

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON,
Appellant(s),

vs.

CALVIN JOHNSON, WARDEN; AND
THE STATE OF NEVADA,
Respondent(s),

Electronically Filed
Dec 15 2023 03:49 PM
Elizabeth A. Brown
Clerk of Supreme Court

Case No: C-21-357927-1
Related Case A-22-853203-W
Docket No: 87443
Consolidated with 86972

RECORD ON APPEAL VOLUME 6

ATTORNEY FOR APPELLANT
MATTHEW TRAVIS JOHNSON # 1210652,
PROPER PERSON
P.O. BOX 650
INDIAN SPRINGS, NV 89070

ATTORNEY FOR RESPONDENT
STEVEN B. WOLFSON,
DISTRICT ATTORNEY
200 LEWIS AVE.
LAS VEGAS, NV 89155-2212

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8/7/2023 6:14 PM
Steven D. Grierson
CLERK OF THE COURT



1 **NNOP**
2 **SDS Chartered, LLC d/b/a SOFOS**
3 **ALEXIS M. DUECKER, ESQ.**
4 Nevada Bar No. 15212
5 340 E. Warm Springs Rd., Suite 110
6 Las Vegas, Nevada 89119
7 Telephone: (702) 743-0107
8 Facsimile: (702) 796-4898
9 Email: alexis@teamsfos.com
10 *Attorney for Defendant*

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

8 **STATE OF NEVADA,**

9 **Plaintiff,**

10 **vs.**

11 **MATTHEW HOUSTON,**

12 **Defendant.**

Case No.: A-22-853203-W

Dept. No.: 17

NOTICE OF NON-OPPOSITION

13
14 **NOTICE IS HEREBY GIVEN** that the undersigned will not be filing an opposition to
15 the Emergency Motion to Proceed Pro Per and Motion for Withdrawal of Attorney brought by or
16 on behalf of the Defendant, unless by further subsequent order of this Court, an opposition
17 becomes necessary or required to clarify a position or further explore an issue. Defense counsel
18 has no opposition so long as the request is not otherwise impermissible.

19
20 DATED this August 7, 2023.

21 **SDS Chartered, LLC d/b/a Sofos**

22 */s/ Alexis M. Duecker*
23 **ALEXIS M. DUECKER, ESQ. #15212**
24 340 E. Warm Springs Rd., Suite 110
25 Las Vegas, Nevada 89119
26 *Attorney for Defendant*
27
28

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW HOUSTON,
Appellant,

vs.

THE STATE OF NEVADA,
Respondent.

Supreme Court Case No. 86972

MOTION TO WITHDRAW AS COUNSEL

COMES NOW, ALEXIS M. DUECKER, ESQ., and hereby respectfully moves this Honorable Court for its Order allowing the withdrawal of ALEXIS M. DUECKER, ESQ. as attorney of record for Appellant, MATTHEW HOUSTON, in the above-entitled matter. This Motion is made and based upon the pleadings and papers on file herein, the attached Memorandum of Points and Authorities in support thereof, and the Declaration of ALEXIS M. DUECKER, ESQ.

DATED this 8th day of August, 2023.

By: /s/Alexis M. Duecker, Esq.

ALEXIS M. DUECKER, ESQ #15212
Attorney for Appellant

Appellant, Matthew Houston's last known mailing address is: High Desert State Prison Inmate No: 1210652, 22010 Cold Creek Road, Indian Springs, Nevada 89070.

The attached Declaration of ALEXIS M. DUECKER, ESQ. describes the compelling necessity to allow withdrawal of counsel at this time.

DATED this 8th day of August, 2023.

By: /s/ Alexis M. Duecker, Esq.
Alexis M. Duecker, Esq. #15212
340 E. Warm Springs Rd. Ste 110
Las Vegas, Nevada 89119
(775) 526-3529

extent that me representing MATTHEW HOUSTON is no longer in his best interests.

5. At this time, it is unknown the extent to which MATTHEW HOUSTON chooses to waive his attorney-client privilege and confidentiality, if at all, and further waiver of that privilege should not be necessary for the Court to issue an order to withdraw me as counsel.

6. I respectfully request that the Court grant an Order to Withdraw and appoint other counsel to represent him in this matter.

7. MATTHEW HOUSTON'S last known mailing address is: High Desert State Prison Inmate No: 1210652, 22010 Cold Creek Road, Indian Springs, Nevada 89070.

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

EXECUTED this 8th day of August, 2023.

/s/ Alexis M. Duecker
Alexis M. Duecker, Esq. #15212

ALEXIS M. DUCKER, Esq.

ATTORNEY-CLIENT
PRIVILEGE

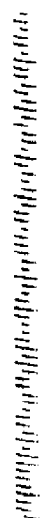
Matthew Houston #121C652
High Desert State Prison
PO Box 650
Indian Springs, Nevada 89070

LAS VEGAS NV 890
15 AUG 2023 PM 4



25

89070-



NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652

INSTITUTION: HIGH DESERT STATE PRISON UNIT #: 12-F-25

GRIEVANCE #: SEE EDOC CASE
A-22-BB3203-W GRIEVANCE LEVEL: EXHAUSTED-EMERGENCY

GRIEVANT'S STATEMENT CONTINUATION: PG. 1 OF 1

TO: NEVADA BOARD OF PAROLE COMMISSIONERS

SUBJECT: PAROLE HEARING RESCHEDULING

1677 Old Hot Springs Road

Suite A

Carson City, NV 89706-0677

August 09, 2023

Hello, As you can see, my P.E.D. is September 03, 2023, and I am more than ready for a positive life. I am in receipt of the 'ORDER TAKING NO ACTION' dated June 28th, 2023. The Caseworker here have informed me that my now-missed hearing is to be rescheduled. Could you please let me know when that will be? I appreciate your help. Matthew Travis Houston # 1210652

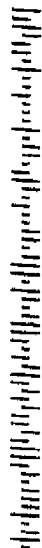
Original: Attached to Grievance
Pink: Inmate's Copy

3800
STATE OF NEVADA
PAROLE BOARD
1677 Old Hot Springs Road, Suite A
Carson City, Nevada 89706
Return Service Requested

9106

Matthew Houston, NDOC #1210652
High Desert State Prison
P.O. Box 650
Indian Springs, NV 89070-0650

GADUSAB 89070



Presort
First Class Mail
ComResPrice



\$ 0.00

CENTRAL OFFICE

1677 Old Hot Springs Rd., Ste. A
Carson City, Nevada 89706
<http://parole.nv.gov>
(775) 687-5049
Fax (775) 687-6736

CHRISTOPHER P. DERICCO, *Chairman*
SUSAN JACKSON, *Member*
MARY K. BAKER, *Member*
SCOTT WEISENTHAL, *Member*

KATIE FRAKER, *Executive Secretary*

STATE OF NEVADA

JOE LOMBARDO
Governor



LAS VEGAS OFFICE

4000 S. Eastern Ave., Ste 130
Las Vegas, Nevada 89119
<http://parole.nv.gov>
(702) 486-4370
Fax (702) 486-4376

CHRISTOPHER P. DERICCO, *Chairman*
ERIC CHRISTIANSEN, *Member*
LAMICIA HAILLEY, *Member*
SANDY SCHMITT, *Member*

NEVADA BOARD OF PAROLE COMMISSIONERS

August 15, 2023

Matthew Houston, NDOC #1210652
High Desert State Prison
P.O. Box 650
Indian Springs, NV 89070-0650

Re: Your letter received August 14, 2023.

Mr. Houston,

The Board took a No Action at your June 28, 2023, parole hearing due to you being unavailable (at court). You are on the September eligibility list. These hearings are scheduled around the third week of August. Your caseworker will inform you of the exact date of your September hearing towards the end of August.

Signed,

A handwritten signature in cursive script that reads "Katie Fraker".

Katie Fraker
Executive Secretary

GROUND NUMBER ELEVEN:

23. (k) Ground ~~11~~ ELEVEN: Petitioner was not only deprived
of his ~~VII~~TH AMDT right to effective aid
of counsel, he was blatantly robbed by the
law firm of CRAIG MUELLER AND ASSOCIATES.

Supporting FACTS (Tell your story briefly without citing cases or law.):

PLEASE SEE ATTACHED RENEWED
COMPLAINT TO THE STATE BAR OF NEVADA:

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MATTHEW TRAVIS HOUSTON,

Plaintiff,

CRAIG MUELLER ASSOCIATES/LOMBARD

Case No. 2:22-cv-01607-DWM-CSD

EMERGENCY ORDER OF INJUNCTION FROM AN INNOCENT MAN TO
DONALD W. MAHLOI AND NANCY ALLF AND
ASSOCIATES D/B/A LARRY PHILLIPS ET AL "HEARING REQUESTED"

If you wish to file a complaint it may be sent by letter, via U.S. Mail or fax to the closest State Bar address listed at the bottom of this section.

An online complaint will be accepted. However, all correspondence from the State Bar will be in writing via US Mail. If you send attachments, you should confirm that they were received. You may be required to send attachments in hard copy.

The Office of Bar Counsel usually completes the initial review of all complaints within ten business days of receipt.

Your correspondence should contain at least the following information:

1. Name of the attorney.
2. A brief description of the nature of the case the attorney was engaged to handle.
3. A chronological review of events, actions, or conversations between you and the named attorney which led you to conclude that the attorney's actions are improper.
4. Copies of letters or documents which serve as material evidence of the allegations you have raised against the attorney.
5. The names, addresses and phone numbers of those persons who have direct knowledge of the allegations you have raised.
6. An acknowledgment of whether you have attempted to first resolve this matter by contacting the attorney directly.

Once we have received your complaint we will review it to determine if there is an issue under the Rules of Professional Conduct. If more information is needed you will be notified. If you have raised an issue under the Rules of Professional Conduct, we will forward a letter to the attorney and direct him or her to respond to our office in writing within ten (10) business days with an explanation. Based on the attorney's response, we will then determine what further investigation might be necessary.

If it is determined that your complaint is basically a fee dispute, we will forward the forms which are utilized for the filing of a complaint with the Fee Dispute Arbitration Committee.

The investigation and review process can take as little as one month or as long as six months or more. You will be kept informed of the status of the matter as it progresses. You should recognize, however, that the Disciplinary Board cannot and does not give legal advice, does not have jurisdiction over damage or malpractice claims against attorneys and cannot alter or affect in any way the outcome of private legal matters in court. If you need additional advice on your case, you must obtain the assistance of your own private attorney.

In Southern Nevada please contact:

State Bar of Nevada Office of Bar Counsel
3100 W. Charleston Blvd., Las Vegas, NV 89102
3rd floor
TEL (702) 382-2200 or (800) 254-2797 FAX (702) 382-8747

In Northern Nevada please contact:

State Bar of Nevada Office of Bar Counsel
9456 Double R Blvd. Suite B, Reno, NV 89521
TEL (775) 329-4100 FAX (775) 329-0522
complaint@nvbar.org

(23)

OPPS

PRELIMINARY OPPOSITION TO DEFENDANT'S MOTION TO DISMISS,
EMERGENCY

LETTER OF MOTION AND CONTINUED
CAVEAT OF INAUGURATION OF THE N.S.A.W.P. ON A
NEVADA DEPARTMENT OF CORRECTIONS

GRIEVANT'S STATEMENT CONTINUATION FORM

FROM:

NAME: Matthew Travis Houston ID. NUMBER: 1210652

INSTITUTION: HIGH DESERT STATE PRISON UNIT #: 9-D-6

EJDC Case #
GRIEVANCE #: A-17-758861-C GRIEVANCE LEVEL: EXHAUSTED

GRIEVANT'S STATEMENT CONTINUATION: PG. 1 OF 3

TO: STATE BAR OF NEVADA

OFFICE OF BAR COUNSEL

LOUISE WATSON

PHILLIP J. PATTEE

VANESSA DALTON

MISS YOSELYN

DANIEL M. HOOGE

TIFFANY BRADLEY

"JOINDER OF COMPLAINT A-17-758861-C TO A-22-862155-C

SUBJECT(S): STATE BAR EXAM

COMPLAINT RE ALEXIS M. DUECKER

COMPLAINT RE CRAIG MUELLER ASSOCIATES

COMPLAINT RE EJDC Case No. A-17-758861-C

NEWLY DISCOVERED EVIDENCE AS RESULT OF SURPRISE

COURT HEARING ON THIS MOST UNHOLY 21ST DAY

OF AUGUST, YEAR OF OUR SATANIC MAGESTY 2023 :

Original:

Pink:

Attached to Grievance + eFILED. 2:22-cv-01607-DWM-GSD
Inmate's Copy (mailed to State Bar of Nevada,
w/ Charleston Blvd. office)

NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: Matthew Travis Houston I.D. NUMBER: 1210652

INSTITUTION: High Desert State Prison UNIT #: 9-D-6

CASE +
GRIEVANCE #: A-17-758861-C GRIEVANCE LEVEL: Exhausted

GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 3

What is up with my complaint against CRAIG
MUELLER ASSOCIATES D/B/A LARRY PHILLIPS ET AL?
I did receive a letter re BRIAN P. CLARK
and the nefarious CLARK MCCOURT, LLC
however I have yet to receive anything
re ALEXIS M. DUECKER, DREW CHRISTENSEN
OFFICE OF THE APPOINTED COUNSEL and/or
NEVADA ATTORNEY FOR INJURED WORKERS D/B/A
LINA SAKALAUSKAS and DANIEL L. SCHWARTZ ET AL.
There are upwards of 300+ defendants and I'm innocent.
YOU WILL PLEASE TAKE NOTICE of the attached
DOC-509 CERTIFIED LEGAL MAIL "Brass-Slip"
#2547948, dated November 22nd, 2022, to
which is the initial complaint against CRAIG
MUELLER ASSOCIATES ET AL. I am very much
tired of the deprivation of my rights under color of law.

Original: ☐ Attached to Grievance
Pink: ☐ Inmate's Copy

NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: Matthew Travis Houston I.D. NUMBER: 1210652

INSTITUTION: HIGH DESERT STATE PRISON UNIT #: 9-D-6

CASE +
GRIEVANCE #: A-17-758861-C GRIEVANCE LEVEL: Exhausted

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 3

I am both actually innocent and factually innocent (90%) +
I really do not have the funds on my NDOC
Inmate Account to be sending certified legal
mail, especially because the HDSP Mailroom
tends to loose my items. I will just have
to have faith and send y'all these complaints, via
CERTIFIED LEGAL -USPS- Can y'all please send me
copies of my initial complaint re A-17-758861-C
aka BERNSTEIN & POISSON? Please also fwd
this JOINDER OF COMPLAINT to Mr. Hooge and
Miss Tiffany, re A-22-862155-C. We have
a hearing tomorrow, 8/23/2023 and although
the prison is on lockdown, they should be able to
make sure I attend @ 9:00 AM. Last up is
can you please provide info on how I can test for
your state's BAR EXAM? Jacob A. Reynolds has doubted

Original: _____ Attached to Grievance me to no avail. Too bad
Pink: _____ Inmate's Copy for him. Go Hawkeyes!

- REV. MATTHEW TRAVIS HOUSTON, CHTD
American Bar Association Member (Retired US Navy)
ABA ID No. 04662784 DOC-3097 (01/02)

8-21-2023

Suprise court hearing
in person today w/
Jennifer L.G. Schwartz,
~~she~~ ^{she} joked about the
government and
welcomed my motions -
and allowed me to
plead my case -

I mentioned
²⁴ the
summons
re Redenta Blacic,
remembered SERT/
A. Goldstein video
visit - A - Dubb riot.

FILE: (to Sup Ct. NV.)

- SUPPLIMENTAL PETITION
- FOR REHEARING IN BANC -

See Nye County
Sheriffs (captain
(arrested CEO illegally))

PERJURY
DEPRIVATION
OF RIGHTS
UNDER COLOR
OF LAW

R. McMorris - Alexander
conspired w/
LVMPD and her
company,
SEOGwick CMS,
and various law
firms to have
Houston falsly
arrested...

YOUR INFORMATIONFirst, Middle and Last Name: Matthew Travis HoustonYour Address: NDOC No. 1210652 - 22010 Cold Creek Road - Po Box 650City: Indian Springs State: NV Zip: 89070-0650**ATTORNEY INFORMATION**Attorney Name: Craig Mueller dba Larry PhillipsLaw Firm Name: CRAIG MUELLER AND ASSOCIATESAttorney Address: 808 South 7th StreetAttorney City: Las Vegas State: NV Zip: 89101**PREVIOUS CONTACT WITH THE STATE BAR OF NEVADA**

Have you previously contacted the State Bar of Nevada regarding this matter?

☒ Yes
 ☐ No
If "Yes", when and where did you contact us?: Retroactively from September 20, 2016-If known, what was the file number for the case or claim: LVJC Case# 22A001793**HIRING THE ATTORNEY**

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

☒ Yes
 ☐ No

If you answered yes:

When did the representation begin: April, 2022What was the fee arrangement: \$10,000.00How much have you paid the lawyer to date: \$10,000.00Brief description of the nature of the case the attorney was engaged to handle (i.e. personal injury, criminal, malpractice): PETITION FOR A WRIT OF HABEAS CORPUS - POST-CONVICTION RELIEF - DIRECT APPEAL / WITHDRAW 'GPA'

If you answered no:

What is your connection to the lawyer: _____

WITNESSES

Names and contact information for other persons who can provide additional information concerning your complaint:

#1: Lucrecia Schoenherr (563) 221-3084#2: Joshua Grainer (714) 916-7431#3: Pitarro and Furno, Chtd (702) 474-7554**LITIGATION**If your case is related to a court case or other proceeding, please provide the following information:
(For example: Smith v. Jones, Case Number 1234, Eighth Judicial District Court)Case Name: State of Nevada v. Matthew HoustonCase Number: C-21-357427-1 / A-22-853203-W

(24)

Name of court or agency: EIGHTH JUDICIAL DISTRICT COURT

EXPLANATION OF GRIEVANCE

Complaint details: In regards to Larry Phillips and CRAIG MUELLER AND ASSOCIATES, please SEE Page No. 3 of the - EMERGENCY OPPOSITION TO ANTHONY M. GOLDSTEIN'S 'MOTION TO DISMISS' FILED 12/07/2022; MOTION FOR RECONSIDERATION OF 02/01/2023; JOINER TO A-17-758861-C AND NOTICE OF MOTION - that is attached to this COMPLAINT and meritorious interpleading / Statement of Facts / ' JOINER OF APPEAL '

In order for us to better understand and investigate your claim, please provide specific information regarding your grievance. In the space above, please provide *in narrative form* a comprehensive and detailed description of the persons and events involved in the conduct which you believe constitutes a breach of professional ethics. In essence, please provide us a story about what occurred in the legal matter underlying your complaint. It is not necessary for you to cite specific Rules of Professional Conduct. However, it is very important that a complete and thorough explanation of events and dates be provided. There is no limit to the amount of spaces that can, and should, be utilized. Explain what measures you have taken to resolve this matter directly with the attorney

Written Materials

Please provide, if applicable, the following materials to the State Bar of Nevada:

- A copy of any written fee agreement with the attorney. If there was no written agreement, please explain your understanding regarding payment to your attorney in your explanation of grievance.
- Copies of the front and back sides of all canceled checks and/or copies of receipts showing payments made by you to the attorney.
- Copies of any pertinent court documents, particularly pleadings and judicial orders, in your possession.
- Copies of all correspondence between you and the attorney.

(25)

STATE OF NEVADA
DEPARTMENT OF CORRECTIONS
INMATE ACCOUNT TRANSACTION
REQUEST

Date: 11-22-2022 No 2547948

To: Inmate services

I hereby authorize my account to be charged in the amount
of \$.....(.....Dollars).

Please pay to.....NDOC.....

Signature.....Matthew Travis Houston.....

Print name.....Matthew Travis Houston.....

ID No.....1210652.....Institution.....NDOC.....

Approved by.....

Transfer	Purchase Order	Postage	Other
		<u>legal</u>	

White
Canary
Pink

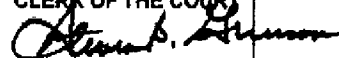
Inmate Services
Institution Copy
Inmate

DOC 509 (Rev.2/06)

State Bar of NV. COMP. RE. LARRY PHILLIPS

DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
7/7/2023 1:54 PM
Steven D. Grierson
CLERK OF THE COURT



Matthew Houston, Plaintiff(s)

Case No.: A-22-862155-C

vs.

State Bar of Nevada, Defendant(s)

Department 27

NOTICE OF HEARING

Please be advised that the Emergency Opposition to Anthony M. Goldstein's Motion to Dismiss filed 12-07-2022; Motion for Reconsideration of 02-01-2023; and Joinder to A-17-758861-C and Notice of Motion in the above-entitled matter is set for hearing as follows:

Date: August 08, 2023

Time: Chambers

Location:

Regional Justice Center
200 Lewis Ave.
Las Vegas, NV 89101

NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Michelle McCarthy
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Michelle McCarthy
Deputy Clerk of the Court

Please file into both cases A-22-862155-C and A-23-865442-C:

Electronically Filed
07/07/2023

Matthew Austin
CLERK OF THE COURT

1 OPPS + JOIN

2 Plaintiff / In Propria Personam
3 Post Office Box 650 [HDSP]
4 Indian Springs, Nevada 89018
5 ABA No. 04662784
6 MATTHEW TRAVIS HOUSTON, (HTD
7 REV.
8 NDOC No. 1210652

DISTRICT COURT
CLARK COUNTY, NEVADA

9 MATTHEW TRAVIS HOUSTON,
10 Plaintiff,

11 vs.

12 STATE BAR OF NEVADA;
13 JOSEPH M. LOMBARDO, ET AL
14 Defendant(s).

Case No. A-22-862155-C

Dept. No. 27

Case No. A-23-865442-C

Dept. No. 7

SEE LVJC Case No. 22A001793

MOTION
TITLE
BEGINS

15 EMERGENCY OPPOSITION TO ANTHONY M. GOLDSTEIN'S MOTION TO DISMISS,
16 FILED 12/07/2022; MOTION FOR RECONSIDERATION OF 02/01/2023;
17 JOINDER TO A-17-756861-C AND NOTICE OF MOTION
18 "HEARING REQUESTED"

19 YOU WILL PLEASE TAKE NOTICE, that the Plaintiff (who has been falsely imprisoned
20 retroactively from before SEPTEMBER 20, 2016), Matthew Travis Houston

21 will come on for hearing before the above-entitled Court on the ___ day of ___, 20___
22 at the hour of ___ o'clock ___ M. In Department ___, of said Court.

23 This Honorable Court will PLEASE TAKE NOTICE of the attached
24 CC FILE - meritoriously VALID interpleadings and 'STATEMENT OF
25 FACTS' under numerous NRCP - N.R.S. - NRAP - NRPC - ETC.:

26 DATED: this 19 day of May, 2023.

27 BY: *Matthew Travis Houston*
28 REV. MATTHEW TRAVIS HOUSTON #1210652
Plaintiff / In Propria Personam

CLERK OF COURT

①

STATEMENT OF FACTS: Kidnapped from his home in

1
2. Iowa City. On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter ^{Plaintiff} "Petitioner-Appellant")
3 was abducted from his hotel room at the Best Western located at [REDACTED] 3041
4 St. Rose Parkway in Henderson, Nevada, as he was not served with any sort of
5 summons or WARRANT, nor was told or read that he had any kind of rights. This
6 false arrest prevented Petitioner-Appellant from attending his appointment the very
7 next day at Nevada Retina Specialists, with Dr. Tyson Ward on July 15, 2021, while
8 this continued imprisonment of his person also prevented him from attending his medical
9 disability rating in Reno, Nevada, on August 15, 2021, with Dr. Dwagleri. Both appointments
10 of which had been scheduled by the abductors, SEDAWICK's Dianne Ferrante, and her
11 alleged supervisor, Rosemarie McMorris-Alexander, as was the booking of his room.
12 The Petitioner-Appellant's attempt at release from CDC was intended so that he could
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J. Wood
14 and Bernard Little, provided misinformation regarding the lack of a directly-related "City Jail
15 Detainer Hold". Counsel had told Petitioner-Appellant, all the while coercing his client into a
16 potential release from custody, that he did not see a detainer hold - when, in fact, there was.
17 This coercion of the client by his previous representation created a second double-jeopardy -
18 in LAS VEGAS MUNICIPAL COURT #1248374A + #1237802A; with the first being by J. Wood
19 in the EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-035713. A. Goldstein NEVER visited Mr.
20 Houston. These traumatic events are a cruel and unusual punishment being inflicted upon an abused
21 and innocent man, who was forced into an involuntary relocation, with unnecessary hardships
22 causing the eviction of his law office located at 435 South Linn Street #927, in Iowa
23 City, Iowa (52240), \$36.5 million of property damage and the destruction of his K-9(s).
24 Due to crimes both civil and criminal, not to mention the willful omissions of Rosemarie
25 McMorris-Alexander and Dianne Ferrante, SEDAWICK and the prosecutions' most unlawful use
26 of overreaching tactics in their exploitation of the innocent man has put the Petitioner-Appellant
27 into an unmanageable state of duress, homelessness, and extensive incarceration. Not at any
28 time did Mr. Houston harass, extort, threaten, or "aggravated stalking" ANY of the
29 parties involved with any of his cases, nor did he act aggressively towards any
30 other individual, business or entity. Mr. Houston is a victim of crime. @

Las Vegas Justice Court
Electronically Filed
12/7/2022 3:34 PM
Melissa Saragos:
CLERK OF THE COURT

JUSTICE COURT, TOWNSHIP OF LAS VEGAS Clark County, Nevada	
Name and Address of Plaintiff(s): Matthew Travis Houston (#1210652) P.O. Box 650 Indian Springs, NV 89070-0650	
Plaintiff(s)' Email Address:	matthewtravishouston@gmail.com
Plaintiff(s)' Telephone Number:	(702) 879-6789
VERSUS	
Name and Address of Defendant(s): Anthony M. Goldstein, Esq. 2421 Tech Center Court Suite 100 Las Vegas, NV 89128	
Defendant(s)' Telephone Number:	(702) 796-1114
Defendant(s)' Email Address:	amg@amglegal.com

Case No. 22A001793Department No. LVJC5**MOTION TO DISMISS**

I request that this case be dismissed ☒ *(choose one)* with prejudice ☐ without prejudice.

This case should be dismissed for the following reasons *(choose one)*:

- ☐ Venue is not proper because I am not a current resident of this township, I am not currently doing business in this township, I am not currently employed in this township; nor was I when the alleged cause of action arose; nor is this township the location where the alleged injury or breach of obligation occurred.
- ☐ Plaintiff seeks additional remedies beyond money.
- ☐ Plaintiff's case is barred by the expiration of the applicable statute of limitations.
- ☐ Plaintiff has already recovered a judgment against me in the following case:

(insert case number) _____

- ☐ The debt alleged by Plaintiff has been discharged in bankruptcy case number *(insert case number)* _____

☒ **Other:**

The dispute set forth in the Complaint seems to involve financial matters relating to Plaintiff's retaining the law office of Defendant Craig Mueller & Associates to represent Plaintiff in a criminal matter. I do not, have never and would never work for Defendant and have no business relationship with Defendant whatsoever.

