned about it.

8 And then lastly I would invite you to
9 consider that this, if you were to continue this
10 matter, and this is my ninth reason, is is that it
11 creates a windfall for him because, and I make this
12 under offer of proof, Mr. Shaddix doesn't
13 communicate. He has a disciplinary history of not
14 communicating.

15 And he doesn't have to. He doesn't have to
16 do anything. But if he doesn't, if he chooses not
17 to, there are consequences that flow from that. So
18 again, the Bar, we're not telling anybody to do
19 anything. We don't tell our members what to do. But
20 if they don't communicate, there's nothing we can do.
21 We're handcuffed into proceeding forward.

22 So for those reasons, Chair, those nine
23 reasons, we ask that you deny the motion. I show
24 it's approximately 9:13 right now. I show no
25 appearance by Mr. Shaddix, and so with that I stand

1 ready to answer any questions.

2 CHAIR OSWALT: I don't have any questions
3 for you, Mr. Hahn. I am going to deny the motion,
4 but I'm going to go through -- and I don't disagree
5 with any of your nine reasons. In fact, those are
6 some of the reasons that I had listed on my notes as
7 well.

8 The consent to a remote proceeding happened,
9 you know, back in the beginning of March. He did
10 fail to appear to both the initial case conference as
11 well as the prehearing conference. By his failure to
12 appear, he did waive his objections. And this
13 motion, should he have wanted to file it timely,
14 would have been due prior to the prehearing
15 conference.

16 Aside from that, in his motion, and I'm
17 going to go through it a little bit just for ease for
18 the Supreme Court if and when they decide to take a
19 look at this, his reasoning for the request for the
20 extension of time and an in-person hearing isn't
21 supported by even the motion. And had he appeared
22 here today, I would have given him the opportunity to
23 go into a little more depth as what he is referencing
24 in his motion, but he's not here, and so all we're
25 left with is the three paragraph motion that he filed

1 this morning.

2 He indicated that a Zoom hearing is unduly
3 burdensome and prejudicial to the respondent. He
4 doesn't explain how Zoom is either of those things.
5 He does indicate that, you know, the courts have
6 allowed in-person proceedings and the courts have
7 allowed litigants to apply should that -- for
8 in-person should it be necessary. He had that
9 opportunity, but that opportunity passed, you know,
10 back in March when we had the initial case
11 conference, as well as the prehearing conference, but
12 no objection was made.

13 Additionally, he indicates that this
14 accommodation should be granted as a matter of basic
15 fairness and due process for both the complainant and
16 the respondent. Nobody has made a timely objection
17 to this, and, you know, this is one of the things
18 that I would have questioned him about should he have
19 appeared today is how appearing and proceeding in a
20 virtual format is unfair to either himself or the
21 complainant. And so for those reasons, in addition
22 to all of the nine reasons that Mr. Hahn suggested in
23 his argument, I'm going to deny this motion.

24 At this time, because Mr. Shaddix isn't
25 present, and because it was granted previously, I'm

1 going to allow the Bar to present their case on a
2 default basis. So I will turn it over to Mr. Hahn.

3 MR. HAHN: Very well, Chair. Good morning
4 again, panel. Bruce Hahn on behalf of the Bar. I'll
5 try to use your time wisely this morning. So to
6 complete our record, Chair, I'll offer a few things.
7 Number one, I'd like the record to reflect that
8 pursuant to Disciplinary Rule of Procedure 32,
9 Ms. Del Rio published the hearing packet to the panel
10 in advance, which largely consists of the pleadings.
11 I show pages 1 through 27 to consist of the
12 complaint, designation of hearing panel, and
13 declaration of mailing.

14 Second, the notice to intent to proceed on a
15 default basis; three, the order appointing the panel
16 chair; fourth, the notice of telephonic initial case
17 conference; fifth, the scheduling order after the
18 initial case conference. Next is the notice of
19 formal hearing, and then lastly the order appointing
20 formal hearing panel. So that is the first matter
21 for our record today. So if the Chair is comfortable
22 acknowledging that, I can proceed to my next.

23 CHAIR OSWALT: Yes.

24 (Thereupon Complainant's Exhibit
25 1 was admitted into evidence.)

1 MR. HAHN: Very well. Second is is that
2 consistent with the Bar's initial disclosures and the
3 final disclosures, which are Exhibits 3 through 9,
4 I'm asking for confirmation and permission to admit
5 and publish Exhibits 3 through 9 that were previously
6 disclosed to Mr. Shaddix in our initial and our
7 subsequent final disclosure.

8 CHAIR OSWALT: In that there's no objection,
9 Exhibits 3 through 9 are admitted.

10 (Thereupon Complainant's Exhibits
11 3 through 9 were admitted into
12 evidence.)

13 MR. HAHN: Very well. And for our record
14 I'll simply identify them. Exhibit 3 is an NHP
15 citation involving the grievant in this case and the
16 Las Vegas Justice Court docket. That's Exhibit 3.

17 Exhibit 4 will be the grievance of
18 Miss Langstaff of May 19, 2021 and June 14, 2021, an
19 engagement email between Miss Langstaff and
20 Mr. Shaddix, and then proof of payment or the
21 retainer. That's Exhibit 4.

22 Exhibit 5 is a letter of inquiry by
23 investigator Dawn Meeks dated July 12, 2021 and a
24 reply from Mr. Shaddix's email address of July 14,
25 2021.

1 Exhibit 6 is a letter of inquiry from
2 investigator Dawn Meeks with the Bar dated
3 October 18, 2021, Mr. Shaddix's "read" receipt from
4 his terminal of October 25th that he received the
5 email, in addition to a thread going back from -- to
6 August 5th and then to July 12, the original email
7 from Miss Meeks.

8 Exhibit 7 is a declaration of service -- or
9 a declaration from Miss Sonia Del Rio dated April 6,
10 2022. And without going through all the details, it
11 explains the grave detail in which Ms. Del Rio and
12 National -- Nationwide Legal Service attempted
13 personal service upon Mr. Shaddix for this event,
14 including three attempts at multiple different
15 addresses, including mailing and certified mailing to
16 his SCR 79 physical address, to include an SCR 79
17 electronic service to his address. So I will let the
18 panel look at that at its leisure.

19 Exhibit 8 is again more affidavits of the
20 Nationwide Legal Service personnel, this Judith Mae,
21 that's M-a-e, last name of All, A-l-l. And again
22 that document is several affidavits. The affidavits
23 are dated March 21st, March 24, and March 28 that
24 reflect personal service attempts that were done on
25 March 17, March 21 and March 23rd respectively.

1 And then the last exhibit, which is
2 Exhibit 9, that will be the 11-4-21 email by, again,
3 Miss Meeks to the respondent. And again that string
4 going all the way back to July 21, 2021 -- or
5 July 21, just to reflect the Bar's good faith
6 attempts to engage Mr. Shaddix. That is the purpose
7 and the reason behind we offer these.

8 I understand that the charges are admitted,
9 but I do know that panels have typically been
10 interested in the background information. So that is
11 up to the panel to look at at your leisure.

12 And then lastly for our preliminary matters
13 here today is is that I will be prospectively
14 admitting disciplinary affidavit Exhibit 2, and that
15 will be at the end of the hearing, should the panel
16 find liability, which I believe the panel -- I have a
17 good faith belief that the panel will, because the
18 charges are deemed admitted. So I will let you --
19 again, I will turn that over to the panel at the time
20 we finish our presentation.

21 So, Chair, that is my preliminary matters.
22 What I'll simply do now at this point in time is
23 offer my prayer and a brief opening statement for the
24 panel to consider, and then I will yield the panel's
25 questions, should there be any once the panel has a

1 chance to examine the exhibits, and whichever way
2 you, as the chair and the panel, would like me to
3 proceed as the Assistant Bar Counsel.

4 CHAIR OSWALT: Mr. Hahn, I'm not showing
5 that we received the exhibits yet. Are those going
6 to be sent via email prior to deliberations or?

7 MR. HAHN: With your permission, Chair, I
8 had asked that since you've already admitted them, I
9 ask for permission to publish them now through
10 Miss Del Rio.

11 CHAIR OSWALT: Sure.

12 MR. HAHN: Miss Del Rio, would you be so
13 kind as to publish. And, panel, just so you know,
14 you won't be overwhelmed, it will be approximately 40
15 pages I believe of documents.

16 CHAIR OSWALT: Okay.

17 MR. HAHN: All right. With that being the
18 case, I'll simply proceed and trying to use your time
19 wisely this morning. And with regard to the Bar's
20 recommendation for the panel to consider, I'm going
21 to start with my recommendation and then I'll move
22 through what the counts involve.

23 The Bar is recommending, based on a finding
24 of liability for the two counts, which is 1.4A,
25 communication allegation, and then 8.1B allegation,

1 which is failure to communicate with the Bar, we're
2 recommending the panel consider, and again this is in
3 conjunction with the evidence that you're going to be
4 receiving today that's been published, in addition to
5 the disciplinary affidavit, that the panel entertain
6 a six month and one day actual suspension. That is
7 the prayer, in addition to our court reporter for her
8 appearance and the transcript fee. So that is the
9 bear -- that is what we're asking and recommending
10 that you consider.

11 The proof is of course consistent with DRP
12 14(c), which is if the respondent fails to respond
13 after the notice of intent is served, the charges in
14 the complaint shall be deemed admitted. Very simple
15 case, two counts only. Basically it's Mr. Shaddix
16 doesn't communicate. And again he doesn't have to,
17 but there's consequences that flow if he chooses not
18 to.

19 So with regard to the proof, the proof is by
20 operation of law. I've offered you Exhibits 3
21 through 9 to consider, which sort of explain the
22 backdrop as, you know, good volunteers for your
23 service to the State Bar and to our membership.

24 Count 1. Count 1 is essentially two bases
25 for not communicating. The first basis is is that

1 the victim, the grievant in this case, Miss Elizabeth
2 Langstaff, after she engaged him, she left numerous
3 voicemail messages that were not returned. They were
4 not returned by his office.

5 The second mechanism is is that after
6 March 13 of 2020, Mr. Shaddix did not communicate
7 with her on three separate subbases. The first
8 subbase is is that he entered a not guilty plea for
9 her on February 20, but he set the matter for a
10 pretrial conference on March 13 and didn't tell her.
11 He didn't communicate the fact that she had a
12 pretrial conference in front of the court.

13 The second sub-mechanism is is that he
14 didn't inform her of his entry of guilty plea on her
15 behalf when he showed up at that March 13, 2020
16 pretrial conference. So number one, he didn't tell
17 her about it; number two is when he showed up, he
18 entered a plea of guilty and she didn't even know it.

19 The third sub-mechanism is is that when he
20 entered a plea of guilty, you know what the court
21 does? The court says, great, where's the fine?
22 Where's the money? She would have gone to warrant.
23 And I'm grateful to say in this case that it did not
24 go to warrant because of the Bar's communication with
25 Miss Langstaff. She was able to take care of it.

1 But the point is is that he didn't inform her of her
2 responsibility to pay the fine once he entered a
3 guilty plea on her behalf.

4 So that's the sum and substance of Count 1,
5 which is not communicating with his client. There's
6 three separate sub-mechanisms and two primary
7 mechanisms by which that has been met, separate and
8 apart from the operation of law.

9 Count 2. Count 2 is not communicating with
10 the Bar. As you know, rule 8.1 indicates that you
11 can't knowingly fail to respond to the Bar in a
12 disciplinary matter or in an admissions matter. This
13 is the disciplinary matter. And in this particular
14 case there's four mechanisms by which he did not
15 respond to the Bar that I've charged.

16 The first mechanism is is that when
17 Miss Meeks reached out on July 12, 2021, we have to
18 put a due date, otherwise people just don't respond.
19 Everybody's busy and we understand that. She asked
20 for a reply by July 30. He replied on August 5th and
21 said, Hey, I have no record. I have no record that I
22 billed her. That's all he said. Of course the
23 evidence, in your evidence packet, will show the
24 opposite. It will show that there was an engagement
25 and there was a bill.

1 Second is is that Mr. Shaddix did indicate
2 that he was going to provide us more information the
3 next day. So when he replied late on August 5, he
4 said he would give us more information on August 6.
5 He didn't. He didn't. And again that throws off all
6 of the Bar's calendering when we reach out to, you
7 know, to our Bar members to find out what their side
8 of the story is. So he said he was going to do
9 something, he didn't do it.

10 The third mechanism is is that when
11 Miss Meeks sent him another email on August 18, she
12 also warned him, By the way, if you don't get back to
13 us, we could be looking at an 8.1 if it's sustained.
14 He didn't substantively reply at all with regard to
15 Miss Meeks' inquiries. Again we're trying to find
16 out what our Bar member's position is, that we had as
17 much of the pieces, the puzzle pieces if we have to
18 go to formal hearing so we're not wasting your time.
19 He didn't substantively respond.

20 And then lastly, the fourth mechanism by
21 which he failed to communicate to the Bar, is is that
22 there was no timely reply to Miss Meeks' email
23 request of November 4. She continued to try and work
24 with Mr. Shaddix. And you'll see in the documents
25 that have been published that she's chasing him down

1 trying to get an understanding, because his replies
2 don't make sense.

3 So that is Count 2. Again Count 1 is he
4 didn't communicate with his client on multiple
5 levels, Count 2 is is he didn't communicate with the
6 Bar on multiple levels.

7 I've already identified the supporting
8 evidence for you to look at as panel members, even
9 though the charges are deemed admitted, and I've sort
10 of outlined those for you in making the record
11 initially.

12 What I will submit that the records show,
13 and again I don't want to take up your time, I'll let
14 you look at it and I'll stand ready to answer any
15 questions that the panel may have after they've
16 looked at the supporting evidence, even though the
17 charges are deemed admitted, I'll submit to you that
18 with regard to Mr. Shaddix's mental state, the mental
19 state demonstrates that with regard to his client, he
20 knowingly didn't communicate to her.

21 You'll notice in exhibit, forgive me, let me
22 find it, the engagement email and then
23 Miss Langstaff's payment of a hundred dollars for him
24 to represent her, he indicates, By the way, if you
25 don't hear from me, do reach out to me. Well, that's

1 what she did. And she left voicemail messages,
2 they're on his machines, presumably he has at least
3 constructive knowledge of it, if not actual knowledge
4 of it; therefore, when you think about the three
5 mental states, there could be negligence, increasing
6 to knowingly, increasing to intentionally.

7 I think the evidence demonstrates that it
8 was knowing. It was knowing that he was supposed to
9 communicate with this client. Who enters a plea of
10 guilty in a criminal matter without talking to their
11 client? Who does that? And in this particular case
12 the evidence from the engagement letter I believe
13 will support that mental state of knowing.

14 With regard to the mental state involving
15 the Bar, he was getting his emails. The evidence
16 will show that he was getting emails at not only his
17 SCR 79 email but his backup email. So he was getting
18 emails to two separate locations that he controlled
19 in communicating with Miss Meeks. And again there
20 was some marginal attempt on his part, but the
21 information he supplied Miss Meeks, number one, it
22 didn't make sense.

23 And you'll see, when you look at the email
24 string in Exhibit 9, Miss Meeks is trying to engage
25 him and trying to make sense and saying, What do you

1 mean you have no record of her being billed? We've
2 got a copy of the billing right here where her credit
3 card was charged. How can this be? Explain this to
4 me. Oh, well, I'll go check my records in my
5 storage. Well, again, that information was never
6 forthcoming.

7 So although the evidence could support
8 intentionally, I suspect the evidence is a little
9 safer on that middle mental state of knowingly. And
10 the mental state of course is important to you in
11 determining how to fashion a remedy in this case. So
12 that's why I'm spending the time I am for the
13 knowingly mental state I believe the evidence
14 supports for Count 1 and for Count 2.

15 Now, also important metric for your calculus
16 is what was the injury. And again I'm going through
17 these because I'm going to ask you to articulate your
18 findings for our record, so again that's why I'm
19 being so laborious. But in this case you know that
20 our Supreme Court and our American Bar Association,
21 they identify the injury can be actual or it can be
22 potential. Both of them are equally important.

23 And then the levels of injury, there's three
24 levels of injury. One is minimal to no injury, the
25 second is injury, the third is serious injury. So in

1 this case I'm going to represent to you under an
2 offer of proof that the injury here was not actual,
3 thank God, it was potential. What happened in this
4 case is is that as you'll see from the docket sheet,
5 which is in Exhibit 2, or forgive me Exhibit 3,
6 Miss Langstaff was able to go in there and pay the
7 fine.

8 But again that was no thanks to Mr. Shaddix,
9 that was because, and under offer of proof that was
10 because Ms. Meeks began working directly with
11 Miss Langstaff to help mitigate her getting a warrant
12 or worse, you know, or just as bad a higher point
13 violation that the court could have imposed upon her
14 had they found her guilty of the actual charge that
15 NHP cited her for.

16 So in this case the injury was potential.
17 And with regard to the level of injury I'm going to
18 argue to the panel that the evidence really supports
19 minimal injury to the victim. But again that was no
20 thanks to Mr. Shaddix, that was thanks to Miss Meeks
21 who took it upon herself to lean in on her behalf.

22 So the injury in this case that I believe
23 the evidence supports, panel, is potential and
24 minimal. But the potential injury of her going to
25 warrant would have been serious. Imagine getting

1 arrested for a warrant on a traffic ticket from NHP
2 because your lawyer never told you you pled guilty?
3 So even though there was minimal actual injury, the
4 potential injury was great.

5 And I simply submit that to you as Bar
6 numbers and lay members of how we know our court
7 system works is that if there's a failure to appear
8 warrant, and there is an entry of plea of guilty, and
9 you don't pay the fine, there's going to be
10 consequences from the court. I think we all know
11 that, and I think you can take judicial notice of
12 that. I don't want to bring Miss Meeks in here and
13 waste your time and have her articulate all of that.
14 But again I'll stand ready to answer your questions.

15 So lastly this leaves us with the discipline
16 standards. And again what I'm going to do is I'm
17 going to finish my outline and I'm going to make
18 myself available for the panel to answer any
19 questions once you've had a chance to examine all the
20 evidence that's been admitted. We now have
21 discipline standards, and I offer these to you,
22 panel, to help you decide what the ABA standards are.

23 I believe that with regard to the
24 communication to, or the lack of communication to the
25 victim, Miss Langstaff, it's discipline standard

1 4.42. And what this is is this is the violation of
2 duties owed to client. That's the rubric of all of
3 the different discipline standards that we have. And
4 when one doesn't communicate with your client, that's
5 a violation of a duty owed to the client, so that's
6 why it falls under that section.

7 But this is what discipline standard 4.42
8 says. It says, Suspension is generally appropriate
9 when a lawyer knowingly fails to perform service for
10 a client and causes injury or potential injury to a
11 client, or a lawyer simply engages in a pattern of
12 neglect which causes injury or potential injury to a
13 client.

14 So with regard to the Count 1, I believe
15 that your loadstar here is 4.42 as an anchor, and
16 then we'll talk about aggravation and mitigation in
17 just a moment.