I further certify that I ☒ mailed ☐ emailed a copy of this Motion to Dismiss to Plaintiff at the address listed above.

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

Signature

Print Name Anthony M. Goldstein, Esq.Dated December 7, 2022Attorney for Pro Se

© Civil Law Self-Help Center, Rev. 7/2/19

Case Number: 22A001793

2-A

RENEWED LIST OF PARTIES, DEMAND FOR REPAIRATIONS AND

CAVEAT

9TH. CIR. Ct. of Appeals. No. 22-15748, 22-16322, 22-16439,

2:21-cv-00499-JAD-DJA 22-16902,

2:22-cv-00693-JAD-NJK 23-15059,

NEVADA DEPARTMENT OF CORRECTIONS 23-15067

GRIEVANT'S STATEMENT CONTINUATION FORM

A-22-853203-W dept. XI

NAME: MATTHEW HOUSTON, CHTD. I.D. NUMBER: 1210652

INSTITUTION: H.D.S.P. "S.M.U." UNIT #: 3-A-2

GRIEVANCE #: June 29, 2022 GRIEVANCE LEVEL: EXHAUSTED

GRIEVANT'S STATEMENT CONTINUATION: PG. 9 OF 14

81) \$ 500,000.00 from Gerri Lynn Hardcastle #13142

82) \$ 500,000.00 from Craig Mueller and Assoc.

83) \$ 500,000.00 from Larry Phillips (p/June 30, 22)

84) \$ 500,000.00 from Kelsey Bernstein to T-REX FWD: \$75,000

On June 30th, 2022 Larry Phillips on the confidential legal telephone call 1:30 pm TIER he insulted my advocacy and still have not drawn up retainer agreement. Why no \$ on my inmate account? "CONTRACT" is hereby terminated between "CRAIG MUELLER AND ASSOC." witnessed by Joshua Grainer, Pitano and Furia, CHTD and "THOMAS" see Sept. 7th, 2021 "HUNTINGTON BEACH LIFEGUARD UNIFORM"

85) \$ 500,000.00 from THERESA DODSON

86) \$ 500,000.00 from E. DEL PADRE

87) \$ 500,000.00 from SUPREME COURT OF NEVADA, ET AL

Original:
Pink

Attached to Grievance
Inmate's Copy

A-17-758861-C
dept #17, XVIII and 29

28

DOC - 3097 (01/02)

(3)

Case 2:19-cv-01472-APG-DJA Document 32 Filed 08/01/22 Page 1 of 1
 Case 2:22-cv-00693-JAD-NJK Document 18 Filed 08/01/22 Page 1 of 4

Reverend

Matthew Travis Houston #1210652 - CHTD

Plaintiff / In Propria Personam

Post Office Box 650 (HOSP)

Indian Springs, Nevada 89018

American Bar Association Member

Bar No. 1166374

UNITED STATES FEDERAL DISTRICT COURT

DISTRICT OF NEVADA

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

Matthew Travis Houston

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Matthew Travis Houston

FILED	RECEIVED
ENTERED	SERVED ON
COUNSELPARTIES OF RECORD	
AUG - 1 2022	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
COURT	DEPUTY

MATTHEW TRAVIS HOUSTON

Plaintiff

vs.

THE STATE OF NEVADA, ETAL

Defendant(s)

2:19-cv-01371-JAD-DJA
 CASE NO. 2:19-cv-01472-APG-DJA
 2:19-cv-01360-RFB-VCF
 2:19-cv-01475-GMX-EJY
 2:19-cv-01740-APG-BNW

NOTICE OF CHANGE OF ADDRESS
 IN RE ALL OF THE ABOVE TITLED
 CASE NUMBERS TO WHICH THE
 PLAINTIFF IS MATTHEW TRAVIS
 HOUSTON

Reverend (CHTD)
 COMES NOW, Plaintiff, Matthew Travis Houston, in Proper Person,
 hereby gives notice to the above-entitled court, that due to (Rosemarie McNorris-
 Alexander, et al) action, Plaintiff, has been kidnapped from 435 South
 of Collection's action, Plaintiff, has been kidnapped from 435 South
 Lion St. #927 Iowa City, IA 52240 TO: H.O.S.P. Indian Springs, NV 89070.

Therefore, Plaintiff, Matthew Travis Houston, prays that this
 Honorable Court will henceforth, send all documents/paperwork concerning the
 above-cited case number to the new address. Other previous addresses
 were: (1009 Cardinal Dr Maguoketa, IA 52060) and (#1 S. Main St #300 Las Vegas, NV 89101)
 DATED: this 24 day of June, 2022.

Was also: PO Box 1273
 Maguoketa, IA
 52060

Respectfully submitted,

BY: Matthew Travis Houston
 Matthew Travis Houston #1210652
 Plaintiff / In Propria Personam
 ABA No. 1166374

YOU WILL NOW TAKE NOTICE OF THE ATTACHED MOTION
 WHICH INCLUDES A CERTIFICATE OF SERVICE. RENEWED
 THIS 19TH DAY OF JULY, 2022. X. Matthew Travis Houston

(4)

JUSTICE COURT, TOWNSHIP OF LAS VEGAS Clark County, Nevada		Case No. <u>22A001793</u> Department No. <u>LVJC 5+15+1</u> SMALL CLAIMS COMPLAINT
Name and Address of Plaintiff(s): <u>Matthew Travis Houston</u> <u>No 1210652</u> <u>PO BOX 650</u> <u>Indian Springs, NV 89070-0650</u>		
Plaintiff(s)' Email Address	<u>matthewtravis.houston@gmail.com</u>	
Plaintiff(s)' Telephone Number	<u>(702) 879-6789</u>	
VERSUS		
Name and Address of Defendant(s): <u>CRAIG MUELLER AND ASSOCIATES</u> <u>808 South 7th Street</u> <u>Las Vegas, NV 89101</u>		
Defendant(s)' Telephone Number and Email Address	<u>(702) 382-1200</u>	
STATE OF NEVADA) COUNTY OF CLARK)		
I, (insert your name) <u>Matthew Travis Houston</u> , being first duly sworn, deposes and says:		
That the defendant is indebted to the plaintiff in the sum of <u>\$10,001.⁰⁰</u> ; that the reason for this indebtedness is:		
<u>Larry Phillips (Nevada Bar No. 7138), Craig Mueller (Nevada Bar No. 4703),</u> <u>and Kelsey Bernstein (Nevada Bar No. 13825) are committing legal</u> <u>malpractice among a variety of numerous other crimes. On or after</u> <u>April 1st, 2022 they stole \$10,000.⁰⁰ from my Bank of America</u> <u>checking account. Witnesses are not limited to Joshua Grainer, Darian</u> <u>M. Geenan, Lucrecia Lavanna Schoenherr and PITARRO AND FUMO, CHTD.</u>		
that this affiant has demanded payment of the sum; that the defendant refuses to pay the same. The Justice Court or the Las Vegas Township, in the County of Clark, State of Nevada is the proper venue for this action pursuant to NRS 73.010. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.		
Signature of Affiant <u>Matthew Travis Houston</u> Print Name <u>Matthew Travis Houston</u>		Dated <u>November 1st, 2022</u> Attorney for <u>"pro se"</u>
ORDER TO APPEAR NOTICE: YOU HAVE BEEN SUED. THE COURT MAY ENTER A JUDGMENT AGAINST YOU WITHOUT YOUR PRESENCE UNLESS YOU APPEAR AT THE TRIAL ON THE FOLLOWING DATE:		
TRIAL DATE: February 1, 2023 <u>Feb. 01, 2023</u> TRIAL TIME: <u>10 AM</u> LOCATION: <u>RTG-Room # 66</u>		
Any Evidence, including receipts, pictures or documents that are necessary to prove your case MUST be brought to trial. Please bring copies for Court to keep and for the opposing party. Any witnesses should appear with you at the time of trial. Those wishing to appear by alternative means should submit a request no later than two (2) judicial days prior to your Trial.		

Additional Defendants:

First/Last Name: STATE BAR OF NEVADA p: (702) 382-2200

Address: 3100 W. Charleston Blvd
SUITE No. 100
Las Vegas, NV 89102

First/Last Name: NEVADA DEFENSE GROUP
aka NEVADA APPEAL GROUP-ATTN: Kelsey Bernstein
Nevada Bar No. 13825
Address: 714 SOUTH 4TH STREET p: (702) 988-2600

Las Vegas, NV 89101
P: (702) 940-1234

First/Last Name: KELSEY BERNSTEIN, ESQ #13825

Address: 600 SOUTH 8TH STREET
Las Vegas, NV 89101
P: (702) 755-8678

First/Last Name: LARRY PHILLIPS, ESQ #7138 (Nevada Bar No. 4703
CRAIG MUELLER
AND ASSOCIATES)

Address: 808 SOUTH 7th Street
Las Vegas, NV 89101
P: (702) 382-1200

First/Last Name: Todd Leventhal and Associates

Address: 626 South 3rd Street
Las Vegas, NV 89101
P: (702) 472-8686

First/Last Name: Anthony M. Goldstein

Address: 2421 Tech Center Court #100
Las Vegas, NV 89128
P: (702) 796-1114

(5)

5-B

EMERGENCY APPROPRIATION
CASE No. 22A001413
DEPT No. LVJC 5

CONTINUATION
INMATE REQUEST FORM

FILED OF CLERK 7/11/20
3:34 PM
Melissa Clark
Clerk Judge Clerk Clerk

1) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
MATTHEW TRAVIS HOUSTON	1210652	3A-22	DEC. 14, 2022

 MENTAL HEALTH

 CASEWORKER

MEDICAL

LAW LIBRARY

DENTAL

EDUCATION

VISITING

SHIFT COMMAND

 LAUNDRY

PROPERTY ROOM

OTHER JUDGE(S) CYNTHIA CRUZ.

5.) NAME OF INDIVIDUAL TO CONTACT: MARY KAY HOLTHUIS, JASMIN LILLY-SPELLS, CAROLYN Ellsworth

5.) NAME OF INDIVIDUAL TO CONTACT:

JASMIN LILLY-SPELLS, CAROLYN Ellsworth

AS ALL FORMS OF GOVERNMENT IN THE STATE OF NEVADA ARE DEFAULTED

6.) REQUEST: (PRINT BELOW) TODAY ON THE SECURUS TECHNOLOGIES LEGAL

TELEPHONE I WAS INFORMED OF THE LEGAL MALPRACTICES

COMMITTED BY INDIVIDUALS AND ENTITIES NOT LIMITED TO

SMS CHARTERED THAT WRIT A-22-853203-W HAD BEEN

SCHEDULED FOR JANUARY 27th, 2023 AND WAS VACATED TO MARCH 28th

2023; VACATED AGAIN TO APRIL 27TH, 2023, AND (VACATED AGAIN TO

MAY 03RD, 2023, No. 1 - MOTION TO EXPEDITE ALLEGED BRIEFING SCHEDULE AS

JOINDER TO A.22.856372, C.9811.2X No. 2-MOTION TO RECUSE ELHAM ROOHANI

7.) INMATE SIGNATURE Matthew Travis Herb J. Jr. DOC# 1210652

8.) RECEIVING STAFF SIGNATURE

DATE _____

9.) RESPONSE TO INMATE

RECEIVED

~~DFC 19 2022~~

HDSP

10.) RESPONDING STAFF SIGNATURE

DATE _____

EMERGENCY MEETING OF HEARINGS DEC. 21ST, 1961

DOC - 3012 (REV. 7/01)

INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Matthew Travis Houston	1210652	3A-22	11-20-2022

4.) REQUEST FORM TO: (CHECK BOX)

☐ MENTAL HEALTH
 ☐ CANTEEN
☐ CASEWORKER
 ☐ MEDICAL
 ☐ LAW LIBRARY
 ☐ DENTAL
☐ EDUCATION
 ☐ VISITING
 ☐ SHIFT COMMAND
☐ LAUNDRY
 ☐ PROPERTY ROOM
 ☒ OTHER MAIL - ROOM

5.) NAME OF INDIVIDUAL TO CONTACT: SUPERVISOR AND/OR LAW CLERK

6.) REQUEST: (PRINT BELOW) Could the mailroom please return a receipt copy of the attached certified legal mail addressed to the following (only as mail sent "CERTIFIED"):

Anthony M. Goldstein

2421 Tech Center Court

Ste No. 100

LAS VEGAS, NV 89128

VIA DOC-509 Brass Slip # 2547943 - Thank you -

7.) INMATE SIGNATURE Matthew Travis Houston DOC# 1210652

8.) RECEIVING STAFF SIGNATURE _____ DATE _____

9.) RESPONSE TO INMATE

CERTIFIED MAIL ARTICLE NO. 7021 0950 0000 8017 6327 - \$ 8.09 - BS-2547943

USPS TRACKING # 9590 9402 7095 1251 463 55

PROCESSED 28 NOV 2022. WILL BE SENT OUT - 01 DEC. 2022

10.) RESPONDING STAFF SIGNATURE  MR DATE 28 NOV. 2022

EDDC No. A-17-758861-C; USDC No. 2:21-cv-00499-JAD
 DOC - 3012 (REV. 7/01)
 6-B (3)

Case 2:22-cv-01748-CDS-DJA Document 10 Filed 01/03/23 Page 5 of 10

STATE OF NEVADA
DEPARTMENT OF CORRECTIONS
INMATE ACCOUNT TRANSACTION
REQUEST

11-22-2022 NO 2547943

INMATE ACCOUNT TRANSACTION REQUEST

INMATE ACCOUNT TRANSACTION REQUEST

INMATE ACCOUNT TRANSACTION REQUEST

INMATE ACCOUNT TRANSACTION REQUEST

INMATE ACCOUNT TRANSACTION REQUEST

1210652

INMATE ACCOUNT TRANSACTION REQUEST	INMATE ACCOUNT TRANSACTION REQUEST
------------------------------------	------------------------------------

DOC 509-Rev 200

NOTE OF DEMAND. 2.A.M. GOLDSTEIN

6-C ⑦

Case 2:22-cv-01748-CDS-DJA Document 10 Filed 01/03/23 Page 8 of 10

NOTICE OF DEMAND (ON A
NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM)

FROM: MATTHEW TRAVIS HOUSTON, CHTD.
DATE: On this 9th day of July, 2022. I.D. NUMBER: 1210652
INSTITUTION: OF WRONGFUL CONVICTION(S) UNIT # C-17-357927.1 (C-21)
GRIEVANCE: APPEAL DEPRIVATION GRIEVANCE CODE: C-17-357927.1 (C-17)
CLAIM

GRIEVANT'S STATEMENT CONTINUATION: PG. 1 OF 1

TO: Anthony M. Goldstein (Defendant-respondent No. 55)

Can you please return ALL of my documents?

You will now take notice of your DEFAULT

STATUS in re "legal malpractice", false

imprisonment and other crimes against the

estate of Matthew Travis Houston, CHTD. not

limited to the illegal withholding of my

original documents and pleadings in re false

arrest 7-14-2021 resulting in case No. C-21-357927.1

and numerous other litigation(s) not limited to

A-17-758861-C and interfering with numerous

appeals of Claim No. 3016661201-0001 and the

blocking, hindering and thwarting of 9th Circuit No.

22-15748, 2:21-cv-00499-JAD-DJA and

2:22-cv-00693-JAD-NJK. This demand of reparations

for incurred damages of \$36,500,000.00 IS RENEWED.

x. Matthew Travis Houston
Dated: 7/9/22 Attached to Grievance → filed in A-22-853203-W

Pink: Inmate's Copy ← MAILED PINK SLIP TO THE

OFFICE OF: ANTHONY M. GOLDSTEIN

2421 Tech Center Court Suite No. 100

Las Vegas, NV 89128

Page Number Six

DUC-3097 (01/02)

③
6-D

JUSTICE COURT, LAS VEGAS TOWNSHIP Clark County, Nevada	Case No. <u>22AC001493</u> Department No. <u>LVJCS</u>
Name and Address of Plaintiff(s) <u>MATTHEW TRAVIS HOUSTON, CHD</u>	PROOF OF SERVICE (for use by Plaintiffs in Small Claims Cases)
(Plaintiff's) Telephone Number <u>(702) 874-6789</u>	
VERSUS	
Name and Address of Defendant(s) <u>CRAIG MUELLER AND ASSOCIATES,</u> <u>STATE BAR OF NEVADA, NEVADA APPEAL GROUP,</u> <u>KELSEY BERNSTEIN, LARRY PHILLIPS, TODD REVENTHAL</u> <u>AND ASSOCIATES, ANTHONY M. GOLDSTEIN, ET AL</u> (Defendant's) Telephone Number:	

I, (insert name of person performing service) Matthew Travis Houston, being duly sworn or under penalty of perjury, state that at all times relevant, I was over 18 years of age and not a party to or interested in the above-captioned case: that I received a copy of the (check the name of documents you served) ☐ Small Claims Complaint, ☐ Instructions to Plaintiff or Defendant, ☐ Small Claims Answer, ☐ Other: NOTICE OF DEMAND / APPEAL DEPRIVATION CLAIM, and that I served the same on Defendant (insert Defendant's name) ANTHONY M. GOLDSTEIN ON (insert date and time you served the document(s)) JULY 4th, Nov. 20th, 2022, at the hour of 9:00 A.M., by (complete appropriate paragraph below):

1. For personal service per JCRCP 4(d)(6): Delivering and leaving a copy with Defendant at (insert address at which you served)
2. For substitute service per JCRCP 4(d)(6): Delivering and leaving a copy with (insert name or physical description of person served)
 a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at (insert Defendant's address)
3. For service by registered or certified mail per JCRCP 91 (if allowed): Depositing a copy in a mailbox of the United States Post Office, enclosed in a sealed envelope, postage prepaid, registered or certified mail, return receipt requested, addressed to Defendant at (insert Defendant's address) 3431 Tech Center Court #100 Las Vegas, NV 89125 (A copy of the signed return receipt must be attached.)
4. For service on a business entity per JCRCP 4(d)(1) or (2): Delivering and leaving a copy with (insert name or physical description of person served) _____, who is Defendant's (check one) ☐ president or other head, ☐ secretary, ☐ cashier, ☐ managing agent, ☐ resident agent, or ☐ other (specify) _____
 at (insert address at which you served) _____

Date: _____ Signature: _____

☐ Residential ☐ Business Address of Process Server: _____ Phone: _____

You MUST check one of the following boxes AND have this affidavit notarized (block on the left) or sign the unsworn declaration per NRS 53.045 (block on the right):

☐ I am a licensed process server or an employee of a licensed process server; my license or registration number is (insert license or registration number): _____

☒ I am not required to be licensed under Chapter 648 of the Nevada Revised Statutes or another provision of law because I am not engaged in the business of serving legal process within the State of Nevada.

SUBSCRIBED AND SWORN to before me this _____ day of _____, 20____.	OR UNSWORN DECLARATION: Per NRS 53.045 "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."
NOTARY PUBLIC in and for the County of _____, State of _____	(Signature) <u>Matthew Travis Houston</u> (Date) <u>January 4th, 2023</u>

LVJCVL Form - 118 - Revised 8/11

Original File Copy-Plaintiff Copy-Defendant

AFFIDAVIT OF SERVICE

STATE OF NEVADA)

ss:

COUNTY OF CLARK)

Appellant, Plaintiff, Matthew Travis Houston, also Petitioner-
being duly sworn, says: That at all times herein affiant was and is over 18

years of age, not a party to nor interested in the proceeding in which this affidavit is
made. That affiant received 1 copy(ies) of the Summons and Complaint, legally on
the 17th day of October, 2022, and served the same on the 1st 3rd day of November
2022 by:

(Affiant must complete the appropriate paragraph)

1. Delivering and leaving a copy with the Defendant _____ at (state address) _____
2. Serving the Defendant _____ by personally delivering and leaving a copy with
_____, a person of suitable age and discretion residing at the Defendant's usual
place of abode located at (state address) _____

[Use paragraph 3 for service upon agent, completing (a) or (b)]

3. Serving the Defendant _____ by personally ^{mailing a second} ~~delivering and leaving a copy at~~ to:
(state address) _____
CLARK COUNTY SHERIFF
PO BOX 553220

(a) With CIVIL PROCESS SECTION, LAS VEGAS, NV 89155-3220 an agent lawfully designated by statute to accept
service of process; SEE DOC 507 No. 2547949

(b) With _____, pursuant to NRS 14.020 as a person of suitable age and
discretion at the above address, which address is the address of the
resident agent as shown on the current certificate of designation filed with
the Secretary of State.

4. Personally depositing a copy in a mail box of the United States Post Office,
enclosed in a sealed envelope, postage prepaid (Check appropriate method):

- ☐ Ordinary mail
☒ Certified mail, return receipt requested
☐ Registered mail, return receipt requested

addressed to the Defendant Mr. Phillips at Defendant's last known address which is

(state address) CRAIG MUELLER AND ASSOCIATES
ATTN: LARRY PHILLIPS AND KELSEY BERNSTEIN
808 SOUTH 7TH STREET P: 702-382-1200
LAS VEGAS, NV 89101

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

EXECUTED this 23rd day of November, 20 22.

Matthew Travis Houston
Signature of person making service

INMATE REQUEST FORM

3.A-34

1.) INMATE NAME MATTHEW TRAVIS HOUSTON DOC # 1210652 2.) HOUSING UNIT 3A-34 3.) DATE November 15, 2022

4.) REQUEST FORM TO (CHECK BOX) ☐ MENTAL HEALTH ☐ CANTEEN
☐ CASEWORKER ☐ MEDICAL ☒ LAW LIBRARY ☐ DENTAL
☐ EDUCATION ☐ VISITING ☐ SHIFT COMMAND
☐ LAUNDRY ☐ PROPERTY ROOM ☒ OTHER MAIL-ROOM

5.) NAME OF INDIVIDUAL TO CONTACT SUPERVISOR AND LAW CLERK FOR STAMPED RECEIPT

6.) REQUEST (PRINT BELOW) I WAS ABLE TO OBTAIN PROCEDURE FOR SENDING CERTIFIED LEGAL MAIL AS WAS INFORMED BY CIO SAINT THAT IT IS BEST TO ATTACH A POC-3012 "KITE" WITH MY DOCUMENTS FOR PROPER NOTICE THAT MY DOCUMENTS HAVE BEEN MAILED VIA USPS "CERTIFIED" AS IT IS ABSOLUTELY IMPERATIVE TO THE JUSTICE THAT I KNOW THAT THIS RESPONDANT'S ADDRESS IS LEGITIMATE. I MOST SINCERELY APPRECIATE YOUR RESPONSE AS TO IF THIS ATTACHED MAIL WAS SENT CERTIFIED.

7.) INMATE SIGNATURE Matthew Travis Houston DOC # 1210652

8.) RECEIVING STAFF SIGNATURE _____ DATE _____

9.) RESPONSE TO INMATE

CERTIFIED MAIL : 702109150 0000 8017 5924 ARTICLE NO. (9590 9402 7095 1251 4617 20) TRACK
CERTIFIED FEE : \$4.00 PROCESSED & SENT 03 NOV 2022
RETURN RECEIPT 3.25
POSTAGE 60 * ADDRESS TO: CRAIG MURPHY ASSOCIATES ATTN: L. PHILLIPS
Total \$7.85 BRASS CLIP # 2549718
608 SOUTH 7TH ST. W. NV 89101

10.) RESPONDING STAFF SIGNATURE MAILROOM DATE 03 NOV 2022

DOC - 3012 (REV. 7/01)

STATE OF NEVADA
DEPARTMENT OF CORRECTIONS
INMATE ACCOUNT TRANSACTION
REQUEST

Date: 11-15-22 **2549718**

To: Inmate services

I hereby authorize my account to be charged in the amount
of \$.....(.....Dollars).

Please pay to: State

Signature: [Signature]

Print name: [Name]

ID No. 11111111 Institution 111111

Approved by: [Signature]

Transfer	Purchase Order	Postage	Other
----------	----------------	---------	-------

White
Carbon
Pink

Inmate Services
Institution Copy
Inmate

DOC 509 (Rev.2/06)

DEMAND NOTE TO LARRY PHILLIPS

STATE OF NEVADA
DEPARTMENT OF CORRECTIONS
INMATE ACCOUNT TRANSACTION
REQUEST

Date: 11-15-22 **2549719**

To: Inmate services

I hereby authorize my account to be charged in the amount
of \$.....(.....Dollars).

Please pay to: State

Signature: [Signature]

Print name: [Name]

ID No. 11111111 Institution 111111

Approved by: [Signature]

Transfer	Purchase Order	Postage	Other
----------	----------------	---------	-------

White
Carbon
Pink

Inmate Services
Institution Copy
Inmate

DOC 509 (Rev.2/06)

JUSTICE COURT COMP. LARRY PHILLIPS

(15)

REV. MATTHEW TRAVIS HOUSTON, CHTD
NO P210652
PO Box 65c
Indian Springs NV 89070-0650

PO Box 551601
CHAMBERS OF THE HON. ADRIANA ESCOBAR
FWD: Law Clerk, Department 14
CC: Kimberly Gutierrez
EIGHTH JUDICIAL DISTRICT COURT
2cc. Lewis Avenue
Las Vegas, NV

Case No A-22-859817-C
#MET60
ABA NO 04662784

89155-1601

HIGH DESERT STATE PRISON
APR 17 2023
UNIT 3 A/B

Matthew Travis Houston
PO Box 650
Indian Springs, Nevada 89070-0650
Telephone No.: (702) 879-6789

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Date: November 1st, 2022

CRAIG MUELLER AND ASSOCIATES
ATTN: LARRY PHILLIPS, Nevada Bar # 7138
808 SOUTH 7TH STREET
LAS VEGAS, Nevada 89101

Dear Mr. Phillips:

This letter is a demand for payment in the amount of \$ 10,001.⁰⁰.

I believe I am owed this amount as a result of the following facts and circumstances: You have failed to refund my inmate account.
In April-May-June of 2022, last summer I had
requested to CRAIG MUELLER his assistance in
acting as a POWER OF ATTORNEY and also the
preparation of legal work not limited to that of a
petition for a writ of habeas corpus to which you billed
my checking account \$10,000.⁰⁰ than caused emotional distress.

You are hereby informed that you have ten (10) days from the date of this letter to pay the demanded amount or to make a satisfactory arrangement with me to fully resolve this matter. In the event this matter is not resolved to my satisfaction, then it is my intent to file an action in Small Claims Court where I will also request that you pay the costs of suit associated with having the matter heard by the court. Please guide yourself accordingly.

Sincerely,

Signed: Matthew Travis Houston
Print: Matthew Travis Houston

Please see enclosed revised Small Claims Complaint along with revised Application to Proceed in Forma Pauperis. Please completely fill out the enclosed documents and submit to the Court. Once the Court receives these two documents, the Court will process and return to you with service packets and complete instructions on how to proceed. The Small Claims Instruction Sheet enclosed is for your reference.