18 Your second anchor for Count 2 from our ABA
19 standards, and of course I'm referring to the ABA
20 green book here, which is Annotated Standards for
21 Imposing Lawyer Sanctions, 2019, the second matter is
22 8.1. That's involving a different rubric. That's
23 violation of duties owed as a professional. So we
24 have a different section. The section there I
25 believe that fits is 7.2.

1 7.2 says suspension is generally appropriate
2 when a lawyer knowingly engages in conduct that is a
3 violation of a duty owed as a professional and causes
4 injury or potential injury to either, A, a client; B,
5 the public, or C, the legal system. And in this case
6 it's the legal system.

7 Miss Del Rio filed a complaint in this case
8 on January 2nd. Then we had to file a notice of
9 intent. Then we had to go through the ICC, which he
10 didn't show. Then we had to go through the
11 prehearing conference, which he didn't show. Then we
12 had to go through three separate service attempts by
13 Nationwide Legal to demonstrate to the panel we take
14 our work seriously and chased him down at three
15 different locations where we were unsuccessful. And
16 you'll see from the affidavits, one of them is a UPS
17 store. The other is a naturopath store, the third is
18 an old address that somebody says he doesn't live
19 here anymore. We chased this guy all over Clark
20 County.

21 So when you think about the injury and then
22 you think about all of the effort that Miss Del Rio
23 made in emailing and emailing and emailing, and then
24 when you think about all of the effort that
25 Miss Meeks, as a paid investigator and certified

1 paralegal, made in reaching out to Ms. Langstaff, in
2 reaching out to Mr. Shaddix repeatedly, now you know
3 why our Bar dues are so high. We have to go through
4 the motions.

5 We want to give our members the benefit of
6 the doubt, but when you look at injury, it's not
7 minimal. The injury to the system is significant.
8 And now our Chair was presented with a motion at 8:01
9 this morning with, again, the idea of delaying
10 further. The injury is real to the legal profession,
11 and you've got to think about what would
12 Ms. Langstaff think about this. I'm not going to
13 present her today, but when you think about what
14 people think about lawyers, when people think about
15 the delay in the system when people don't respond,
16 what we have to do, it's significant. So I want to
17 invite the panel to think about that in you weighing
18 out whether those standards apply.

19 Lastly now I'd like to move to the
20 aggravating and mitigation that may justify an upward
21 deviation or a downward deviation. I believe that
22 the evidence demonstrates in this matter, and I'll
23 make this under offer of proof, because some of it
24 involves an exhibit that you haven't received yet,
25 that will be Exhibit 2 from Miss Del Rio. That will

1 be published at the end after you've had a chance to
2 consider the evidence.

3 I believe number one is subsection A,
4 102.5(1)(a), prior disciplinary offenses. That
5 aggravates whatever decision you believe that a
6 baseline would tell you to do. So because he's done
7 this before, it sort of demonstrates I believe to the
8 Bar and to the panel that, you know, we're not
9 getting the message through.

10 We need to somehow have a progressive
11 discipline model in mind to encourage not only our
12 member but other members who are considering, well,
13 jeez, if it doesn't matter to the Bar, I guess I can
14 do it, too. That's not doing our clients a service,
15 and that's not doing the legal profession a service.
16 That's not doing you a service when you have to
17 constantly appear at these voluntary panels and you
18 give up your time. That's just not a good use of
19 your resources.

20 And so we're trying not to be ogres here,
21 but 102.5(1) says prior disciplinary offenses
22 aggravate whatever you think is appropriate in this
23 case. So whatever baseline, it could be adjusted up,
24 in your discretion.

25 The second matter I believe is 102.5(1)(e)

1 as in "elephant." And what this is is this is I
2 believe what the evidence will demonstrate by virtue
3 of his inaction all along in this case is bad faith
4 obstruction of the disciplinary proceedings by
5 intentionally failing to comply with the rules.

6 In this case there was no disclosures
7 offered by Mr. Shaddix. There was no final
8 disclosures offered by Mr. Shaddix. If he doesn't
9 want to appear, I don't know that we can -- I don't
10 know that I feel comfortable in recommending that he
11 undergo an aggravator for that, but if he -- he was
12 ordered to provide disclosures. He didn't. And I
13 believe that that is worthy of your consideration as
14 an aggravator under 102.5(1)(e) as in "elephant."
15 That's bad faith obstruction.

16 If I can't get information, how am I going
17 to be able to defend against it? How am I going to
18 be able to defend against a one hour motion to
19 continue and for a Zoom -- or for an in-person
20 hearing? I can't defend the Bar. I can't defend the
21 public when I'm not provided with that information.

22 The last aggravator I believe is worthy of
23 your considering, and this will be proof to you by
24 Exhibit 2, it will show how long Mr. Shaddix has been
25 practicing law. Now, you heard the Chair already

1 read out his Bar number. We know he's been
2 practicing a long, long time, and that's true. But
3 Ms. Del Rio's affidavit in Exhibit 2 will demonstrate
4 that he has a substantial experience in the practice
5 of law as a Bar member. So that is an aggravator.

6 And the theory behind that is is that if
7 you've been doing this for a long time, there's
8 really no mitigation involved. The ABA standard
9 cutoff is usually ten years. That's usually when
10 above that it becomes substantial experience, or
11 below that is not substantial experience. With his
12 Bar number alone, and when you see the affidavit he's
13 been practicing for some time, the theory is is if
14 you've been a practicing lawyer for a while, you
15 shouldn't be engaging in this kind of conduct, and
16 it's an aggravator.

17 So again whatever baseline, which I believe
18 the baselines for Count 1 and Count 2 are suspension,
19 you have three aggravators to consider that may
20 increase whatever number you think is appropriate.

21 I do believe that there's one mitigator here
22 for you to consider, and I'm not going to try and
23 offer evidence on behalf of Mr. Shaddix, I'm just
24 trying to do my job as Bar Counsel to give you a fair
25 perspective of everything, that would be 102.5(2)(b)

1 as in "boy." I didn't see a dishonest or selfish
2 motive here on Mr. Shaddix's part. What I just saw
3 is I just saw somewhere between reckless indifference
4 to an intentionally "I can't be bothered, I'm doing
5 other things."

6 So I didn't see great financial gain here, I
7 didn't see evidence of graft. Miss Langstaff was out
8 a hundred bucks. She was out a lot of frustration, a
9 lot of anguish about what might happen, and then
10 ultimately the court was very gracious with her. I
11 think they understood her plight, and so that's why
12 there was minimal actual injury here, even though
13 you'll see the citation. This goes back to August of
14 2019. She didn't get this thing wrapped up until
15 just a couple of months ago. So I think there is
16 some anguish associated with that that would be
17 reasonable for any of us if we got a traffic ticket
18 and our lawyer dropped the ball on us.

19 So that's the mitigation I see. I see one
20 mitigating factor, and again I'm not trying to offer
21 or speak for Mr. Shaddix, I'm just trying to do my
22 job.

23 So for those reasons, panel, my
24 recommendation, and I'm just about done here now, I
25 show it's 9:45 and we still have no appearance by

1 Mr. Shaddix online, but that's why I'm recommending
2 six months and one day suspension, and again that's
3 in part predicated upon the evidence that's been
4 submitted to you, the charges are deemed admitted,
5 and then Exhibit 2 will demonstrate to you the prior
6 discipline involving Mr. Shaddix that goes back a
7 number of years, and then ultimately a matter not
8 very long ago.

9 And my encouragement to you is to consider
10 that progressive discipline model, because if lower
11 measures have been very unsuccessful, we've only got
12 one other way to communicate with people, and that's
13 if the Supreme Court steps in by virtue of your
14 recommendation to get the message across to
15 Mr. Shaddix.

16 So, Chair, that is my presentation. Again,
17 I can go through each of the exhibits and demonstrate
18 for you what the relevance is, other than me, you
19 know, kind of making my offer of proof when I
20 outlined what Exhibit 3 was, Exhibit 4, Exhibit 5. I
21 can do that if that's what you'd prefer, Chair and
22 panel. If you'd like to look at the evidence and
23 then have questions for me, I yield to you. Whatever
24 the panel wants, I'm available. So with that I stand
25 ready.

1 CHAIR OSWALT: So first off do any of the
2 other panel members have any questions at this time?

3 PANEL MEMBER KINGSLEY: I do not.

4 PANEL MEMBER NAQVI: I don't have any questions.

5 CHAIR OSWALT: Okay. I think what I would
6 like to do is go to deliberate but leave this portion
7 of the hearing open, just because we have about 55
8 pages, plus we're going to be receiving Exhibit 2
9 from the Bar, so that if we have any questions and
10 can't come to a decision at this time, we can come
11 back and open up questions to the Bar at that point,
12 and if not we can just render our decision.

13 MR. HAHN: Very well. Then my encouragement
14 to you, Chair, is is that if you are going to
15 deliberate and incorporate your examination of
16 Exhibits 3 through 9, upon the panel finding that
17 liability attaches by operation of law, and just
18 fundamental fairness with the documents, I would just
19 invite you to tell me before you render your final
20 decision so Miss Del Rio can then publish Exhibit 2,
21 which is the disciplinary history, and that's going
22 to be relevant to the ultimate sanction, unless you
23 want it now.

24 CHAIR OSWALT: I don't have an objection to
25 receiving it now. If we want to find the liability

1 first, how would we notify everyone? Come back and
2 go back on the record or just as a matter of
3 convenience how would you suggest we...

4 MR. HAHN: My recommendation, I just want to
5 be absolutely fair, Judge, and so what my
6 encouragement to you is is that if we publish
7 Exhibit 2 to the panel, the panel could simply make
8 an offer, you on behalf of the panel could simply
9 make an offer of proof that you examined Exhibits 3
10 through 9, concurred with the liability on both
11 grounds, and then thereafter examine Exhibit 2 in
12 terms of rendering your ultimate decision regarding
13 discipline. That would be my recommendation to you.

14 CHAIR OSWALT: I'm comfortable with that, or
15 if there's a way if I can email Miss Del Rio to let
16 her know that we're done with 3 through 7.

17 MR. HAHN: Sure. 3 through 9, yes, ma'am.

18 CHAIR OSWALT: I'm sorry, 3 through 9.
19 Okay, so I think we're ready to deliberate at this
20 point, and then I'll just shoot an email over to
21 Miss Del Rio when we're ready for Exhibit 2.

22 MR. HAHN: Very well.

23 (A recess was taken.)

24 (Thereupon Complainant's Exhibit

25 2 was admitted into evidence.)

1 CHAIR OSWALT: So we're back on the record
2 in State Bar of Nevada versus Thomas Shaddix, Bar
3 Number 7905, Case Number OBC21-0567. The panel has
4 returned from deliberations. During those
5 deliberations we did reach out to the Bar after
6 concluding that the Bar has met its burden with
7 respect to the two counts in the complaint and had
8 Miss Del Rio forward us over Exhibit 2, which was the
9 respondent's disciplinary history with the State Bar.

10 So I'm going to go through what the panel
11 discussed and deliberated and agreed upon, and then I
12 will open it up to the other panel members if they
13 have anything to add or if I forgot something.

14 So first with respect to the 1.4 violation
15 where the Bar found -- alleged that Mr. Shaddix
16 violated 1.4 with respect to communication with his
17 client, we did find that he was in violation of that
18 rule.

19 We did find that it fell under the 4.42
20 violation of duties owed to the client. We were in
21 agreement with the Bar that his mental state was
22 knowingly, that the injury was potential, and that
23 the level was minimal to no injury. With respect to
24 that we found specifically that he knowingly failed
25 to communicate to the client after the hearing what

1 the result of the hearing was and what her duties
2 were with respect to the payment of the fine.

3 We did find the injury to be potential in
4 that because the grievant was unaware that her fine
5 was due, she could have had some legal ramifications
6 with respect to possibly a warrant out for her arrest
7 and other things with respect to her driver's
8 license. And that the level of injury was minimal to
9 no injury, based upon those findings.

10 With respect to 8.1 where the Bar alleged
11 Mr. Shaddix was in violation with his duties with
12 communication to the Bar, we did find that he was in
13 violation of those standards. We did agree that it
14 fell under the ABA 8.1 duties owed as a professional,
15 and that the harm would have been to the legal
16 system. We did find that his mental state for that
17 was knowing and the injury was potential. And that
18 the level of injury was minimal to no injury for that
19 one as well.

20 In addition we looked at the aggravating and
21 mitigating standards or factors for Mr. Shaddix. We
22 did agree with the Bar on all four factors. So going
23 through those we agree that Mr. Shaddix's prior
24 disciplinary hearing was an aggravating factor,
25 particularly in going through and that this is what

1 was disclosed to the panel members as Exhibit 2.

2 We did find that not only did Mr. Shaddix
3 have a history of discipline with the Bar, but that
4 his discipline was very much consistent throughout
5 and that he had issues with communication and
6 diligence with a client, and he failed to participate
7 and cooperate with the Bar.

8 And so I think we kind of took that
9 aggravating factor a little more serious because all
10 the things that he's done in this case he's done
11 before. This is not new to him. And he knows what
12 is required of him from his prior discipline record
13 dating back to 2007, it looks like was when that
14 first one came down but the conduct was in 2006.

15 The second aggravating factor as asserted by
16 the Bar was the bad faith obstruction of the
17 disciplinary proceedings, and we're in agreement with
18 that. Particularly in this case he was -- this
19 morning he filed a motion to continue and obstruct
20 this proceeding from going forward even further, and
21 still failed to appear for his Zoom hearing.

22 The other thing that I noticed with respect
23 to that one is his first disciplinary hearing back in
24 2006, 2007, he chose to appear remotely, where in
25 this case he was ordered to do so and now it's unfair

1 and it's prejudicial to him.

2 And then the last one as asserted by the Bar
3 was substantial experience in the practice of law as
4 the last aggravating factor, and we are in agreement
5 about that. He has been practicing for quite some
6 time. It looks like between 2001 and 2002 is when he
7 was admitted.

8 And lastly the mitigating factor, and it
9 should be noted that if Mr. Shaddix would have
10 participated in this hearing, or this process, there
11 may have been more mitigating factors to consider;
12 but because of his failure to participate and
13 cooperate and really assert defenses on his behalf,
14 we're in agreement with the mitigating factor of the
15 lack of dishonest or selfish motive, because there
16 has been no evidence presented with respect to that.

17 And then finally the panel members are in
18 agreement that a six month and one day actual
19 suspension is warranted in this case. We also agree
20 that he is to pay the fees associated with the same,
21 and the actual costs of the investigation, the court
22 reporter, and hearing costs.

23 Do any of the panel members have anything to
24 add?

25 PANEL MEMBER KINGSLEY: I do not.

1 PANEL MEMBER NAQVI: I do not.

2 CHAIR OSWALT: Mr. Hahn?

3 MR. HAHN: Just a few follow-up questions,
4 if I may. Thank you, panel, for your time and for
5 your careful enumeration. This is really helpful for
6 our record, and so thank you for that. I have just
7 two questions. With regard to the fees, and I may
8 have neglected this, Chair, is is that I had asked
9 for the panel's consideration of the reporter's
10 appearance fee in addition to the transcript fee, but
11 there's also I believe an SCR 120 fee of suspension
12 of \$2500. Does the panel find that appropriate?

13 CHAIR OSWALT: Yes.

14 MR. HAHN: Very well. The second question I
15 had had to do with the injury. And again I may
16 have -- I may have not articulated this properly.
17 I'm clear in -- I'm clear with the panel's finding
18 that there was minimal actual injury. With regard to
19 potential injury, I heard, if I understood you, I
20 believe that you may have articulated that there was
21 minimal potential injury, but yet I heard you share
22 that, you know, there could have been adverse impacts
23 with the driver's license, there could have been
24 actual impact with a warrant. So is the wish of the
25 panel a finding that there was injury -- there was

1 potential -- there was the level of injury potential
2 or there was serious injury potential, or minimal, as
3 I may have misunderstood.

4 CHAIR OSWALT: We did discuss this, and this
5 is kind of a hard one to distinguish, but I think it
6 would be potential. And the reason for that is
7 because I feel like based on the record that we have
8 in front of us it appears that the grievant resides
9 in California. I feel like the chance of someone,
10 even if she did have a warrant out for a traffic
11 infraction from another state, I think the potential
12 for her to be arrested was there, but I don't think
13 that -- I think it's unlikely that someone would
14 arrest her for not paying a ticket in another state.
15 I think it's something that they would just make her
16 aware of and then send her on her way.

17 Obviously potentially they could have done
18 all those other things, but I think it's unlikely,
19 especially considering, and we talked about this as
20 well, the last docket entry in her traffic citation
21 case was from 3-17 of 2020, and that is the day where
22 all of the traffic warrants were quashed in Las Vegas
23 Justice Court because it's the day that everything
24 was shut down due to the pandemic. And so even
25 though it's no thanks to Mr. Shaddix or his work on

1 that portion of the case, she would not have had an
2 arrest warrant for more than potentially one day.

3 MR. HAHN: That being the findings of the
4 panel, I have no further questions. I yield to any
5 questions the panel would have, and again the Bar
6 thanks you for your time.

7 I would like Mr. Shaddix's motion, which has
8 been file stamped, marked for our record as Exhibit
9 10 and included as part of the record, if that's okay
10 with the panel.

11 CHAIR OSWALT: It's so admitted.

12 (Thereupon Complainant's Exhibit

13 10 was admitted into evidence.)

14 CHAIR OSWALT: I don't have any other
15 questions for the Bar. Do the other panel members?

16 PANEL MEMBER KINGSLEY: No, I do not.

17 PANEL MEMBER NAQVI: No questions for me.
18 Thank you all very much.

19 CHAIR OSWALT: Thank you, everyone. I think
20 we can go off the record.

21 MR. HAHN: Yeah, and I just show it at,
22 again, 10:25, again no appearance by Mr. Shaddix for
23 purposes of our record. Thank you, Chair. We can go
24 off the record, if that's your desire, yes.

25 CHAIR OSWALT: Yes.

(Thereupon the proceedings
were concluded at 10:25 a.m.)

* * * * *

CERTIFICATE OF REPORTER

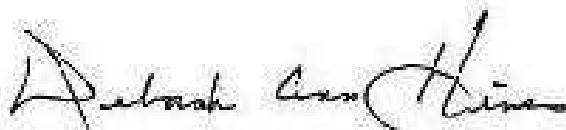
STATE OF NEVADA)

SS:

COUNTY OF CLARK)

I, Deborah Ann Hines, certified court reporter, do hereby certify that I took down in shorthand (Stenotype) all of the proceedings had in the before-entitled matter at the time and place indicated; and that thereafter said shorthand notes were transcribed into typewriting at and under my direction and supervision and the foregoing transcript constitutes a full, true and accurate record of the proceedings had.

IN WITNESS WHEREOF, I have hereunto affixed my hand this 22nd day of April, 2022.



Deborah Ann Hines, CCR #473, RPR

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STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

THOMAS S. SHADDIX, ESQ.

File No: OBC21-0567

FORMAL HEARING
April 13, 2022 @ 9:00 a.m. via ZOOM

INDEX OF DOCUMENTS

DOCUMENT	PAGE NOS.
Complaint, Designation of Hearing Panel, and Declaration of Mailing Filed January 4, 2022	SBN 001-012
Notice of Intent to Proceed on Default Basis February 2, 2022	SBN 013-015
Order Appointing Hearing Panel Chair Filed March 4, 2022	SBN 016-017
Notice of Telephonic Initial Case Conference Filed March 7, 2022	SBN 018-019
Scheduling Order After Initial Case Conference Filed March 10, 2022	SBN 020-023
Notice of Formal Hearing Filed March 11, 2022.....	SBN 024-025
Order Appointing Formal Hearing Panel Filed March 15, 2022	SBN 026-027

PANEL

Dana Oswalt, Esq., Panel Chair
Farhan Naqvi, Esq., Panel Member
Anne Kingsley, Panel Lay Member

Bruce C. Hahn, Esq.
Assistant Bar Counsel

Thomas S. Shaddix, Esq.
Respondent

Case No: OBC21-0567



FILED

JAN - 4 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.)
NV Bar No. 7905)
)
Respondent.)

COMPLAINT

TO: Thomas S. Shaddix Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121-3822
(SCR 79 permanent mailing)

AND

Thomas S. Shaddix, Esq.
shaddixts@ticketdefenders.net
(SCR 79 email address)

AND

Thomas S. Shaddix, Esq.
Thomas@shaddixlaw.com
(Non-SCR 79 address)

PLEASE TAKE NOTICE that pursuant to Supreme Court Rule ("SCR") 105(2) a
VERIFIED RESPONSE OR ANSWER to this Complaint must be filed with the Office of Bar
Counsel, State Bar of Nevada, 3100 W. Charleston Blvd., Ste. 100, Las Vegas, Nevada, 89102,

1 within twenty (20) days of service of this Complaint. Procedure regarding service is addressed
2 in SCR 109.

3 Complainant, State Bar of Nevada ("State Bar"), by and through its Assistant Bar
4 Counsel Bruce C. Hahn is informed and believes as follows:

5 1. Respondent Attorney Thomas Shaddix, Esq. ("Respondent"), Bar No. 7905 is
6 currently an active member of the State Bar of Nevada. At all times pertinent to this complaint
7 had his principal place of business for the practice of law located in Clark County, Nevada.

8 2. On or about September 23, 2019, Elizabeth Langstaff ("Grievant") was cited for
9 a traffic violation in the Las Vegas Justice Court ("LVJC") under case number X02245939.

10 3. On or about January 2, 2020, Grievant Langstaff retained the Law Office of
11 Thomas S. Shaddix, Esq., ("Respondent"), dba "Traffic Ticket Defenders" ("TD") to represent
12 her in the LVJC traffic citation. The Grievant spoke with TD office manager Alison Perelmen
13 ("Perelmen") who processed a \$100 charge to Grievant's credit card.

14 4. On or about January 16, 2020, Perelmen emailed the Grievant advising that an
15 "attorney session" was scheduled for February 20, 2020. The email stated that the hearing
16 results would be sent in 2-3 weeks. The email directed the Grievant to contact TD thereafter
17 if she did not hear from TD.

18 5. From February 21, 2020 through April 2021, the Grievant left several voicemail
19 messages with the TD office but did not receive return calls. The Grievant assumed the courts
20 and the TD office was closed due to the COVID-19 pandemic.

21 6. In early to mid-May 2021, the Grievant discovered that the TD phone number
22 was disconnected, despite the same number being actively displayed on the TD website of
23 www.ticketdefenders.net. On May 19, 2021, the Grievant filed an online grievance with the
24 State Bar, naming the Respondent.

25 ///

1 7. State Bar Senior Paralegal Investigator Dawn Meeks investigated the Langstaff
2 grievance against the Respondent to include a review of the LVJC record identified below:

3 8. On February 20, 2020, the Respondent entered a “Not Guilty” plea on Grievant
4 Langstaff’s behalf, thereafter, setting a “Pretrial Conference” with the court for March 13,
5 2020.

6 9. On March 13, 2020, the Respondent entered a “Guilty” plea on the Grievant’s
7 behalf to an amended charge of “Illegal Parking” with a commensurate fine of \$55.00.

8 10. The Respondent’s office did not timely communicate to the Grievant that they
9 had entered a guilty plea on her behalf or the obligation to pay the \$55 fine.

10 11. On July 12, 2021, the State Bar emailed Respondent’s office with a letter of
11 investigation seeking information on the Langstaff grievance by July 26. On July 14, 2021, the
12 Respondent replied with an email to the State Bar that he would “respond as soon as possible.”
13 The Respondent did not timely substantively respond.

14 12. On August 5, 2021, the Respondent emailed the State Bar stating he had no
15 record that the Langstaff matter was “billed” or that he was retained. The Respondent stated
16 he would “update” with his findings by tomorrow. The State Bar received no update from the
17 Respondent.

18 13. On October 18, 2021, the State Bar emailed the Respondent seeking specific
19 responses on the Langstaff grievance by October 27 and for him to confirm receipt of the State
20 Bar inquiry. The letter advised the Respondent that a potential charge under RPC 8.1 would
21 be considered absent a timely reply. The State Bar’s email delivery system received a “read
22 receipt” prompt about 7 hours later.

23 14. On October 28, 2021, the Respondent emailed the State Bar seeking a time
24 extension to reply. The State Bar agreed to November 4.

25

1 15. On November 4, the Respondent emailed a response, stating that the Grievant's
2 "credit card was declined" and he hasn't had "a new client since April 2020." That same
3 afternoon, the State Bar emailed the Respondent again seeking his response to specific
4 questions concerning the Langstaff grievance. The Respondent did not timely reply.

5 **COUNT ONE - RPC 1.4(a) (Communication)**

6 16. RPC 1.4(a) states in relevant part: "A lawyer shall:...(3) Keep the client
7 reasonably informed about the status of the matter; (4) Promptly comply with reasonable
8 requests for information..."

9 17. About February 21, 2020 through April 2021, the Respondent failed to promptly
10 comply with reasonable requests for information by not responding to Grievant Langstaff's
11 voice mail messages for a case status and/or,

12 18. On and after March 13, 2020, the Respondent failed to keep Grievant Langstaff
13 reasonably informed about the status of a matter, to wit, her traffic ticket status change with
14 Las Vegas Justice Court, by not informing her of his entry of a guilty plea on her behalf and/or
15 her obligation to pay a fine associated with that change of plea.

16 **COUNT TWO - RPC 8.1 (Bar Disciplinary Matters)**

17 19. RPC 8.1 states in relevant part: "...a lawyer...in connection with a disciplinary
18 matter, shall not: (b) ...knowingly fail to respond to a lawful demand for information from [a]
19 ...disciplinary authority,..."

20 20. On and after July 12, 2021, the State Bar sought to communicate with the
21 Respondent concerning the Langstaff grievance, during which the Respondent failed to:

22 a) timely substantively respond to the State Bar's written inquiry of July 12, 2021,
23 and/or,

24 b) timely substantively provide the State Bar with the "update" he represented he would
25 provide by August 6, 2021, and/or,

1 c) timely substantively respond to the State Bar's written request of October 18, 2021,
2 and/or,

3 d) timely substantively respond to the State Bar's written request of November 4, 2021.

4 WHEREFORE, Complainant seeks relief as follows:

5 21. That a hearing be held pursuant to Nevada Supreme Court Rule 105;

6 22. That Respondent be assessed the costs of the disciplinary proceeding pursuant
7 to SCR 120; and

8 23. That pursuant to SCR 102, such disciplinary action be taken by the Southern
9 Nevada Disciplinary Board against Respondent as may be deemed appropriate under the
10 circumstances.

11
12 Dated this 4th day of January 2022.

13 **STATE BAR OF NEVADA**
14 DANIEL M. HOOGE, Bar Counsel

15 *Bruce Hahn*

16 By: _____
17 Bruce C. Hahn, Assistant Bar Counsel
18 Nevada Bar No. 5011
19 3100 W. Charleston Blvd., Ste. 100
20 Las Vegas, Nevada, 89102
21
22
23
24
25



FILED

JAN - 4 2022

STATE BAR OF NEVADA

BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No.: OBC21-0567

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.,)
NV BAR No. 7905)
)
Respondent.)

**DESIGNATION OF
HEARING PANEL MEMBERS**

TO: Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121
shaddixts@ticketdefenders.net
(SCR 79 address & email)

and
thomas@shaddixlaw.com
(Alternate email address)

The following are members of the Disciplinary Board for the Southern District of Nevada. Pursuant to Nevada Supreme Court Rule (SCR) 105, you may issue peremptory challenge to five (5) such individuals by delivering the same in writing to the Office of Bar Counsel within twenty (20) days of service of the complaint.

The Chair of the Southern Nevada Disciplinary Board will thereafter designate a hearing panel of three (3) members of the Disciplinary Board, including at least one member who is not an attorney, to hear the above-captioned matter.

1. Russell E. Marsh, Esq., Chair
2. Dana Palmer Oswalt, Esq., Vice Chair
3. Christopher J. Lalli, Esq., Vice Chair
4. Neil Beller, Esq.
5. Annette L. Bradley, Esq.
6. John E. Bragonje, Esq.
7. Shemilly A. Briscoe, Esq.
8. Amanda Brookyser, Esq.
9. Robert J. Caldwell, Esq.
10. Jacqueline B. Carman, Esq.
11. Andrew A. Chiu, Esq.
12. James P. Chrisman, Esq.
13. Marc P. Cook, Esq.
14. Ira W. David, Esq.
15. Damon Dias, Esq.
16. Sandra K. DiGiacomo, Esq.
17. F. Thomas Edwards, Esq.
18. Matthew S. Fox, Esq.
19. Alan Freer, Esq.
20. Adam Garth, Esq.
21. Kelly Giordani, Esq.
22. Robert G. Giunta, Esq.
23. Angela Guingcangco, Esq.
24. Parish D. Heshmati, Esq.
25. Kenneth E. Hogan, Esq.

- 1 26. Jennifer K. Hostetler, Esq.
- 2 27. David Kaplan, Esq.
- 3 28. Franklin J. Katschke, Esq.
- 4 29. James T. Leavitt, Esq.
- 5 30. Michael B. Lee, Esq.
- 6 31. Jennifer R. Lloyd, Esq.
- 7 32. Donald Lowrey, Esq.
- 8 33. Dawn M. Lozano, Esq.
- 9 34. Roger Madsen, Esq.
- 10 35. Jason R. Maier, Esq.
- 11 36. Farhan Naqvi, Esq.
- 12 37. Michael J. Oh, Esq.
- 13 38. Gary A. Pulliam, Esq.
- 14 39. Paul "Luke" Puschnig, Esq.
- 15 40. Michael D. Rawlins, Esq.
- 16 41. Jericho L. Remitio, Esq.
- 17 42. Jarrod L. Rickard, Esq.
- 18 43. Miriam E. Rodriguez, Esq.
- 19 44. Vincent J. Romeo, Esq.
- 20 45. Daniel F. Royal, Esq.
- 21 46. Maria V. Saladino, Esq.
- 22 47. Africa A. Sanchez, Esq.
- 23 48. Jen J. Sarafina, Esq.
- 24 49. Jay A. Shafer, Esq.
- 25 50. Thomas R. Sheets, Esq.

- 1 51. Jeffrey G. Sloane, Esq.
- 2 52. Sarah E. Smith, Esq.
- 3 53. James R. Sweetin, Esq.
- 4 54. Stephen L. Titzer Esq.
- 5 55. Jacob J. Villani, Esq.
- 6 56. Marni Watkins, Esq.
- 7 57. Dan R. Waite, Esq.
- 8 58. Joseph Went, Esq.
- 9 59. Reed J. Werner, Esq.
- 10 60. Natalie Ann Allred, Laymember
- 11 61. Afeni Banks, Laymember
- 12 62. Brian Catlett, Laymember
- 13 63. Alexander Falconi, Laymember
- 14 64. Brittany Falconi, Laymember
- 15 65. Joelyne Gold, Laymember
- 16 66. Elizabeth A. Hanson, Laymember
- 17 67. Jack S. Hegeduis, Laymember
- 18 68. Julia D. Hesmati, Laymember
- 19 69. William M. Holland, Laymember
- 20 70. Nicholas Kho, Laymember
- 21 71. Annette Kingsley, Laymember
- 22 72. Gale Kotlikova, Laymember
- 23 73. Todd Krome, Laymember
- 24 74. Benjamin S. Lurie, Laymember
- 25 75. Jo Kent McBeath, Laymember

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- 76. Steve Moore, Laymember
- 77. Kellie C. Rubin, Laymember
- 78. Danny Lee Snyder, Jr., Laymember
- 79. Harvey Weatherford, Laymember

DATED this 4th day of January 2022.

STATE BAR OF NEVADA
Daniel M. Hooge, Bar Counsel

Bruce Hahn

By: _____
Bruce C. Hahn, Assistant Bar Counsel
3100 W. Charleston Blvd, Ste. 100
Las Vegas, Nevada 89102
Phone: (702) 382-2200

Case No.: OBC21-0567



FILED

JAN - 4 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.,)
NV Bar No. 7905)
)
Respondent.)

DECLARATION OF MAILING

Sonia Del Rio, under penalty of perjury, being first and duly sworn, deposes
and says as follows:

1. That Declarant is employed with the State Bar of Nevada and, in such capacity,
Declarant is Custodian of Records for the Discipline Department of the State
Bar of Nevada.
2. That Declarant states that the enclosed documents are true and correct copies
of the **COMPLAINT, FIRST DESIGNATION OF HEARING PANEL
MEMBERS, and STATE BAR OF NEVADA'S PEREMPTORY
CHALLENGES** in the matter of the *State Bar of Nevada vs. Thomas S.
Shaddix, Esq.*, Case No. OBC21-0567.

///

1 3. That pursuant to Supreme Court Rule 109, the Complaint, First Designation of
2 Hearing Panel Members, and State Bar of Nevada's Peremptory Challenges
3 were served on the following placing copies in an envelope which was then
4 sealed and postage fully prepaid for regular and certified mail, and deposited
5 in the United States mail at Las Vegas, Nevada on **January 4, 2022**, to:

6 Thomas S. Shaddix, Esq.
7 2550 E. Desert Inn Rd. #181
8 Las Vegas, NV 89121
9 **CERTIFIED MAIL RECEIPT: 7021 2720 0000 9932 7944**

9 **And via electronic mail on January 4, 2022 to:**

10 Thomas S. Shaddix, Esq. (SCR 79 Email): shaddixts@ticketdefenders.net
11 (Alternate Email): thomas@shaddixlaw.com

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Dated this 4th day of January 2022.

14
15 *Sonia Del Rio*
16 _____
17 Sonia Del Rio, an employee
18 of the State Bar of Nevada
19
20
21
22
23
24
25

Case No: OBC21-0567



FILED

FEB - 2 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.,)
Nevada Bar No. 7905,)
Respondent.)

NOTICE OF INTENT TO PROCEED
ON DEFAULT BASIS

TO: Thomas S. Shaddix Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121-3822
(SCR 79 permanent mailing)

AND
Thomas S. Shaddix, Esq.
shaddixts@ticketdefenders.net
(SCR 79 email address)

AND
Thomas S. Shaddix, Esq.
Thomas@shaddixlaw.com
(Non-SCR 79 address)

PLEASE TAKE NOTICE THAT unless the State Bar receives a responsive pleading in the above-captioned matter by February 25, 2022, it will proceed on a default basis and ***the charges against you shall be deemed admitted.*** Supreme Court Rule 105 (2) states in relevant part:

1 A copy of the complaint shall be served on the attorney and it shall
2 direct that a verified response or answer be served on bar counsel within 20
3 days of service. In the event the attorney fails to plead, **the charges shall be**
4 **deemed admitted**; provided, however, that an attorney who fails to respond
within the time provided may thereafter obtain permission of the appropriate
disciplinary board chair to do so, if failure to file is attributable to mistake,
inadvertence, surprise, or excusable neglect. (Emphasis added.)

5 Additional copies of the Complaint previously served upon you, and the First
6 Designation of Hearing Panel Members, accompanies this Notice.

7 DATED this 2 day of February 2022.

8
9 **STATE BAR OF NEVADA**
10 **DANIEL M. HOOGE, BAR COUNSEL**

11 *Bruce Hahn*

12
13

Bruce C. Hahn, Assistant Bar Counsel
14 Nevada Bar No. 5011
15 3100 W. Charleston Blvd., Ste. 100
16 Las Vegas, Nevada 89102
17 (702) 382-2200
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CERTIFICATE OF SERVICE

The undersigned hereby certifies a true and correct copy of the **Notice of Intent to Proceed on a Default Basis, Complaint, and First Designation of Panel Members** were deposited in the United States Mail at Las Vegas, Nevada, postage fully pre-paid thereon for first class-regular mail and certified mail, return receipt requested, addressed to:

Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd., #181
Las Vegas, NV 89121
Certified Mail Receipt: 7021 1970 0000 0350 4153

and via email to:

1. Thomas S. Shaddix, Esq. (SCR 79 Email): shaddixts@ticketdefenders.net
thomas@shaddixlaw.com

Dated this 2nd day of February 2022

Sonia Del Rio
Sonia Del Rio, an employee of
the State Bar of Nevada.



FILED

MAR - 4 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No.: OBC21-0567

STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,

NV BAR NO. 7905

Respondent.

**ORDER APPOINTING HEARING
PANEL CHAIR**

IT IS HEREBY ORDERED that the following member of the Southern Nevada Disciplinary Board has been designated and as the Hearing Panel Chair.

1. Dana Oswalt, Esq.,

DATED this 2 day of March, 2022

SOUTHERN NEVADA DISCIPLINARY BOARD

By: *Christopher Lalli*
Christopher Lalli (Mar 2, 2022 14:03 PST)
Christopher J. Lalli, Esq.
Nevada Bar No. 5398
Vice-Chair, Southern Nevada Disciplinary Board

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **ORDER APPOINTING**
3 **HEARING PANEL CHAIR** was electronically served upon:

- 4 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
5 2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
6 thomas@shaddixlaw.com
7 3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

8 DATED this 4th day of March 2022.

9
10 *Sonia Del Rio*
11 _____
12 Sonia Del Rio an employee of
13 the State Bar of Nevada.
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FILED

MAR - 7 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No. OBC21-0567

**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.,)
Nevada Bar No. 7905,)
Respondent.)

**NOTICE OF TELEPHONIC INITIAL
CASE CONFERENCE**

PLEASE TAKE NOTICE, the telephonic Initial Case Conference in the above-entitled matter is set for **March 8, 2022, at 3:00 p.m.** The State Bar conference call number is 1-877-594-8353, participant passcode is 46855068#.

Dated this 7 day of March 2022.