Thank you,

Small Claims Department

RESPONSE : 11/11/2022

THANK YOU TO THE CLERK(S). JUST
FOR THE RECORD, THE INCLUDED ~~2~~ NOTICE
OF DEMAND TO THE DEFENDANT, LARRY
PHILLIPS, NEVADA BAR NO. 7138 IS A
HAND-WRITTEN COPY, AS THERE IS A DELAY
IN NDOC SENDING LEGAL MAIL "CERTIFIED"
I HAVE UTILIZED A DOC-3012 "KITE" TO
THE MAILROOM TO INFORM THE
DEFENDANTS WHO ARE WELL AWARE OF THEIR
STATUS OF DEFAULT. I SINCERELY
APPRECIATE YOUR HELP,

MATTHEW TRAVIS HOUSTON
No 1210652 @ HDSP

(18)

AAFW

Name: Matthew Travis HoustonAddress: PO Box 650City, State, Zip: Indian Springs, NV 89070-0650Phone: (702) 879-6789

Email: _____

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADAMATTHEW TRAVIS HOUSTON,
Plaintiff,

vs.

CRAIG MUELLER AND ASSOCIATES,
Defendant.CASE NO.: JC 22ACC 1793DEPT: 5-15-1TRIAL DATE: 02/01/2023
(February 1st, 2023)

Application to Proceed in Forma Pauperis

I am unable to pay the costs of prosecuting or defending this action. I request permission to proceed without paying costs or fees pursuant to NRS 12.015 based on the following:

1. **Public Assistance** includes Medicaid, Nevada Check Up, SNAP (food stamp assistance), TANF, Low-income energy assistance, Child Care & Development Fund assistance. Please indicate whether or not you receive one or more of the above listed benefits.
- ☐ Yes I receive one or more of the above listed benefits.
- ☒ No I do not receive any of the above listed benefits

2. **Household Members:** In my household there are 1 adults (over 18) and 0 children (under 18) for a total of 1 people.

3. **Income** includes employment (include tips/overtime), unemployment, retirement, pension, social security, child support. Please list all income for household member: (all numbers should be after taxes are taken out):

For each adult in the home, list net monthly income (after taxes):

My total income	\$	0
Household Adult #1 total income	\$	0
Household Adult #2 total income	\$	0
Household Adult #3 total income	\$	0
Household Adult #4 total income	\$	0
Household Adult #5 total income	\$	0
HOUSEHOLD TOTAL	\$	0

4. My basic monthly expense include: Fill out the chart below.

Rent / Mortgage	\$	0
Utilities (electric, gas, water, phone, other utilities)	\$	0
Food	\$	0
Child care	\$	0
Medical expenses (health insurance, co-pays, out of pocket expenses)	\$	0
Transportation (bus fare, car, gas, insurance)	\$	0
Other:	\$	0
TOTAL	\$	0

5. Other Compelling Reason. Explain why you cannot pay the filing fee.

I have been wrongfully convicted since December
BTH, 2021 since false arrest on July 14th, 2021
resulting in my extensive incarceration into NDOC.

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

DATED (month) November (day) 1, 2022.

Submitted By: (Signature) Matthew Travis Houston

Printed Name: Matthew Travis Houston

FOR COURT USE ONLY

Upon consideration of the movant's Application to Proceed in Forma Pauperis, and good cause appearing therefore,

☐ The Application to Proceed in Forma Pauperis is **GRANTED**. The applicant shall be permitted to proceed with fees and costs waived in this action as permitted by NRS 12.015.

☐ The Application to Proceed in Forma Pauperis is **DENIED** for the following reasons:
☐ The applicant is not indigent within the meaning of NRS 12.015
☐ The application was incomplete or not legible.

Date _____

Justice of the Peace/Clerk of Court _____

REV. M. T. HOUSTON, CHFD
Nº 1210652
PO Box 650
Indian Springs, NV
20070-0650

AGA Nº 04662724

PO Box 552511
JUSTICE COURT LAS VEGAS
200 LEWIS AVENUE
LAS VEGAS, NV
89155-2511

RECEIVED

LAS VEGAS JUSTICE COURT
CIVIL RECORDS

FEB 21 2023

291018301 0075

|||||

UNIT 3A/B
FEB 15 2023
HIGH DESERT STATE PRISON

1205

REV. MATTHEW TRAVIS HOUSTON, CH-2
NDOC No. 1210652

NDOC No. 1210652

॥ ॐ नमो भगवते वासुदेवाय ॥

PC Box 650

Indian Springs, NV 89070-0650

PO Box 551601

EIGHTH JUDICIAL DISTRICT COURT
CHAMBERS OF THE HON. DANIEL E. CHIE
Attorney Clerk of Department No. 7

AND Mrs. NANCY ALLEN
CHAMBERS of Phil. Attns. law Clerk in Department No. 3

1866 Lewis & Clark

五、

100

Q. Now, you said that you didn't know who the person was that was in the car with you, is that right?

Case No. A-23-865442-C

120

AND A-22-862155-

#REF500

435-791-7644
#AME100
AOL



246

72

**RENEWED
CERTIFICATE OF SERVICE BY MAILING**

I, Matthew Travis Houston hereby certify, pursuant to NRCP 5(b), that on this 16th day of December, 2022, I mailed a true and correct copy of the foregoing, "SUPPLEMENTAL COMPLAINT to Case No. (c) A.22.859815.C and A.17.758861.C" and FAIRLY, BY DEPOSITING TO ANTHONY M. GOLDBERG, M.D., M.D., DISABILITIES by depositing it in the High Desert State Prison, Legal Library, First-Class Postage, fully prepaid,

addressed as follows:

CRAIG MUELLER ASSOCIATES
800 S. 7th Street
Las Vegas, NV 89101

EDDC
200 LEWIS Avenue
Las Vegas, NV
89155-1601

JUSTICE COURT -
Las Vegas, NV
Post Office Box 650
200 Lewis Avenue
Las Vegas, NV
89155-2511

Office of the
Attorney General - Nevada
Attn: D. Ford
1500 E. Washington Avenue
Room 340
Las Vegas, NV
89101

Anthony M. Goldberg
2001 South Center Court
Las Vegas, NV
89124

CC: FILE

DATED: this 16th day of December, 2022

Matthew Travis Houston
Matthew Travis Houston #1210652
Plaintiff / In Propria Personam
Post Office box 650 [HDSP]
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:

PLEASE SEE ATTACHED EXHIBITS:
-- 1-16 --

23

JUSTICE COURT, LAS VEGAS TOWNSHIP Clark County, Nevada	DOCUMENT RETURN FORM
RETURN TO: Matthew Travis Houston #1210652	
The following documents are enclosed: Fee Waiver & Complaint	
☒ Your document(s) is being returned for the following reason(s): ☐ Wrong Court. ☐ Fees incorrect or missing. ☐ Additional Paperwork required. ☐ Incorrect Case Number / Name. ☐ Incorrect / Missing Information. ☐ Answer filed on ☐ Notice of Bankruptcy filed on ☐ Amount of principal on Default Judgment does not match amount on Complaint. ☐ Please fill in ALL money amounts EXCEPT the attorney fee area. " Total Judgment Amount " is not allowed. ☐ Leave attorney fees blank. ☐ Proof of Service needed. ☐ Please Submit a Default form (issued by clerk). ☐ Must file complete default package per LVJC Local Rule 33. ☐ Order of Dismissal has been issued pursuant to Justice Court Rules of Civil Procedure 41(e) or 4(i). ☐ A Voluntary Dismissal has already been filed on this case. ☐ Submission does not comply with Local Rule 33. ☐ Submission does not comply with Mandatory E-Filing of ALL Civil case documents. Starting August 1, 2011, pursuant to Supreme Court Order Amended Electronic Filing Rules and Las Vegas Justice Court Administrative Order 11-05, documents submitted on paper are being returned so that it/they may be electronically filed (E-File) with the Court. Documents must be filed through Odyssey E-File & Serve at http://efilenv.com for a charge of \$2.50 for each document. This fee is in addition to any applicable Court filing fees. You can review instructions on how to register for and use E-File & Serve at the Justice Court's website @ http://www.lasvegasjusticecourt.us/. Documents may be filed without an E-Filing fee at the Regional Justice Center. ☒ Other: Case number 22A001793 has been closed since February 01, 2023 in which a Fee Waiver was already previously filed. The Court cannot accept documents with multiple case numbers being listed or with writing all over the documents. Please seek legal assistance.	
By: (Clerk),	Date: August 16, 2023

LVJCCL Form -112 Revised 8/11

JC DEPARTMENT 1

CASE SUMMARY

CASE NO. 22A001793

Matthew Travis Houston #1210652, Plaintiff(s)	§	Location:	JC Department 1
vs.	§	Judicial Officer:	Graham, Elana Lee
Craig Mueller and Associates, State Bar of Nevada,	§	Filed on:	11/10/2022
Nevada Appeal Group, Kelsey Bernstein, ESQ et al.,	§	Case Number History:	
Defendant(s)			

CASE INFORMATION

Statistical Closures		Case Type:	Small Claims - General Individual Plaintiff
02/01/2023	Involuntary (statutory) Dismissal	Case Status:	02/01/2023 Closed
		Case Flags:	Fee Waiver Granted Inmate Filing Reassignment to Department 1

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	22A001793
Court	JC Department 1
Date Assigned	01/01/2023
Judicial Officer	Graham, Elana Lee

PARTY INFORMATION

Plaintiff	Houston #1210652, Matthew Travis	Pro Se
Defendant	Bernstein, Kelsey, ESQ	
	Craig Mueller and Associates	Mueller, Craig A, ESQ Retained 702-382-1200(W)
	Goldstein, Anthony M Removed: 01/09/2023 Dismissed	
	Nevada Appeal Group	
	Phillips, Larry, ESQ	
	State Bar of Nevada	
	Todd Leventhal and Associates Removed: 01/09/2023 Dismissed	

DATE

EVENTS & ORDERS OF THE COURT

INDEX

02/08/2023	 Affidavit Affidavit of Service
02/08/2023	 Affidavit Not Found Affidavit
02/01/2023	 Small Claims Individual (11:00 AM) (Judicial Officer: De La Garza, Melisa ;Location: RJC Courtroom 6D)

JC DEPARTMENT 1
CASE SUMMARY
CASE NO. 22A001793

Events: 11/10/2022 Small Claims Affidavit of Complaint - \$7,500.01 to \$10,000

MINUTES



Order

Order for Dismissal signed/filed in open court.

CV USJR Involuntary (statutory) Dismissal

Matter Heard;

Journal Entry Details:

Court proceedings were recorded using electronic sound recording equipment. Plaintiff present via telephone. Plaintiff sworn in. Court questions Craig Mueller if he is representing Plaintiff and Mr. Mueller asserts he does represent the Plaintiff. Mr. Mueller states the Plaintiff plead guilty to aggravated stalking in front of Judge Villani and presented his office with luminous paperwork and asked for assistance in getting a Writ of Habeas Corpus prepared. Plaintiff had attempted to do the Writ on his own with no success. Mr. Mueller states he hired outside Counsel to do some legal research and sent various correspondence to Plaintiff asking for additional information. Mr. Mueller asserts there is still about another 6 to 7 months before the deadline runs out on the Writ and still actively working on it. Court informs the Small Claims cannot give a Plaintiff money for an attorney or appoint an attorney. Court further notes the Plaintiff case in Small Claims is DENIED. Court Orders case dismissed due to improper venue. Order for Dismissal signed/filed in open court. ;

Parties Present: Attorney Mueller, Craig A, ESQ

Plaintiff Houston #1210652, Matthew Travis

02/01/2023 CV USJR Involuntary (statutory) Dismissal

02/01/2023 Order

Order for Dismissal signed/filed in open court.

01/31/2023 Small Claims Certificate of Mailing - Clerk

Party: Plaintiff Houston #1210652, Matthew Travis

Order Regarding Appointing Counsel

01/30/2023 Order

Order Denying Motion to Appoint Counsel

01/24/2023 Ex Parte

Ex Parte Emergency Declaration

01/24/2023 Motion

Motion to Appoint Counsel

01/18/2023 Memorandum of Costs and Disbursements

Memorandum of Costs and Disbursements

01/18/2023 Proof of Service

Proof of Service - Certified Mailed to Anthony Goldstein

01/09/2023 Small Claims Individual (11:00 AM) (Judicial Officer: Diefenbach, Lauren ;Location: RJC Courtroom 6B)

Events: 12/07/2022 Motion to Dismiss

Defendant's Anthony Goldstein's Motion to Dismiss

MINUTES



Order

Order Regarding Motion to Dismiss signed/filed in open Court.

Motion Granted;

Journal Entry Details:

JC DEPARTMENT 1
CASE SUMMARY
CASE NO. 22A001793

Court proceedings were recorded using electronic sound recording equipment. Plaintiff not present. Anthony Goldstein, Esq., Defendant, present via Bluejeans. Todd Leventhal present. Court notes it as informed the Plaintiff had not returned from a medical appoint and not present via telephone. Court further notes the Plaintiff's presence is not necessary for it to rule on the Defendant Anthony Goldstein's Motion to Dismiss. Todd Leventhal, Esq., states he would like to orally join the Motion to Dismiss as he does not know who the Plaintiff is. Motion to Dismiss by the Defendant - GRANTED with prejudice as to Todd Leventhal and Anthony Goldstein. Order Regarding Motion to Dismiss signed/filed in open Court. Copy of Order given to Mr. Leventhal in open court.;

*Parties Present: Defendant Todd Leventhal and Associates
Defendant Goldstein, Anthony M*

01/09/2023	 Order Order Regarding Motion to Dismiss signed/filed in open Court.
01/01/2023	Administrative Reassignment to Department 1 Case reassigned from Department 5 (Judge Cynthia Cruz)
12/12/2022	 Order Order for Telephonic Testimony
12/08/2022	 Order Order Regarding Motion to Dismiss
12/07/2022	 Motion to Dismiss Party: Defendant Goldstein, Anthony M Motion to Dismiss Small Claims Complaint
11/21/2022	 Small Claims Certificate of Mailing - Clerk Party: Plaintiff Houston #1210652, Matthew Travis Filed Copy of the Small Claims Complaint, Application to Proceed in Forma Pauperis/Order Granting Fee Waiver Application, and Order for Telephonic Testimony. Original Documents submitted and five (7) complete Service Packets with instructions.
11/10/2022	 Order Order for Telephonic Testimony
11/10/2022	Order to Proceed In Forma Pauperis Granted Party: Plaintiff Houston #1210652, Matthew Travis
11/10/2022	 Small Claims Affidavit of Complaint - \$7,500.01 to \$10,000 Small Claims Complaint \$10,001
11/10/2022	 Application to Proceed in Forma Pauperis - Fee Waiver Req Fee Waiver
11/10/2022	Start Time Tracking: JCRCP 93
11/10/2022	Start Time Tracking: JCRCP 41(e) - 5 years
11/10/2022	Start Time Tracking: JCRCP 41(e) - 2 years

DATE

FINANCIAL INFORMATION

Plaintiff Houston #1210652, Matthew Travis	
Total Charges	196.00
Total Payments and Credits	196.00

JC DEPARTMENT I
CASE SUMMARY
CASE No. 22A001793

	Balance Due as of 08/16/2023		0.00
11/10/2022	Charge	Plaintiff Houston #1210652, Matthew Travis	196.00
11/10/2022	Credit	Plaintiff Houston #1210652, Matthew Travis	(196.00)

**OFFICE OF THE SHERIFF
CLARK COUNTY DETENTION
CIVIL PROCESS SECTION**

MATTHEW TRAVIS HOUSTON)

PLAINTIFF)

vs)

CRAIG MUELLER AND ASSOCIATES)

DEFENDANT)

CASE No. 22A001793

SHERIFF CIVIL NO: 22007421

NOT FOUND AFFIDAVIT

STATE OF NEVADA)

) ss:

COUNTY OF CLARK)

E.P. BROWN, being duly sworn, deposes and says:

That he/she is a regularly appointed, qualified Deputy Constable of the said County of Clark, in the State of Nevada and over the age of twenty-one years, not a party to the action or related to either party, nor an attorney for a party, nor in any way interested in the within named action, and authorized to serve civil process by the laws of the State of Nevada, and competent to be a witness therein; that he/she and now is a citizen of the United States of America and of the State of Nevada and that he/she received the within stated civil process: SMALL CLAIMS COMPLAINT, SUMMONS AND ORDER TO APPEAR on 12/5/2022 at the hour of 2:00 PM.

That after due search and diligent inquiry throughout Clark County, State of Nevada, I was unable to effect service upon the said *NEVADA APPEAL GROUP* Defendant within Clark County, Nevada.

ATTEMPTS TO LOCATE:

Date: 12/8/2022 @ 10:10 AM - 714 S 4TH STREET LAS VEGAS, NV 89101

Attempted By: E.P. BROWN

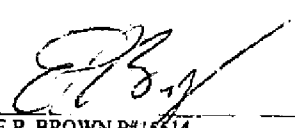
Service Type: UNABLE TO SERVE.

Notes: THIS IS NEVADA DEFENSE GROUP. NO NAMES ON SMALL CLAIM WORK AT THIS OFFICE

I, DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: December 13, 2022

Joseph M. Lombardo, Sheriff

By: 
E.P. BROWN P#15514
Deputy Constable

RECEIVED

AUG 07 2023

CLERK OF THE COURT

301 E. Clark Ave. #100 Las Vegas, NV 89101 (702) 455-5400

Matthew Houston
1240652
HOSP
PO Box 650
Inyan Springs, NV
89070-0650

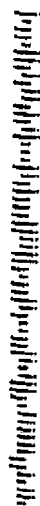
* legal mail *

CCF 3763

LAS VEGAS NV 890
19 MAY 2022PM 3 L

Regional Justice Center
S. Grierson, Clerk
200 Lewis Ave., 3rd Floor
Las Vegas, NV
~~8900204~~
89155-1160

BS101-630000



HIGH DESERT STATE PRISON
MAY 18 2022
UNIT 3 CID

Therefore, pursuant to the facts and the law stated herein, Defendant requests that his guilty plea be withdrawn, as he is in fact the Plaintiff-in-Error.

Dated this 17th day of May, 2022.

Respectfully Submitted,



It is affirmed pursuant to NRS 2398.030 that the preceding document does NOT contain the social security number of anybody.

CERTIFICATE OF SERVICE BY MAILING

I, Matthew Travis Houston, hereby certify, pursuant to NRC 5(b), that on this 17th day of May, 2022, I mailed a true and correct copy of the foregoing EMERGENCY MOTION TO WITHDRAW PLEA, by depositing it in the High Derest State Prison legal mail service provided through the Law Library, with First class Postage prepaid, and addressed to the following:

clerk S. Grierson
200 Lewis Ave, 3rd Floor
Las Vegas, NV
89155-1160

CHAMBERS OF THE HON.
JENNIFER L. G. SCHWARTZ

CC: File

Dated this 17th day of May, 2022, Renewed September 03, 2023.

BY: Matthew Travis Houston
Matthew Travis Houston #1210652

10

Rev. MATTHEW TRAVIS HOUSTON, CHD

MDoc # 1210652

HDSP

Po Box 650

Indian Springs, NV

89070-0650

BS# 2643367



USPS POSTAGE
02 4M
ZIP 89101 5011.15
0000391000 SEP 07 2023

RECEIVED

SEP 11 2023

CLERK OF THE COURT

RECEIVED

SEP 11 2023

CLERK OF THE COURT

Attn: Law Clerk of Dept # 174
EIGHTH JUDICIAL DISTRICT COURT
CHAMBERS OF THE HON. JENNIFER L.G. SCHWARTZ
200 Lewis Avenue
Las Vegas, NV

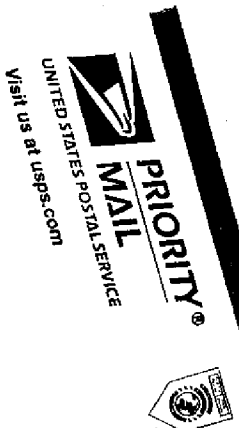
89155

3762

C-21-357927-1

Case # A-22-853203-W

ABA ID No. 04662784



Label 1079, January 2008

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

Supreme Court No. 84886
District Court Case No. C357927

FILED

SEP 21 2023

Elizabeth A. Brown
CLERK OF COURT

CLERK'S CERTIFICATE

STATE OF NEVADA, ss.

I, Elizabeth A. Brown, the duly appointed and qualified Clerk of the Supreme Court of the State of Nevada, do hereby certify that the following is a full, true and correct copy of the Judgment in this matter.

JUDGMENT

The court being fully advised in the premises and the law, it is now ordered, adjudged and decreed, as follows:

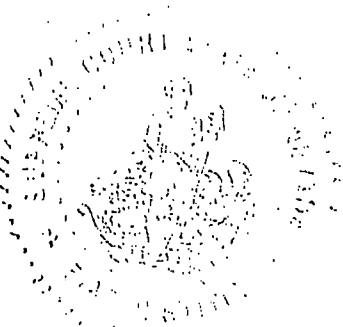
""ORDER the judgment of the district court AFFIRMED in part and DISMISSED in part.""

Judgment, as quoted above, entered this 27th day of July, 2023.

IN WITNESS WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court at my Office in Carson City, Nevada this September 20, 2023.

Elizabeth A. Brown, Supreme Court Clerk

By: Elyse Hooper
Administrative Assistant



C-21-357927-1
CCJA
NV Supreme Court Clerks Certificate/Judge
5047714



IN THE COURT OF APPEALS OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

No. 84886-COA

FILED

JUL 27 2023

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK

ORDER AFFIRMING IN PART AND DISMISSING IN PART

Matthew Travis Houston appeals from an order of the district court denying a motion to withdraw guilty plea filed on April 13, 2022, a motion requesting to suppress the sentencing hearing filed on April 2, 2022, a motion requesting a hearing and release on to intensive supervision filed on April 6, 2022, and a motion requesting an appearance by telephone or video conference filed on April 18, 2022. Eighth Judicial District Court, Clark County; Elham Roohani, Judge.

In his motion to withdraw guilty plea, Houston alleged persons stole his dogs, contended he suffers from battered person syndrome and was a victim in a mass shooting incident, contended that the district court and other persons disrespected him, and stated that he did not place phone calls to the victims in this matter. Houston's motion challenges his judgment of conviction, and he does not allege that he meets the requirements of NRS 34.724(3). Therefore, Houston's motion should be construed as a postconviction petition for a writ of habeas corpus in accordance with *Harris v. State*, 130 Nev. 435, 448-49, 329 P.3d 619, 628 (2014). However, Houston's claims were outside the scope of claims permissible in a postconviction petition for a writ of habeas corpus arising from a guilty plea.

See NRS 34.810(1)(a); *Gonzales v. State*, 137 Nev. 398, 403, 492 P.3d 556, 562 (2021). Therefore, we conclude that the district court did not err by denying the motion.

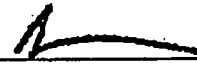
Houston also appeals from the district court's denial of his motion requesting to suppress the sentencing hearing, motion requesting a hearing and release on to intensive supervision, and motion requesting an appearance by telephone or video conference. However, no statute or court rule permits an appeal from an order denying these motions. Therefore, we lack jurisdiction to consider this portion of Houston's appeal. See *Castillo v. State*, 106 Nev. 349, 352, 792 P.2d 1133, 1135 (1990) (explaining the right to appeal is statutory; where no statute or court rule provides for an appeal, no right to appeal exists). Accordingly, we dismiss this portion of Houston's appeal.

Houston appears to argue on appeal that the district court was biased against him. We conclude that relief is unwarranted because Houston has not demonstrated that the district court's denial of Houston's motions was based on knowledge acquired outside of the proceedings and the decision does not otherwise reflect "a deep-seated favoritism or antagonism that would make fair judgment impossible." *Canarelli v. Eighth Judicial Dist. Court*, 138 Nev. 104, 107, 506 P.3d 334, 337 (2022) (internal quotation marks omitted) (explaining that unless an alleged bias has its origins in an extrajudicial source, disqualification is unwarranted absent a showing that the judge formed an opinion based on facts introduced during official judicial proceedings and which reflects deep-seated favoritism or antagonism that would render fair judgment impossible); see *In re Petition to Recall Dunleavy*, 104 Nev. 784, 789, 769 P.2d 1271, 1275 (1988) (providing that rulings made during official judicial

proceedings generally “do not establish legally cognizable grounds for disqualification”); *see also Rivero v. Rivero*, 125 Nev. 410, 439, 216 P.3d 213, 233 (2009) (stating that the burden is on the party asserting bias to establish sufficient factual grounds for disqualification), *overruled on other grounds by Romano v. Romano*, 138 Nev. 1, 6, 501 P.3d 980, 984 (2022). Therefore, Houston is not entitled to relief based on this claim. Accordingly, we

ORDER the judgment of the district court AFFIRMED in part and DISMISSED in part.¹


_____, C.J.
Gibbons


_____, J.
Bulla


_____, J.
Westbrook

cc: Chief Judge, Eighth Judicial District Court
Eighth Judicial District Court, Department 11
Matthew Travis Houston
Attorney General/Carson City
Clark County District Attorney
Eighth District Court Clerk

¹We have reviewed the document that Houston filed with this court on July 25, 2023, and we conclude no relief is warranted.

Further, having reviewed all of the documents Houston has filed in this matter, to the extent Houston attempts to present claims or facts in those submissions which were not previously presented in the proceedings below, we decline to consider them in the first instance. *See McNelton v. State*, 115 Nev. 396, 415-16, 990 P.2d 1263, 1275-76 (1999).

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

Supreme Court No. 84886
District Court Case No. C357927

REMITTITUR

TO: Steven D. Grierson, Eighth District Court Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: September 20, 2023

Elizabeth A. Brown, Clerk of Court

By: Elyse Hooper
Administrative Assistant

cc (without enclosures):

Hon. Elham Roohani, District Judge
Matthew Travis Houston
Clark County District Attorney \ Alexander G. Chen\ John T. Afshar

RECEIPT FOR REMITTITUR

Received of Elizabeth A. Brown, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on SEP 21 2023.

HEATHER UNGERMANN

Deputy District Court Clerk

RECEIVED
APPEALS
SEP 21 2023

CLERK OF THE COURT

Heather L. Smith
CLERK OF THE COURT

OPI
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
TIANNA JEFFERSON
Deputy District Attorney
Nevada Bar #015751
200 Lewis Avenue
Las Vegas, Nevada, 89155-2212
(702) 671-2500
Attorney for Plaintiff

**DISTRICT COURT
CLARK COUNTY, NEVADA**

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW HOUSTON,
aka, Matthew Travis Houston, #7035801

Defendant.

CASE NO. C-21-357927-1

DEPT NO. XVII

**ORDER FOR PRODUCTION OF INMATE
MATTHEW HOUSTON, aka, Matthew Travis Houston, BAC #1210652**

**DATE OF HEARING: October 25, 2023
TIME OF HEARING: 9:00 AM**

TO: NEVADA DEPARTMENT OF CORRECTIONS; and

TO: KEVIN MCMAHILL, Sheriff of Clark County, Nevada:

Upon the ex parte application of THE STATE OF NEVADA, Plaintiff, by STEVEN B. WOLFSON, District Attorney, through TIANNA JEFFERSON, Deputy District Attorney, and good cause appearing therefor,

IT IS HEREBY ORDERED that NEVADA DEPARTMENT OF CORRECTIONS shall be, and is, hereby directed to produce MATTHEW HOUSTON, aka, Matthew Travis Houston, Defendant in Case Number C-21-357927-1, wherein THE STATE OF NEVADA is the Plaintiff, inasmuch as the said MATTHEW HOUSTON, aka, Matthew Travis Houston is currently incarcerated in the NEVADA DEPARTMENT OF CORRECTIONS located in Clark County, Nevada, and his presence will be required in Las Vegas, Nevada, commencing

1 on October 25, 2023, at the hour of 9:00 o'clock AM and continuing until completion of the
2 prosecution's case against the said Defendant.