STATE BAR OF NEVADA
Daniel M. Hooge, Bar Counsel

Bruce Hahn

Bruce C. Hahn, Assistant Bar Counsel
3100 W. Charleston Boulevard, Suite 100
Las Vegas, Nevada 89102
(702) 382-2200
Attorney for Complainant

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CERTIFICATE OF SERVICE

The undersigned hereby certifies a true and correct copy of the foregoing
NOTICE OF TELEPHONIC INITIAL CASE CONFERENCE was served
electronically to:

1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
thomas@shaddixlaw.com
3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

Dated this 7th day of March 2022.

Sonia Del Rio
Sonia Del Rio, an employee
of the State Bar of Nevada

Case No.: OBC21-0567



STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,

NV Bar No. 7905

Respondent.

SCHEDULING ORDER AFTER
INITIAL CASE CONFERENCE

Pursuant to Rule 17 of the Disciplinary Rules of Procedure ("DRP"), on March 8, 2022, 2021, at 3:00 p.m., Dana Oswalt, Esq., the Formal Hearing Panel Chair, met telephonically with Bruce Hahn, Esq., Assistant Bar Counsel, on behalf of the State Bar of Nevada ("SBN"), assisted by Sonia Del Rio, SBN Hearing Paralegal. Respondent did not appear. Respondent made no advance contact with the State Bar or the Chair advising of any scheduling or appearance difficulty.

During the Case Conference the parties discussed disclosures, discovery issues, the potential for resolution of this matter prior to the hearing, a status conference, and the hearing date.

The Chair finds and rules as follows:

1. The State Bar consents to service. The Chair orders that service to all parties and the Chair will occur by electronic means of all documents pursuant to SCR 109(2), NRCP

1 5, and DRP 11(b)(3) with the understanding that **all documents need to be submitted by**
2 **5:00 p.m. to be file stamped timely.**

3 **2.** The State Bar consents that venue is proper in Clark County, Nevada. The Chair
4 finds Clark County venue proper.

5 **3.** The Formal Hearing for this matter is hereby set for **one half (1/2) day**
6 **starting at 9:00 a.m. on April 13, 2022**, and shall take place virtually via Zoom
7 Conferencing until further notice.

8 **4.** On or before **March 15, 2022, at 5:00 p.m.**, the State Bar of Nevada's
9 initial disclosures shall be served on all parties. The documents provided by the State Bar
10 shall be bates stamped with numerical designations. *See* DRP 17 (a).

11 **5.** On or before **March 23, 2022, at 5:00 p.m.**, Respondent's initial
12 disclosures shall be served on all parties. The documents provided by the Respondent shall
13 be bates stamped with alphabetical exhibit designations. *See* DRP 17 (a).

14 **6.** On or before **April 7, 2022, at 5:00 p.m.**, the parties shall serve a Final
15 Designation of witnesses expected to testify and exhibits expected to be presented at the
16 Formal Hearing in this matter, pursuant to SCR 105(2)(d), DRP 17(a) and DRP 21.

17 **7.** All documents disclosed shall be bates stamped, the State Bar will use
18 numerical exhibit designations and Respondent will use alphabetical exhibit designations,
19 pursuant to DRP 17.

20 **8.** On **March 30, 2022, at 10:00 a.m.**, the parties shall meet telephonically
21 with Dana Oswalt, Esq. for the Pre-hearing Conference. Any pending issues, including
22 pending Motions, will be addressed at the Pre-hearing Conference. The parties shall use the
23 State Bar conference bridge (877) 594-8353 and the passcode is 46855068#. Pursuant to
24 DRP 23, at the Pre-hearing conference (i) the parties shall discuss all matters needing
25 attention prior to the hearing date, (ii) the Chair may rule on any motions or disputes

including motions to exclude evidence, witnesses, or other pretrial evidentiary matter, and (iii) the parties shall discuss and determine stipulated exhibits proffered by either the State Bar or Respondent as well as a stipulated statement of facts, if any.

9. The State Bar stipulates to waive SCR 105(2)(d) to allow for the formal appointment of the remaining hearing panel members on a date that is greater than 45 days prior to the scheduled hearing.

10. Based upon the State Bar's oral motion and offer of proof at ICC to support a finding of Default against the Respondent, the Chair made a provisional ruling that the charges filed against the Respondent are deemed admitted based upon the following findings: The Chair finds that the Respondent has not filed a timely responsive pleading to the State Bar Complaint filed January 4, 2022, and the Respondent has not provided any objection to the State Bar's Notice of Intent to Proceed on a Default Basis filed on or about February 2, 2022. The Chair further finds that the Respondent failed to appear at ICC without notice or excuse.

Based on the proffer of the State Bar to the foregoing during the telephonic Initial Conference and good cause appearing, **IT IS SO ORDERED.**

Dated this 10 day of March 2022.

SOUTHERN NEVADA DISCIPLINARY BOARD

Dana P. Oswalt

By: Dana P. Oswalt (Mar 10, 2022 14:36 PST)

Dana Oswalt, Esq.
Hearing Panel Chair

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **SCHEDULING ORDER**
3 **AFTER INITIAL CASE CONFERENCE** were deposited in the United States Mail at Las Vegas,
4 Nevada, postage fully pre-paid thereon for first-class regular mail addresses to:

5 Thomas S. Shaddix, Esq.
6 2550 E. Desert Inn Rd., #181
7 Las Vegas, NV 89121
(SCR 79 Address)

8 And via email to:

- 9 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
10 2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
11 thomas@shaddixlaw.com
12 3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

13 DATED this 11th day of March 2022.
14

15 *Sonia Del Rio*
16 _____
17 Sonia Del Rio an employee of
18 the State Bar of Nevada.
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Case No.: OBC21-0567



**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.)
Nevada Bar No. 7905)
Respondent.)

**NOTICE OF
FORMAL HEARING**

PLEASE TAKE NOTICE that the formal hearing in the above-entitled action has been scheduled for **one day on April 13, 2022, at the hour of 9:00 a.m.,** The hearing will be conducted virtually through **ZOOM video conference, until further notice.** The parties have stipulated to the hearing date set forth above.

Please be further advised that you are entitled to be represented by counsel, to cross-examine witnesses, and to present evidence.

DATED this 11 day of March 2022.

STATE BAR OF NEVADA
Daniel M. Hooge, Bar Counsel

Bruce Hahn

By: _____
Bruce C. Hahn, Assistant Bar Counsel
3100 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89102
(702) 382-2200
Attorney for State Bar of Nevada

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **NOTICE OF**
3 **FORMAL HEARING** were deposited in the United States Mail at Las Vegas, Nevada,
4 postage fully pre-paid thereon for certified mail and first-class regular mail addressed
5 to:

6 Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd., #181
7 Las Vegas, NV 89121
(SCR 79 Address)
8 **CERTIFIED MAILING: 7021 1970 0000 0350 4276**

9 And via email to:

- 10 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
11 2. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
12 thomas@shaddixlaw.com
13 3. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

14 DATED this 11th day of March 2022.

16 *Sonia Del Rio*

17 _____
Sonia Del Rio an employee of
18 the State Bar of Nevada.



FILED

MAR 15 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

Case Nos: OBC21-0567

**STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD**

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.

NV BAR No. 7905

Respondent.

**ORDER APPOINTING
FORMAL HEARING PANEL**

IT IS HEREBY ORDERED that the following members of the Southern Nevada Disciplinary Board have been designated as members of the formal hearing panel in the above-entitled action. The hearing will be convened on the 13th day of April, 2022 starting at 9:00 a.m. via Zoom Video Conferencing.

1. Dana Oswalt, Esq., Chair;
2. Farhan Naqvi, Esq.
3. Anne Kingsley, Laymember

DATED this 14 day of March, 2022

SOUTHERN NEVADA DISCIPLINARY BOARD

By: Christopher Lalli
Christopher Lalli (Mar 14, 2022 06:41 PDT)

Christopher Lalli, Esq.
Nevada Bar No. 5398
Vice-Chair, Southern Nevada Disciplinary Board

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies a true and correct copy of the **ORDER APPOINTING**
3 **FORMAL HEARING PANEL** were served electronically to:

- 4 1. Dana Oswalt, Esq. (Panel Chair): dana@bensonbingham.com
5 2. Farhan Naqvi, Esq. (Panel Member): Naqvi@naqvilaw.com
6 3. Anne Kingsley (Panel Lay Member): Anne.kingsley@unlv.edu
7 4. Thomas S. Shaddix, Esq. (Respondent): shaddixts@ticketdefenders.net;
8 thomas@shaddixlaw.com
9 5. Bruce C. Hahn, Esq. (Assistant Bar Counsel): bruceh@nvbar.org

10 DATED this 15th day of March 2022.

11
12 *Sonia Del Rio*
13 _____
14 Sonia Del Rio an employee of
15 the State Bar of Nevada.
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DECLARATION OF SONIA DEL RIO
CUSTODIAN OF RECORDS

SONIA DEL RIO, under penalty of perjury, being first duly sworn, declares and says as follows:

1. That Declarant is employed as a Hearing Paralegal for the Office of Bar Counsel of the State Bar of Nevada and in such capacity is the custodian of records for the State Bar of Nevada;
2. That Declarant has reviewed the State Bar of Nevada membership records regarding Respondent Thomas S. Shaddix, Nevada Bar number 7905, and has verified that he was first licensed to practice law in the State of Nevada on October 5, 2001.
3. That Declarant has reviewed the State Bar of Nevada membership records and confirmed Respondent is Active.
4. That Declarant has reviewed the State Bar of Nevada discipline records regarding Respondent and has verified that he has the following prior discipline:
 - a. Letter of Private Reprimand, Filed 3/12/07 for RPC 5.5(1) and RPC 8.1(b).
 - b. Public Reprimand, Filed 6/6/11 for RPC 1.3, RPC 1.4, and RC 8.1(b).
 - c. Public Reprimand, Filed 7/10/14 for RPC 1.4 and RPC 8.1(b).
 - d. Order Approving Conditional Guilty Plea, Suspension for 6 months and 1 day, stayed for 18 months subject to conditions. Filed 5/14/21 for RPC 1.4, RPC 1.15, RPC 5.3, and RPC 8.1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of April 2022.

Sonia Del Rio

Sonia Del Rio, Hearing Paralegal
Office of Bar Counsel

FILED

MAR 12 2007

Elizabeth C. Bouwman
STATE BAR OF NEVADA

Case No. N06-16-1032

STATE BAR OF NEVADA

NORTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS S. SHADDIX, ESQ.,

Respondent.

**FINDINGS OF FACT, CONCLUSIONS
OF LAW, DECISION AND ORDER**

THIS MATTER came before a designated Formal Hearing Panel of the Northern Nevada Disciplinary Board (the "Panel") for hearing on February 26, 2007. The Panel consisted of Dan R. Reaser, Esq., Chairman, Lay-member Judy Southard, Shelly T. O'Neill, Esq., G. David Robertson, Esq., and Jill Greiner, Esq. The State Bar of Nevada (the "State Bar") appeared and was represented by Assistant Bar Counsel, Glen M. Machado, Esq. The Respondent, Thomas S. Shaddix, Nevada State Bar No. 7905 (the "Respondent" or "Mr. Shaddix") appeared telephonically *in propria persona*.

FINDINGS OF FACT

Based upon the pleadings filed, the documentary evidence admitted as Hearing Exhibits 1 through 5, and the testimonial evidence of the Respondent presented at the hearing in these proceedings, the Panel makes Findings of Fact as follows:

1. The Respondent is an attorney licensed to practice law in the state of Nevada whose principal office for the practice of law is located at 3235 South Eastern Avenue, in the city of Las Vegas, county of Clark. See Hearing Exhibit 1, at 0001, lines 11-12 & 21-22, State Bar of Nevada v. Thomas S. Shaddix, Case No. N06-16-1032, *Complaint* at 1 (filed Aug. 28, 2006)(the

1 “Complaint”); Hearing Exhibit 1, at 0009, lines 1-4 & 1-21, State Bar of Nevada v. Thomas S.
2 Shaddix, Case No. N06-16-1032, *Response to Complaint* at 1 (filed Oct. 16, 2006)(the
3 “Answer”).
4

5 2. Mr. Shaddix was admitted to practice law in Nevada in 2002. Prior to the
6 proceedings in this case, the Respondent has not been the subject of any prior instances of
7 private or public discipline by the State Bar of Nevada. *See State Bar of Nevada v. Thomas S.*
8 *Shaddix*, Case No. N06-16-1032, *Transcript of Proceedings* (dated Feb. 26, 2007)(the “Hearing
9 Transcript”).
10

11 3. On or about May 2, 2006, Mr. Shaddix was transferred by order of the Supreme
12 Court of Nevada to inactive status for failure to comply with the continuing legal education
13 requirements of SCR 205 to SCR 215. The Court’s action followed notices and warnings to Mr.
14 Shaddix. *See Hearing Exhibit 4*.
15

16 4. On or about May 23, 2006, the Clerk of the Justice and Municipal Court of
17 Carson Township (the “Justice Court”) submitted a grievance letter to the State Bar of Nevada
18 concerning certain statements, representations and tactics of Mr. Shaddix in connection with the
19 Respondent’s defense of a client who had received a speeding ticket (the “Traffic Case”). *See*
20 Hearing Exhibit 2 (Letter to State Bar of Nevada from Jim R. Snyder (dated May 23, 2006)(the
21 “Grievance Letter”)
22

23 5. On June 2, 2006, and June 21, 2006, respectively, the State Bar of Nevada issued
24 to Mr. Shaddix two certified letters requesting the Respondent provide a written response to the
25 Grievance Letter. *See Hearing Exhibit 1*, at 0002, lines 17-21 (Complaint at 2); Hearing Exhibit
26 3. Mr. Shaddix did not respond to these letters from the State Bar. Hearing Transcript.
27
28

1 6. On or about June 7, 2006, Mr. Shaddix sent a letter to the Justice Court proposing
2 terms and reasons for a negotiated settlement of the Traffic Case. *See* Hearing Exhibit 2 (Letter
3 to Carson City Justice Court from Thomas S. Shaddix (dated June 7, 2006)(the “Shaddix
4 Settlement Letter”); Hearing Transcript.

5
6 7. During the week of August 14, 2006, the State Bar left two voicemail messages
7 on Mr. Shaddix’s office telephone related to his failure to reply to the certified letters. *See id.* at
8 0002, lines 20-21 (Complaint at 2). Mr. Shaddix did not contest this fact. *See* Hearing Exhibit 1,
9 at 00011, lines 16-21 (Answer at 3) (“Respondent does not deny that two voicemail messages
10 were left on the office telephone . . .”).

11
12 8. Mr. Shaddix testified that his law office is located in a multi-tenant office building
13 with a shared reception function. While the Respondent recognized one of the receipt signatures
14 on one of the certified letters from the State Bar as that of a former receptionist, Mr. Shaddix
15 testified he had not received these letters until they were produced as exhibits during the formal
16 hearing before the Panel. *See* Hearing Transcript. Mr. Shaddix also testified that his law office
17 had experienced similar mail delivery deficiencies, including communications from a number of
18 courts. The Respondent explained he had implemented certain corrective action to cure the mail
19 delivery problems experienced by his law office.
20

21 9. The Respondent does not recall the content of either of the August 2006,
22 voicemails from the State Bar. Hearing Exhibit 1, at 00011, lines 16-21 (Answer at 3). Mr.
23 Shaddix testified that he had not understood the distinction between the State Bar and the
24 Nevada Board of Continuing Legal Education (the “NBCLE”). He thought these telephone
25 messages were related to a delinquent fee issue with the NBCLE that the Respondent believed
26 was resolved in July 2006. *See* Hearing Transcript.
27
28

10. Mr. Shaddix had completed his required continuing legal education courses on or about April 28, 2006. The Respondent, however, failed to pay the required fees to be reinstated to active status for a number of months. *See* Hearing Exhibit 5; Hearing Transcript.

11. Mr. Shaddix was reinstated to active status in the State Bar of Nevada on or about September 12, 2006. *See* Hearing Exhibit 5.

12. The State Bar of Nevada and the Respondent have stipulated to waive the hearing venue requirements of SCR 105(2)(b). *See* Hearing Exhibit 1, at 00020; Hearing Transcript. At his request and for his convenience, Mr. Shaddix was permitted to participate in the Formal Hearing by telephone. The State Bar did not object to this accommodation. *See* Hearing Transcript.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Panel hereby issues the following Conclusions of Law:

(a) The Panel was designated by the Northern Nevada Disciplinary Board Chair to adjudicate this case and has jurisdiction over the Respondent and the subject matter of these proceedings. *See* NEV. SUP. CT. R. 99.

(b) Venue in this matter is properly with the Northern Nevada Disciplinary Board and in the county of Washoe, state of Nevada. NEV. SUP. CT. R. 105.

(c) Submitted to the Panel for decision are two claims by the State Bar against Mr. Shaddix. First, the State Bar asserts that the Respondent violated Rule 5.5(1) of the Nevada Rules of Professional Conduct (“RPC”). NEV. R. PROF. CONDUCT 5.5(1). Second, the State Bar alleges that Mr. Shaddix violated RPC 8.1(b). NEV. R. PROF. CONDUCT 8.1(b).

1 (d) Accordingly, the underlying subject matters of the Grievance Letter are not the
2 issues presented to the Panel by the claims for relief pleaded in the State Bar's Compliant.
3 Instead, the grounds alleged to support imposition of professional discipline relate to the Mr.
4 Shaddix's compliance with professional licensing requirements.
5

6 (e) The State Bar must prove by clear and convincing evidence that Mr. Shaddix
7 violated RPC 5.5(1) and RPC 8.1(b). *See* NEV. SUP. CT. R. 105(2)(e); In re Stuhff, 108 Nev. at
8 633-634, 837 P.2d at 856; Gentile v. State Bar, 106 Nev. 60, 62, 787 P.2d 386, 387 (1990).
9

10 **A. UNAUTHORIZED PRACTICE OF LAW**

11 (f) RPC 5.5 provides that "[a] lawyer shall not . . . [p]ractice law in a jurisdiction
12 where doing so violates the regulation of the legal profession in that jurisdiction . . ." NEV. R.
13 PROF. CONDUCT 5.5(1). A member of the State Bar of Nevada whose status is changed from
14 active to inactive for noncompliance with SCR 205 to SCR 215, "is not entitled to engage in the
15 practice of law in the State of Nevada *until . . . reinstated . . .*" NEV. SUP. CT. R. 212(6)
16 (emphasis added).
17

18 (g) The uncontroverted evidence establishes that Mr. Shaddix was on inactive status
19 when he sent the Shaddix Settlement Letter. The Shaddix Settlement Letter unequivocally states
20 that the Respondent was representing a client in proposing to a court a negotiated settlement of a
21 traffic offense. This type of activity is the practice of law. *See, e.g., Salman v. Newell*, 110 Nev.
22 1333, 885 P.2d 607 (1994). *See generally* Laws. Manual on Prof. Conduct § 21:8006
23 (ABA/BNA).
24

25 (h) Mr. Shaddix's defense to practicing law while on inactive status was that he
26 believed he could continue to practice law because he had completed the required continuing
27 education courses on or about April 28, 2006. This defense is not supported by any
28

1 interpretation of the applicable provisions of SCR 205 to 215. *See* NEV. SUP. CT. R. 205 - 215.
2 The Respondent is presumed to know and understand the laws that govern the practice of his
3 profession. *See, e.g., Sengel v. IGT*, 116 Nev. 565, 572-573, 2 P.3d 258 (2000); *see also* NEV. R.
4 PROF. CONDUCT 1.0A(c) (failure to comply with an obligation imposed by a Rule is basis for
5 discipline; no knowledge of Rule required).
6

7 (i) The record, therefore, establishes by clear and convincing evidence that Mr.
8 Shaddix engaged in the unauthorized practice of law and violated RPC 5.5(1).
9

10 **B. FAILURE TO RESPOND TO DISCIPLINARY AUTHORITY**

11 (j) RPC 8.1 provides in relevant part that “a lawyer . . . in connection with a
12 disciplinary matter, shall not . . . knowingly fail to respond to a lawful demand for information
13 from . . . disciplinary authority . . .” NEV. R. PROF. CONDUCT 8.1(b). As used in RPC 8.1(b), the
14 term “knowingly” means actual knowledge. NEV. R. PROF. CONDUCT 1.0(f).

15 (k) The State Bar established by clear and convincing evidence that lawful written
16 demands for information were sent to Mr. Shaddix on June 2, 2006, and June 21, 2006. The
17 State Bar did not counter Mr. Shaddix’s testimony that he had not received these written
18 demands for information until after these proceedings commenced.
19

20 (l) The State Bar established by clear and convincing evidence that during the week
21 of August 14, 2006, the State Bar left two voicemail messages on Mr. Shaddix’s office telephone
22 system, a fact the Respondent did not deny or otherwise controvert.

23 (m) Mr. Shaddix’s defense to his failure to respond to these telephone inquiries was he
24 thought these telephone messages were related to a delinquent bar fee issue that the Respondent
25 believed was resolved in July 2006. For this reason, he did not return the telephone messages.
26
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1 Mr. Shaddix testified he did not recall the content of these messages and the State Bar did not
2 prove that the messages themselves communicated to the Respondent a demand for information.

3 (n) That said, the record establishes that Mr. Shaddix received the telephone
4 messages and failed to respond. From his conduct, the Panel could infer the Respondent may
5 have “knowingly” failed to respond to a demand for information. As the Supreme Court of
6 Oregon noted in a professional discipline context, “[a] lawyer acts knowingly by being
7 consciously aware of the nature or attendant circumstances of the conduct, but not having a
8 conscious objective to accomplish a particular result.” See In re Worth, 82 P.3d 605, 615 (Or.
9 2003). The Panel believes it is a fair inference from Mr. Shaddix’s failure to return the State
10 Bar’s telephone messages, that while he may not have had the conscious objective to refuse to
11 respond to a lawful informational request, the Respondent certainly was aware that he was being
12 non-responsive and that there could be professional conduct issues involved in any inquiry by the
13 State Bar. Essentially, by his non-responsive conduct, Mr. Shaddix either knew or should have
14 known there could be professional conduct ramifications, even if only related to a fee payment
15 issue.

16 (o) Had the Respondent implemented an appropriate office management procedure to
17 protect against mis-delivery or non-delivery of certified and other mail, the State Bar would not
18 have needed to resort to telephonic attempts to communicate with Mr. Shaddix on matters of
19 professional conduct. Likewise, had Mr. Shaddix responded to the telephone messages, there is
20 a substantial likelihood that formal disciplinary processes would have been completely
21 unnecessary.

22 (p) Given the State Bar’s burden of proof, however, the Panel cannot conclude that
23 there is clear and convincing evidence that Mr. Shaddix knowingly failed to respond to a lawful
24

1 demand for information although the Panel views this as a close question. An attorney should
2 not be excused from the obligations of cooperation imposed by RPC 8.1(b) through a form of
3 benign neglect.
4

5 **DECISION AND ORDER**

6 In assessing the form of discipline to recommend, the Panel has accounted for a number
7 of mitigating factors which must be considered. The most important of these factors is the
8 candor of the Respondent. *See, e.g., Hearing Transcript* at []. Mr. Shaddix stated on a number of
9 instances that he knew that he was ultimately responsible for compliance with the rules of
10 professional conduct and that neither the circumstances of solo private practice nor neglectful
11 conduct excused these obligations. The Panel believes that Mr. Shaddix understands the need to
12 address deficiencies in his law office management procedures and to become more versed in his
13 professional obligations. *See Hearing Transcript* at []. Also relevant to the Panel is that no
14 prejudice has been caused to any client and Mr. Shaddix was the principal victim of his own
15 misconduct. Additionally, the Respondent has not been the subject of any prior instances of
16 private or public discipline by the State Bar of Nevada.
17

18 These mitigating factors, however, do not excuse the established violation by the
19 Respondent of RPC 5.5(1). The Panel recommends that Mr. Shaddix be privately reprimanded.
20 The text of the recommended private reprimand is set forth on **Exhibit A**, accompanying this
21 Order.
22

23 The Panel also recommends that the Respondent be ordered:

- 24 (1) To pay the costs associated with these proceedings pursuant to SCR 120.
25
26
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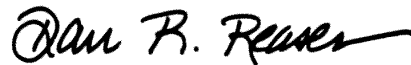
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(2) To pay a fine in the amount of ONE THOUSAND DOLLARS (\$1,000.00) unless on or before December 1, 2007, the Respondent submits proof satisfactory to the State Bar that he has successfully completed the following continuing legal education in person:

(A) At least five (5) hours on subjects related to law office management; and,

(B) At least five (5) hours on professional ethics.

DATED and ENTERED this 12th day of March, 2007.



DAN R. REASER, ESQ., Chair
Northern Nevada Disciplinary Board Panel

EXHIBIT A

CASE NO. N06-16-1032

STATE BAR OF NEVADA
NORTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA, COMPLAINANT
VS.
THOMAS S. SHADDIX, ESQ., RESPONDENT

PRIVATE REPRIMAND

TO: THOMAS S. SHADDIX, ESQ.

On or about May 2, 2006, you were transferred by order of the Supreme Court of Nevada to inactive status for failure to comply with the continuing legal education requirements of SCR 205 to SCR 215. The Court's action followed notices and warnings. You were reinstated to active status in the State Bar of Nevada on or about September 12, 2006. While on inactive status you continued to engage in the practice of law in Nevada as demonstrated by the fact that on or about June 7, 2006, you sent a letter to the Justice and Municipal Court of Carson Township on behalf of a client proposing terms and reasons for a negotiated settlement of a traffic case.

Based on the forgoing, you are hereby Privately Reprimanded for violations of Rule 5.5(1) of the Nevada Rules of Professional Conduct. While your conduct in this matter was not shown to have injured or prejudiced any client, you are also cautioned that given the evidence presented at your Formal Hearing on February 26, 2007, the Formal Hearing Panel of the Northern Nevada Disciplinary Board believes that you should promptly implement appropriate law office management processes to address deficiencies that if not corrected could result in injury and prejudice to clients or reoccurrence of the demonstrated failure to adhere to the rules that govern your continued practice of law.

Dated this 12th day of March, 2007.

Dan R. Reaser, Esq.
Formal Hearing Panel Chair
Northern Nevada Disciplinary Panel

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1 Case No. SG10-0390

FILED

2 STATE BAR OF NEVADA

JUN 06 2011

3 SOUTHERN NEVADA DISCIPLINARY BOARD

JCB

4 STATE BAR OF NEVADA,)

STATE BAR OF NEVADA

5 Complainant,)

6 vs.)

PUBLIC REPRIMAND

7 THOMAS S. SHADDIX, ESQ.,)
NEVADA BAR NO. 7905)

8 Respondent.)
9

10 TO: THOMAS S. SHADDIX, ESQ.

11 Barry Egert ("Egert") retained you for representation concerning a federal DUI criminal
12 matter. Egert's complaint to the State Bar indicated a lack of diligence and a lack of
13 communication in your representation of him, including your failure to appear at a December
14 2009 hearing which subsequently resulted in Egert being arrested on a bench warrant.

15 On May 14, 2010, the State Bar sent you a letter of investigation to your Supreme
16 Court Rule ("SCR") 79 address regarding Egert's grievance. On June 8, 2010, the State Bar
17 received a letter from you dated June 1, 2010, wherein you requested an extension in which
18 to respond to the State Bar until June 8, 2010. However, you did not correspond further with
19 the State Bar in this matter and failed to respond to the substance of the State Bar's letter
20 dated May 14, 2010.

21 The State Bar subsequently sent you a reminder letter dated June 25, 2010, to your
22 SCR 79 address via regular mail and certified mail/return receipt requested. The
23 correspondence informed you that failure to respond would result in a grievance file being
24 opened and your failure to cooperate would be considered a violation of RPC 8.1 (Bar
25

1 Admission and Disciplinary Matters). You failed to respond to the State Bar's letter dated
2 June 25, 2010.

3 As a result, a grievance file was opened on August 17, 2010, and you were sent
4 notice via regular mail and certified mail/return receipt requested to his SCR 79 address.
5 The letter asked you to respond to Egert's grievance within ten (10) days. You failed to
6 respond to the State Bar's letter dated August 17, 2010.

7 Although the State Bar was required to make numerous attempts prior to establishing
8 contact with you, you ultimately accepted responsibility for your actions in regard to Egert's
9 matter and for not responding to the State Bar. Prior to communicating with the State Bar,
10 you fully refunded Egert's fee and remained as counsel in Egert's matter until the completion
11 of his case, which resulted in Egert receiving probation for one count and dismissal of the
12 three remaining counts.

13 In regard to your failure to respond to the State Bar, you are reminded that the
14 practice of law is a self-regulated profession and therefore it is imperative for attorneys to
15 fully cooperate in disciplinary proceedings in order to maintain the integrity of the profession.

16 In light of the foregoing, you violated Rule of Professional Conduct ("RPC") 1.3
17 (Diligence), RPC 1.4 (Communication) and RPC 8.1(b) (Bar Admission and Disciplinary
18 Matters) and are hereby PUBLICLY REPRIMANDED.

19 Dated this 6th day of June, 2011.

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21 SHANN D. WINESETT, ESQ., Chair
22 Southern Nevada Disciplinary Panel
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Case No. SG11-1182



FILED

JUL 10 2014

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD OF THE STATE BAR OF NEVADA

BY: *[Signature]*
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA,

Complainant,

vs.

THOMAS SHADDIX, ESQ.,
BAR NO. 7905,

Respondent.

PUBLIC REPRIMAND

TO: Thomas Shaddix, Esq.
Bar No. 7905
3234 S. Eastern Avenue
Las Vegas, NV 89169

You have a high volume law practice, Traffic Defenders, with a focus on traffic tickets and related offenses. On or about June 11, 2011, an individual named Alejandro Rodriguez ("Rodriguez") appeared in Justice Court in a misdemeanor arraignment case. The Judge noted that the gentleman before the Court appeared much older than the defendant's listed age and the Court quickly determined it was the wrong Alejandro Rodriguez, wholly unrelated to the actual Defendant.

Rodriguez, who speaks no English, advised the Court through an interpreter that he showed up in Court because he had received a notice from your office, specifically a form letter dated June 27, 2011, prominently labeled as a legal advertisement across the top.

The letter indicated, *inter alia*, that "Public records show that you were recently charged for the above alleged criminal misdemeanor" and included the date and time of the arraignment. The format of the letter closely resembled the format used by the Justice Court website to relay information.

1 The Court forwarded the matter to the State Bar for review. A grievance file was
2 opened and you thereafter failed to timely respond, resulting in the matter going to a
3 Screening Panel of the Southern Nevada Disciplinary Board without a response from you.

4 When you did respond, you informed the State Bar that the underlying matter was
5 caused by communication problems in your intake process. Specifically, a family member of
6 the actual defendant spoke to your intake staff about potential representation but never came
7 back. Neither did the actual defendant contact your office. Out of an abundance of caution
8 you sent the notice letter regarding the arraignment date to Mr. Rodriguez directly. However,
9 because of the uncertainty of the contact information you had from intake, you included the
10 requisite advertising disclaimers.

11 Unfortunately, your staff prepared the letter with an address for the wrong Alejandro
12 Rodriguez.

13 You admit to being dilatory in responding to the State Bar, necessitating the initiation
14 of formal disciplinary proceedings. You also stated you fully understand the stress and
15 inconvenience this error caused Mr. Rodriguez and have audited your intake process to
16 ensure this does not happen again.

17 The foregoing conduct violates Rules of Professional Conduct ("RPC") 1.4
18 (Communication) and RPC 8.1(b) (Bar Disciplinary Matters: Responding to the State Bar) and
19 you are hereby **PUBLICLY REPRIMANDED**.

20 Furthermore, any future knowing failures to respond to the State Bar resulting in a file
21 going to a Screening Panel without a response will result in the State Bar's recommendations
22 for a Formal Hearing and your suspension, irrespective of the underlying allegations.

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IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF DISCIPLINE OF
THOMAS S. SHADDIX, BAR NO. 7905.

No. 82632

FILED

MAY 14 2021

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

ORDER APPROVING CONDITIONAL GUILTY PLEA AGREEMENT

This is an automatic review of a Southern Nevada Disciplinary Board hearing panel's recommendation that this court approve, pursuant to SCR 113, a conditional guilty plea agreement in exchange for a stated form of discipline for attorney Thomas S. Shaddix. Under the agreement, Shaddix admitted to violating professional conduct rules 1.3 (diligence), 1.4 (communication), 1.15 (safekeeping property), 5.3 (responsibilities regarding non-lawyer assistants), and 8.1 (disciplinary matters), and agreed to a 6-month-and-1-day suspension, stayed for 18 months subject to certain conditions.

As part of his guilty plea agreement, Shaddix admitted to the facts and violations. The record therefore establishes that he violated the above-referenced rules by failing to complete services for which a client retained him, including failing to pay the client's traffic tickets, as agreed; failing to communicate with the client about the status of the case; having his office assistant complete the initial consultation, including completing the retainer agreement; and failing to respond to the State Bar's inquiries regarding the client's grievance and another matter that had been referred to the State Bar.

The issue for this court is whether the agreed-upon discipline sufficiently protects the public, the courts, and the legal profession. See

SUPREME COURT
OF
NEVADA

(O) 1947A 

21-13957


State Bar of Nev. v. Claiborne, 104 Nev. 115, 213, 756 P.2d 464, 527-28 (1988) (stating purpose of attorney discipline). In determining the appropriate discipline, we weigh four factors: “the duty violated, the lawyer’s mental state, the potential or actual injury caused by the lawyer’s misconduct, and the existence of aggravating or mitigating factors.” *In re Discipline of Lerner*, 124 Nev. 1232, 1246, 197 P.3d 1067, 1077 (2008).

Based on the duties Shaddix knowingly violated, and because his conduct harmed or potentially harmed his clients and the legal profession, the baseline sanction before considering aggravating and mitigating circumstances is suspension. See Standards for Imposing Lawyer Sanctions, *Compendium of Professional Responsibility Rules and Standards*, Standard 4.42 (Am. Bar Ass’n 2017) (providing that suspension is appropriate when “a lawyer engages in a pattern of neglect and causes injury or potential injury to a client”); Standard 7.2 (“Suspension is generally appropriate when a lawyer knowingly engages in conduct that is a violation of a duty owed as a professional and causes injury or potential injury to a client, the public, or the legal system.”). The record supports the panel’s findings of four aggravating circumstances (prior disciplinary record, a pattern of misconduct, multiple offenses, and substantial experience in the practice of law), and one mitigating circumstance (absence of dishonest or selfish motive). Under the *Lerner* factors, we conclude that the recommended discipline is appropriate and serves the purpose of attorney discipline.

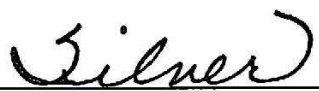
Accordingly, commencing from the date of this order, we hereby suspend attorney Thomas S. Shaddix from the practice of law in Nevada for 6 months and 1 day, stayed for 18 months subject to the following conditions. Shaddix must: (1) pay \$3,250 in restitution to his client in the

traffic matter; (2) engage in binding fee dispute resolution with the client at his own expense within the first 90 days of his probation period; (3) complete, in addition to required continuing legal education, an additional 1.5 hours of education related to diligence, 1.5 hours addressing communication, and 3 hours pertinent to his duty to respond to the State Bar; (4) obtain a mentor approved by the State Bar, who agrees to provide the Bar with quarterly reports as outlined in the conditional guilty plea agreement; (5) not receive any new disciplinary cases during his probation period that result in a screening panel recommending a letter of reprimand or a formal hearing; and (6) comply with any court orders issued in the two district court cases identified in the conditional guilty plea agreement. Additionally, Shaddix must pay \$2,500 in administrative costs pursuant to SCR 120 and the actual costs of the disciplinary proceeding within 30 days from the date of this order. The parties shall comply with SCR 115 and SCR 121.1.


It is so ORDERED.