3 IT IS FURTHER ORDERED that KEVIN MCMAHILL, Sheriff of Clark County,
4 Nevada, shall accept and retain custody of the said MATTHEW HOUSTON, aka, Matthew
5 Travis Houston in the Clark County Detention Center, Las Vegas, Nevada, pending
6 completion of said matter in Clark County, or until the further Order of this Court; or in the
7 alternative shall make all arrangements for the transportation of the said MATTHEW
8 HOUSTON, aka, Matthew Travis Houston to and from the Nevada Department of Corrections
9 facility which are necessary to insure the MATTHEW HOUSTON, aka, Matthew Travis
10 Houston's appearance in Clark County pending completion of said matter, or until further
11 Order of this Court.

12 Dated this 5th day of October, 2023

13 
14 DISTRICT JUDGE

15 56B 4DC B3F5 F841
16 Jennifer Schwartz
District Court Judge

17 STEVEN B. WOLFSON
18 Clark County District Attorney
Nevada Bar #001565

19 BY 
20

21 TIANNA JEFFERSON
22 Deputy District Attorney
23 Nevada Bar #015751
24
25
26
27

28 21CR019840/dmr/L4

1 **CSERV**

2
3 **DISTRICT COURT**
4 **CLARK COUNTY, NEVADA**

5
6 State of Nevada

CASE NO: C-21-357927-1

7 vs

DEPT. NO. Department 17

8 Matthew Houston
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order for Production of Inmate was served via the court's electronic
13 eFile system to all recipients registered for e-Service on the above entitled case as listed
below:

14 Service Date: 10/5/2023

15 G. Cox

Coxgd@clarkcountynv.gov

16 Ben Little

Benard.Little@ClarkCountyNV.gov

17 Clark County District Attorney's Office

PDmotions@clarkcountyda.com

18 Alexis Duecker

alexis@amdlawlv.com

19 Nicole Walker

nicole.walker@clarkcountynv.gov



**EIGHTH JUDICIAL DISTRICT COURT
CLERK OF THE COURT**

REGIONAL JUSTICE CENTER
200 LEWIS AVENUE, 3rd FL.
LAS VEGAS, NEVADA 89155-1160
(702) 671-4554

Steven D. Grierson
Clerk of the Court

Anntoinette Naumec-Miller
Court Division Administrator

October 05, 2023

Attorney: Alexis M. Duecker
AMD Law PLLC
Alexis M Duecker Esq
8687 W Sahara Ave Ste 201
Las Vegas NV 89117

Case Number: C-21-357927-1
Department: Department 17

Defendant: Matthew Houston

Attached are pleadings received by the Office of the District Court Clerk which are being forwarded to your office pursuant to Rule 3.70.

Pleadings: **Response To Findings Of Facts And Conclusion Of Law**

Rule 3.70. Papers which May Not be Filed

Except as may be required by the provisions of NRS 34.730 to 34.830, inclusive, all motions, petitions, pleadings or other papers delivered to the clerk of the court by a defendant who has counsel of record will not be filed but must be marked with the date received and a copy forwarded to the attorney for such consideration as counsel deems appropriate. This rule does not apply to applications made pursuant to Rule 7.40(b)(2)(ii).

Cordially yours,
DC Criminal Desk # 7
Deputy Clerk of the Court

REV. MATTHEW TRAVIS HOUSTON, CHTD

H.D.S.P. No. 1210652

P.O. Box 650

Indian Springs, NV 89407-0650

United States Navy M.E.P.S. Veteran, Delayed Entry Program 2002

Member of the American Bar Association (retired)

ABA No. 04662784

DISTRICT COURT

CLARK COUNTY, NEVADA

CASE NO.: A-22-853203-W
DEPARTMENT No. 17

MATTHEW TRAVIS HOUSTON,

Plaintiff / Plaintiff-in-error
(petitioner-appellant),

CASE NO.: A-17-758861-C

DEPT No.: 28 and 29

-vs-

CASE NO.: C-21-357927-1

CALVIN JOHNSON ET AL.

MANDALAY BAY RESORT AND CASINO

D/B/A MANDALAY BAY CORP ET AL.

THE STATE OF NEVADA, ETAL

DEPT No.: XI

PART III OF

Defendants/Respondant(s)

PERSONAL RESTRAINT PETITION,

RESPONSE TO "FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FILED SEPTEMBER 06, 2023; EMERGENCY NOTICE OF APPEAL AND CONTINUED/RENEWED

RESPONSE TO "ORDER GRANTING IN PART, DENYING"

IN PART DEFENDANT'S PRO PER MOTION

TO DISMISS COUNSEL" FROM 2/1/2022; AS A

~~HEARING REQUESTED~~

~~TIME 11:30 AM~~

BRANDEIS BRIEF

"HEARING REQUESTED"

PLEASE TAKE NOTICE that it is asked of this court,

"why did the Plaintiff-in-error have to become wrongfully

convicted to Fine Benard Little?" Mr. Little submitted

his MOTION TO WITHDRAW AS COUNSEL on October 5th,

2021 and during that time a pro se Motion TO DISMISS the

frivolous charges was submitted to the clerk. The petitioner-

appellant is in opposition to "the state of being without legal

significance" of Judge Tierra Jones especially because he still

has not been provided the name of the "substitute judge"

who appointed Anthony M. Goldstein to properly withdraw petitioner-

appellant's VOIDED guilty plea. This dereliction of duty has caused

nothing more than a miscarriage of justice, adding insult to injury, while

defaming the character Page Number: 1 of an innocent man.

CLERK OF THE COURT

MAR 29 2022

RECEIVED

STATEMENT OF FACTS: Kidnapped from his home in

1 Iowa, On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter "Petitioner-Appellant")
2 was abducted from his hotel room at the Best Western located at [REDACTED] 3041
3 St. Rose Parkway in Henderson, Nevada, as he was not served with any sort of
4 summons or WARRANT, nor was told or read that he had any kind of rights. This
5 false arrest prevented Petitioner-Appellant from attending his appointment the very
6 next day at Nevada Retina Specialists, with Dr. Tyson Ward on July 15, 2021, while
7 this continued imprisonment of his person also prevented him from attending his medical
8 disability rating in Reno, Nevada, on August 15, 2021, with Dr. Dwagleri. Both appointments
9 of which had been scheduled by the abductors, SEDAWICK's Dianne Ferrante, and her
10 alleged supervisor, Rosemarie McMorris-Alexander, as was the booking of his room.
11
12 The Petitioner-Appellant's attempt at release from CENIC was intended so that he could
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J. Wood
14 and Bernard Little, provided misinformation regarding the lack of a directly-related "City Jail
15 Detainer Hold". Counsel had told Petitioner-Appellant, all the while coercing his client into a
16 potential release from custody, that he "did not see a detainer hold" when, in fact, there was.
17 This coercion of the client by his previous representation created a second double-jeopardy -
18 in LAS VEGAS MUNICIPAL COURT #1248354A + #C1237802A; with the first being by J. Wood
19 in the EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-035713. A. Goldstein never visited
20 Mr. Houston. These traumatic events are a cruel and unusual punishment being inflicted upon an abused
21 and innocent man, who was forced into an involuntary relocation, with unnecessary hardships
22 causing the eviction of his law office located at 435 South Lion Street #927, in Iowa
23 City, Iowa (52240), \$36.5 million of property damage and the destruction of his K-9(s).
24 Due to crimes both civil and criminal, not to mention the willful omissions of Rosemarie
25 McMorris-Alexander and Dianne Ferrante, SEDAWICK and the prosecutions' most unlawful use
26 of overreaching tactics ~~in~~ their exploitation of the innocent man has put the Petitioner-Appellant
27 into an unmanageable state of duress, homelessness, and extensive incarceration. Not at any
28 time ~~did~~ Mr. Houston make any threats or acts of harassment, extortion or
29 aggravated stalking towards any of the parties in Mr. Houston's cases or anybody
30 else. It is in FACT Mr. Houston ~~is~~ the victim of crime.



PERSONAL RESTRAINT PETITION,
(and now continued)
Page No. 28 of "PETITION FOR A WRIT OF HABEAS
CORPUS"
AND Letter of Motion To:



CLARK COUNTY COURTS
EIGHTH JUDICIAL DISTRICT COURT
LAS VEGAS TOWNSHIP JUSTICE COURT

REGIONAL JUSTICE CENTER
200 LEWIS AVENUE
LAS VEGAS, NEVADA 89155
(702) 671-4528

Steven D. Grierson
Clerk of the Court

PLEASE TAKE NOTICE THAT THE ORIGINAL
PETITION FOR POST-CONVICTION RELIEF WAS
PREPARED AS PART OF "DIRECT APPEAL"

March 7, 2022

AND FILED AS "NOTICE OF APPEAL" HOWEVER,
THIS "COMPLETE" DOCUMENT IS TO BE

Re: Case No: N/A SUBMITTED AS AN EXHIBIT 1 IN
THE RELATED CASE NUMBER TO BE ASSIGNED BY

Dear: Matthew Travis Houston: THE CLERK TITLED:

Matthew Travis Houston vs. Gene Porter, et al

This office is in receipt of Petition for Writ of Habeas Corpus. We are unable to process for
the reason(s) stated below.

which is to be JOINDER TO A-17-758861-C.

- ☒ Filing fee in the sum of \$270.00 is required by money order, cashier's check, or personal check (must be pre-printed).
- ☐ Document(s) cannot be filed as presented. Please refer to our website www.clarkcountycourts.us for the proper paperwork to file.
- ☐ Please contact the Legal Aid Office for further assistance (702)386-1070 or civillawselfhelpcenter.org

- ☐ Other PAGE NUMBER 29 is to be filed by
petitioner, plaintiff in way too many FEDERAL JURISDICTIONS.
TO INSURE THAT THE DOCUMENTS ARE PROPERLY PROCESSED, PLEASE RETURN
THIS LETTER WHEN THE REQUESTED ITEMS ARE RETURNED TO US.

Sincerely,
Clerk of the Court
#56

Deputy Clerk, Deputy

RECEIVED
MAR 29 2022
CLERK OF THE COURT

TO the clerk: 28 pages total... March 10th, 2022

The next 20 pages is ~~are~~ my original petition,
followed an application to proceed in forma
pauperis. I would like that also on the
record for my pro se 3rd party personal injury
case No. A-17-758861-C. Thank you,

X. Matthew Travis Houston

28

1 Perhaps a cause of this neglect of duty is the fact
2 that there are other objective factors showing both
3 cause and prejudice as there is much more in this
4 case to blame besides bad lawyering. Additionally, the
5 claim of ineffective aid of counsel was reinforced by the
6 Supreme Court of Nevada's dismissal of DIRECT APPEAL
7 No. 84281 on March 10th, 2022. Had either Anthony
8 M. Goldstein, Jeremy Wood, Benard Little or the attorney
9 from the cases in Las Vegas Municipal Court adhered to
10 any sort of principle than the petitioner-appellant
11 would not have been as prejudiced.

12 Primarily, it is the fact that the judge, prosecution
13 and alleged "victim" in this case are females, causing a
14 sexist bias against the petitioner-appellant who had already, while
15 in a state of trauma been subjected to a double-jeopardy.
16 Not only was petitioner-appellant made victim of sexist
17 bigotry, but he became more of the scapegoat to the evil forces of
18 stereotypical racism after being told by Benard Little that "because
19 he was white, he would not qualify for aid from the Bail Bond Project."
20 Social worker Cassandra Diez, also from the Clark County
21 Public Defender's office, was also a hindrance to justice
22 when she had informed petitioner-appellant that "it would be a
23 conflict of interest if [petitioner-appellant] ^{-you-} authorized Benard
24 Little for someone from their office to act as a POWER
25 OF ATTORNEY so that [petitioner-appellant] ^{-you-} could have the
26 overly-inflated bond paid in full." But why would any of that even
27 matter to the social worker who would not accept complete
28 medical records from all of the petitioner-appellant's team of doctors?

1 PLEASE TAKE NOTICE that it is asked of this court,
2 "is there a state wide conspiracy to conceal the truth
3 about the exploitation of the injured worker(s) from the
4 citizens of Nevada?" There surely must be in the case(s)
5 of Matthew Travis Houston.

6 The temerity of dispute resolution has escalated into the most
7 extreme sort of prejudice, which has been swept under the
8 rug by those individuals causing a broken system. In this
9 case involving Daniel Schwartz, with potential organized criminal
10 operations possibly involving Scott Poisson in the State of Florida,
11 and Alexis Plunkett out of the State of Ohio, the theory of
12 of a conspiracy causing legal, medical and judicial malpractice
13 against the Plaintiff-in-error has been further validated externally
14 to the now dismissed counsel with additional shady characters including
15 but not limited to: Karen Schwartz, Lina Sakalauskas, Gene Porter and
16 both David Jones and Tierra Danielle Jones. External to the
17 procedural errors causing this illegal incarceration is the fact that
18 big business was able to coerce LVMPD into acting as a modern
19 day Gestapo. Therefore it is asked to this court,

20 "a conspiracy is possible... is it not?" In fact, it
21 is no conspiracy that Sedgwick's interest off of the petitioner-
22 appellant is making quite a bit of money when not having to
23 pay the injured worker(s) their legally and rightfully
24 entitled benefits. (Now if you please skip ahead to page 49-55) You
25 will PLEASE TAKE NOTICE of this now amended:

26 "EMERGENCY OPPOSITION OF REMAND

27 AND MOTION TO DISMISS No. C-21-357927-1

28 AND EXHONCRATE
AND EXONORATE THE PETITIONER-APPELLANT?

Page Number 3

(See pages 49-55) ←

P. 34-now 80-86 ←

No. 1210652 @ H.D.S.P.
P.O. Box 650
Indian Springs, NV 89070-0650

1 To date, the Appellant's "PETITION FOR JUDICIAL REVIEW OF
2 THE EVENTS OF DECEMBER 6th, 2021" has been ignored by the
3 courts, even before the illegal arrest of the petitioner-appellant
4 on July 14th, 2021 because judicial ineptitude and procedural
5 mishandlements ought NEVER happen. However, due to particular
6 individuals acts in temerity and carelessness, these errors throw
7 monkeywrenches into particular parts of the machine, therefore
8 preventing the lawful turnings in the wheels of justice from working
9 towards the forces of good, and all that it is of. It is hereby
10 asked to this court, "are these most cruel and inhumane injustices to be
11 accepted by our judicial system and ^{the} people of the State of Nevada?"
12 It was asked by the most falsely accused Appellant, (OFFICIALLY before
13 See # → the 13th of October, 2021) that this case be opposed and completely dismissed,
14 page 49 as proven by the original motion's pages "1-6" which were put on record
15 by the clerk when they were stamped "RECEIVED OCT 2021 CLERK # 49-56
16 OF COURT". The originals are at the offices of Bernard Little, et al
17 who neglected their duties in providing this court with truth, contributing to
18 malpractice and is an additional cause of this wrongful conviction. This error
19 shows the tendency of judicial officers of Las Vegas to parade the
20 elements of oppression and facism. As a result, the Appellant prays
21 that prosecutorial malice, misconduct, wanton disregard and careless neglect
22 be lessened, if not completely eliminated while reading of the observations
23 and the theory of District Attorney Mr. Tim Garrison who is,
24 most unfortunately no longer with us. May he provide this court
25 with motivation in a reminder to all of the call of duty in
26 encouragement to unhinder, repair and more equally balance the
27 scale of justice in the community of Lost Wages, Nevada
28 that is still part of the good 'ol' United States of America:

Page Number 4

Interview With District Attorney Jim Garrison

as he is clearly in opposition to government interference:

I was with the artillery supporting the division that took Dachau; I arrived there the day after it was taken, when bulldozers were making pyramids of human bodies outside the camp. What I saw there has haunted me ever since. Because the law is my profession, I've always wondered about the judges throughout Germany who sentenced men to jail for picking pockets at a time when their own government was jerking gold from the teeth of men murdered in gas chambers. I'm concerned about all of this because it isn't a German phenomenon; it's a human phenomenon. It can happen here, because there has been no change and there has been no progress and there has been no increase of understanding on the part of men for their fellow man.

What worries me deeply, and I have seen it exemplified in this case, is that we in America are in great danger of slowly evolving into a proto-facist state. It will be a ~~different~~ different kind of facist state from the one the Germans evolved; theirs grew out of depression and promised bread and work, while ours, curiously enough, seems to be emerging from prosperity. But in the final analysis, it's based on power and on the inability to put human goals and human conscience above the dictates of the state. Its origins can be traced in the tremendous

P.O. Box 650
Indian Springs, NV 89070-0650

1 war machine we've built since 1945, the "military-
2 industrial complex" that Eisenhower vainly warned
3 us about, which now dominates every aspect of our
4 life. The power of the states and Congress has
5 gradually been abandoned to the Executive Department,
6 because of war conditions; and we've seen the
7 creation of an arrogant, swollen bureaucratic complex
8 totally unfettered by the checks and balances of
9 the Constitution.

10
11 In a very real and terrifying sense, our Government
12 is the CIA and the Pentagon, with Congress reduced
13 to a debating society. Of course, you can't spot
14 this trend to facism by casually looking around. You
15 can't look for such familiar signs as the swastikas,
16 because they won't be there. We won't build
17 Dachaus and Auschwitzes; the clever manipulation of
18 the mass media is creating a concentration camp of the
19 mind that promises to be far more effective in keeping
20 the populace in line. We're not going to wake up one
21 morning and suddenly find ourselves in gray uniforms
22 goose-stepping off to work. But this isn't the test.
23 The test is: What happens to the individual who
24 dissents? In Nazi Germany he was physically
25 destroyed; here, the process is more subtle,
26 but the end results can be the same.

1 I've learned enough about the machinations of the
2 CIA in the past year to know that this is no
3 longer the dream world America I once believed
4 in. The imperatives of the population explosion,
5 which inevitably will lessen our belief in the
6 sanctity of the individual human life, combined
7 with the awesome power of the CIA and the
8 defense establishment, seem destined to seal the
9 fate of the America I knew as a child and bring
10 us into a new Orwellian world where the citizen
11 exists for the state and where raw power justifies
12 any and every immoral act. I've always had a
13 kind of knee-jerk trust in my Government's
14 basic integrity, whatever political blunders it may
15 make. But I've come to realize that in Washington,
16 deceiving and manipulating the public are viewed by
17 some as the natural prerogatives of office. Huey
18 Long once said, "Facism will come to America in the
19 name of anti-facism." I'm afraid, based on my
20 own experience that facism will come to America
21 in the name of national security.

22
23 JFK Lancer, "Jim Garrison's Playboy Interview,
24 Part Three," accessed 4 Dec. 2012:

25 <http://www.jfklancer.com/Garrison4.html>

26 Any opinion Gee Jon? NOW SEE P. 134 and P. 135.. I didn't think so.

27 What is the reason behind the smoke and mirrors
28 of the Regional Injustice Center? Invasion or control?

Page Number 7

KILLING MACHINE

DID NEVADA'S INNOVATIVE
GAS CHAMBER INSPIRE HITLER?

BY SCOTT CHRISTIANSON

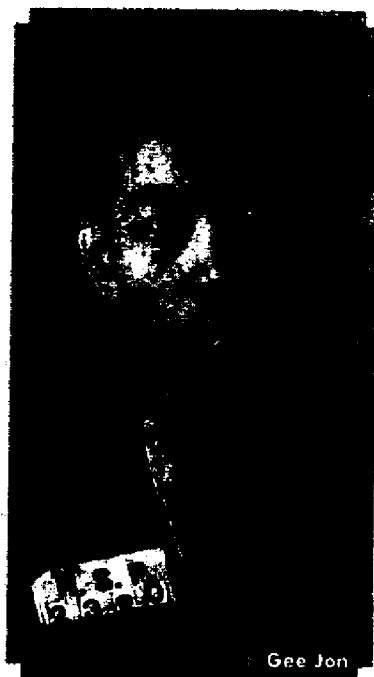
On February 8, 1924, in a stone-and-concrete shack that for 40 years had served as the Nevada state prison's barbershop, a Chinese immigrant and convicted killer named Gee Jon became the first person ever executed in a gas chamber. Inside the sealed room two wooden chairs with armrests had been positioned a few feet apart—Gee's accomplice had also been scheduled to die but received a commutation. In front of and between the chairs stood a small metal device that would spray hydrocyanic acid, commercially known as cyanogen. A state spokesman insisted one deep breath by the condemned man would paralyze his lungs, displace the oxygen in his body and cause instant and painless death. Witnesses would be spared any painful outcries.

Prior to the execution, the warden staged a rehearsal with a stray white cat and two kittens. He estimated the cats died within 15 seconds. The test revealed a small leak, which was quickly patched to avert the poisoning of witnesses or staff.

It appeared Gee needed about six minutes to die, though the gas clouding the windows made it difficult to see inside. The warden pronounced the method "a wonderful and humane way of execution." Unlike hanging (by which an inmate might suffer for up to 15 minutes), electrocution (which could take three or four jolts) or a firing squad (which sometimes didn't cause instant death), gas first produced unconsciousness. The state's largest newspaper, the *Nevada State Journal*, began its coverage by pronouncing, "Nevada's novel death law is upheld by the highest court—humanity."

Eighteen days after Gee's death, in Munich, a right-wing radical named Adolf Hitler went on trial for his role in the failed Beer Hall Putsch. The previous year U.S. newspapers had reported on Hitler's extraordinary ability to sway crowds and his deep hatred of Jews, Communists, Bolsheviks and liberals, as well as his embrace of the trappings of fascism that had been introduced in 1922 by Italy's Benito Mussolini.

One of Hitler's friends who visited him in jail and kept him abreast of developments in the U.S. was Ernst "Putzi" Hanfstaengl, a six-foot-four German American patrician graduate of Harvard and descendent of a Union army general who had helped carry Abraham Lincoln's coffin. When Hanfstaengl wasn't entertaining his friend with his piano playing, he stimulated Hitler's imagination with stirring accounts of skyscrapers, gangsters and college football chants. He also translated and read aloud from British and U.S. newspapers. Hitler had been gassed



Gee Jon

and temporarily blinded while serving on the front during World War I, so he already knew gas was an ugly, painful and unpredictable weapon, and he disdained its use in battle. He would have been interested to learn about what the Americans had done in Nevada.

After being convicted and receiving a five-year sentence, Hitler began composing his own political creed, which he first titled *Eine Abrechnung* (Settling Accounts) but later changed to *Mein Kampf* (My Struggle). He wrote, "If at the beginning of the war and during the war, 12 or 15,000 of these Hebrew corrupters of the people had been held under poison gas, as happened to

hundreds of thousands of our very best German workers in the field, the sacrifice of millions at the front would not have been in vain." Decades later Lucy Dawidowicz, a historian of the Holocaust, wrote, "Did the idea of the final solution originate in this passage, germinating in Hitler's subconscious for some 15 years before it was to sprout into practical reality?"

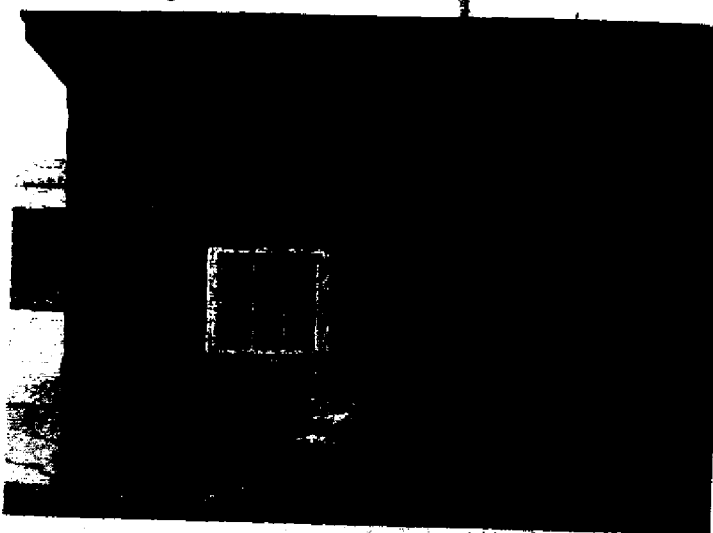
Another biographer observed, "Hitler's concept of concentration camps as well as the practicality of genocide owed, so he claimed, to his studies of English and U.S. history. He admired the camps for Boer prisoners in South Africa and for the Indians in the Wild West, and he often praised to his inner circle the efficiency of America's extermination—by starvation and uneven combat—of the red savages who could not be tamed by captivity." Hitler learned about the American enslavement

of blacks and Jim Crow laws enforcing racial segregation, about the shipment of Native Americans to faraway prisons via boxcars and recent court rulings

National Origins Act, which called for eugenic quotas."

Historians have not yet turned up direct evidence that Hitler's thinking was influenced by the first successful use of the gas chamber, but the event was in the headlines during his trial, imprisonment and the writing of *Mein Kampf*. At the same time, delegations of German officials, criminologists and legal scholars were touring the American penal system, inspecting prison conditions and methods of punishment. These visits were also widely reported in Germany and most certainly read by executives at certain chemical companies. After all, cyanide was their business.

The Nevada gas chamber.



upholding the involuntary sterilization of the unfit. Yet another historian noted that *Mein Kampf* displayed Hitler's "keen familiarity with the recently passed U.S.

Scott Christianson is author of *The Last Gasp: The Rise and Fall of the American Gas Chamber*, published this month by the University of California Press.

hat is the question posed in a 2001 law review article by Kevin Francis O'Neill, who was the lead counsel in a suit filed by the ACLU to prevent Ohio wardens from removing "offensive" language from the final statements of condemned prisoners. O'Neill notes that the Anglo-Saxon tradition of last words dates back to at least 1288; even accused witches and slaves were given the opportunity. Today some states allow last words to be uttered only out of earshot of witnesses, while Texas gives its condemned an open microphone. Here are memorable examples of inmates exercising their right to free speech one final time. For more, see Robert Elder's new book, *Last Words of the Executed* (University of Chicago Press).

"Your motherfuckers haven't paid any attention to anything I've said in the last 22 and a half years; why would anyone pay any attention to anything I've had to say now?" —Richard Conely II (Ohio, 2008), when asked if he'd like to make a statement

"Give my apologies to the families of the victims." —Arthur Bishop (Utah, 1988)

"Let Mama know I still love her." —Gerrard (Alabama, 1992)

"Being born black was against me." —Lester Young (Georgia, 1985)

"I am innocent of this crime." —Eugene Davis (Arkansas, 1997)

"I forgive all who have taken part in any way in my death." —Ronald O'Bryan (Texas, 1984)

"The act I committed to put me here was not just

heinous, it was senseless. But the person that committed that act is no longer here." —Napoleon Beazley (Texas, 2002)

"I'd rather be fishing." —Jimmy Glass (Louisiana, 1987)

Silently flipped off witnesses as gas billowed around him. —Donald Harding (Arizona, 1992)

"I can't imagine losing two children. If I was y'all, I would have killed me." —Dennis Dowthitt (Texas, 2001)

"You are about to witness the damaging effect electricity has on Wood." —Frederick Wood (New York, 1963)

"Living has been hard, and now it's time to die." —Johnny (Louisiana, 1984)

"Freedom at last, man." —John Reed (North Carolina, 1981)

"You doing that right?" —Stanley "Teenie" Williams (California, 2005), founder of the Crips street gang, after a nurse took 10 minutes to insert the needle

"Hurrah for anarchy!" —the Haymarket defendants (Chicago, 1887), in unison

"God, you're a dirty son of a bitch, because I'm innocent." —Robert Pierce (California, 1956)

"I'm human! I'm human!" —David Lawson (North Carolina, 1994), screaming to be heard through the thick glass separating him from witnesses. Lawson had asked that his execution be televised.