Parraguirre


Stiglich


Silver

cc: Chair, Southern Nevada Disciplinary Board
Thomas S. Shaddix
Bar Counsel, State Bar of Nevada
Executive Director, State Bar of Nevada
Admissions Office, U.S. Supreme Court

STATE OF NEVADA Nevada Highway Patrol			
In the Justice/Municipal Court: LAS VEGAS JUSTICE COURT <input type="checkbox"/> Juvenile		County: CLARK Issue Date/Time: 9/23/2019 1659 Violation Date/Time: 9/23/2019 1656	
		Citation # X02245939 Case # Accident #: Type: TRAFFIC	
LOCATION AND VIOLATION INFORMATION			
Location: SUNSET and E OF SR604 BT/Sector: HLR91		Weather: Cloudy Traffic: Moderate	Road Conditions: Dry Direction: W
Cited:	Actual:	School Zone: No	Arrest: No
Posted:	Confirm:	Construction Zone WP: No	Accident: No
Grant: *NONE		Ped Safety Zone: No	
VIOLATOR / DRIVER			
Name: LANGSTAFF, ELIZABETH			
Address: 2940 S BRADFORD PL Apt# F		City: SANTA ANA	State: CA Zip: 92707
Hgt: 506	Wgt: 135	Sex: F	Hair: BLK Eyes: BRN Race: W DOB: 5/21/1969 Phone:
DL #: A5543819		DL State: CA	CDL: No Class: C
DL Expires: 5/21/2020		Restrictions:	
VEHICLE Did operate the following vehicle:			
VIN #: WBA8E9C54GK604257		Model: 3 SERIES	Type: SE State: NV
Make: BMW		Color: RED	Veh Tag: LV8X26 Haz Mat: No
DOT #:		Reg Exp: 05/04/2020	Veh Yr: 2016 CMV: No
Owner: LANGSTAFF, ELIZABETH Address: 650 S TOWN CENTER DR APT 2119, LAS VEGAS, NV 89144-4438			
VIOLATIONS Did then and there commit the following offense(s);			
VIOLATION 1 - CITATION - 484B.223 - 53790 - Use Restriction/Center Lane DRIVER TRAVELED IN CLEARLY MARKED CENTER LANE FOR MORE THAN 200'			
Bail: Crt Req Admin Fee: Crt Req Facility Fee: Crt Req SP CT Fee: Crt Req Total: Crt Req			
I certify (or Declare) under penalty of perjury under the laws of the state of Nevada that I have reasonable grounds/probable cause to believe and do believe that above named person committed the above offense(s) contrary to law.			
Trooper's Signature 		Complainant's Signature	Defendant's Signature
Trooper Patronas ID# 456		Citizen:	This is not a plea of guilty. (Not void if unsigned)
		Addr:	
		City:	State: NV Zip:
Failure to comply with this complaint or future dates relating to this complaint will constitute a separate offense			
Interpreter Needed: *NONE		Court Mandatory: YES	
Without admitting having committed the above offense(s), I hereby promise to respond as directed on this notice and waive my right to be taken immediately before a magistrate (NRS 484D.630 and NRS 484A.750)			
You are hereby ordered to appear to answer to the above charges on the day and time:			
LAS VEGAS JUSTICE COURT Physical: 200 Lewis Avenue First Floor, Las Vegas, NV 89101 Mailing: Same as Physical 702-671-3444 https://www.lasvegasjusticecourt.us/		Total Bail: COURT Appear On: 12/23/2019 At: 0800 HRS	

LANGSTAFF, ELIZABETH

Officer Notes:		X02245939
Picture	Radar (Mov/Sta):	
	Stop Type: TRAFFIC	
	Trailer Tag:	
	Trailer State:	
	Trailer Expires:	
	Appear On Date: 12/23/2019	
	Appear at Time: 0800 HRS	
	Unit:	
	Have Insurance: Yes	
Officer Notes:	Insurance Exp:	
	Tint %:	
	Signed Status: Served	
	Approved By:	
Diagram	Approver Badge No:	
	Approved Date:	

LAS VEGAS JUSTICE COURT - TRAFFIC DIVISION

CASE SUMMARY**CASE NO. X02245939****The State of Nevada vs. Langstaff, Elizabeth**§
§
§
§
§Location: **Traffic**
Filed on: **09/27/2019**
Appear by: **06/13/2020****CASE INFORMATION**




Offense	Citation	Statute	Deg	Date	Case Type:
1. ILLEGAL PARKING	X02245939	484.399	M	09/23/2019	Traffic
		(1)			
<i>Filed As:</i> Improper use of restricted or center lane [53790]		M	9/27/2019		

PARTY INFORMATION

Defendant **Langstaff, Elizabeth**
 2940 S Bradford Pl
 Apt# F
 Santa Ana, CA 92707

Lead Attorneys
Shaddix, Thomas S.
Retained
 702-430-8420(W)

DATE**EVENTS & ORDERS OF THE COURT**

03/17/2020	Charge(s) Amended
03/13/2020	Pretrial Hearing (1:30 PM)
	MINUTES
	Pay in Full
	Plea of Guilty Entered
	Traffic School Not Required (0 PT)
	Hearing Held;
	<i>Hearing Held</i>
03/13/2020	Traffic School Not Required (0 PT)
03/13/2020	Plea of Guilty Entered
03/13/2020	Pay in Full
03/13/2020	 Court Entry
02/20/2020	Attorney Session (8:00 AM)
	MINUTES
	Plea of Not Guilty Entered
	Hearing Held;
	<i>Hearing Held</i>
	SCHEDULED HEARINGS
	Pretrial Hearing (03/13/2020 at 1:30 PM)
	<i>Hearing Held</i>
02/20/2020	Plea of Not Guilty Entered
02/20/2020	 Court Entry
01/07/2020	Late Notice Sent
09/27/2019	Traffic School 1 Citation 5 Hour Requirement (0 PT)
	<i>(0) Points Upon Completion of 5 Hour Traffic School</i>
09/27/2019	 Citation Image
09/27/2019	Citation
	Defendant Langstaff, Elizabeth
	Charge Traffic Fees Defendant Langstaff, Elizabeth 198.00

LAS VEGAS JUSTICE COURT - TRAFFIC DIVISION

CASE SUMMARY

CASE NO. X02245939

FINANCIAL INFORMATION

DATE

Defendant Langstaff, Elizabeth
Total Charges
Total Payments and Credits
Balance Due as of 10/28/2021

55.00
0.00
55.00

From: nevadabarforms@gmail.com
To: complaints@nevadabarforms@gmail.com
Subject: New submission from File a Complaint Online
Date: Wednesday, May 19, 2021 6:50:04 PM

First, Middle and Last Name
Elizabeth Langstaff
Your Address
8180 Herring Avenue Las Vegas, NV 89147 Map It
Your Email
lizzielang@gmail.com
Your Primary Telephone Number
(714) 785-4814
Attorney Information
Attorney Name
Thomas Shaddix
Law Firm Name
Ticket Defenders
Attorney Address
6166 S Sandhill Road Las Vegas, NV 89120 Map It
Previous Contact with the State Bar of Nevada
Have you previously contacted the State Bar of Nevada regarding this matter?
No
If known, what was the file number for the case or claim?
LVJ X02245939
Hiring the Attorney
Did you hire/retain the attorney about whom you are complaining?
Yes
When did the representation begin?
1/02/2020
What was the fee arrangement?
\$100.00 up front and remaining balance after court determination
How much have you paid the lawyer to date?

\$100.00
Brief description of the nature of the case the attorney was engaged to handle (i.e. personal injury, criminal, malpractice)
Traffic ticket, they agreed to represent me at the Las Vegas Justice Court to get points taken away and possibly get citation fee reduced.
Names and contact information for other persons who can provide additional information concerning your complaint
At attorney's office I spoke several times to an Alison, it seemed she was the office manager at that time, she is the one who took my payment and made the arrangements. The office phone number was 702-735-7867, it is now a phone number NOT in service.
Litigation
Case Number
Citation # X02245939
Name of court or agency
Las Vegas Justice
Explanation of Grievance
Complaint Details
I retained the services from Attorney Thomas Shaddix for a traffic ticket, the citation happened prior to the pandemic and I was told that the hearing was scheduled and there was no need for me to do anything else but wait and hear back from their office. I did not hear back from them in 2020, I assumed with the pandemic the attorney's office and courts were closed. I did send them emails and left numerous voice messages in hopes of receiving an update on my case. No call back or emails have been provided since 1/02/2020. Now I'm finding out Mr. Shaddix's business phone number is disconnected and office closed and no forwarding information found on-line on this attorney.
Explain what measures you have taken to resolve this matter directly with the attorney
I have called and emailed them numerous times in hope of an update, no response. Now it seems they are no where to be found.
I WILL MAIL DOCS AND RECEIPT TO YOUR OFFICE

From: nevadabarforms@gmail.com
To: [complaints; nevadabarforms@gmail.com](mailto:complaints;nevadabarforms@gmail.com)
Subject: New submission from File a Complaint Online
Date: Monday, June 14, 2021 12:01:42 AM

First, Middle and Last Name

Elizabeth Langstaff

Your Address

8180 Herring Avenue
LAS VEGAS, NV 89147
[Map It](#)

Your Email

lizzielang@gmail.com

Your Primary Telephone Number

(714) 785-4814

Attorney Information**Attorney Name**

Thomas S. Shaddix

Law Firm Name

Ticket Defenders/Law Office of Thomas Shaddix, Esq.

Attorney Address

6166 S. Sandhill Road, Ste, 146
LAS VEGAS, NV 89120
[Map It](#)

Previous Contact with the State Bar of Nevada**Have you previously contacted the State Bar of Nevada regarding this matter?**

Yes

If yes, when and how did you contact us?

On-line

If known, what was the file number for the case or claim?

LVJ X02245939

Hiring the Attorney**Did you hire/retain the attorney about whom you are complaining?**

Yes

When did the representation begin?

1/02/2020

What was the fee arrangement?

\$195.00 or court fee determination
How much have you paid the lawyer to date?
\$100.00
Brief description of the nature of the case the attorney was engaged to handle (i.e. personal injury, criminal, malpractice)
Traffic Citation
Names and contact information for other persons who can provide additional information concerning your complaint
Alison/Office Manager at Attorney Shaddix's office.
Litigation
Case Name
Elizabeth Langstaff
Case Number
LVJ X02245939
Name of court or agency
Las Vegas Justice Court
Explanation of Grievance
Complaint Details
I have made numerous calls and emails to the law office to get an update/status of my case and no response. I know that during the pandemic the courts were closed so I did not think anything of the lack of response. I tried again to get an update a few weeks ago and I come to find the business phone is not longer in service. I've emailed Mr. Shaddix and his assistant Alison and no reply from either one of them.
Explain what measures you have taken to resolve this matter directly with the attorney
Attempting to call and email numerous times, business phone is disconnected. Not sure if attorney is still in business.
Related File(s)
<ul style="list-style-type: none"> • Alison-Email-Traffic-Defenders.docx • T.-Shaddix-Law-Receipt.jpg • ASNLVJX02245939.rtf

Alison <alison@ticketdefenders.net>

Thu, Jan 16,
2020, 2:06 PM

to me

Good Afternoon, Ms. Langstaff,

Attached, please find your attorney session notice. Please read your notice in full, as it contains information you need to know regarding your case, and feel free to contact our office with any questions.

We thank you for your business and wish you a very happy new year!

Traffic Ticket Defenders

702-735-7867

www.ticketdefenders.net

Like Us at Facebook.com/ttdlv

Follow Us on Twitter @TRAFFICDEFENDERS

January 16, 2020

Elizabeth Langstaff
650 S Town Center Dr. # 2119
Las Vegas, NV 89144
(Sent Via E-mail Only: lizzielang@gmail.com)

Dear Ms. Langstaff,

Your traffic citation # **X02245939** is set to be heard in the **Las Vegas Justice Court** on **02/20/2020**. You will receive the results of that hearing 2 to 3 weeks after that date, depending upon how long it takes the Court to enter the results into their data base. **You do not need to appear at the above date or take any additional action with the Court regarding the above citation at this time!**

If you have not received your results from our office within three weeks of the above hearing date, you should immediately contact us to find out the status of your case.

Although we will send you written notification, it is your responsibility to verify the hearing results with our office and take whatever action is necessary to close your matter with the Court.

You may check the status of your citation with the Court on-line using Google at:

<https://www.clarkcountycourts.us/Anonymous/default.aspx>

Thank you again for using **Traffic Ticket Defenders** to assist you in resolving this matter. If you have any comments or suggestions on how we may better serve you in the future, please let us know!

Sincerely,

Thomas S. Shaddix, Esq.
Traffic Ticket Defenders (tss)

6166 S. Sandhill Rd., Ste. 146 | Las Vegas, NV 89169
702.735.STOP (7867) | Fax: 702.522.6069 | www.ticketdefenders.net
Like us at [Facebook.com/ttdlv](https://www.facebook.com/ttdlv) -or- Follow us on Twitter @TRAFFICDEFENDER

< Inbox



From: [SHADDIXTS@ticketdefender...](#) >



To: [Liz Langstaff](#) >

Hide

Law Office of Thomas S. Shaddix, Esq. Customer Receipt

January 2, 2020 at 10:47 AM

📁 Found in Important Mailbox

Your card has been charged by Traffic
Ticket Defenders. Below is
your receipt of payment.

Transaction Details

Date: 01/02/20 10:47:37

Merchant: Traffic Ticket Defenders

Type: Credit Card Sale

Invoice #:

Amount: 100.00

Description: LVJ X02245939 ap

Card Holder: Elizabeth Langstaff

Card Number: xxxxxxxxxxxxxx9026



From: [Thomas Shaddix, Esq.](#)
To: [Dawn Meeks](#)
Subject: RE: State Bar of Nevada Communication re OBC21-0567 / Langstaff
Date: Wednesday, July 14, 2021 9:44:40 AM

Good morning Ms. Meeks, I have received your email and will review and respond as soon as possible. Thank you for following up with me on this.

----- Original message -----

From: Dawn Meeks <Dawnm@nvbar.org>
Date: 7/12/21 12:38 PM (GMT-08:00)
To: thomas@shaddixlaw.com
Subject: State Bar of Nevada Communication re OBC21-0567 / Langstaff

Mr. Shaddix,

Attached please find correspondence that requires your attention. Please confirm that you have received this.

Thank you,

Dawn Meeks, CP

Senior Certified Paralegal / Investigator

Office of Bar Counsel

Direct Dial: (702) 317-1439

Main Number: (702) 382-2200

State Bar of Nevada

3100 W. Charleston Blvd., Suite 100

Las Vegas, NV 89102

www.nvbar.org

SBN seal email



Notice of Confidentiality: The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking any action in reliance upon, this information by anyone other than the intended recipient is not authorized.

The Office of Bar Counsel (OBC) is committed to fighting the outbreak of coronavirus (COVID-19). All OBC staff will work remotely for the immediate future. We will not receive physical mail on a regular basis. This may delay or adversely affect your matter with the OBC. We ask that you communicate through email to dawnm@nvbar.org. Thank you for your patience and cooperation during this difficult time.

From: [Dawn Meeks](#)
To: [Thomas Shaddix, Esq.](#)
Subject: RE: State Bar of Nevada Communication re OBC21-0567 / Langstaff
Date: Monday, October 18, 2021 1:13:00 PM
Attachments: [2021-07-12 Shaddix v OBC21-0567 Open.pdf](#)
[image.png](#)
[2021-06-21 OBC21-0567 more info.pdf](#)
[Langstaff New Submission v OBC21-0567 Complaint Online.pdf](#)
Importance: High

Mr. Shaddix,

The Office of Bar Counsel has received no response to our letter of July 12, 2021, copy of which is enclosed. You had indicated that a response would be provided by August 6, 2021 and it was not.

If no response is received from you, this grievance file will be referred to the screening panel of the Southern Nevada Disciplinary Board, which will consider the complaint on the assumption that all of the allegations made in the letter of complaint are true. In addition, the panel will be asked to consider your failure to respond as a failure to cooperate with the State Bar in its efforts to enforce Rules of Professional Conduct, which will be considered as a separate disciplinary violation pursuant to RPC 8.1(b) (Bar admission and disciplinary matters).

Please provide the requested information no later than **October 27, 2021. PLEASE CONFIRM RECEIPT OF THIS EMAIL.**

Dawn Meeks, CP
Senior Certified Paralegal / Investigator
Office of Bar Counsel
Direct Dial: (702) 317-1439
Main Number: (702) 382-2200

State Bar of Nevada
3100 W. Charleston Blvd., Suite 100
Las Vegas, NV 89102
www.nvbar.org



Notice of Confidentiality: The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking any action in reliance upon, this information by anyone other than the intended recipient is not authorized.

The Office of Bar Counsel (OBC) is committed to fighting the outbreak of coronavirus (COVID-19). All OBC staff will work remotely for the immediate future. We will not receive physical mail on a

regular basis. This may delay or adversely affect your matter with the OBC. We ask that you communicate through email to dawnm@nvbar.org. Thank you for your patience and cooperation during this difficult time.

From: Thomas Shaddix, Esq. <thomas@shaddixlaw.com>
Sent: Thursday, August 5, 2021 9:54 AM
To: Dawn Meeks <Dawnm@nvbar.org>
Subject: RE: State Bar of Nevada Communication re OBC21-0567 / Langstaff

Good morning Ms. Meeks,

I do not have any record that this matter was actually billed for or I was ever retained for this matter. I will be pulling a record database from storage this afternoon and will update you with my findings by tomorrow. I appreciate your patience in this regard.

Thank you,

Thomas

----- Original message -----

From: Dawn Meeks <Dawnm@nvbar.org>
Date: 7/12/21 12:38 PM (GMT-08:00)
To: thomas@shaddixlaw.com
Subject: State Bar of Nevada Communication re OBC21-0567 / Langstaff

Mr. Shaddix,

Attached please find correspondence that requires your attention. Please confirm that you have received this.

Thank you,

Dawn Meeks, CP
Senior Certified Paralegal / Investigator
Office of Bar Counsel
Direct Dial: (702) 317-1439
Main Number: (702) 382-2200

State Bar of Nevada
3100 W. Charleston Blvd., Suite 100
Las Vegas, NV 89102
www.nvbar.org



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From: thomas@shaddixlaw.com
To: [Dawn Meeks](#)
Subject: Return Receipt (read): RE: State Bar of Nevada Communication re OBC21-0567 / Langstaff
Date: Monday, October 25, 2021 4:38:33 PM
Attachments: [MDM_vse.txt](#)

This is a Return Receipt for your message

To: "Thomas Shaddix, Esq." <thomas@shaddixlaw.com>
Subject: RE: State Bar of Nevada Communication re OBC21-0567 / Langstaff
Date: 2021-10-18 16:13

Note: This receipt only acknowledges that the message was displayed on the recipient's computer. There is no guarantee that the recipient has read or understood the message contents.



FILED

APR -6 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

Case No: OBC21-0567

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.,)
Nevada Bar No. 7905)
Respondent.)

DECLARATION OF SERVICE ACCORDING
TO SCR 109(1)
IN SUPPORT OF ENTRY OF DEFAULT

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

Sonia Del Rio, Hearing Paralegal, in the Office of Bar Counsel at the State Bar of Nevada, under penalty of perjury, being first duly sworn, declares and says as follows:

That Declarant is employed as a Hearing Paralegal for the State Bar of Nevada Office of Bar Counsel ("OBC") and in such capacity is a custodian of records for the OBC; Declarant certifies that the attached documents are true and accurate copies of records generated by and maintained by the OBC in the ordinary course of business.

That Declarant certifies that the following is a summary of the OBC efforts to locate and serve attorney Thomas S. Shaddix, Esq. ("Respondent"):

- Respondent is member of the State Bar of Nevada (Bar No. 7905), having been licensed in the State of Nevada since October 5, 2001.

- 1 2. Nevada Supreme Court Rule (“SCR”) 79(1) requires every member of the State Bar of
2 Nevada to provide the State Bar with a permanent mailing address, permanent telephone
3 number, and a current email address for purposes of State Bar communication with the
4 attorney.
- 5 3. The SCR 79 information provided by Respondent and on file with the State Bar is:
- 6 a. Mailing Address: 2550 E. Desert Inn Rd., #181, Las Vegas, NV 89121
- 7 b. Alternate Address: 3126 Asoleado Cir., Las Vegas, NV 89121
- 8 c. Email Address: shaddixts@ticketdefenders.net
- 9 d. Alternate Email Address: thomas@shaddixlaw.com
- 10 e. Previous SCR 79 address: 6166 S. Sandhill Rd., #146, Las Vegas, NV 89120
- 11 4. Respondent has not updated his SCR 79 information since April 7, 2021.