(See) EXHIBIT : (pages #49-55)

EMERGENCY MOTION TO OPPOSE REMAND
AND DISMISS CASE
IN ITS ENTIRETY

• drawn October 13th, 2021 @ C.C.D.C.
• certified by U.S.P.S. October 13th, 2021
• recieved by Clerk of the Court October 18th, 2021
• was fwd to Clark County Public Pretender
instead of filed into ^{this} case. This warrants
equitable telling. It also shows proceedural error(s).
• shows grounds for emotional distress ~~endured~~
by the Def. since the court incurred error
contributed to the cause of ^{aid of} ineffective counsel
leading to wrongful conviction as the court failed in
responding to Bernard Little's motion to withdraw (See p. 125-
p. 127)
he had submitted on October 5th, 2021. These
procedural errors greatly prejudiced the Defendant, but
perhaps the most significant bias shown towards the
Defendant was when he was told on record that he
was not eligible, nor was he accepted to Mental
Health court because he survived fatal traumatic brain
injuries and other catastrophic injuries. This in itself
is a civil rights lawsuit as the results of this case
show that the courts of Clark County, Nevada must view
the disabled as inferior, ^(are obviously not) and entitled to the priveleges of normal citizens.
• to illustrate to the court and for the sake of justice, ~~at all times~~
a comparrison and contrast will be shown ~~the~~ of the relationship
between potential Page Number 8 world conspiracy and
what's known as truth.

1-1st truth. And to ask this court again: Is there
6 a conspiracy against Matthew Travis Houston, or just
1 ~~the~~ ~~the~~ A WORLDWIDE GOVERNMENT CONSPIRACY
2 TO CONCEAL THE TRUTH FROM THE PUBLIC?

3 In the short span of six years, twenty-two
4 English scientists who worked on Star Wars-type
5 projects have died under questionable circumstances.
6 All of them had worked on different facets of
7 electronic warfare, which includes UFO research. A
8 list of the deceased and the dates and circumstances
9 of their deaths follows.

10

- 11 1. 1982. Professor Keith Bowden: killed in auto crash.
- 12 2. July 1982. Jack Wolfenden: died in glider accident.
- 13 3. November 1982. Ernest Brockway: suicide.
- 14 4. 1983 Stephen Drinkwater: suicide by strangulation.
- 15 5. April 1983. Lieutenant-Colonel Anthony Godley:
16 missing, declared dead.
- 17 6. April 1984. George Franks: suicide by hanging.
- 18 7. 1985. Stephen Oke: suicide by hanging.
- 19 8. November 1985. Jonathon Wash: suicide by
20 jumping from a building.
- 21 9. 1986. Dr. John Brittan: suicide by carbon-
22 monoxide poisoning.
- 23 10. October 1986. Arshad Sharif: suicide by
24 placing a rope around his neck, tying it to a
25 tree, and then driving away at high speed. Took
26 place in Bristol, one hundred miles away from his home
27 in London.
- 28

28a

Page Number 9

P.40

1 11. October 1986. Vimal Dajihai: suicide by jumping
2 from a bridge in Bristol, one hundred miles from
3 his home in London.

4 12. January 1987. Artar Singh-Gida: missing,
5 declared dead.

6 13. February 1987. Peter Pepell: suicide by
7 crawling under car in garage.

8 14. March 1987. David Sands: suicide by
9 driving car into café at high speed.

10 15. April 1987. Mark Wisner: death by self-strangulation

11 16. April 10, 1987. Stuart Goeding: killed in Cyprus.

12 17. April 1987. Shani Warren: suicide by drowning.

13 18. May 1987. Michael Baker: killed in auto-crash.

14 19. May 1988. Trevor Knight: suicide.

15 20. August 1988 Alistair Becham: suicide
16 by self-electrocution.

17 21. August 1988: Brigadier Peter Ferry,
18 suicide by self-electrocution.

Comparison
and contrast:

19 22. Date unknown: Victor Moore;

20 23. Mitchell Ryan Suicide → November 18th, 2014[†] Houston, brother,

21 suicide by hanging. 24. Uncle Rollie Schoenherr, ^{ruled a} suicide however

22 Coincidences? body found in Wisconsin shot up inside a

23 truck with its doors locked. Numerous bullets. 25. Uncle Randall Schoenherr,

24 2019. Died by being poisoned. - Author's Note pages 396 - 397

25 from The Doomsday Conspiracy by (In re) "judgement",

26 Sidney Sheldon, 1991. A bit of science will now show

27 this court there's absolute ZERO coincidences in the fact

28 that Rosemary McMornis is scamming big insurance:

1 JUDGEMENT UNDER UNCERTAINTY:

2 HEURISTICS AND BIASES,* by Amos Tversky

3 and Daniel Kahneman

4 *This article originally appeared in Science, vol. 185,
5 1974. The research was supported by the Advanced Research
6 Projects Agency of the Department of Defense and was monitored
7 by the Office of Naval Research under contract
8 N00014-79-C-0438 to the Oregon Research Institute, Eugene.
9 Additional support for this research was provided by the Research and
10 Development Authority of the Hebrew University, Jerusalem, Israel.

11
12 Many decisions are based on beliefs concerning the likelihood of
13 uncertain events such as the outcome of an election, the guilt
14 of a defendant, or the future value of the dollar. These
15 beliefs are usually expressed in statements such as "I think
16 that..." "chances are..." "it is unlikely that..." and so
17 forth. Occasionally, beliefs concerning uncertain events are
18 expressed in numerical form as odds or subjective
19 probabilities. What determines such beliefs? How do people
20 assess the probability of an uncertain event or the value
21 of an uncertain quantity? This article shows that people rely
22 on a limited number of heuristic principles which reduce the complex
23 tasks of assessing probabilities and predicting values to simpler
24 judgemental operations. In general, these heuristics are
25 quite useful, but sometimes they lead to severe and
26 systematic errors.

27 The subjective assessment of probability resembles the
28 subjective assessment of physical quantities such as

distance or size. These judgements are all based on data of limited validity which are processed according to heuristic rules. For example, the apparent distance of an object is determined in part by its clarity. The more sharply the object is seen, the closer it appears to be. This rule has some validity, because in any given scene the more distant objects are seen less sharply than nearer objects. However, the reliance on this rule leads to systematic errors in the estimation of distance. Specifically, distances are often overestimated when visibility is poor because the contours of objects are blurred. On the other hand, distances are often underestimated when visibility is good because objects are seen sharply. Thus, the reliance on clarity as an indication of distance leads to common biases. Such biases are found in the intuitive judgement of probability. This article describes three heuristics that are employed to assess probabilities and to predict values. Biases to which these heuristics lead are enumerated, and the applied and theoretical implications of these observations are discussed.

REPRESENTATIVENESS

Many of the probabilistic questions for which people are concerned belong to one of the following types:

- What is the probability that object A belongs to class B?
- What is the probability that event A originates from process B?
- What is the probability that process B will generate event A?

1 In answering such questions, people typically rely on
2 the representativeness heuristic, in which probabilities are
3 evaluated by the degree to which A is representative
4 of B, that is, by the degree to which A resembles B.
5 For example, when A is highly representative of B,
6 the probability that A originates from B is judged
7 to be high. On the other hand, if A is not
8 similar to B, the probability that A originates
9 from B is judged to be low.
10 For an illustration of judgement by representativeness,
11 consider an individual who has been described by a
12 former neighbor as follows: "Steve is very shy and
13 withdrawn, invariably helpful, but with little interest
14 in people, or in the world of reality. A meek and
15 tidy soul, he has a need for order and structure,
16 and a passion for detail." How do people assess
17 the probability that Steve is engaged in a particular
18 occupation from a list of possibilities (for example,
19 Farmer, Salesman, airline pilot, librarian, or physician)?
20 How do people order these occupations from most to
21 least likely? In the representativeness heuristic,
22 the probability that Steve is a librarian, for example,
23 is assessed by the degree to which he is representative
24 of, or similar to, the stereotype of a librarian.
25 Indeed, research with problems of this type has shown that
26 people order the occupations by probability and by similarity
27 in exactly the same way.¹ This approach to the judgement
28 of probability leads to serious errors, because similarity, or

1 representativeness, is not influenced by several
2 factors that should affect judgements of
3 probability.

4 Insensitivity to prior outcomes. One of the
5 factors that have no effect on representativeness
6 but should have a major effect on probability is the
7 prior probability, or base-rate frequency, of the
8 outcomes. In the case of Steve, for example,
9 the fact that there are many more farmers than
10 librarians in the population should enter into any
11 reasonable estimate of the possibility that Steve
12 is a librarian rather than a farmer. Considerations
13 of base-rate frequency, however, do not affect the
14 similarity of Steve to the stereotypes of librarians
15 and farmers. If people evaluate possibility of
16 representativeness, therefore, prior possibilities will
17 be neglected. This hypothesis was tested in an
18 experiment where prior probabilities were manipulated.²

19 Subjects were shown brief personality descriptions
20 of several individuals, allegedly sampled at random
21 from a group of 100 professionals—engineers and
22 lawyers. The subjects were asked to assess
23 for each description, the probability that it belonged
24 to an engineer rather than a lawyer. In one
25 experimental condition, subjects were told that the
26 group from which the descriptions had been drawn
27 consisted of 70 engineers and 30 lawyers. In
28 another condition, subjects were told that the

1 group consisted of 30 engineers and 70 lawyers.
2 The odds that any particular description belongs
3 to an engineer rather than to a lawyer should
4 be higher in the first condition, where there is a
5 majority of engineers, than in the second
6 condition, where there is a majority of lawyers.
7 Specifically, it can be shown by applying Bayes'
8 rule that the ratio of these odds should be
9 $(.7/.3)^2$, or 5.44, for each description. In a
10 sharp violation of Bayes' rule, the subjects
11 in the two conditions produced essentially the
12 same probability judgements. Apparently, subjects
13 evaluated the likelihood that a particular description
14 belonged to an engineer rather than to a lawyer
15 by the degree to which this description was
16 representative of the two stereotypes, with little
17 or no regard for the prior ~~probabilities~~ ~~of~~ ~~the~~
18 probabilities of the categories.
19 The subjects used prior probabilities correctly
20 when they had no other information. In the
21 absence of a personality sketch, they judged the
22 probability that an unknown individual is an engineer
23 to be .7 and .3, respectively, in the two base-rate
24 conditions. However, prior probabilities were
25 effectively ignored when a description was introduced,
26 even when the description was totally uninformative.
27 The responses to the description illustrate this
28 phenomenon.

1 Dick is a 30-year-old man. He is married
2 with no children. A man of high
3 ability and high motivation, he promises
4 to be quite successful in his field.
5 He is well liked by his colleagues.
6

7 This description was intended to convey no information
8 relevant to the question of whether Dick is an
9 engineer or a lawyer. Consequently, the probability
10 that Dick is an engineer should equal the proportion
11 of engineers in the group, as if no description had
12 been given. The subjects, however, judged the
13 probability of Dick being an engineer to be .5
14 regardless of whether the stated proportion of
15 engineers in the group was .7 or .3. Evidently,
16 people respond differently when given no evidence
17 and when given worthless evidence. When no
18 specific evidence is given, prior probabilities are
19 properly utilized; when worthless evidence is given,
20 prior probabilities are ignored.³

21 ~~Insensitivity to sample size.~~ To evaluate the
22 probability of obtaining a particular result in a sample
23 drawn from a specific population, people typically
24 apply the representativeness heuristic. That is,
25 they assess the likelihood of a sample result,
26 for example, that the average height in a
27 random sample of ten men will be 6 feet, by
28 the similarity of this result to the corresponding

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1 parameter (that is, to the average height in the
2 population of men). The similarity of a simple
3 statistic to a population parameter does not
4 depend on the size of the sample. Consequently,
5 if probabilities are assessed by representativeness,
6 that the judged probability of a sample statistic
7 will be essentially independent of sample size.
8 Indeed, when subjects assessed the distributions
9 of average height for samples of various sizes,
10 they produced identical distributions. For example,
11 the probability of obtaining an average height greater
12 than 6 feet was assigned the same value for
13 samples of 1,000, 100, and 10 men.⁴ Moreover,
14 subjects failed to appreciate the role of sample
15 size even when it was emphasized in the formulation
16 of the problem. Consider the following question:

17
18 A certain town is served by two hospitals.
19 In the larger hospital about 45 babies
20 are born each day, and in the smaller
21 hospital about 15 babies are born each day.
22 As you know, 50% of all babies are boys.
23 However, the exact percentage varies from day
24 to day. Sometimes it may be higher than
25 50%, sometimes lower.
26 For a period of 1 year, each hospital
27 recorded the days on which more than 60%
28 of the babies born were boys.

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1 which hospital do you think recorded
2 more such days?

3 The larger hospital (~~22~~) (21)

4 The smaller hospital (21)

5 About the same - (that is,
6 within 5% of each other) (53)

7
8 The values in parenthesis are the number of
9 undergraduate students who chose each answer.

10 Most subjects judged the probability of
11 obtaining more than 60% boys to be the same in
12 the small and in the large hospital, presumably
13 because these events are described by the same
14 statistic and are therefore equally representative of
15 the general population. In contrast, sampling
16 theory entails that the expected number of days
17 on which more than 60% of the babies are boys is
18 much greater in the small hospital than in the
19 large one, because a large sample is less likely
20 to stray from 50%. This fundamental notion
21 of statistics is evidently not part of people's
22 repertoire of intuitions.

23 A similar insensitivity to sample size has
24 been reported in judgements of posterior probability,
25 that is, of the probability that a sample has been
26 drawn from one population rather than from another.
27 Consider the following example:

28

1 Imagine an urn filled with balls of which
2 $2/3$ are of one color and $1/3$ of another.

3 One individual has drawn 5 balls from
4 the urn, and found that 4 were red and
5 1 was white. Another individual has drawn
6 20 balls and found that 12 were red and
7 8 were white. Which of the two individuals
8 should feel more confident that the urn
9 contains $2/3$ red balls and $1/3$ white balls,
10 rather than the opposite? What odds
11 should each individual give?
12

13 In this problem, the correct posterior odds are
14 8 to 1 for the 4:1 sample and 16 to 1 for the 12:8
15 sample, assuming equal prior probabilities. However, most
16 people feel that the first sample provides much stronger
17 evidence for the hypothesis that the urn is predominantly
18 red, because the proportion of red balls is larger in the
19 first than in the second sample. Here again,
20 intuitive judgements are dominated by the sample
21 proportion and are essentially unaffected by the size of
22 the sample, which plays a critical role in the
23 determination of the actual posterior odds.⁵ In addition,
24 intuitive estimates of posterior odds are far less
25 extreme than the correct values. The underestimation
26 of the impact of evidence has been observed
27 repeatedly in problems of this type.⁶ It has
28 been labeled "conservatism."

1 Misconceptions of chance. People expect that a
2 sequence of events generated by a random process
3 will represent the essential characteristics of that
4 process even when the sequence is short. In
5 considering tosses of a coin for heads or tails, for
6 example, people regard the sequence H-T-N-T-T-N
7 to be more likely than the sequence H-H-H-T-T-T,
8 which does not appear random; and also more
9 likely than the sequence H-H-H-H-T-N, which
10 does not represent the fairness of the coin.
11 Thus, people expect that the essential characteristics
12 of the process will be represented, not only globally
13 in the entire sequence, but also locally in each of
14 its parts. A locally representative sequence, however,
15 deviates systematically from chance expectation:
16 it contains too many alternations and too few runs.
17 Another consequence of the belief in local
18 representativeness is the well-known gambler's fallacy.
19 After observing a long run of red on the roulette
20 wheel, for example, most people erroneously believe
21 that black is now due, presumably because the
22 occurrence of black will result in a more
23 representative sequence than the occurrence of an
24 additional red. Chance is commonly viewed as a self-
25 correcting process in which a deviation in one direction
26 induces a deviation in the opposite direction to restore
27 the equilibrium. In fact, deviations are not "corrected"
28 as a chance process unfolds; they are merely diluted.

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1 Misconceptions of chance are not limited to
2 naive subjects. A study of the statistical
3 institutions of experienced research psychologists⁸
4 revealed a lingering belief in what may be
5 called "the law of small numbers," according to
6 which even small samples are highly representative
7 of the populations from which they are drawn.
8 The responses of these investigators reflected
9 the expectation that a valid hypothesis about a
10 population will be represented by a statistically
11 significant result in a sample with little regard
12 for its size. As a consequence, the researchers
13 put too much faith in the results of small samples
13 and grossly overestimated the replicability of such
14 results. In the actual conduct of research, this
15 bias leads to the selection of samples of inadequate
16 size and to overinterpretation of findings.

17 Insensitivity to predictability. People
18 are sometimes called upon to make such numerical
19 predictions as the future value of stock, the
20 demand for a commodity, or the outcome of a
21 football game. Such predictions are often made by representativeness.
22 For example, suppose one is given a description of a company
23 and is asked to predict its future profit. If the
24 description of the company is very favorable, a very high
25 profit will appear most representative of that description;
26 if the description is mediocre, a mediocre performance will
27 appear most representative. The degree to which

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1 the description is favorable is unaffected by the reliability
2 of that description or by the degree to which it permits
3 accurate prediction. Hence, if people predict solely in
4 terms of the favorableness of the description, their
5 predictions will be insensitive to the reliability of the
6 evidence and to the expected accuracy of the prediction.

7 This mode of judgement violates the normative statistical
8 theory in which the extremeness and the range of predictions
9 are controlled by considerations of predictability. When
10 predictability is nil, the same prediction should be made in
11 all cases. For example, if the descriptions of companies
12 provide no information relevant to profit, then the same value
13 (such as average profit) should be predicted for all companies.
14 If predictability is perfect, of course, the values predicted
15 will match the actual values and the range of predictions
16 will equal the range of outcomes. In general, the higher the
17 predictability, the wider the range of predicted values.

18 Several studies of numerical prediction have demonstrated
19 that intuitive predictions violate this rule, and that subjects
20 show little or no regard for considerations of predictability.⁹
21 In one of these studies, subjects were presented with several
22 paragraphs, each describing the performance of a student teacher
23 during a particular practice lesson. Some subjects were asked to
24 evaluate the quality of a lesson described in the paragraph in
25 percentile scores, relative to a specified population. Other
26 subjects were asked to predict, also in percentile scores,
27 the standing of each student teacher 5 years after the practice
28 lesson. The judgements made under the two conditions were identical.

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1 That is, the prediction of a remote criterion (success of a teacher after
2 5 years) was identical to the evaluation of the information on which
3 the prediction was based (the quality of the practice lesson). The
4 students who made these predictions were undoubtedly aware of the
5 limited predictability of teaching competence on the basis of a single
6 trial lesson 5 years earlier; nevertheless, their predictions were as extreme
7 as their evaluations.

8 The illusion of validity. As we have seen, people often predict by
9 selecting the outcome (for example, an occupation) that is most
10 representative of the input (for example, the description of a person).

11 The confidence they have in their prediction depends primarily on the
12 degree of representativeness (that is, on the quality of the match
13 between the selected outcome and the input) with little or no regard
14 for the factors that limit predictive accuracy. Thus, people express
15 great confidence in the prediction that a person is a librarian when given
16 a description of his personality which matches the stereotype of
17 librarians, even if the description is scanty, unreliable, or outdated.

18 The unwarranted confidence which is produced by a good fit between
19 the predicted outcome and the input information may be called the
20 illusion of validity. This illusion persists even when the judge is
22 aware of the factors that limit the accuracy of his predictions. It is
23 a common observation that psychologists who conduct selection interviews
24 often experience considerable confidence in their predictions, even when
25 they know of the vast literature that shows selection interviews to
26 be highly fallible. The continued reliance on the clinical interview for
27 selection, despite repeated demonstrations of its inadequacy, amply
28 attests to the strength of this effect.

29 The internal consistency of a pattern of inputs is a major detriment

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1 of one's confidence in predictions based on these inputs. For example,
2 people express more confidence in predicting the final grade point
3 average of a student whose first-year record includes many A's
4 and C's. Highly consistent patterns are most often observed when
5 the input variables are highly redundant or correlated. Hence,
6 people tend to have great confidence in predictions based on redundant
7 input variables. However, an elementary result in the statistics of
8 correlation asserts that, given input variables of stated validity,
9 a prediction based on several such inputs can achieve higher
10 accuracy when they are independent of each other than when they
11 are redundant or correlated. Thus, redundancy among inputs
12 decreases accuracy even as it increases confidence, and people are
13 often confident in predictions that are quite likely to be off the mark.

14 Misconceptions of regression. Suppose a large group of
15 children has been examined on two equivalent versions of an aptitude
16 test. If one selects ten children from among those who did best on
17 one of the two versions, he will usually find their performance on
18 the second version to be somewhat disappointing. Conversely, if
19 one selects ten children from among those who did worst on one
20 version, they will be found, on the average, to do somewhat better
21 on the other version. More generally, consider two variables X and Y
22 which have the same distribution. If one selects individuals whose
23 average X score deviates from the means of X by k units, then
24 the average of their Y scores will usually deviate from the mean of
25 Y by less than k units. These observations illustrate a general
26 phenomenon known as regression toward the mean, which was
27 first documented by Galton more than 100 years ago.
28

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In the normal course of life, one encounters many instances of regression toward the mean, in the comparison of the height of fathers and sons, of the intelligence of husbands and wives, or of the performance of individuals on consecutive examinations. Nevertheless, people do not develop correct intuitions about this phenomenon. First, they do not expect regression in many contexts where it is bound to occur. Second, when they recognize the occurrence of regression, they often invent spurious causal explanations for it.¹¹ We suggest that the phenomenon of regression remains elusive because it is incompatible with the belief that the predicted outcome should be maximally representative of the input, and, hence, that the value of the outcome variable should be as extreme as the value of the input variable.

The failure to recognize the import of regression can have pernicious consequences, as illustrated by the following observation.¹² In a discussion of flight training, experienced instructors noted that praise for an exceptionally smooth landing is typically followed by a poorer landing on the next try, while harsh criticism after a rough landing is usually followed by an improvement on the next try. The instructors concluded that verbal rewards are detrimental to learning, while verbal punishments are beneficial, contrary to accepted psychological doctrine. This conclusion is unwarranted because of the presence of regression toward the mean. As in other cases of repeated examination, an improvement will usually follow a poor performance and a deterioration will usually follow an outstanding performance, even if the instructor does not respond to the trainee's achievement on the first attempt. Because the instructors had praised their trainees after good landings and

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admonished them after poor ones, they reached the erroneous and potentially harmful conclusion that punishment is more effective than reward.

Thus, the failure to understand the effect of regression leads one to overestimate the effectiveness of punishment and to underestimate the effectiveness of reward. In social interaction, as well as in training, rewards are typically administered when performance is good, and punishments are typically administered when performance is poor. By regression alone, therefore, behavior is most likely to improve after punishment and most likely to deteriorate after reward. Consequently, the human condition is such that, by chance alone, one is most often rewarded for punishing others and most often punished for rewarding them. People are generally not aware of this contingency. In fact, the elusive role of regression in determining the apparent consequences of reward and punishment seems to have escaped the notice of students of this area.

AVAILABILITY

There are situations in which people assess the frequency of a class or the probability of an event by the ease with which instances or occurrences can be brought to mind. For example, one may assess the risk of heart attack among middle-aged people by recalling such occurrences among one's acquaintances. Similarly, one may evaluate the probability that a given business venture will fail by imagining various difficulties it could encounter. This judgemental heuristic is called availability. Availability is a useful clue for assessing frequency or probability, because instances of large classes are usually recalled better and faster than

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instances of less frequent classes. However, availability is affected by factors other than frequency and probability. Consequently, the reliance on availability leads to predictable biases, some of which are illustrated below.

Biases due to the retrievability of instances. when the size of a class is judged by the availability of its instances, a class whose instances are easily retrieved will appear more numerous than a class of equal frequency whose instances are less retrievable. In an elementary demonstration of this effect, subjects heard a list of well-known personalities of both sexes and were subsequently asked to judge whether the list contained more names of men than of women. Different lists were presented to different groups of subjects. In some of the lists the men were relatively more famous than the women, and in others the women were relatively more famous than the men. In each of the lists, the subjects erroneously judged that the class (sex) that had the more famous personalities was the more numerous.¹³

In addition to familiarity, there are other factors, such as salience, which affect the retrievability of instances. For example, the impact of seeing a house burning on the subjective probability of such accidents is probably greater than the impact of reading about a fire in the local paper. Furthermore, recent occurrences are likely to be relatively more available than earlier occurrences. It is a common experience that the subjective probability of traffic accidents rises temporarily when one sees a car overturned by the side of the road.

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Biases due to the effectiveness of a search set.

Suppose one samples a word (of three letters or more) at random from an English text. It is more likely that the word starts with *r* or that *r* is the third letter? People approach this problem by recalling words that begin with *r* (road) and words that have *r* in the third position (car) and assess the relative frequency by the ease with which words of the two types come to mind. Because it is much easier to search for words by their first letter than by their third letter, most people judge words that begin with a given consonant to be more numerous than words in which the same consonant appears in the third position. They do so even for consonants, such as *r* or *k*, that are more frequent in the third position than in the first.¹⁴

Different tasks elicit different search sets. For example, suppose you are asked to rate the frequency with which abstract words (thought, love) and concrete words (door, water) appear in written English. A natural way to answer this question is to search for contexts in which the word could appear. It seems easier to think of contexts in which an abstract concept is mentioned (love in love stories) than to think of contexts in which a concrete word (such as door) is mentioned. If the frequency of words is judged by the availability of the contexts in which they appear, abstract words will be judged as relatively more numerous than concrete words. This bias has been observed in a recent study¹⁵ which showed that the judged frequency of occurrence of abstract words was much higher than that of concrete words, equated in objective frequency. Abstract words were also judged to appear in a much greater variety of contexts than concrete words.

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Biases of imaginability. Sometimes one has to assess the frequency of a class whose instances are not stored in memory but can be generated according to a given rule. In such situations, one typically generates several instances and evaluates frequency or probability by the ease with which the relevant instances can be constructed. However, the ease of constructing instances does not always reflect their actual frequency, and this mode of evaluation is prone to biases. To illustrate, consider a group of 10 people who form committees of k members, $2 \leq k \leq 8$. How many different committees of k members can be formed? The correct answer to this problem is given by the binomial coefficient $(10/k)$ which reaches a maximum of 252 for $k=5$. Clearly, the number of committees of k members defines a unique group of $(10-k)$ nonmembers.