12 **A. Service of the Complaint**

- 13 5. That on January 4, 2022, the State Bar filed a Complaint against Respondent in the above-
14 captioned matter.
- 15 6. Pursuant to SCR 109(1) service of the Complaint was made by mailing a copy to
16 Respondent’s SCR 79 address via certified mail, on January 4, 2022. On that same date
17 a copy of the Complaint was also sent via first class United States mail to Respondent’s
18 SCR 79 Address. *See Exhibit 1.*
- 19 7. That on January 4, 2022, the State Bar also sent via electronic mail a copy of the
20 Complaint, First Designation of Hearing Panel Members, and State Bar of Nevada’s
21 Peremptory Challenges filed for Case No. OBC21-0567 to Respondent’s permanent
22 email shaddixts@ticketdefenders.net and alternate email address
23 thomas@shaddixlaw.com. *See Exhibit 2.*
- 24 8. As of January 11, 2022, the USPS website stated that the certified mail is in transit to
25 next facility. As of March 31, 2022, that status has not changed. *See Exhibit 3.*

1 9. A response to the Complaint was due on or before January 27, 2022, (twenty days plus
2 three days for service by mail).

3 10. The State Bar has not received a response to the Complaint from Respondent.

4 **B. Service of the Notice of Intent to Enter Default**

5 11. That on February 2, 2022, the State Bar filed a Notice of Intent to Proceed on a Default
6 Basis (“NOIPD”) against Respondent for his failure to respond to the Complaint.

7 12. Pursuant to SCR 109(1) service of the NOIPD was made by mailing a copy to
8 Respondent’s SCR 79 address, via certified mail, and sent via electronic mail to
9 Respondent’s permanent and alternate email addresses. *See Exhibit 4.*

10 13. The certified of the NOIPD to Respondent’s SCR 79 Address was delivered on February
11 5, 2022. *See Exhibit 5.*

12 14. The State Bar’s email to Respondent’s SCR 79 and alternate emails was not returned or
13 designated “undeliverable.”

14 15. The State Bar has not received a response to the electronic mail sent on January 4, 2022,
15 and February 2, 2022.

16 16. Pursuant to the deadline noticed by the NOIPD, a response to the Complaint was due on
17 or before February 25, 2022.

18 **C. Personal Service Attempts**

19 17. That on March 17, 2022, Nationwide Legal employee, Judith Mae All, attempted to
20 serve Respondent with copies of the Complaint, Designation of Hearing Panel Members,
21 Declaration of Mailing, Notice of Intent to Proceed on a Default, Order Appointing
22 Hearing Panel Chair, Notice of Telephonic Initial Case Conference, Order Appointing
23 Formal Hearing Panel, Notice of Formal Hearing, and State Bar’s Initial Disclosures of
24 Documents and Witnesses to Respondent’s SCR 79 permanent address 2550 E. Desert
25

1 Inn Rd., #181, Las Vegas, NV 89121. Ms. All reported that the address is to a UPS store.

2 *See Exhibit 6.*

3 18. That on March 21, 2022, Nationwide Legal employee Judith Mae All, attempted to
4 serve Thomas Shaddix with copies of Complaint, Initial Disclosure of Documents and
5 Witnesses, Order Appointing Formal Hearing Panel, Notice of Formal Hearing,
6 Scheduling Order After Initial Case Conference, Notice of Telephonic Initial Case
7 Conference, Order Appointing Hearing Panel Chair, notice of Intent to Proceed on
8 Default Basis, Designation of Hearing Panel Members, and Declaration of Mailing to
9 his alternate address used in a previous hearing 6166 Sandhill Road, Suite 146, Las
10 Vegas, NV 89120. Ms. All reported that the door to suite 146 was locked and per
11 signage current business address is Naturopathic Nevada PLLC. There is no signage
12 at suite or on directory for Thomas Shaddix. *See Exhibit 7.*

13 19. That on March 23, 2022, Nationwide Legal employee, Judith Mae All, attempted to
14 serve Thomas Shaddix with copies of the Complaint, Notice of Intent to Proceed on
15 Default Basis, Order Appointing Hearing Panel Chair, Notice of Telephonic Initial
16 Case Conference, Scheduling Order After Initial Case Conference, Notice of Formal
17 Hearing, Order Appointing Formal Hearing Panel, Initial Disclosure of Documents
18 and Witnesses, and Declaration of Mailing to Mr. Shaddix's private home address
19 3126 Asoleado Circle, Las Vegas, NV 89121. Ms. All reported she spoke to current
20 resident and stated that he does not know subject and must have been previous tenant.
21 *See Exhibit 8.*

22 ///

23 ///

24 ///

1 20. To date, the State Bar has not received a response to the Complaint or the NOIPD from
2 Respondent.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 DATED this 6th day of April 2022.

5

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Sonia Del Rio
Sonia Del Rio, Hearing Paralegal
State Bar of Nevada, Office of Bar Counsel

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EXHIBIT 1

EXHIBIT 1

Case No: OBC21-0567



FILED

JAN - 4 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.)
NV Bar No. 7905)
)
Respondent.)

COMPLAINT

TO: Thomas S. Shaddix Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121-3822
(SCR 79 permanent mailing)

AND

Thomas S. Shaddix, Esq.
shaddixts@ticketdefenders.net
(SCR 79 email address)

AND

Thomas S. Shaddix, Esq.
Thomas@shaddixlaw.com
(Non-SCR 79 address)

PLEASE TAKE NOTICE that pursuant to Supreme Court Rule ("SCR") 105(2) a
VERIFIED RESPONSE OR ANSWER to this Complaint must be filed with the Office of Bar
Counsel, State Bar of Nevada, 3100 W. Charleston Blvd., Ste. 100, Las Vegas, Nevada, 89102,

1 within twenty (20) days of service of this Complaint. Procedure regarding service is addressed
2 in SCR 109.

3 Complainant, State Bar of Nevada ("State Bar"), by and through its Assistant Bar
4 Counsel Bruce C. Hahn is informed and believes as follows:

5 1. Respondent Attorney Thomas Shaddix, Esq. ("Respondent"), Bar No. 7905 is
6 currently an active member of the State Bar of Nevada. At all times pertinent to this complaint
7 had his principal place of business for the practice of law located in Clark County, Nevada.

8 2. On or about September 23, 2019, Elizabeth Langstaff ("Grievant") was cited for
9 a traffic violation in the Las Vegas Justice Court ("LVJC") under case number X02245939.

10 3. On or about January 2, 2020, Grievant Langstaff retained the Law Office of
11 Thomas S. Shaddix, Esq., ("Respondent"), dba "Traffic Ticket Defenders" ("TD") to represent
12 her in the LVJC traffic citation. The Grievant spoke with TD office manager Alison Perelmen
13 ("Perelmen") who processed a \$100 charge to Grievant's credit card.

14 4. On or about January 16, 2020, Perelmen emailed the Grievant advising that an
15 "attorney session" was scheduled for February 20, 2020. The email stated that the hearing
16 results would be sent in 2-3 weeks. The email directed the Grievant to contact TD thereafter
17 if she did not hear from TD.

18 5. From February 21, 2020 through April 2021, the Grievant left several voicemail
19 messages with the TD office but did not receive return calls. The Grievant assumed the courts
20 and the TD office was closed due to the COVID-19 pandemic.

21 6. In early to mid-May 2021, the Grievant discovered that the TD phone number
22 was disconnected, despite the same number being actively displayed on the TD website of
23 www.ticketdefenders.net. On May 19, 2021, the Grievant filed an online grievance with the
24 State Bar, naming the Respondent.

25 ///

1 7. State Bar Senior Paralegal Investigator Dawn Meeks investigated the Langstaff
2 grievance against the Respondent to include a review of the LVJC record identified below:

3 8. On February 20, 2020, the Respondent entered a “Not Guilty” plea on Grievant
4 Langstaff’s behalf, thereafter, setting a “Pretrial Conference” with the court for March 13,
5 2020.

6 9. On March 13, 2020, the Respondent entered a “Guilty” plea on the Grievant’s
7 behalf to an amended charge of “Illegal Parking” with a commensurate fine of \$55.00.

8 10. The Respondent’s office did not timely communicate to the Grievant that they
9 had entered a guilty plea on her behalf or the obligation to pay the \$55 fine.

10 11. On July 12, 2021, the State Bar emailed Respondent’s office with a letter of
11 investigation seeking information on the Langstaff grievance by July 26. On July 14, 2021, the
12 Respondent replied with an email to the State Bar that he would “respond as soon as possible.”
13 The Respondent did not timely substantively respond.

14 12. On August 5, 2021, the Respondent emailed the State Bar stating he had no
15 record that the Langstaff matter was “billed” or that he was retained. The Respondent stated
16 he would “update” with his findings by tomorrow. The State Bar received no update from the
17 Respondent.

18 13. On October 18, 2021, the State Bar emailed the Respondent seeking specific
19 responses on the Langstaff grievance by October 27 and for him to confirm receipt of the State
20 Bar inquiry. The letter advised the Respondent that a potential charge under RPC 8.1 would
21 be considered absent a timely reply. The State Bar’s email delivery system received a “read
22 receipt” prompt about 7 hours later.

23 14. On October 28, 2021, the Respondent emailed the State Bar seeking a time
24 extension to reply. The State Bar agreed to November 4.

25

1 15. On November 4, the Respondent emailed a response, stating that the Grievant's
2 "credit card was declined" and he hasn't had "a new client since April 2020." That same
3 afternoon, the State Bar emailed the Respondent again seeking his response to specific
4 questions concerning the Langstaff grievance. The Respondent did not timely reply.

5 **COUNT ONE - RPC 1.4(a) (Communication)**

6 16. RPC 1.4(a) states in relevant part: "A lawyer shall:...(3) Keep the client
7 reasonably informed about the status of the matter; (4) Promptly comply with reasonable
8 requests for information..."

9 17. About February 21, 2020 through April 2021, the Respondent failed to promptly
10 comply with reasonable requests for information by not responding to Grievant Langstaff's
11 voice mail messages for a case status and/or,

12 18. On and after March 13, 2020, the Respondent failed to keep Grievant Langstaff
13 reasonably informed about the status of a matter, to wit, her traffic ticket status change with
14 Las Vegas Justice Court, by not informing her of his entry of a guilty plea on her behalf and/or
15 her obligation to pay a fine associated with that change of plea.

16 **COUNT TWO - RPC 8.1 (Bar Disciplinary Matters)**

17 19. RPC 8.1 states in relevant part: "...a lawyer...in connection with a disciplinary
18 matter, shall not: (b) ...knowingly fail to respond to a lawful demand for information from [a]
19 ...disciplinary authority,..."

20 20. On and after July 12, 2021, the State Bar sought to communicate with the
21 Respondent concerning the Langstaff grievance, during which the Respondent failed to:

22 a) timely substantively respond to the State Bar's written inquiry of July 12, 2021,
23 and/or,

24 b) timely substantively provide the State Bar with the "update" he represented he would
25 provide by August 6, 2021, and/or,

1 c) timely substantively respond to the State Bar's written request of October 18, 2021,
2 and/or,

3 d) timely substantively respond to the State Bar's written request of November 4, 2021.

4 WHEREFORE, Complainant seeks relief as follows:

5 21. That a hearing be held pursuant to Nevada Supreme Court Rule 105;

6 22. That Respondent be assessed the costs of the disciplinary proceeding pursuant
7 to SCR 120; and

8 23. That pursuant to SCR 102, such disciplinary action be taken by the Southern
9 Nevada Disciplinary Board against Respondent as may be deemed appropriate under the
10 circumstances.

11
12 Dated this 4th day of January 2022.

13 **STATE BAR OF NEVADA**
14 DANIEL M. HOOGE, Bar Counsel

15 *Bruce Hahn*

16 By: _____
17 Bruce C. Hahn, Assistant Bar Counsel
18 Nevada Bar No. 5011
19 3100 W. Charleston Blvd., Ste. 100
20 Las Vegas, Nevada, 89102
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Case No.: OBC21-0567



FILED

JAN - 4 2022

STATE BAR OF NEVADA
BY: [Signature]
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
)
THOMAS S. SHADDIX, ESQ.,)
NV Bar No. 7905)
)
Respondent.)

DECLARATION OF MAILING

Sonia Del Rio, under penalty of perjury, being first and duly sworn, deposes
and says as follows:

1. That Declarant is employed with the State Bar of Nevada and, in such capacity,
Declarant is Custodian of Records for the Discipline Department of the State
Bar of Nevada.
2. That Declarant states that the enclosed documents are true and correct copies
of the **COMPLAINT, FIRST DESIGNATION OF HEARING PANEL
MEMBERS, and STATE BAR OF NEVADA'S PEREMPTORY
CHALLENGES** in the matter of the *State Bar of Nevada vs. Thomas S.
Shaddix, Esq.*, Case No. OBC21-0567.

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3. That pursuant to Supreme Court Rule 109, the Complaint, First Designation of Hearing Panel Members, and State Bar of Nevada’s Peremptory Challenges were served on the following placing copies in an envelope which was then sealed and postage fully prepaid for regular and certified mail, and deposited in the United States mail at Las Vegas, Nevada on **January 4, 2022**, to:

Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121
CERTIFIED MAIL RECEIPT: 7021 2720 0000 9932 7944

And via electronic mail on January 4, 2022 to:

Thomas S. Shaddix, Esq. (SCR 79 Email): shaddixts@ticketdefenders.net
(Alternate Email): thomas@shaddixlaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 4th day of January 2022.

Sonia Del Rio

Sonia Del Rio, an employee
of the State Bar of Nevada

EXHIBIT 2

EXHIBIT 2

From: [Microsoft Outlook](#)
To: shaddixts@ticketdefenders.net; [Thomas Shaddix, Esq.](#)
Subject: Relayed: State Bar of Nevada vs. Thomas Shaddix, Esq. (Complaint)
Date: Tuesday, January 4, 2022 3:58:21 PM
Attachments: [State Bar of Nevada vs. Thomas Shaddix, Esq. \(Complaint\).msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
shaddixts@ticketdefenders.net (shaddixts@ticketdefenders.net) <mailto:shaddixts@ticketdefenders.net>
Thomas Shaddix, Esq. (thomas@shaddixlaw.com) <mailto:thomas@shaddixlaw.com>
Subject: State Bar of Nevada vs. Thomas Shaddix, Esq. (Complaint)

EXHIBIT 3

EXHIBIT 3



FAQs >

Track Another Package +

Tracking Number: 70212720000099327944

Remove X

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

USPS Tracking Plus® Available ∨

In Transit to Next Facility

January 11, 2022

Feedback

Get Updates ∨

Text & Email Updates	∨
Tracking History	∨
USPS Tracking Plus®	∨
Product Information	∨

See Less ^

Can't find what you're looking for?

EXHIBIT 4

EXHIBIT 4

Case No: OBC21-0567



FILED

FEB - 2 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,)
)
Complainant,)
vs.)
THOMAS S. SHADDIX, ESQ.,)
Nevada Bar No. 7905,)
Respondent.)

NOTICE OF INTENT TO PROCEED
ON DEFAULT BASIS

TO: Thomas S. Shaddix Esq.
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121-3822
(SCR 79 permanent mailing)

AND
Thomas S. Shaddix, Esq.
shaddixts@ticketdefenders.net
(SCR 79 email address)

AND
Thomas S. Shaddix, Esq.
Thomas@shaddixlaw.com
(Non-SCR 79 address)

PLEASE TAKE NOTICE THAT unless the State Bar receives a responsive pleading in the above-captioned matter by February 25, 2022, it will proceed on a default basis and ***the charges against you shall be deemed admitted.*** Supreme Court Rule 105 (2) states in relevant part:

1 A copy of the complaint shall be served on the attorney and it shall
2 direct that a verified response or answer be served on bar counsel within 20
3 days of service. In the event the attorney fails to plead, **the charges shall be**
4 **deemed admitted**; provided, however, that an attorney who fails to respond
within the time provided may thereafter obtain permission of the appropriate
disciplinary board chair to do so, if failure to file is attributable to mistake,
inadvertence, surprise, or excusable neglect. (Emphasis added.)

5 Additional copies of the Complaint previously served upon you, and the First
6 Designation of Hearing Panel Members, accompanies this Notice.

7 DATED this 2 day of February 2022.

8
9 **STATE BAR OF NEVADA**
10 **DANIEL M. HOOGE, BAR COUNSEL**

11 *Bruce Hahn*

12
13

Bruce C. Hahn, Assistant Bar Counsel
14 Nevada Bar No. 5011
15 3100 W. Charleston Blvd., Ste. 100
16 Las Vegas, Nevada 89102
17 (702) 382-2200
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Thomas S. Shaddix, Esq.
2550 E. Desert Inn Rd., #181
Las Vegas, NV 89121
Certified Mail Receipt: 7021 1970 0000 0350 4153

1. Thomas S. Shaddix, Esq. (SCR 79 Email): shaddixts@ticketdefenders.net
thomas@shaddixlaw.com

Dated this 2nd day of February 2022

Sonia Del Rio
Sonia Del Rio, an employee of
the State Bar of Nevada.

From: [Sonia Del Rio](#)
To: shaddixts@ticketdefenders.net; [Thomas Shaddix, Esq.](#)
Cc: [Bruce Hahn](#); [Louise Watson](#); [Tiffany Bradley](#)
Subject: State Bar of Nevada vs. Thomas Shaddix, Esq.
Date: Wednesday, February 2, 2022 2:39:00 PM
Attachments: [2022.01.04 - PD.pdf](#)
[2022.01.04 - Intent.pdf](#)
[2022.01.04 - Designation of Hearing Panel Members.pdf](#)

Good Afternoon Mr. Shaddix,

Please find attached the Notice of Intent to Proceed on a Default Basis, Complaint, and Designation of Hearing Panel Members regarding the above referenced matter.

Sincerely,

Sonia Del Rio
Hearing Paralegal, Office of Bar Counsel
3100 W. Charleston, Suite 100
Las Vegas, NV 89102
Telephone: (702) 382-2200 Ext. 414
[www.soniad@nvbar.org](mailto:soniad@nvbar.org)

The Office of Bar Counsel (OBC) is committed to fighting the outbreak of coronavirus (COVID-19). All OBC staff will work remotely for the immediate future. We will not receive physical mail on a regular basis. This may delay or adversely affect your matter with the OBC. We ask that you communicate through email to soniad@nvbar.org. Thank you for your patience and cooperation during this difficult time.



Notice of Confidentiality: The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking any action in reliance upon, this information by anyone other than the intended recipient is not authorized.

EXHIBIT 5

EXHIBIT 5



FAQs >

Track Another Package +

Tracking Number: 70211970000003504153

Remove X

Your item was delivered to an individual at the address at 12:16 pm on February 5, 2022 in LAS VEGAS, NV 89121.

USPS Tracking Plus® Available ∨

Delivered, Left with Individual

February 5, 2022 at 12:16 pm
LAS VEGAS, NV 89121

Feedback

Get Updates ∨

Text & Email Updates	∨
Tracking History	∨
USPS Tracking Plus®	∨
Product Information	∨

See Less ^

EXHIBIT 6

EXHIBIT 6

AFFIDAVIT OF DUE DILIGENCE

STATE BAR OF NEVADA SOUTHERN NEVADA DISCIPLINARY BOARD
CLARK COUNTY, STATE OF NEVADA

STATE BAR OF NEVADA,

Complainant

v.