One way to answer this question without computation is to mentally construct committees of k members and to evaluate their number by the ease with which they come to mind. Committees of few members, say 2, are more available than committees of many members, say 8. The simplest scheme for the construction of committees is a partition of the group into disjoint sets. One readily sees that it is easy to construct five disjoint committees of 2 members, while it is impossible to generate even two disjoint committees of 8 members. Consequently, if frequency is assigned by imaginability, or by availability for construction, the small committees will appear more numerous than larger committees, in contrast to the correct bell-shaped function. Indeed, when naive subjects were asked to

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1 estimate the number of distinct committees of various sizes,
2 their estimates were a decreasing ~~and~~ monotonic function of
3 committee size.¹⁶ For example, the median estimate of
4 the number of committees of 2 members was 70, while
5 the estimate for committees of 8 members was 20 (the
6 correct answer is 45 in both cases).

7 Imaginability plays an important role in the evaluation of
8 probabilities in real-life situations. The risk involved in an
9 adventurous expedition, for example, is evaluated by imagining
10 contingencies with which the expedition is not equipped to cope.
11 If many such difficulties are vividly portrayed, the expedition
12 can be made to appear exceedingly dangerous, although the ease
13 with which disasters are imagined need not reflect their actual
14 likelihood. Conversely, the risk involved in an undertaking may be
15 grossly underestimated if some possible dangers are either
16 difficult to conceive of, or simply do not come to mind.

17 Illusory correlation. Chapman and Chapman¹⁷ have
18 described an interesting bias in the judgement of the frequency
19 with which two events co-occur. They presented naive judges
20 with information concerning several hypothetical mental patients.
21 The data for each patient consisted of a clinical diagnosis and
22 a drawing of a person made by the patient. Later the judges
23 estimated the frequency with which each diagnosis (such as
24 paranoia or suspiciousness) had been accompanied by various
25 features of the drawing (such as peculiar eyes). The subjects
26 markedly overestimated the frequency of co-occurrence of
27 natural associates, such as suspiciousness and peculiar eyes. This
28 effect was labelled illusory correlation. In their erroneous

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1 judgements of the data, to which they had been exposed,
2 naive subjects "rediscovered" much of the common, but
3 unfounded, clinical lore concerning the interpretation of the
4 draw-a-person test. The illusory correlation effect was
5 extremely resistant to contradictory data. It persisted
6 even when the correlation between symptom and diagnosis
7 was actually negative, and it prevented the judges from
8 detecting relationships that were in fact present.

9 Availability provides a natural account for the illusory-
10 correlation effect. The judgement of how frequently
11 two events co-occur could be based on the strength
12 of the associative bond between them. When the
13 association is strong, one is likely to conclude that the
14 events have been frequently paired. Consequently, strong
15 associates will be judged to have occurred together frequently.
16 According to this view, the illusory correlation between
17 suspiciousness and peculiar drawing of the eyes, for example,
18 is due to the fact that suspiciousness is more readily
19 associated with the eyes than with any other part of the body.

20 Lifelong experience has taught us that, in general,
21 instances of large classes are recalled better and faster than
22 instances of less frequent classes; that likely occurrences are
23 easier to imagine than unlikely ones; and that the associative
24 connections between events are strengthened when the events
25 frequently co-occur. As a result, man has at his disposal
26 a procedure (the availability heuristic) for estimating the
27 numerosity of a class, the likelihood of an event, or the
28 frequency of co-occurrences, by the ease with which the

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relevant mental operations of retrieval, construction, or association can be performed. However, as the preceding examples have demonstrated, this valuable estimation procedure results in systematic errors.

ADJUSTMENT AND ANCHORING

In many situations, people make estimates by starting from an initial value that is adjusted to yield the final answer. The initial value, or starting point, may be suggested by the formulation of the problem, or it may be the result of a partial computation. In either case, adjustments are typically insufficient.¹⁸ That is, different starting points yield different estimates, which are biased toward the initial values. We call this phenomenon anchoring.

Insufficient adjustment. In a demonstration of the anchoring effect, subjects were asked to estimate various quantities, stated in percentages (for example, the percentage of African countries in the United Nations). For each quantity, a number between 0 and 100 was determined by spinning a wheel of fortune in the subjects' presence. The subjects were instructed to indicate first whether that number was higher or lower than the value of the quantity, and then to estimate the value of the quantity by moving upward or downward from the given number. Different groups were given different numbers for each quantity, and these arbitrary numbers had a marked effect on estimates. For example, the median estimates of the percentage of African countries in the United Nations were 25 and 45 for groups that received 10 and 65,

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respectively, as starting points. Payoffs for accuracy did not reduce the anchoring effect.

Anchoring occurs not only when the starting point is given to the subject, but also when the subject bases his estimate on the result of some incomplete computation. A study of intuitive numerical estimation illustrates this effect.

Two groups of high school students estimated, within 5 seconds, a numerical expression that was written on the blackboard. One group estimated the product

$$8 \times 7 \times 6 \times 5 \times 4 \times 3 \times 2 \times 1$$

while another group estimated the product

$$1 \times 2 \times 3 \times 4 \times 5 \times 6 \times 7 \times 8$$

To rapidly answer such questions, people may perform a few steps of computation and estimate the product by extrapolation or adjustment. Because adjustments are typically insufficient, this procedure should lead to underestimation. Furthermore, because of the result of the first few steps of multiplication (performed from left to right) is higher in the descending sequence than in the ascending sequence, the former expression should be judged larger than the latter. Both predictions were confirmed. The median estimate for the ascending sequence was 512, while the median estimate for the descending sequence was 2,250. The correct answer is 40,320.

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Biases in the evaluation of conjunctive and disjunctive events.

In a recent study by Bar-Hillel¹⁹ subjects were given the opportunity to bet on one of two events. Three types of events were used: (i) simple events, such as drawing a red marble from a bag containing 50% red marbles and 50% white marbles; (ii) conjunctive events, such as drawing a red marble seven times in succession, with replacement, from a bag containing 90% red marbles and 10% white marbles; and (iii) disjunctive events, such as drawing a red marble at least once in seven successive tries, with replacement, from a bag containing 10% red marbles and 9% white marbles. In this problem, a significant majority of subjects preferred to bet on the conjunctive event (the probability of which is .48) rather than on the simple event (the probability of which is .50). Subjects also preferred to bet on the simple event rather than on the disjunctive event, which has a probability of .52. Thus, most subjects bet on the less likely event in both comparisons. This pattern of choices illustrates a general finding. Studies of choice among gambles and of judgements of probability indicate that people tend to overestimate the probability of conjunctive events²⁰ and to underestimate the probability of disjunctive events. These biases are readily explained as effects of anchoring. The stated probability of the elementary event (success at any one stage) provides a natural starting point for the estimation of the probabilities of both conjunctive and disjunctive events. Since adjustment from the starting point is typically insufficient, the final estimates remain too close to the

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probabilities of the elementary events in both cases. Note that the overall probability of a conjunctive event is lower than the probability of each elementary event, whereas the overall probability of a disjunctive event is higher than the probability of each elementary event. As a consequence of anchoring, the overall probability will be overestimated in conjunctive problems and underestimated in disjunctive problems.

Biases in the evaluation of compound events are particularly significant in the context of planning. The successful completion of an undertaking, such as the development of a new product, typically has a conjunctive character; for the undertaking to succeed, each of a series of events must occur. Even when each of these events is very likely, the overall probability of success can be quite low if the number of events is large. The general tendency to overestimate the probability of conjunctive events leads to unwarranted optimism in the evaluation of the likelihood that a plan will succeed or that a project will be completed on time. Conversely, disjunctive structures are typically encountered in the evaluation of risks. A complex system, such as a nuclear reactor or a human body, will malfunction if any of its essential components fails. Even when the likelihood of failure in each component is slight, the probability of an overall failure can be high if many components are involved. Because of anchoring, people will tend to underestimate the probabilities of failure in complex systems. Thus,

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the direction of the anchoring bias can sometimes be inferred from the structure of the event. The chain-like structure of conjunction leads to overestimation, the funnel-like structure of disjunctions leads to underestimation.

Anchoring in the assessment of subjective probability distributions. In decision analysis, experts are often required to express their beliefs about a quantity, such as the value of the Dow Jones average on a particular day, in the form of a probability distribution. Such a distribution is usually constructed by asking the person to select values of the quantity that correspond to specified percentiles of his subjective probability distribution. For example, the judge may be asked to select a number, X_{90} , such that his subjective probability that this number will be higher than the value of the Dow Jones average is .90. That is, he should select the value X_{90} so that he is just willing to accept 9 to 1 odds that the Dow Jones average will not exceed it. A subjective probability distribution for the value of the Dow Jones average can be constructed from several such judgements corresponding to different percentiles.

By collecting subjective probability distributions for many different quantities, it is possible to test the judge for proper calibration. A judge is properly (or externally) calibrated in a set of problems if exactly 11% of the true values of the assessed quantities falls below his stated values of X_{11} . For example, the true values should fall below X_{01} for 1% of the quantities and above X_{99} for

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1 1% of the quantities. Thus, the true values should fall in
2 the confidence interval between X_{01} and X_{99} on 98% of
3 the problems.

4 Several investigators²¹ have obtained probability distribution
5 for many quantities from a large number of judges. These
6 distributions indicated large and systematic departures from
7 proper calibration. In most studies, the actual values of the
8 assessed quantities are either smaller than X_{01} or greater than
9 X_{99} for about 30% of the problems. That is, the subjects
10 state overly narrow confidence intervals which reflect more
11 certainty than is justified by their knowledge about the
12 assessed quantities. This bias is common to naive and
13 to sophisticated subjects, and it is not eliminated by
14 introducing proper scoring rules, which provide incentives
15 for external calibration. This effect is attributable,
16 in part at least to anchoring.

17 To select X_{90} for the value of the Dow Jones
18 average, for example, it is natural to begin by thinking
19 about one's best estimate of the Dow Jones and to adjust
20 this value upward. If this adjustment—like most others—
21 is insufficient, then X_{90} will not be sufficiently extreme. A
22 similar anchoring effect will occur in the selection of X_{10} , which
23 is presumably obtained by adjusting one's best estimate
24 downward. Consequently, the confidence interval between X_{10}
25 and X_{90} will be too narrow, and the assessed probability
26 distribution will be too tight. In support of this interpretation it can
27 be shown that subjective probabilities are systematically altered by a procedure in
28 which one's best estimate does not serve as an anchor.

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Subjective probability distributions for a given quantity (the Dow Jones average) can be obtained in two different ways: (i) by asking the subject to select values of the Dow Jones that correspond to specified percentiles of his probability distribution and (ii) by asking the subject to assess the probabilities that the true value of the Dow Jones will exceed some specified values. The two procedures are formally equivalent and should yield identical distributions. However, they suggest different modes of adjustment from different anchors. In procedure (i), the natural starting point is one's best estimate of the quantity. In procedure (ii), on the other hand, the subject may be anchored on the value stated in the question. Alternatively, he may be anchored on even odds, or a 50-50 chance, which is a natural starting point in the estimation of likelihood. In either case, procedure (ii) should yield less extreme odds than procedure (i).

To contrast the two procedures, a set of 24 quantities (such as the air distance from New Delhi to Peking) was presented to a group of subjects who assessed either X_{10} or X_{90} for each problem. Another group of subjects received the median judgement of the first group for each of the 24 quantities. They were asked to assess the odds that each of the given values exceeded the true value of the relevant quantity. In the absence of any bias, the second group should retrieve the odds specified to the first group, that is 9:1. However, if even odds or the stated value serve as anchors, the odds of the second group should be less extreme, that is, closer to 1:1. Indeed, the median odds stated by this group, across all problems, were 3:1.

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Indian Springs, NV 89070

1 when the judgements of the two groups were tested for external
2 calibration, it was found that subjects in the first group were
3 too extreme, in accord with earlier studies. The events that
4 they defined as having a probability of .10 actually obtained in
5 24% of the cases. In contrast, subjects in the second
6 group were too conservative. Events to which they assigned
7 an average probability of .34 actually obtained in 26% of
8 the cases. These results illustrate the manner in which the
9 degree of calibration depends on the procedure of elicitation.
10

11 DISCUSSION

13 This article has been concerned with cognitive biases that
14 stem from the reliance on judgemental heuristics. These biases
15 are not attributable to motivational effects such as wishful thinking
16 or the distortion of judgements by payoffs and penalties. Indeed,
17 several of the severe errors of judgement reported earlier
18 occurred despite the fact that subjects were encouraged to
19 be accurate and were rewarded for the correct answers.²²

20 The reliance on heuristics and the prevalence of biases
21 are not restricted to laymen. Experienced researchers are also
22 prone to the same biases—when they think intuitively.

23 For example, the tendency to predict the outcome that best
24 represents the data, with insufficient regard for prior
25 probability, has been observed in the intuitive judgements of
26 individuals who have had extensive training in statistics.²³

27 Although the statistically sophisticated avoid elementary
28 errors, such as the gambler's fallacy, their intuitive judgements

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are liable to similar fallacies in more intricate and less transparent problems.

It is not surprising that useful heuristics such as representativeness and availability are retained, even though they occasionally lead to errors in prediction or estimation.

What is perhaps ~~more~~ surprising is the failure of people to infer from lifelong experience such fundamental statistical rules as regression toward the mean, or the effect of sample size on sampling variability. Although everyone is exposed, in the normal course of life, to numerous examples from which these rules could have been induced, very few people discover the principles of sampling and regression on their own. Statistical principles are not learned from everyday experience because the relevant instances are not coded appropriately. For example, people do not discover that successive lines in a text differ more in average word length than do successive pages, because they simply do not attend to the average word length of individual lines or pages. Thus, people do not learn the relation between sample size and sampling variability, although the data for ~~learning~~ such learning are abundant.

The lack of an appropriate code also explains why people usually do not detect the biases in their judgements of probability. A person could conceivably learn whether his judgements are externally calibrated by keeping a tally of the proportion of events that actually occur among those to which he assigns the same probability. However, it is not natural to group events by their judged probability. In the absence of such grouping it is impossible for an individual to

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1 discover, for example, that only 50% of the predictions to
2 which he has assigned a probability of .9 or higher actually
3 came true.

4 The empirical analysis of cognitive biases has implications
5 for the theoretical and applied role of judged probabilities. Modern
6 decision theory²⁴ regards subjective probability as the quantified
7 opinion of an idealized person. Specifically, the subjective
8 probability of a given event is defined by the set of bets
9 about this event that such a person is willing to accept. An
10 internally consistent, or coherent, subjective probability measure
11 can be derived for an individual if his choices among bets satisfy
12 certain principles, that is, the axioms of the theory. The
13 derived probability is subjective in the sense that different
14 individuals are allowed to have different probabilities for the
15 same event. The major contribution of this approach is that
16 it provides a rigorous subjective interpretation of probability
17 that is applicable to unique events and is embedded in a
18 general theory of rational decision.

19 It should perhaps be noted that, while subjective
20 probabilities can sometimes be inferred from preferences among
21 bets, they are normally not formed in this fashion. A person
22 bets on team A rather than team B because he believes that
23 team A is more likely to win; he does not infer this
24 belief from his betting preferences. Thus, in reality,
25 subjective probabilities determine preferences among bets and are not
26 derived from them, as in the axiomatic theory of rational
27 decision.²⁵

28 The inherently subjective nature of probability has led many students

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1 to the belief that coherence, or internal consistency, is the
2 only valid criterion by which judged probabilities should be
3 evaluated. From the standpoint of the formal theory of
4 subjective probability, any set of internally consistent
5 probability judgements is as good as any other. This criterion
6 is not entirely satisfactory, because an internally consistent set
7 of subjective probabilities can be incompatible with other beliefs
8 held by the individual. Consider a person whose subjective
9 probabilities for all possible outcomes of a coin-tossing game
10 reflect the gambler's fallacy. That is, his estimate of the
11 probability of tails on a particular toss increases with the
12 number of consecutive heads that preceded that toss. The
13 judgements of such a person could be internally consistent and
14 therefore acceptable as adequate subjective probabilities according
15 to the criterion of the formal theory. These probabilities,
16 however, are incompatible with the generally held belief that a
17 coin has no memory and is therefore incapable of generating
18 sequential dependencies. For judged probabilities to be considered
19 adequate, or rational, internal consistency is not enough. The
20 judgements must be compatible with the entire web of beliefs held
21 by the individual. Unfortunately, there can be no simple formal
22 procedure for assessing the compatibility of a set of probability
23 judgements with the judge's total system of beliefs. The rational
24 judge will nevertheless strive for compatibility, even though
25 internal consistency is more easily achieved and assessed. In
26 particular, he will attempt to make his probability judgements
27 compatible with his knowledge about the subject matter, the laws
28 of probability, and his own judgemental heuristics and biases.



GARY VAUSE
Chairman

STEFANIE HUMPHREY
Vice-Chair

State of Nevada
COMMISSION ON JUDICIAL DISCIPLINE
P.O. Box 18123
Reno, Nevada 89511
Telephone (775) 687-4017 • Fax (775) 448-9704
Website: <http://judicial.nv.gov>

PAUL C. DEYHLE
*General Counsel and
Executive Director*

February 15, 2023

Matthew Houston
High Desert State Prison
PO Box 650
Indian Springs, NV 89070

Dear Mr. Houston:

We are in receipt of your correspondence dated 2/10/2023. This office can only process and review complaints on a "Verified Statement of Complaint" form with an original signature. I have enclosed a complaint form together with an information brochure concerning this Commission. When we receive the completed and signed form, we will process your request. The documents received today will be attached to the complaint when received. Please note that the Commission does not provide copies of the Nevada Code of Conduct as we are not staffed or budgeted to do so. If you have any questions regarding the process, feel free to contact this office.

Sincerely,

NEVADA COMMISSION ON
JUDICIAL DISCIPLINE

A handwritten signature in black ink, reading "Kadie Seghieri".

Kadie Seghieri
Paralegal/Management Analyst II

Enclosures

STATE OF NEVADA
COMMISSION ON JUDICIAL DISCIPLINE

P.O. Box 18123
Reno, Nevada 89511

CONFIDENTIAL

Matthew Houston
High Desert State Prison
PO Box 650
Indian Springs, NV 89070

NEVADA DEPARTMENT OF CORRECTIONS

LEGAL MAIL

NAME: _____ DOC#: _____ UNIT: _____

REPORT TO CONTROL AT ADMIN FOR THE FOLLOWING:

LEGAL MAIL: _____

CERTIFIED MAIL: _____

REGISTERED MAIL: _____

DATE: _____ OFFICER: _____

INMATE SIGNATURE: _____ DOC#: 1810655 DATE: 3/8/23

DOC - 3020 (REV. 7/01)

SUMMARY

This article described three heuristics that are employed in making judgements under uncertainty: (i) representativeness, which is usually employed when people are asked to judge the probability that an object or event A belongs to class or process B; (ii) availability of instances or scenarios, which is often employed when people are asked to assess the frequency of a class or the plausibility of a particular development; and (iii) adjustment from an anchor, which is usually employed in numerical prediction when a relevant value is available. These heuristics are highly economical and usually effective, but they lead to systematic and predictable errors. A better understanding of these heuristics and of the biases to which they lead could improve judgements and decisions in situations of uncertainty.

CONCLUDING NOTES AND

ATTACHED EXHIBIT(S)

WHEREFORE, the Plaintiff-in-error-petitioner-appellant prays that a competent reader of this document (preferably the judge who is to NOT be biased) has had some time to let this all sink in while these pleadings seem to be lost within the bureaucratic ineptitude and temerity of Clark County and the careless State of Nevada. In observing the next few pages, further proof substantiating grounds from page No. 1 will illustrate just how dereliction of duty added insult to injury.

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P. 74

NO 1210652 - MUST
PO Box 650
Indian Springs, NV 89070

1 Pages of the EXHIBIT numbered 45-48 are
2 original documents showing proof that WMPD David Kelly, #7143,
3 Capital Police ^{#C6056} Montero, Radenta Blacic, Rosemary McMorris-
4 Alexander, Jonathan Shockley, Sheriff Joe Lombardo,
5 Tierra Danielle Jones, Bernard Little, ^{#12025} Jeremy Wood,
6 Cassandra Diez, Michael P. Villani, Steven B. Wolfson, ^{#001565}
7 ^{#12480} Kristina A. Rhoades, David M. Jones, Laura Goodman, ^{#013390}
8 Elli Rookhani, ^{#5674} Darin F. Inlay, Detective F. Edge #8645
9 and other bad actors not limited to WMPD Robert Jones
10 #9920 all knew and were made fully aware that the
11 Plaintiff-in-error-Petitioner-appellant was in no sort of
12 way deemed to be competent by the court as result
13 of those bad actors conspiring to commit (as proven by
14 the false arrest and void plea) coercion, legal malpractice,
15 and other crimes against Matthew Travis Houston.

16 The question to justice is why would David Kelly,
17 Montero, F. Edge, Kristina A. Rhoades and other individuals
18 mix up their false allegations to the court while
19 misinterpreting the Nevada Revised Statutes to ruin
20 the life of the totally permanently disabled advocate
21 for injured workers? Apparently this court must
22 believe that the rich MUST get richer while the poor
23 must suffer into debtor's prison and other cruel and
24 unusual punishments, especially when the court illegally
25 denied Houston his First Amendment Right To Petition
26 the courts for redress of grievances even before the clerk
27 denied the filing of his initial habeas petition March, 7th 2022
28 and demanded \$270.⁰⁰. How is Joe Biden gonna pay that?
(SEE PAGE No. 28) Page Number 44

Social Security Administration

Important Information

notice to principle is
notice to the agency
notice to the agency
is notice to principle

Social Security Administration
P.O. Box 17707
Baltimore, MD 21235-7707
Date: November 24, 2021



0026976 00026976 2 AB 0.461 1117MCTTSIEI T135 P4
MATTHEW TRAVIS HOUSTON
C/O CLARK COUNTY
DETENTION CTR
330 S CASINO CTR BLVD
LAS VEGAS NV 89101-6102

Thank you so much L.V.M.P.O.
for destroying the law office in
Iowa 95 city, Iowa of the
BAICK HOUSTON
LAW FIRM

* PLEASE TAKE NOTICE OF

MY TRUE A.K.A, WHICH THE READER OF THIS DOCUMENT
CAN OBSERVE IN THE 9th CIRCUIT OF THE DISTRICT OF NEVADA...
We are sending you this letter in both a standard print version and a large
print version. You will receive them in separate envelopes.

Good news! We are writing to tell you about a program that helps people
receiving disability benefits to go to work. It also may help people who are
already working to earn more money.

Ticket to Work and Self-Sufficiency is the name of the program. It was
established by Congress and is run by Social Security. It may help you get a
job if you want one or help you get a better job. Enclosed with this letter is
your Ticket to Work. The Ticket to Work is a very important paper that you
should keep in a safe place.

And don't worry. The Ticket to Work and Self-Sufficiency Program is
voluntary. You do not have to take part in this program to keep receiving
your disability benefits. But, if you want to work, we have many special rules
to help you. These special rules may help you keep some of your cash benefits
and will let you keep your Medicaid or Medicare coverage while you work.

How The Program Works

You can take the enclosed Ticket to Work to any of the Employment
Networks we have approved to help you or to a State vocational
rehabilitation (VR) agency. When you and an Employment Network or State
VR agency agree to work together, they will help you with services and
supports to get and keep a job.

It won't cost you anything. Social Security will pay any Employment
Network or State VR agency that helps you go to work.

And this is very important. If you are working with an Employment Network
or State VR agency and you meet certain other requirements, **we will not
begin a medical review to decide if you are still disabled.** For more
information, please read the enclosed pamphlet.

Page Number 45

OF NOTICE OF APPEAL TO AND RESPONSE TO ORDER GRANTING IN
PART, DENYING IN PART DEFENDANTS PROPER MOTION TO DISMISS COUNSEL
FROM 2/1/2022.

See Next Page

P.76

How To Find An Employment Network Or State VR Agency

If you are interested, you can get a list of Employment Networks or find the State VR agency in your area by calling toll-free 1-866-968-7842 (TTY 1-866-833-2967) Monday through Friday from 8:00AM - 8:00PM, EST.

On the Internet, you can search for Employment Networks and State VR agencies by visiting www.choosework.net and selecting "Find Help." You may receive a call from an Employment Network or State VR agency in your area to see if you are interested in the program.

If You Have Questions

If you have any questions about this program, please call toll-free 1-866-968-7842 (TTY 866-833-2967).

For general questions about Social Security benefits, please visit Social Security's website at www.socialsecurity.gov. You also may call Social Security toll-free at 1-800-772-1213 (TTY 1-800-325-0778), or you may write or visit any Social Security office. They also can give you information about other employment supports that help people with disabilities go to work.



If you visit a Social Security office, please bring this letter and your Ticket to Work with you.

Health Care Options

Need health insurance or know someone who does? Visit www.HealthCare.gov or call 1-800-318-2596 to get more information. If you are deaf or hard of hearing, you may call (TTY) 1-855-889-4325.

Suspect Social Security Fraud?

If you suspect Social Security fraud, please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

Social Security Administration

Enclosure(s):
Ticket to Work
Your Ticket To Work (SSA Publication No. 05-10061)

Page Number 46
OF NOTICE OF APPEAL TO AND RESPONSE TO "ORDER GRANTING IN PART, DENYING IN PART DEFENDANT'S PRO PER MOTION TO DISMISS COUNSEL" FROM 2/1/2022.

P.77

Social Security Administration
Retirement, Survivors, and Disability Insurance
Important Information

BNC#: 21B1528J20793
MATTHEW T HOUSTON
C/O CLARK COUNTY
DETENTION CTR
330 S CASINO CTR BLVD
LAS VEGAS NV 89101-6102

(FORM SSA-4926-SM-D)

Your New Benefit Amount

BENEFICIARY'S NAME: MATTHEW T HOUSTON

Your Social Security benefit will increase by 5.9% in 2022 because of a rise in the cost of living. You can use this letter as proof of your benefit amount if you need to apply for food, rent, or energy assistance. You can also use it to apply for bank loans or for other business. Keep this letter with your important financial records.

How Much You Will Get	
Your monthly benefit before deductions	\$1,375.00
Deductions:	
Medicare Medical Insurance (If you did not have Medicare as of November 18, 2021 and someone else pays your premium, we show \$0.00)	\$0.00
Medicare Prescription Drug Plan (We will notify you if the amount changes in 2022. If you did not elect withholding as of November 1, 2021, we show \$0.00)	\$0.00

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U.S. Federal tax withholding	\$0.00
Voluntary Federal tax withholding	\$0.00
(If you did not elect voluntary tax withholding as of November 18, 2021, we show \$0.00)	
After we take any other deductions, you will receive the payment you are due for December 2021 on or about January 3, 2022.	\$1,375.00

The information above shows your monthly benefit amount before and after deductions. Please remember, we will pay you in the month following the month for which it is due.

The Treasury Department requires Federal benefit payments to be made electronically. If you still receive a paper check, please visit the Department of the Treasury's Go Direct website at **www.godirect.gov** to request electronic payments.

If you disagree with any of these amounts, you must file an appeal with us within 60 days from the date you receive this letter. We will assume you got this letter 5 days after the date of the letter, unless you show us that you did not get it within the 5-day period. The fastest and easiest way to file an appeal is to visit

<https://secure.ssa.gov/iApp/INMID/start> online.

If You Have Questions

- Visit us at **www.ssa.gov** online.
- Call us toll-free at **1-800-772-1213** (TTY **1-800-325-0778**).
- Contact your nearest Social Security office.

SUITE 150
1250 S BUFFALO DR
LAS VEGAS NV 89117

{eventually we'll
get to Part III} A.M.T.H.

Page Number 48
C-21-357927-1

P. 79

RECEIVED

Americans w/ Disability

FILED

MAR 14 2022

Act of 1990, 1993

MAR 15 2022

CLERK OF THE COURT

CLERK OF COURT

DA
22

MATTHEW TRAVIS HOUSTON, P.C.

10/13/

1. S. Main St #300

2021

LV, NV B9101

EIGHTH JUDICIAL DISTRICT
COURT

LV, NV

Clark County, NV

Hearing: 4/06/2022
Time: 1:30 PM

9 Houston Def et al C-21-357927

10 vs. 21-CR-019840

11 NEVADA Plan. 21-CR-033713

12 C1237802A + C1248304A

EMERGENCY MOTION TO
OPPOSE REMAND AND
DISMISS CASE IN
IT'S ENTIRETY.

RECEIVED
OCT 18 2021
CLERK OF THE COURT

18 for the son years since 9/20/
19 2016, Houston is disabled from
20 catastrophic 45' fall @ Mandalay
21 Bay Resort. He survived 10/1/2017.
22 He is surviving the illegal
23 deprivation of his ka unit
24 Johnny Cash and the puppy
25 he was training, until 7-14-2021. His
26 dogs must be returned ASAP.

Page Number 49

PAGE NUMBER 1 OF 6

NOW SEE STAMP FROM 10/18/2021

P.80

10/13/2021 p#2

1 Houston is indigent again
 2 as a result of the false
 3 reports made by his work
 4 comp, which lasts until
 5 age 76. This court
 6 must attach this criminal
 7 case to every single case
 8 in which he is the victim,
 9 and grant motion to toll
 10 everything since 9/30/2016
 11 so that his personal injury
 12 lawsuit may finally be
 13 settled.

14
 15 Lastly, Houston is contributor
 16 to Foundation for HumPO and a
 17 good Samaritan, and volunteers w/
 18 legal Aid of Southern NY, and
 19 must be able to complete
 20 his paralegal classes @
 21 Blackstone, edu, and does
 22 not have to utilize public
 23 defender resources because of
 24 conflict of interest, judicial bias, etc.
 25
 26 Dec. under pen. of perjury. M.T.H., P.C.

Page Number 50

PAGE NUMBER 2 OF 6

P.81

Affidavit #1 P. #3

* Cert. of service * 10/13/2021
via U.S. P.S.
(Self explanatory, NRS, etc.)

It's certifiably
correct that Defendant
was illegally arrested
on 7/14/2021
and his puppies were
stolen from them.

Houston's wallet was stolen
on Sept. 11, 2021 also,
and his current state of
trauma since 9/30/2016
is at least survivable,
thanks to our considerate
and understanding community.

Dec. under pen. of perjury.

X M.T.H. 10/13/2021

AFFIDAVIT Pt. #2

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26

Not that our judicial system
cares about my pro se law firm,
but the illegal arrest and
malicious prosecution caused, (in
addition to the dog chipping of kg
Shiny Cash and little Luke Dog,
an eviction of Houston's
law office in Iowa City, Iowa,
@ 435 S. Lin St #927.

So now about a thousand
EXHIBITS are ~~lost~~ in
storage, and his house
plants most likely were not
able to be watered.
It is a mystery why the
judicial system of Clark County
thinks that it's OK to
make an ultimately
successful and disabled
entrepreneur become indigent,
homeless, bankrupted, divorced,
and expect him to be
able to file non-
impaired documents of truth.

M.T.H.
10/13/2021

cover note

1 to the Clerk: 10/13/2021

2
3 Attached is emergency motion
4 of opposition to remand,
5 Houston has been
6 permanently totally disabled
7 since 9/30/2016 and

8 is again indigent, and this
9 whole letter, motion,
10 affidavit of truth, must
11 be attached to his

12 employment discrimination claim

13 in re IATSE 720, his injury
14 lawsuit which was butchered
15 by the attorneys he had to
16 by five, and too many

17 other problems. I would

18 think the courts would

19 appreciate Houston PAO SE's

20 efforts at restoring justice

21 to the great State of

22 Nevada, and that the

23 courts would appreciate

24 advocacy for of one man

25 being illegally deprived of his

26 service animals. -M.T. H., P.C.

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PAGE NUMBER 5 OF 6

P.84



LAS VEGAS NV 890

13 OCT 2021 PM 5 L

PAGE NUMBER 6 OF 6

3
Saster.
P.5
is.
ly,
wperos
isquati
naquolite, et al.

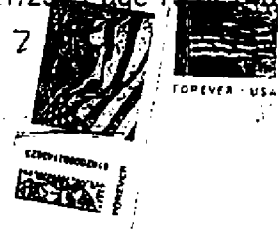
EIGHTH JUDICIAL DIST. COURT
ATTN: CLERK S. GRIERSON
Regional Injustice Center
200 Lewis Ave
Las Vegas, NV 89101
81155

Page Number 54

P.85

HDSP
PO Box 650
Indian Springs, NV
89070-0650

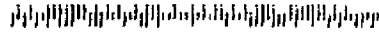
LAS VEGAS NV 890
9 MAR 2022 PM 3 L



DEPUTY OF THE CLERK
ATTN: HEATHER UNDERMANN
CLERK OF THE COURT
STEVEN D. GRIERSON
IN RE: C-21-357927-1
Regional Justice Center
200 Lewis Ave, 3rd Floor
Las Vegas, NV
89155-1160

RECEIVED
MAR 14 2022
CLERK OF THE COURT

83101-630000



UNIT 12
MAR 09 2022
HIGH DESERT STATE PRISON

Page Number 55

COMMENTARY

PHILIP NICE

Top Floor at the Tower

'Go to, let us build us a city and a tower, whose top may reach unto heaven' — Genesis 11:4

THE PROJECT IS IMPOSSIBLY ENORMOUS. It sprawls across city blocks and beyond. It contains trillions of parts and counting, accumulated into one mountainous human effort. Its mass is seismic, its height is dominating, and it keeps growing. It's a project best measured not in feet, miles or megatons, but in lives.

This is a description of the Genesis 11 tower of Babel, perhaps somewhat accurately captured in well-known illustrations like those of Peter Bruegel the Elder and others.

But it is also a description of human civilization itself, generation upon generation, course upon course, life upon life. The top level is the newest: an active layer of material, technology and human activity. From here, the view is spectacular. Looking down at the clouds below, and the world below that, as from the window of an aircraft, how can you be anything but dazzled at the civilization that built such a vantage point as this?

Here's how: Look inside.

Inside are the laborers. Inside are their taskmasters. Inside is human suffering of our own making.

One generation atop another atop another has set over itself its elites and travailed under them, laying the walls, the arches, the beams of human history and stacking them high with lives of ignorance, confusion, poverty and affluence, failure, futility, fear, strife, murder and suicide, violence and war. When the mass sufferings reach a breaking point, new elites have arisen and pushed the masses into new tasks—and brought new suffering. The levels below us are catastrophically out of course, but we just pile on more of the same and keep building. This is not so much a metaphor. This is the human condition.

This is the very nature of human beings. No amount of oppression, suffering or death has caused us to stop worshipping our own human will. We exert our will on the less powerful, and the will of the more powerful is exerted on us by our chieftains, kings, politicians, dictators and other taskmasters.

We oppress, raid, steal, dehumanize and mass-slaughter hundreds and thousands and millions because of our indestructible belief that human beings can rule ourselves. *After all*, we say, *just look at our tower.*

Human beings seem driven by a conviction, even if subconscious, that we are operating independently from our Creator—that, in fact, He may well want to destroy us, and that if we are to escape His punishment, we must do it together; we must make and submit to our human taskmasters, and we must build this tower. *We will live our own way.* How far will

we take this belief? To the grave.

Here on the top floor, we are enjoying the view. But at this late stage of construction, the structure, out of plumb, out of level, yet ever taller, is swaying out of control.

Our elites—and we—are now actively demolishing those few strong columns our Creator gave us that still remain standing: man and wife, parents and children, ideals of human freedom and accountability. It is becoming clear, if we will just see it, that we and our elites are hopelessly, terminally underqualified to build our own lives, let alone civilization. Deadly serious world elites are now telling us to cover our faces (made in the semblance of our Creator); stay inside; subject our bodies to injections and other medical mandates; eat insects instead of meat; live in pods; let criminals go unpunished; believe lies about the distant and recent past; forfeit our liberty; own no homes, vehicles, or other personal property; tolerate, wear, ingest or implant surveillance devices; forfeit our children's minds and sexuality; have no children at all, before or after they are conceived; have no family; give up our nationalities and eventually leave Earth altogether. No privacy, no freedom, no property, no family, no man or woman, no country, no Earth—no choice.

We could believe that our Creator made us for a purpose other than to destroy us. We could submit to His occasional punishment in order to better reach the potential He created humans to achieve, and live according to His will. Instead, we believe He must be resisted or denied altogether, and we must submit instead to the punishment, will and dehumanization of radical, destructive, insane elites who view us not as children of God but almost literally as ants.

Open your eyes. Our Creator is exposing to us the fundamental flaw not just of a particular political party or ideology or class but of human civilization itself. It's time to see this tower for what it really is.

Read "Mystery of Civilization" in Herbert W. Armstrong's book *Mystery of the Ages*.

SEPTEMBER 2022 35



Electronically Filed
07/02/2023

Matthew Travis Houston
CLERK OF THE COURT

RESPONSE TO THE FALSE CLAIMS OF JOHN T.
AFSHAR AND ROSEMARIE MORRIS-ALEXANDER AND

RENEWED OPPOSITION(S) TO ALL PENDING MOTION TO DISMISS

REV. MATTHEW TRAVIS HOUSTON, CHTD Case No. A-22-859817 (Dept. 14)
ABA No. 04662784
22010 Cold Creek Rd - Po Box 650 Case No. A-23-865412 (C-14)
Indian Springs, NV 89070 Case No. A-22-853203-W' 21
P: (702) 879-6789 C HOSP
C: (714) 916-7431
P: (610) 762-4143 Case No. A-22-859815-C
Dept. 17

DISTRICT COURT Dept. 24
CLARK COUNTY, NEVADA Case No. A-22-862155-C
Dept. No. 24

(SEE CASE NO. 2:23-CV-00031-RFB DJA
CSEE
Case No. 2:22-cv-01285-MMD-VER)
MATTHEW TRAVIS HOUSTON, Plaintiff -
Petitioner - Appellant
V. DIANNE FERRANTE,
"ACTING WARDEN" JEREMY BEAN,
CALVIN JOHNSON, ET AL
Defendant(s) -
Respondant(s) - Appellee(s)
RENEWED
EMERGENCY SUPPLEMENT AND
EX PARTE MOTION TO
REINSTATE
SCREENING / BRIEFING

Plaintiff moves this Court to apply the Statement of Facts
so that the Court will take notice of the ^{Filed} ~~attached~~ EXHIBITS
i.e., interpleadings(s) and enter judgement pursuant to law
after this 29th day of December, 2022, and May 12, 2023.
SEE EXHIBIT A- Appellant's Opening Brief Part III
EXHIBIT B- Notice of Appearance For Respondents and Response
EXHIBIT C- Supreme Court of Nevada interpleadings
EXHIBIT D- Discovery Material

→ "HEARING REQUESTED"

(SEE ATTACHED INTERPLEADINGS)

Matthew Travis Houston
REV. MATTHEW TRAVIS HOUSTON, CHTD
ABA No - 04662784

RECEIVED

This Honorable Court will PLEASE TAKE NOTICE
that an exhaustion of state remedies is NOT necessary
to prevent further injustice, manifest injustice, and
further damages to the innocent (both factually and
actually) man, the Plaintiff-in-Error / Petitioner - Appellant:

July, 23/2020 - McMorris Alexander threats "eat their hearts"
 C1237802A LLV# 200700099898 - Harassment charge

Dec. 23, 2020 - Redenta Blacic VM

Dec. 31, 2020 - Capitol Report Number 20C 900043 and LLV# 1590 210300101590

March 16, 2021 - Report from Capitol Police Montero to D. Kelly and Jason Lewis' lies 2 IOWA FOWLER

March 22, 2021 - F. Edge / D. Kelly / R. Blacic interview

March 30, 2021 - edge + Kelly sign declaration of warrant

May 11, 2021 - Nevada Pretrial Risk Assessment

July 14, 2021 - 21CR033713 21CR0198110 - JC dept #3 AUGUST, 2021

Fake Arrest 210700065245 2. J.C. Hearing to Waive? 21CR033713 - EXTORTION

3. Info. filed - 6:56 am - alleged GPA signed by Little

AUG. 4. Initial Arraignment - Villani - Samantha Albright
 J.C. Hearing filed Kristine Santi
 10:56 am GPA signed filed

Sept 4 - moved f/ CCDC to City Jail

September 7th, 2021 - released from CCDC on ankle

9.11, 2021 - met w/ Pitano and Furno

Sept. 30, 2021 - 21P01275 expires

OCT. 1 - VM to J.S. after expired NO CONTACT ORDER

5 - 21P01950 application filed, MOT. to Remand

7 - TPO (2nd) 1950 - order setting hearing

11 - Scott A. Ramsey, Kristina A. Rhoades, Tierra Jones, Teri Berkshire

Sunday, reminded 17 - House Arrest - Leslie Goldberg, Parion M. Beeman suck Victoria Boyd

(25 - Nancy Becker, V. Boyd, T. Berkshire, W.J. Merbach, B.S. Little

(28 - Served 21P01950 Amy Chellini without attorney present (no argument)

Nov. 1 - Nancy Becker, Teri Berkshire, Victoria Boyd
 Confirmation of Goldstein

Nov. 29 - Tierra Jones, Madalyn Kearney, V. Boyd

Dec. 6 - T.J. Goldstein + John T. Jones, Jr. (requested 1 week continuance)

Dec. 8 - J.O.C. - dropped 21CR033713 Dec. 10 - visit / interview by Amy Court

detective and DA - encouraged
July-2020 - R. Mc Morris "eat their hearts reports" the 1st TPO

Event # 210600045671

12.06.2021

12.08.2021:

clerk - Michaela Tapia
Recorder - Victoria Boyd
Deborah Scott

from J.O.C.: who is G.D. Cox?
CCPD?

H.01.2021 - Nancy Becker

21CR033713 - EXTORTION

4.26.21

~~21CR019840~~ - false Threats of Terrorism
21CR019840 Redenta Black

event # 210306101540
DA case # 202115878C

6/11/21 alleged rape message & where's the proof?

#210600045671

There was no rape message left or phone call made 6/11/2021

7.14.21 # ^{arrest} 210700065245

21PO1275
expired 9/30/2021

21CR033713 - extortion

8.02.21

~~8.04.21~~

C.21.357927.1 - stalking hearing waiver
10.11.21 - house arrest

~~8.04.21~~

~~8.03.21~~

~~10.06.21~~ 6:56 am

INFORMATION - stalking - GPA signed
FILED

10.02.2021 - 1st hearing
10.11.2021 - hearing

8.04.21 - hearing from 8.02.21 filed

10.01.21

GPA filed

10.5.21 - 2nd TPO filed mt. p. forward

10:56 am

GPA filed

10.28.21 - served 2nd TPO

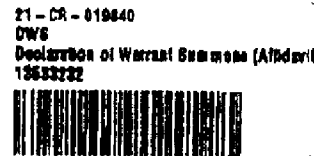
21PO1450

no B. Little - attorney present

12.06.21 - Monday - sentencing

12.08.21 - JOC

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS
(N.R.S. 171.106)
(N.R.S. 53 amended 7/13/1993)
"PRINT"



FILED
Event Number: **210300101690**
2021 APR 21 P 2:34

STATE OF NEVADA) Houston, Matthew

) ss: ID#:

COUNTY OF CLARK)

DOB:

SS#:

JUSTICE COURT
LAS VEGAS NEVADA

BJG

D. Kelly, being first duly sworn, deposes and says:

That He is a Detective with the Las Vegas Metropolitan Police Department, being so employed for a period of 19 years, assigned to investigate the crime(s) of Threat/False Info Re Act of Terrorism NRS 202.448 committed on or about 12/23/2020, which investigation has developed Houston, Matthew as the perpetrator thereof.

THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME, TO WIT:

On 03/16/2021 I D. Kelly #7413 was notified by Capital Police Officer Montero #C6056 of incidents involving an individual named Matthew Houston who was threatening to commit acts of violence unless his workman's compensation appeal was resolved.

On 12/23/2020 at 0803 am Matthew Houston left a voicemail on the main telephone line for Office for Consumer Health Assistance located at 332 W. Sahara #100 Las Vegas, NV 89102 from phone number [REDACTED] Redenta Blacic who is the Ombudsman for Workers Compensation returned Houston's phone call at 0829 am the same day. Houston told Blacic that he had an appeal before the Nevada Supreme Court and alleged he was being harassed by his insurer Sedgwick CMS Nevada Attorney for injured workers and the Department of Administration Hearings Division. Blacic asked if he had filed a complaint with the Division of Industrial Relations Workers Compensation Section and Houston responded that he had filed several complaints with them and again stated he was being harassed by everyone. As Blacic started to explain the process, Houston became angry and began yelling about knowing the process and being harassed and that he should be afforded all the benefits instead of being harassed by government agencies. He then stated to Blacic that "They shouldn't be surprised if/when he goes on a mass shooting rampage like the one committed on October 1st" Blacic does not remember if Houston used the words "if" or "when". Blacic attempted to calm Houston down but was unsuccessful. Houston attempted to call back two more times but Blacic did not answer the calls. No phone calls or voicemails were recorded.

I conducted an interview with Blacic on 03/22/21 with Detective F. Edge #8645 and obtained Blacic's taped statement regarding the incident. Blacic stated she was scared that Houston would carry out his threats, and

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CONTINUATION

Event #: 210300101590

after the phone call notified her supervisor. A Capital Police report was generated under Report Number 20C900043 which was taken on 12/31/20. I also completed an LVMPD report under LVMPD Evt# LLV 210300101590

On 07/23/2020 Houston also made threats to Rosemarie McMorris who is employed by Houston's insurer. McMorris filed an LVMPD crime report under Evt# LLV200700099888 for Harassment. Details of the report indicate Houston threatened to murder every employee of Sedgwick and their families and "Eat their hearts" and an Arrest warrant for harassment was submitted at that time.

On 03/16/2021 Jason Lewis [REDACTED] advised Capital Police that Houston also has made threats to the Department of Administration Hearings Division of Northern Nevada located in Carson City leaving a voicemail stating "I need immediate assistance because I am going to fucking murder every fucking employee at Mandalay Bay, MGM and everyone in the state of Nevada if you fucking people don't give me my fucking money."

Capital Police officer Montero had local Iowa PD officer Fowler [REDACTED] verify Houston's physical address as 435 S Linn St Apt 927, Iowa City IA 52240. Fowler stated that Houston has been responsible for 21 calls for service in Iowa City and is mentally ill and constantly on & off his prescribed medication.

Due to the fact that Houston through the means of oral communication made the threat "They shouldn't be surprised if/when he goes on a mass shooting rampage like the one committed on October 1st." and therefore, intimidated and alarmed Blacic and her coworkers. There is Probable Cause to believe that Houston made a Threat/False Info Re Act of Terrorism NRS 202.448.

Wherefore, Declarant prays that a Warrant of Arrest be issued for suspect Houston, Matthew on the charge(s) of Threat/False Info Re Act of Terrorism NRS 202.448.

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

Executed on this 30th day of March, 2021.

DECLARANT: [Signature] 7413

WITNESS: [Signature] Edge 8645

DATE: 03-30-21

WHERE IS THE APPROVAL PAGE TO THIS? :
 LAS VEGAS METROPOLITAN POLICE DEPARTMENT
 DECLARATION OF WARRANT/SUMMONS

(N.R.S. 171.106)

MALARKEY = (N.R.S. 53 amended 7/13/1993) NOW SEE MALARKEY-(S):

"PRINT" Capital Police Report Number 2090013

"Click to Add/Edit Event # on All Pages" key 1) On Event Number: 210300101000 - 0014

key 2) On See 210600045671

key 3) On See 200700019848

STATE OF NEVADA) Houston, Matthew

) ss: ID# 7035801

COUNTY OF CLARK) DOB: [REDACTED] SS# [REDACTED]

LV MUN. Art C 1237802A

7.14.21 LLV# 210700065245

NOW SEE MOTION(S) TO SUPPRESS THIS

D. Kelly, being first duly sworn, deposes and says:

DON MALARCHY
 MOST MALIGNANT

That He is a Detective with the Las Vegas Metropolitan Police Department, being so employed for a period of 19 years, assigned to investigate the crime(s) of Threat/Fake Info Re Act of Terrorism NRS 202.448 committed (on or about 12/23/2020), which investigation has developed Houston, Matthew as the perpetrator thereof. Then why isn't David Kelly sure of the exact date of these false accusations?

THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME, TO WIT: What sort of "incidents" were these?

On 03/18/2021 I D. Kelly #7413 was notified by Capital Police Officer Montero #C6058 of incidents involving an individual named Matthew Houston who was threatening to commit acts of violence unless his workman's compensation appeal was resolved.

Explanation for my sort of process? Why would Houston need any process? when his Supreme Court appeal was

On 12/23/2020 at 0903 am Matthew Houston left a voicemail on the main telephone line for Office for Consumer Health Assistance located at [REDACTED] from phone number [REDACTED]

Redenta Black who is the Ombudsman for Workers Compensation returned Houston's phone call at 0929 am the same day. Houston told Black that he had an appeal before the Nevada Supreme Court and alleged he was being harassed by his insurer Sedgwick CMS Nevada Attorney for injured workers and the Department of Administration Hearings Division. Black asked if he had filed a complaint with the Division of Industrial Relations Workers Compensation Section and Houston responded that he had filed several complaints with them and again stated he was being harassed by everyone. As Black started to explain the process, Houston became angry and began yelling about knowing the process and being harassed and that he should be afforded all the benefits instead of being harassed by government agencies. He then stated to Black that "They shouldn't be surprised

When he goes on a mass shooting rampage like the one committed on October 1st / Black does not remember

if Houston used the words "if" or "when". Black attempted to calm Houston down but was unsuccessful. Houston

attempted to call back two more times but Black did not answer the calls. No phone calls or voicemails were

recorded.

I conducted an interview with Black on 02/22/21 with Detective F. Edge #8846 and obtained Black's taped statement regarding the incident. Black stated she was scared that Houston would carry out his threats, and

well after 02/23/2021, or it was it on or about?

if she's not sure of what Houston said, unrecalled than why would she have interpreted the p.3

this was
 no sort
 of
 appeal.
 This is
 from a
 case
 of
 neglect
 which
 R. Black
 neglected
 his duties
 in helping
 resolve.
 These were
 the
 contributions

already
 in the
 process?
 this
 was
 sort of
 false
 claim.

if she
 doesn't
 remember
 than why
 did she
 make
 any
 claims
 at all?

sure of what she heard,

LVMPD 314 (Rev. 8/01) MCRD 2/7/19

LAPUEGAS METROPOLITAN POLICE DEPARTMENT

CONTINUATION

Event #: 210300101580-001

Who was this? why isn't this individual named in report?
after the phone call notified her supervisor. A Capital Police report was generated under Report Number 20C900043 which was taken on 12/31/20. I also completed an LVMPD report under LVMPD Ev# LLV 210300101580 well after on or about 12/23/2021.

where's the proof of this?

On 07/23/2020 Houston also made threats to Rosemarie McMorris who is employed by Houston's house. McMorris filed an LVMPD crime report under Ev# LLV200700009888 for Harassment. Details of the report indicate Houston threatened to murder every employee of Sedgwick and their families and "Eat their hearts" and an Arrest warrant for harassment was submitted at that time.

why isn't this in DISCOVERY? Obviously this 'DISCOVERY' is incomplete.

On 03/18/2021 Jason Lewis advised Capital Police that Houston also has made threats to the Department of Administration Hearings Division of Northern Nevada located in Carson City leaving a voicemail stating "I need immediate assistance because I am going to fucking murder every fucking employee at Mandalay Bay, MGM and everyone in the state of Nevada if you fucking people don't give me my fucking money."

EVIDENCE OF INCOMPETENCE:

Capital Police officer Montero had local Iowa PD officer Fowler (verify Houston's physical address as [redacted]) Fowler stated that Houston has been responsible for 21 calls for service in Iowa City and is mentally ill and constantly on & off his prescribed medication.

Again, where's the proof of any of this? Due to the fact that Houston through the means of oral communication made the threat "They shouldn't be surprised when he goes on a mass shooting rampage like the one committed on October 1st" and therefore, intimidated and alarmed Blacic and her coworkers. There is Probable Cause to believe that Houston made a Threat/Falsely Info Re Act of Terrorism NRS 202.448.

Wherefore, Declarant prays that a Warrant of Arrest be issued for suspect Houston, Matthew on the charge(s) of Threat/Falsely Info Re Act of Terrorism NRS 202.448.

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

Executed on this 30th day of March, 2021.

DECLARANT:

[Signature] 7418

WITNESS:

Edge 8645

DATE:

03-30-21

Case Report Number:
LLV210300101590-001

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT



Case Report

Administrative

Case Report Number	LLV210300101590-001	Verification	
Subject	Terroristic Threats- Radents, Black	Verification Level	
Disposition	Active	Pracinct	Bolden Area Command
Entered On	3/23/2021 10:40:05 AM	Jurisdiction	Las Vegas, City of
Entered By	Kelly, David	Grid	
Reported On	3/22/2021	Sector	US
Reporting Officer	Kelly, David	Map	
Reporting Agency	LV - LAS VEGAS METROPOLITAN POLICE DEPARTMENT	Beat	
		Census/Geo Code	
		Cell Source	
Report Type		Related Cases	
Assisted By		Means	
Occurred On (Date and Time)	Wednesday 12/23/2020 9:29:00 AM	Other Means	
Or Between (Date and Time)		Motives	
Location	[REDACTED]	Other Motives	
CSZ		Vehicle Activity	
Location Name		Direction Vehicle Traveling	
		Cross Street	
		Notified	

For Exceptional Clearances

Clearance Basis

Exceptional Clearance Date

Narrative

On 03/18/2021 I D. Kelly #7413 was notified by Capital Police Officer Montero #C8056 of incidents involving an individual named Matthew Travis Houston who was threatening to commit acts of violence unless his workman's compensation appeal was resolved.