THOMAS S. SHADDIX, ESQ.,
Nevada Bar No. 7905,

Respondent

Case No.: OBC21-0567

Bruce C Hahn Esq., Bar No. 5011

OFFICE OF BAR COUNSEL

3100 W. Charleston 100

Las Vegas, NV 89102

(702) 382-2200

Attorneys for the Complainant

Client File# OBC21-0567

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Complaint; Notice Of Formal Hearing; Order Appointing Formal Hearing Panel; Designation Of Hearing Panel Members; Order Appointing Hearing Panel Chair; Notice Of Intent To Proceed On Default Basis; Notice Of Telephonic Initial Case Conference; Scheduling Order After Initial Case Conference; State Bar Of Nevada's Initial Disclosure Of Documents And Witnesses; Declaration Of Mailing, from OFFICE OF BAR COUNSEL

That attempts were made to serve Thomas S. Shaddix, Esq. with Complaint; Notice Of Formal Hearing; Order Appointing Formal Hearing Panel; Designation Of Hearing Panel Members; Order Appointing Hearing Panel Chair; Notice Of Intent To Proceed On Default Basis; Notice Of Telephonic Initial Case Conference; Scheduling Order After Initial Case Conference; State Bar Of Nevada's Initial Disclosure Of Documents And Witnesses; Declaration Of Mailing, at:

Attempted at 2550 E. Desert Inn Road, Box 181, Las Vegas, NV 89121-3611 On 3/17/2022 at 12:47 PM

Results: Address is a UPS store. Spoke with: Jerry - Store Clerk - (Latino, Male, 40's, 5'9", 240 lbs., Black hair, Brown eyes) - he confirms that Box 181 is current for subject.

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/21/2022

[Signature of Judith Mae All]

Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656



Control #: NV255333
Reference: OBC21-0567

EXHIBIT 7

EXHIBIT 7



FILED

MAR 29 2022

STATE BAR OF NEVADA
BY: [Signature]
OFFICE OF BAR COUNSEL

AFFIDAVIT OF DUE DILIGENCE

STATE BAR OF NEVADA SOUTHERN NEVADA DISCIPLINARY BOARD
CLARK COUNTY, STATE OF NEVADA

STATE BAR OF NEVADA,

Complainant

v.

THOMAS S. SHADDIX, ESQ.,
Nevada Bar No. 7905,

Respondent

Case No.: OBC21-0567

Bruce C. Hahn Esq., Bar No. 5011

OFFICE OF BAR COUNSEL

3100 W. Charleston 100

Las Vegas, NV 89102

(702) 382-2200

Attorneys for the Complainant

Client File# OBC21-0567

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Complaint; Initial Disclosure Of Documents And Witnesses; Order Appointing Formal Hearing Panel; Notice Of Formal Hearing; Scheduling Order After Initial Case Conference; Notice Of Telephonic Initial Case Conference; Order Appointing Hearing Panel Chair; Notice Of Intent To Proceed On Default Basis; Designation Of Hearing Panel Members; Declaration Of Mailing, from OFFICE OF BAR COUNSEL

That attempts were made to serve Thomas Shaddix, Esq with Complaint; Initial Disclosure Of Documents And Witnesses; Order Appointing Formal Hearing Panel; Notice Of Formal Hearing; Scheduling Order After Initial Case Conference; Notice Of Telephonic Initial Case Conference; Order Appointing Hearing Panel Chair; Notice Of Intent To Proceed On Default Basis; Designation Of Hearing Panel Members; Declaration Of Mailing, at:

Attempted at 6166 Sandhill Road, Suite 146, Las Vegas, NV 89120 On 3/21/2022 at 1:44 PM

Results: Door to Suite 146 is locked. Per signage current business at address is Naturopathic Nevada PLLC. There is no signage at suite or on directory for subject Thomas Shaddix Esquire.

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/24/2022[Signature]Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656Control #: NV255463
Reference: OBC21-0567

EXHIBIT 8

EXHIBIT 8



FILED

MAR 29 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

AFFIDAVIT OF DUE DILIGENCE

STATE BAR OF NEVADA SOUTHERN NEVADA DISCIPLINARY BOARD
CLARK COUNTY, STATE OF NEVADA

STATE BAR OF NEVADA,

Complainant

v.

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Nevada Bar No. 7905,

Respondent

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Attorneys for the Complainant

Client File# OBC21-0567

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That attempts were made to serve Thomas Shaddix, Esq with Complaint; Notice Of Intent To Proceed On Default Basis; Order Appointing Hearing Panel Chair; Notice Of Telephonic Initial Case Conference; Scheduling Order After Initial Case Conference; Notice Of Formal Hearing; Order Appointing Formal Hearing Panel; Initial Disclosure Of Documents And Witnesses; Declaration Of Mailing, at:

Attempted at 3126 Asoleado Circle, Las Vegas, NV 89121 On 3/23/2022 at 3:28 PM

Results: Spoke with: Josh - Current Resident - (Caucasian, Male, 60's, 5'9", 250 lbs., Gray hair, Blue eyes, Mustache/Beard) - stated that he does not know subject and must have been a previous tenant.

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Date: 3/28/2022

[Signature]
Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656



Control #: NV255592
Reference: OBC21-0567



FILED

MAR 29 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

AFFIDAVIT OF DUE DILIGENCE

STATE BAR OF NEVADA SOUTHERN NEVADA DISCIPLINARY BOARD
CLARK COUNTY, STATE OF NEVADA

STATE BAR OF NEVADA,

Complainant

v.

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Client File# OBC21-0567

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Attempted at 2550 E. Desert Inn Road, Box 181, Las Vegas, NV 89121-3611 On 3/17/2022 at 12:47 PM
Results: Address is a UPS store. Spoke with: Jerry - Store Clerk - (Latino, Male, 40's, 5'9", 240 lbs., Black hair, Brown eyes) - he confirms that Box 181 is current for subject.

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/21/2022*[Signature of Judith Mae All]*Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656Control #: NV255333
Reference: OBC21-0567



FILED

MAR 29 2022

STATE BAR OF NEVADA
BY: [Signature]
OFFICE OF BAR COUNSEL

AFFIDAVIT OF DUE DILIGENCE

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CLARK COUNTY, STATE OF NEVADA

STATE BAR OF NEVADA,

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v.

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(702) 385-5444
Nevada Lic # 1656Control #: NV255463
Reference: OBC21-0567



FILED

MAR 29 2022

STATE BAR OF NEVADA
BY: *[Signature]*
OFFICE OF BAR COUNSEL

AFFIDAVIT OF DUE DILIGENCE

**STATE BAR OF NEVADA SOUTHERN NEVADA DISCIPLINARY BOARD
CLARK COUNTY, STATE OF NEVADA**

STATE BAR OF NEVADA,

Complainant

v.

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Nevada Bar No. 7905,

Respondent

Case No.: OBC21-0567

Bruce C. Hahn Esq., Bar No. 5011

OFFICE OF BAR COUNSEL

3100 W. Charleston 100

Las Vegas, NV 89102

(702) 382-2200

Attorneys for the Complainant

Client File# OBC21-0567

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Results: Spoke with: Josh - Current Resident - (Caucasian, Male, 60's, 5'9", 250 lbs., Gray hair, Blue eyes, Mustache/Beard) - stated that he does not know subject and must have been a previous tenant.

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Date: 3/28/2022

Judith Mae All
Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656



Control #: NV255592
Reference: OBC21-0567

From: [Dawn Meeks](#)
To: thomas@shaddixlaw.com
Subject: RE: State Bar of Nevada Communication re OBC21-0567 / Langstaff
Date: Thursday, November 4, 2021 3:01:00 PM

Mr. Shaddix:

Thank you for letting me know about the fee. However, I am unclear on the following:

1. Did you attend the attorney session and negotiate her plea? The court records show an attorney session happened.
2. Did you let her know the outcome and advise her of the fine?

Thank you.

Dawn Meeks, CP
Senior Certified Paralegal / Investigator
Office of Bar Counsel
Direct Dial: (702) 317-1439
Main Number: (702) 382-2200

State Bar of Nevada
3100 W. Charleston Blvd., Suite 100
Las Vegas, NV 89102
www.nvbar.org

Notice of Confidentiality: The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking any action in reliance upon, this information by anyone other than the intended recipient is not authorized.

The Office of Bar Counsel (OBC) is committed to fighting the outbreak of coronavirus (COVID-19). All OBC staff will work remotely for the immediate future. We will not receive physical mail on a regular basis. This may delay or adversely affect your matter with the OBC. We ask that you communicate through email to dawnm@nvbar.org. Thank you for your patience and cooperation during this difficult time.

-----Original Message-----

From: thomas@shaddixlaw.com <thomas@shaddixlaw.com>
Sent: Thursday, November 4, 2021 2:59 PM
To: Dawn Meeks <Dawnm@nvbar.org>
Subject: Re: State Bar of Nevada Communication re OBC21-0567 / Langstaff

Good afternoon Ms. Meeks,

Per my review Ms. Langstaff's transaction never settled into my account.

It is customary that a confirmation email of an attorney session is sent upon "initial" approval of a transaction. However, when a credit card transaction is later declined we try and contact the client to inform them of same and make other arrangements for payment or attempt to withdraw as attorney of record.

How would the Bar advise me to proceed as I can not refund a fee that was never collected.

As for the website, I will contact my provider again and have it removed as I have been out of operational business since June of 2020 and have not taken on a new client since April of 2020.

I appreciate your further instruction and please reach me at the following contacts:

Thomas@shaddixlaw.com
(702) 238-9738
2550 E. Desert Inn Rd. #181
Las Vegas, NV 89121

On 2021-10-28 20:10, Dawn Meeks wrote:

> Mr. Shaddix,
>
> I can grant this one extension until November 4, 2021.
>
> Today, I received the attached Traffic Court records, which reflect
> that you are attorney of record. Please note that in the supplement
> provided by Ms. Langstaff, your assistant sent her an email advising
> that an attorney session was scheduled.
>
> Please review your records to advise whether Ms. Langstaff was ever
> advised by you of the outcome of the March 13, 2020 plea and the fine
> associated with the plea. Provide copies of that communication in
> your response.
>
> In addition, I called the number associated with your website and that
> number is not accepting calls, nor does it have an outgoing message.
> Please explain and state whether you intend to update your website and
> contact information.
>
> Thank you,
>
>
> Dawn Meeks, CP
> Senior Certified Paralegal / Investigator Office of Bar Counsel Direct
> Dial: (702) 317-1439 Main Number: (702) 382-2200
>
> State Bar of Nevada
> 3100 W. Charleston Blvd., Suite 100
> Las Vegas, NV 89102
> [https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.nvbar.org&c=E,
> 1,U0SaqsflbGmLoXInDdOzzsdc4p3M3siwlKjRxpUvN_pZcvp_nBKAEUNkMGt5Zuj-zLVy
> Kk5lXbmoeAw-HK10bygkJ3iZ9g25F11NkovIpuAjLYbr2J8rGOdCo3ZL&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.nvbar.org&c=E,1,U0SaqsflbGmLoXInDdOzzsdc4p3M3siwlKjRxpUvN_pZcvp_nBKAEUNkMGt5Zuj-zLVyKk5lXbmoeAw-HK10bygkJ3iZ9g25F11NkovIpuAjLYbr2J8rGOdCo3ZL&typo=1)
>
>
> Notice of Confidentiality: The information transmitted is intended
> only for the person or entity to whom it is addressed and may contain
> confidential and/or privileged material. Any review, retransmission,
> dissemination or other use of, or taking any action in reliance upon,
> this information by anyone other than the intended recipient is not
> authorized.
>
> The Office of Bar Counsel (OBC) is committed to fighting the outbreak
> of coronavirus (COVID-19). All OBC staff will work remotely for the
> immediate future. We will not receive physical mail on a regular

> basis. This may delay or adversely affect your matter with the OBC.
> We ask that you communicate through email to dawnm@nvbar.org. Thank
> you for your patience and cooperation during this difficult time.
>
>
>
>
>
> -----Original Message-----
> From: thomas@shaddixlaw.com <thomas@shaddixlaw.com>
> Sent: Thursday, October 28, 2021 3:26 PM
> To: Dawn Meeks <Dawnm@nvbar.org>
> Subject: Re: State Bar of Nevada Communication re OBC21-0567 /
> Langstaff
> Importance: High
>
> Good afternoon Ms. Meeks, I would request that this deadline be
> extended for one week while I contact my previous financial
> institution to demonstrate that the transaction was never completed
> and therefore never settled into my account. I am unsure if there was
> a card decline or a dispute initiated by the party at this point.
> Please calendar my response due date as November 4, 2021. Thank you.
>
> On 2021-10-18 16:13, Dawn Meeks wrote:
>> Mr. Shaddix,
>>
>> The Office of Bar Counsel has received no response to our letter of
>> July 12, 2021, copy of which is enclosed. You had indicated that a
>> response would be provided by August 6, 2021 and it was not.
>>
>> If no response is received from you, this grievance file will be
>> referred to the screening panel of the Southern Nevada Disciplinary
>> Board, which will consider the complaint on the assumption that all
>> of the allegations made in the letter of complaint are true. In
>> addition, the panel will be asked to consider your failure to respond
>> as a failure to cooperate with the State Bar in its efforts to
>> enforce Rules of Professional Conduct, which will be considered as a
>> separate disciplinary violation pursuant to RPC 8.1(b) (Bar admission
>> and disciplinary matters).
>>
>> Please provide the requested information no later than October 27,
>> 2021. PLEASE CONFIRM RECEIPT OF THIS EMAIL.
>>
>> Dawn Meeks, CP
>>
>> Senior Certified Paralegal / Investigator
>>
>> Office of Bar Counsel
>>
>> Direct Dial: (702) 317-1439
>>
>> Main Number: (702) 382-2200
>>
>> State Bar of Nevada
>>
>> 3100 W. Charleston Blvd., Suite 100
>>

>> Las Vegas, NV 89102
>>
>> <https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.nvbar.org&c=E>
>> ,
>> 1,PIYSm3X2rm8_9G-fuhTpVcWY_jMIWKjV2vT_i40wH2WIRX0Kx106RKM_9dfd876ZHa1
>> c
>> F6O3uEZd95Aqr43qHdLXIMm4S2dFIUeR3oJ9idkxi-EWwlc,&typo=1 [1]
>>
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>> regular basis. This may delay or adversely affect your matter with the OBC.
>> We ask that you communicate through email to dawnm@nvbar.org. Thank
>> you for your patience and cooperation during this difficult time. _
>>
>> From: Thomas Shaddix, Esq. <thomas@shaddixlaw.com>
>> Sent: Thursday, August 5, 2021 9:54 AM
>> To: Dawn Meeks <Dawnm@nvbar.org>
>> Subject: RE: State Bar of Nevada Communication re OBC21-0567 /
>> Langstaff
>>
>> Good morning Ms. Meeks,
>>
>> I do not have any record that this matter was actually billed for or
>> I was ever retained for this matter. I will be pulling a record
>> database from storage this afternoon and will update you with my
>> findings by tomorrow. I appreciate your patience in this regard.
>>
>> Thank you,
>>
>> Thomas
>>
>> ----- Original message -----
>>
>> From: Dawn Meeks <Dawnm@nvbar.org>
>>
>> Date: 7/12/21 12:38 PM (GMT-08:00)
>>
>> To: thomas@shaddixlaw.com
>>
>> Subject: State Bar of Nevada Communication re OBC21-0567 / Langstaff
>>
>> Mr. Shaddix,
>>
>> Attached please find correspondence that requires your attention.
>> Please confirm that you have received this.
>>
>> Thank you,
>>
>> Dawn Meeks, CP

>>
>> Senior Certified Paralegal / Investigator
>>
>> Office of Bar Counsel
>>
>> Direct Dial: (702) 317-1439
>>
>> Main Number: (702) 382-2200
>>
>> State Bar of Nevada
>>
>> 3100 W. Charleston Blvd., Suite 100
>>
>> Las Vegas, NV 89102
>>
>> <https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.nvbar.org&c=E>
>> ,
>> 1,6JxFjnny6fZ-XLt0dbk6eiZOvhk4Z7r3wWpJM0gdVNJ9xK6AYrVxdXvreP9djiaKZ9x
>> 3
>> fbkqzJM9vBjRrfK9DRyI-LyiaRzZjeQEv4MHc0o,&typo=1 [2]
>>
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>>
>>
>>
>> Links:
>> -----
>> [1]
>> <https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.nvbar.org%2f&c>
>> =
>> E,1,RiMKbTyU1thFlbB1Odl15Caqoy4r571UjToeRtYUBYrr55biFOqVkvX4qqedFHBLV
>> I
>> j-bbI_Djl2tMG6WyV_uVzEVm6U6H3bLADA2tB0&typo=1
>> [2]
>> <https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.nvbar.org%2f&a>
>> m
>> p;c=E,1,J2oaQAtRxtTCbIjNV_rci7mBjI7E2JMYm6S3wGE9DIBKx1JRrKByLZCzg4Ukx
>> t
>> umetjCcwYRWAFCkuoiCkIxwnbS8XyPpwKCd8LSW0GoEsQr3v3BHOWiCQ,,&typo=1

1 Thomas S. Shaddix, ESQ
2 Nevada Bar No. 7905
3 2550 E. Desert Inn Rd. #181
4 Las Vegas, Nevada 89121
5 702.238.9738

6 STATE BAR OF NEVADA
7 SOUTHERN NEVADA DISCIPLINARY BOARD



FILED

APR 13 2022

STATE BAR OF NEVADA

BY: 
OFFICE OF BAR COUNSEL

9 STATE BAR OF NEVADA,

Case No. : OBC 21-0567

11 COMPLAINANT,

13 Vs.

15 THOMAS S. SHADDIX, ESQ.

16 Nevada Bar No. 7905,

18 RESPONDENT,

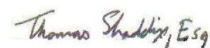
21 MOTION FOR EXTENSION OF TIME AND REQUEST FOR IN PERSON HEARING

23 COMES NOW the Respondent, Thomas S. Shaddix, ESQ, and especially moves to continue the
24 currently scheduled "Zoom Hearing" and Respondent requests an in person hearing to be set in its place
25 at a later date. All parties have been previously notified by Respondent of his intent to seek such a
26 setting per e-mail on April 7, 2022 and there have been no objections or other communications during
27 the interim period.

29 This request is made without intent to hinder these proceedings and for good cause.
30 Respondent has previously participated in a disciplinary hearing via the "Zoom" application and found it
31 to be unduly burdensome as well as prejudicial to the Respondent. The State of Nevada Covid-19
32 protocols have been modified allowing for In Person hearings for other types of judicial proceedings in
33 both the Justice and District Courts of the State of Nevada to proceed as well as for litigants to apply for
34 same in certain cases should that be necessary. Such an accommodation in this matter should be
35 granted due to the seriousness of the possible outcomes of this matter as well as for basic fairness and
36 due process concerns for both the Complainant and Respondent. Although there may have been a time
37 where such video or telephonic appearances have been justified, that time is well past.

39 I hereby request the above matter to be assigned an "In Person" hearing date and for any
40 individuals subject to that date to appear personally, or alternatively submit a declaration for
41 appearance by audiovisual transmission for approval.

43 Dated this _13th_ day of April, 2022

45 

46 Thomas S. Shaddix, Esq.