On 12/23/2020 at 0903 am Matthew Houston left a voicemail on the main telephone line for Office for Consumer Health Assistance located at [REDACTED] from phone number [REDACTED] Radents Black who is the Ombudsman for Workers Compensation returned Houston's phone call at 0929 am the same day. Houston told Black that he had an appeal before the Nevada Supreme Court and alleged he was being harassed by his insurer Sedgwick CMS Nevada Attorney for injured workers and the Department of Administration Hearings Division. Black
Printed 3/23/2021 11:12 AM

Page 1 of 7

P.5

Case Report Number:
LLV210300101000-001

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT



asked if he had filed a complaint with the Division of Industrial Relations Workers Compensation Section and Houston responded that he had filed several complaints with them and again stated he was being harassed by everyone. As Blacic started to explain the process, Houston became angry and began yelling about knowing the process and being harassed and that he should be afforded all the benefits instead of being harassed by government agencies. He then stated to Blacic that "They shouldn't be surprised if/when he goes on a mass shooting rampage like the one committed on October 1st" Blacic does not remember if Houston used the words "if" or "when". Blacic attempted to calm Houston down but was unsuccessful. Houston attempted to call back two more times but Blacic did not answer the calls. No phone calls or voicemails were recorded.

I conducted an interview with Blacic on 03/22/21 with Detective F. Edge #8645 and obtained Blacic's taped statement regarding the incident. Blacic stated she was scared that Houston would carry out his threats, and after the phone call notified her supervisor. A Capital Police report was generated under Report Number 20C000043 which was taken on 12/31/20.

On 07/23/2020 Houston also made threats to Rosemarie McMorris who is employed by Houston's insurer. McMorris filed an LVMPD crime report under Ev# LLV200700098888 for Harassment. Details of the report indicate Houston threatened to murder every employee of Badgwick and their families and "Eat their hearts" and an Arrest warrant for harassment was submitted.

On 03/16/2021 Jason Lewis [REDACTED] advised Capital Police that Houston also has made threats to the Department of Administration Hearings Division of Northern Nevada located in Carson City leaving a voicemail stating "I need immediate assistance because I am going to fucking murder every fucking employee at Mandalay Bay, MGM and everyone in the state of Nevada if you fucking people don't give me my fucking money."

Capital Police officer Montero had local Iowa PD officer Fowler [REDACTED] verify Houston's physical address as [REDACTED]. Fowler stated that Houston has been responsible for 21 calls for service in Iowa City and is mentally ill and constantly on & off his prescribed medication.

Due to the fact that Houston through the means of oral communication over the telephone made the threat "They shouldn't be surprised if/when he goes on a mass shooting rampage like the one committed on October 1st" and therefore, intimidated and alarmed Blacic and her coworkers. There is Probable Cause that Houston made a threat/Falsely Info Re act of Terrorism NRS 202.446.

Offense _____

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Page 2 of 7

P. 6

**LAS VEGAS METROPOLITAN
POLICE DEPARTMENT**

Offenders _____

Aliases

2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032	2032-2033	2033-2034	2034-2035	2035-2036	2036-2037	2037-2038	2038-2039	2039-2040	2040-2041	2041-2042	2042-2043	2043-2044	2044-2045	2045-2046	2046-2047	2047-2048	2048-2049	2049-2050	2050-2051	2051-2052	2052-2053	2053-2054	2054-2055	2055-2056	2056-2057	2057-2058	2058-2059	2059-2060	2060-2061	2061-2062	2062-2063	2063-2064	2064-2065	2065-2066	2066-2067	2067-2068	2068-2069	2069-2070	2070-2071	2071-2072	2072-2073	2073-2074	2074-2075	2075-2076	2076-2077	2077-2078	2078-2079	2079-2080	2080-2081	2081-2082	2082-2083	2083-2084	2084-2085	2085-2086	2086-2087	2087-2088	2088-2089	2089-2090	2090-2091	2091-2092	2092-2093	2093-2094	2094-2095	2095-2096	2096-2097	2097-2098	2098-2099	2099-2100	2100-2101	2101-2102	2102-2103	2103-2104	2104-2105	2105-2106	2106-2107	2107-2108	2108-2109	2109-2110	2110-2111	2111-2112	2112-2113	2113-2114	2114-2115	2115-2116	2116-2117	2117-2118	2118-2119	2119-2120	2120-2121	2121-2122	2122-2123	2123-2124	2124-2125	2125-2126	2126-2127	2127-2128	2128-2129	2129-2130	2130-2131	2131-2132	2132-2133	2133-2134	2134-2135	2135-2136	2136-2137	2137-2138	2138-2139	2139-2140	2140-2141	2141-2142	2142-2143	2143-2144	2144-2145	2145-2146	2146-2147	2147-2148	2148-2149	2149-2150	2150-2151	2151-2152	2152-2153	2153-2154	2154-2155	2155-2156	2156-2157	2157-2158	2158-2159	2159-2160	2160-2161	2161-2162	2162-2163	2163-2164	2164-2165	2165-2166	2166-2167	2167-2168	2168-2169	2169-2170	2170-2171	2171-2172	2172-2173	2173-2174	2174-2175	2175-2176	2176-2177	2177-2178	2178-2179	2179-2180	2180-2181	2181-2182	2182-2183	2183-2184	2184-2185	2185-2186	2186-2187	2187-2188	2188-2189	2189-2190	2190-2191	2191-2192	2192-2193	2193-2194	2194-2195	2195-2196	2196-2197	2197-2198	2198-2199	2199-2200	2200-2201	2201-2202	2202-2203	2203-2204	2204-2205	2205-2206	2206-2207	2207-2208	2208-2209	2209-2210	2210-2211	2211-2212	2212-2213	2213-2214	2214-2215	2215-2216	2216-2217	2217-2218	2218-2219	2219-2220	2220-2221	2221-2222	2222-2223	2223-2224	2224-2225	2225-2226	2226-2227	2227-2228	2228-2229	2229-2230	2230-2231	2231-2232	2232-2233	2233-2234	2234-2235	2235-2236	2236-2237	2237-2238	2238-2239	2239-2240	2240-2241	2241-2242	2242-2243	2243-2244	2244-2245	2245-2246	2246-2247	2247-2248	2248-2249	2249-2250	2250-2251	2251-2252	2252-2253	2253-2254	2254-2255	2255-2256	2256-2257	2257-2258	2258-2259	2259-2260	2260-2261	2261-2262	2262-2263	2263-2264	2264-2265	2265-2266	2266-2267	2267-2268	2268-2269	2269-2270	2270-2271	2271-2272	2272-2273	2273-2274	2274-2275	2275-2276	2276-2277	2277-2278	2278-2279	2279-2280	2280-2281	2281-2282	2282-2283	2283-
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Addresses

Residence	Iowa City	United States
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Enrolla

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

Hair Color
Hair Style
Hair Length
Facial Hair
Complexion
Teeth
Build

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p. 7

Case Report Number:
LLV210300101590-001

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT



Height
Weight
Hand
Resident Nonresident
POB
DLN
DL State
DL Country

SSN
Registered Sex
Offender
EXP Date (RSO)
Accent
Nationality
Immigration
Status

Scars, Marks and Tattoos

[REDACTED]

Languages Spoken

[REDACTED]

Attire
Employer/School
Employer Address
Employer CSZ
Occupation/Grade

MO
Other MO
Habitual Offender
Status

Notes

Victims

Name: Black, Radenta

Victim Type Individual

Victim of 51522 - Make Threat/Fake Info Re Act Of Terrorism/Wind(F)-NRS 202.448 - IBR 13C

Case Report Number:
LLV210300101090-001



LAS VEGAS METROPOLITAN
POLICE DEPARTMENT

Aliases

[REDACTED]

Alerts

Addresses

[REDACTED]			
Business	[REDACTED]	Las Vegas, NV	Clark United States

Phones

[REDACTED]

Emails

[REDACTED]

Scars, Marks and Tattoos

[REDACTED]

Languages Spoken

[REDACTED]

Case Report Number:
LLV210300101690-001



LAS VEGAS METROPOLITAN
POLICE DEPARTMENT

Marital Status		DL Country	
Sex	Female	SSN	
Race	White	Attire	
Ethnicity	Hispanic or Latino	Employer/School	
DOB	[REDACTED]	Employer Address	
Age	58	Employer CSZ	
Eye Color		Occupation/Grade	
Hair Color		Testify	
Facial Hair		Injury	
Complexion		Registered Sex Offender	
Height		EXP Date (RSO)	
Weight		Accent	
Hand		Nationality	
Resident	Resident	Immigration Status	
POB			
DLN			
DL State			

Offender Relationships

S - Houston, Matthew	Relationship Unknown
----------------------	----------------------

Circumstances
Just. Hom. Circ.

LEOKA Info

Type	Activity
Assignment	ORI-Other Jurisdiction

Notes

Witnesses

Printed 3/23/2021 11:12 AM

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Case Report Number:
LLV210300101690-001



LAS VEGAS METROPOLITAN
POLICE DEPARTMENT

Other Entities _____

Properties _____

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P.11

VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
 "PRINT"

"Click here to add/edit Event # or Subject's Name"

Event #: LLV210300101590
 Statement Of: Redenta Blacic (RB)

SPECIFIC CRIME:

DATE OCCURRED:

TIME OCCURRED:

LOCATION OF OCCURRENCE:

☐ CITY OF LAS VEGAS

☐ CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: Redenta Blacic (RB)

DOB:
 RACE:
 HEIGHT:
 HAIR:
 WORK SCHEDULE:
 HOME ADDRESS:
 WORK ADDRESS:
 BEST PLACE TO CONTACT:
 BEST TIME TO CONTACT:

SOCIAL SECURITY #:
 SEX: F
 WEIGHT:
 EYES:
 DAYS OFF:
 HOME PHONE:
 WORK PHONE:
 EMAIL:

The following is the transcription of a tape-recorded interview conducted by Det. David Kelly (DK), P# 7413, and Det. Farrah Edge (FE), P#8845, LVMPD Counter Terrorism Section, on 03/22/2021 at 0925 hours.

DK: Okay this is event 210300101590, operator this is officer D. Kelly, P#7413, conducting a taped interview with Redenta Blacic, um it is R-E-D-E-N-T-A Blacic B-L-A-C-I-C, ah the date and time is March 22nd, and the time is 9:25 AM., and we are currently located at [REDACTED] and this interview is in regards to investigation of a terroristic threat, that occurred at the same address. Also present is officer a F. Edge, P#?

FE: 8845

DK: Um Ms. Blacic before we begin are you aware this interview is being recorded?

RB: Yes.

DK: Would you say your name and spell your last name?

RB: Redenta, last name is Blacic B-L-A-C-I-C.

DK: Okay, either Off. Edge or I made any promises to you to get me a statement?

RB: No.

For Official Use Only

**VOLUNTARY STATEMENT
(Continuation)**

Statement Of: Radenta Black (RB)

Exhibit #: LLV210300101690

DK: And are you giving this statement of your own free will?

RB: Yes.

DK: Awesome. So yeah, can you just tell me what happened in regards to this incident?

RB: Okay on um December 23rd, um I received an email from our administrative assistant indicating that Mr. Huston had called and left a message and wanted us um to return his call. I am the workers compensation on Buds – Ombudsman and he had some workers compensation issues, so the email came to me. I called him on the 23rd, at 9:03 when I a – when he answered the phone, he basically indicated that he was on the other phone with the Federal Department of Labor, as well as myself, and he said he was taped recording both phone calls.

Um he never said he had any issue with a not wanting to talk to me, I mean he continued the conversation, um indicating how he had been wronged by the workers compensation system, and every entity in Workers Compensation Nevada Attorney for Injured Workers, a his workers compensation insurer third party administrative which was Sedwick, and um I tried to um deescalate the situation explaining um workers compensation was a process. Um he was alleging harassment by his third party administrator Sedwick, by the Nevada Attorney for Injured Workers, um the Department of Administration, the hearings, he had um, had some hearing and he did not prevail, and um he currently shared he had a hearing pending um at the Nevada Supreme Court, I do believe.

But he's very um disgruntled, a so again I tried to calmed him down, and when I explained that workers compensation was a just a process, just trying to explain to him is a process, he um – he started yelling, that he knows workers compensation um and how he was being harassed and he should be provided everything because he was the injured worker.

Um instead of being harassed by government agencies, and then he stated that we should not be surprised um he used the word if/or when I'm sorry I don't remember if or when he um goes on a mass shooting rampage like um the one committed on October 1st. I attempted – I attempted to calm him down that failed, so I disc – I disconnected the call, he attempted to call back, I did not pick up the call. I called my supervisor who said that um we needed to file a report with Capital Police, um because of the statement he said, you know if/or when he, he said he, goes on um ...

DK: ... right.

RB: ... a the shooting spree, like October 1st, then – that really concerned me.

DK: And um did you – did you make a, filed a report with Capital Police?

RB: Yes I did. Yes I did, I filed a report with Capital Police, and um they have my statement and the online report, the number is 20C900043. Um after that um, they reached out to me, it was over the Christmas holiday, so things were scattered um, I also um – the officer asked me to reach out to Sedwick, who is the third party administrator as well as the Division of Industrial Relations, who is my former employer. So, I do – I do know the District Manager over there,

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P. 13

VOLUNTARY STATEMENT
(Continuation)

Statement Of: Redenta Black (RB)

Event #: LLV210300101550

VICTIM OF NASHVILLE, TN TERRORIST ATTACK? **OBJ**
and um she had shared with me that he had called the DIR, that they did filed a report because of the third party notification that Sedwick had notified them of their concern of Mr. (Huston) um it took a few days, it was after Christmas, I don't remember the exact day but Rosemary McMorris, who is the manager of Sedwick finally reached out to me, and she shared with me, that they had also filed a report, because they were also concerned with um their well being.

Because he had threatened her, the adjuster, the supervisor, um and to the point where they were working from home and Sedwick had to hire security for them, while they were working at home because of the threats that Mr. (Huston) made against them, um that's where we are with that.

OBJ

DK: And did they um, let you know what the nature of those threats were?

RB: No they did not, because I'm no longer the regulator.

DK: Okay.

RB: Um I'm not privy to a lot information that I would've been privy to had I still been part of, in the regulatory agency.

DK: And -- and how approximately how long has this situation been going on with Mr. (Huston)?

RB: Um...

OBJ

DK: Approximately...

OBJ

RB: ... approximately, when I talked to him in December um, gosh it at least I -- I think, God it sounded like it was a like month -- a month and half before when Sedrick had complaint, it was already something that had been done, prior to him reaching out to us and making that threat.

DK: Okay, um...

RB: ... I don't know a time, I'm so sorry they didn't share that with me.

DK: No, that's okay. Um and then when he called back, a did he leave messages?

OBJ

RB: He did but unfortunately we did not saved them. Um they were again late, I forward them to my supervisor, didn't do anything, but unfortunately, I'm so sorry they were not saved.

DK: That's -- that's okay. Did -- did you listen to those messages?

RB: Um n -- I just heard his name and then I just sent it forward.

DK: Okay.

RB: Because I just did not.

DK: Okay, and then um...

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P. 14

VOLUNTARY STATEMENT
(Continuation)

Statement Of: Redenta Black (RB)

Event #: LLV210300101590

RB: ... I just thought it was better for me, just...

DK: ... sure, that's understandable.

RB: Just send it to my supervisor.

DK: And then when he called, did he called um a this main office number?

RB: Would he did, the first time he called the main office number, and then because I was working remotely, um I had a cellular phone that's an office phone, it's a 775 number, and when I do that um I call off that number because no one picks up a restricted call from my phone.

DK: Okay. *why wouldn't she answer if Houston called back? if she was truly afraid why didn't she file*

RB: So, I use that phone, and that's a 775 number and that's the phone I used and that's the one *complaint* he would - would he tried originally right away to call back on that one, I ignored it he didn't leave any messages, but when he did call back after, he did call back on the mainline. Which *earlier* is the one I forwarded to my supervisor *then 4 months later?*

DK: Okay, and forgive me for not knowing all the appropriate division...

RB: ... uh-um...

DK: ... and ...

RB: ... oh I'm sorry...

DK: ... and organization...

RB: ... uh-um...

OBJECTION:

DK: ... involved with this process, but do you know if he made any threats to the Nevada Department of Administration Hearings Division of Northern Nevada?

RB: Um - um no I do not.

DK: Okay. *How does RB "know" that he made threats to Sedgwick?*

RB: Um, I know that he made threats to Sedgwick, I know that the Division of Industrial Relations Workers Compensation Section because Sedgwick reported them, were reported to him to them, because they were concerned. Um they filed a verbal with Capital Police.

DK: Okay. *Why did Sedgwick make these false reports?*

RB: But, I - for what the Division of Industrial Relations Workers Compensation Section said, Mr. Houston did not threaten them directly, he just... *well what did he "just" do?*

DK: Okay. And when - when you were on the phone with Mr. Houston...

VOLUNTARY STATEMENT
(Continuation)

Statement Of: **Referta Black (RB)**

Exhibit #: **LLV210300101600**

RB: ... uh-um...

DK: ... he made the -- the threats were you, a did you believe that he (unintelligible)

((crosstalk))

RB: ... *tone and manner is illegal pursuant to the First Amendment* without question, I was fearful, I was, I was -- I was distraught and I was fearful, because of his *new company he did make the threats* tone and his manner. And I been doing workers-comp since 1992, um actually as an audit investigator, so I -- I had threats, I had all those types of things um said to me in the past. Um you know workers-comp is not a system that breeds positivity (laughter).

DK: Sure.

RB: *As so if she did have experience, why did she not report the audit? Why did she deny her duty in helping Houston file a grievance.* It's a, so but he -- he scared me I mean, I still get upset, his is how many months later. And he frightens me, his tone, because he said if/when he, he said he -- he, not someone, he said *a grievance* he, and he was frightening, I -- I was fearful.

DK: Okay. And again what was the date of this phone call?

RB: Um it was, um December, um 23rd.

DK: And do you remember roughly what time?

RB: Yeah it was 8:03, because I -- I logged it right away, I have, I sent...

DK: ... okay approximately how long did the conversation last?

RB: Um I wanna say maybe ten minutes, ten -- fifteen minutes, at the most.

DK: Okay and he made the threat...

RB: *How did Houston make a threat if none of the phone calls were recorded or logged?* ... at the most...

DK: ... toward the end of the conversation?

RB: Yes, yes it was just like I said as soon as he said that and I couldn't calmed him down, and he frighten me, um because again I'm not generally frighten, it's not ...

DK: ... okay...

RB: ... something I -- I, I'm like I'm done, so I disconnected the call, and I called, I talked to my supervisor right away, I called them on my cell phone saying, a -- you need to know this, because...

DK: Okay, um so what I'm gonna do is um I'm gonna file a Las Vegas Metropolitan Police Department report.

RB: Uh-uh.

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P. 16

**VOLUNTARY STATEMENT
(Continuation)**

Statement Of: Redonta Blacic (RB)

Event #: LLV210300101590

DK: For this crime.

RB: Okay.

DK: Um and I'm gonna used you as a witness in the victim of the State, and a used you statement as part of the um packet. Um I just wanna make sure you're okay with if I send to court...

RB: ... yes that's fine...

DK: ... and that you might have to testify or ...

RB: ... that's fine...

DK: ... something like that.

RB: Because as I said, he frighten me.

DK: No worries.

RB: And that - that's not generally something that happens.

DK: No, and it's against the law to do that.

RB: You know, okay (laughter).

DK: It's, it's - it's good that you, that you know that you - you went through the Capital Police to - to...

RB: ... uh-uh...

DK: ... to start this process, to get it going. Um Det. Edge do you have any questions?

FE: No.

DK: Um okay, would this ends the a interview the time is, the same people are present, and the time is 9:35 AM.

THIS VOLUNTARY STATEMENT WAS COMPLETED AT 3320 W. Sahara Ave., Unit#100, Las Vegas Nevada 89102
ON THE 22nd DAY OF March 2021, AT 0935 HOURS.

**NOTICE OF INTENT TO USE AUDIOVISUAL TECHNOLOGY PURSUANT TO NRS
171.1975 TO PRESENT LIVE TESTIMONY AT PRELIMINARY EXAMINATION DUE TO
COVID-19 OUTBREAK**

Pursuant to NRS 171.1975, if the preliminary hearing in this matter is conducted during the COVID-19 outbreak, the State of Nevada intends to present the testimony of all victims and witnesses, regardless of geographical location, through the use of audiovisual technology. The court must allow the use of such audiovisual technology if good cause exists.¹

Prior to the preliminary hearing in this matter, the witness will be sworn and will sign the previously provided declaration, which acknowledges that "the witness understands that he or she is subject to the jurisdiction of the courts of this state and may be subject to criminal prosecution for the commission of any crime in connection with his or her testimony, including, without limitation, perjury, and that the witness consents to such jurisdiction."²

There is good cause existing to limit in-person testimony at a preliminary hearing during the COVID-19 outbreak due to the following facts and circumstances:

On March 11, 2020, the World Health Organization, noting their deep concern as to "both [] the alarming levels of spread and severity, and [] the alarming levels of inaction," to the COVID-19 outbreak, officially declared the outbreak as a pandemic. While doing so, the WHO noted they "have never before seen pandemic that can be controlled," and since they were first notified, they have "called everyday *(sic)* for countries to take urgent and aggressive action," further noting, "[w]e have rung the alarm bell loud and clear."³

Since this classification of the COVID-19 outbreak as a pandemic, Federal, State, County, and Local governments across the United States of America have taken swift and significant action to prevent the spread of this disease.

On Friday, March 13, President Trump declared a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak.⁴ Three days after this initial proclamation, President Trump and the White House Coronavirus Task Force issued stronger guidelines in an effort to slow the spread of this disease. Notably, the guidelines stated "[e]ven if you are young, or otherwise healthy, you are at risk and your activities can increase the risk for others. It is critical that you do your part to slow the spread of the coronavirus." President Trump called for gatherings to be no larger than ten people and to avoid eating and drinking in bars, restaurants, or food courts.⁵ Finally, the Director of the National Institute of Allergy and Infectious Diseases

¹ NRS 171.1975.1 "... if good cause otherwise exists, the magistrate must allow the witness to testify at the preliminary examination through the use of audiovisual technology."

² NRS 171.1975.2

³ <https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19--11-march-2020>

⁴ <https://www.whitehouse.gov/newsroom/action/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak>

⁵ <https://www.whitehouse.gov/briefings-statements/coronavirus-guidelines-america/>

https://www.whitehouse.gov/wp-content/uploads/2020/03/03_16_20_coronavirus-guidance_8.5x11_315PM.pdf

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custody status, are still expected to proceed in person, although alternative appearances for the attorneys are "encouraged when possible."¹³

While there are precautionary measures in place to screen for those exhibiting symptoms of the virus before entering the courthouse, the courthouse is open to the public as of March 16, 2020. A person infected with this virus, and who is contagious, may take up to two weeks to exhibit the symptoms that are the current focus of any screening. Further, multiple new studies strongly suggest that those who are infected, but are asymptomatic, are likely a significant force driving the spread of COVID-19.¹⁴ Finally, President Trump declared COVID-19 an "invisible enemy."¹⁵

Considering preliminary hearings are still scheduled and expected to be heard in the Las Vegas Justice Court, where attorneys are encouraged to use alternative methods to appear, limiting the in-person testimony of all victims and witnesses is required in the interest of public health and the safety of our community. Therefore, the State of Nevada intends to introduce such testimony at the preliminary hearing through the use of audiovisual technology should this hearing proceed during the COVID-19 outbreak.

¹³ <http://www.lasvegasjusticecourt.us/Admin%20Order%202020-03.pdf>

¹⁴ <https://www.cnn.com/2020/03/14/health/coronavirus-symptoms/asymptomatic/index.html>,
<https://theconversation.com/content/early/2020/03/13/science.abb3221?pg=1>,
<https://www.sciencemag.org/article/coronavirus-most-contagious-before-during-first-week-symptoms>,
<https://www.foxnews.com/media/dt-siegel-here-concerns-coronavirus-highly-contagious>

¹⁵ <https://www.politico.com/news/2020/03/16/trump-recommends-avoiding-gatherings-of-more-than-10-people-132323>

21-CR-018840
CRM
Criminal Complaint
13633231



JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED

THE STATE OF NEVADA, 2021 APR 27 P 2:34

Plaintiff,

JUSTICE COURT
LAS VEGAS NEVADA

CASE NO:

21CR019840

-vs-

BY 3JG

DEPT NO:

3

MATTHEW HOUSTON, aka,
Matthew Travis Houston #

DA CASE NO: 202115878C

Defendant.

CRIMINAL COMPLAINT

The Defendant above named having committed the crime of MAKING THREATS OR CONVEYING FALSE INFORMATION CONCERNING ACT OF TERRORISM (Category B Felony - NRS 202.448, 202.4415 - NOC 51522), in the manner following, to wit: That the said Defendant, on or about the 23rd day of December, 2020, at and within the County of Clark, State of Nevada, did then and there willfully, unlawfully, maliciously, and feloniously, by means of oral, written or electronic communications make a threat or convey false information concerning an act of terrorism with the intent to injure, intimidate, frighten, alarm or distress any person, whether or not that person is actually injured, intimidated, frightened, alarmed or distressed, to REDENTA BLACIC and/or the OFFICE OF CONSUMER HEALTH ASSISTANCE, 332 West Sahara Avenue, No. 100, Las Vegas, Clark County, Nevada, by threatening to go on a mass shooting rampage similar to 1 October.

All of which is contrary to the form, force and effect of Statutes in such cases made and provided and against the peace and dignity of the State of Nevada. Said Complainant makes this declaration subject to the penalty of perjury.

04/26/21

/mab
LVMPD EV# 210300101590
(TK) 3

\\CLARKCOUNTY\DA.NET\CRM\CASE2\2021\15878\UFILING\202115878C-COMP-(MATTHEW TRAVIS HOUSTON)-001.DOCX

NEVADA PRETRIAL RISK (NPR) ASSESSMENTDefendant's Name: **MATTHEW HOUSTON**Booking #: [REDACTED]Assessment Date: **5-11-2021**Assessor: **AT**County: **Clark**Defendant's Name: **MATTHEW HOUSTON**

DOB:

AGE: **36**Case/Booking #: **21-CR-019840**Dept. #: **JC-3**Address: **NOT INTERVIEWED**Contact Phone #: **N/A**# of Current Charges: **1**

City:

State: Zip:

Most Serious Charge: **Make threat/false
info re act of terrorism/WMD**Total Bail at booking: **TBD****SCORING ITEMS****SCORE**

- 1. Does the Defendant Have a Pending Pretrial Case at Booking?**

No If yes, list case # and jurisdiction:

0

- 2. Age at First Arrest (include juvenile arrests)**

First Arrest Date **9-08-2005**

21 to 35 yrs

1

- 3. Prior Misdemeanor Convictions (past 10 years)**

One to five

1

- 4. Prior Felony/Gross Misd. Convictions (past 10 years)**

One or more

1

- 5. Prior Violent Crime Convictions (past 10 years)**

None

0

- 6. Prior FTAs (past 24 months)**

None

0

- 7. Substance Abuse (past 10 years)**

Prior multiple arrests for drug use or possession/alcohol/drunkenness

2

- 8. Mitigating Verified Stability Factors (limit of -2 pts. total deduction)**

None verified

0**TOTAL SCORE:****5**Risk Level: **Moderate**OVERRIDE?: ☐ Yes ☒ No

Override Reason(s):

If Other, explain: _____

Final Recommended Risk Level: **Moderate**☐ LOW☒ MODERATE☐ HIGHER

Supervisor/Designee Signature _____

Date: **5-11-2021**21-CR-019840
NPR
Nevada Risk Assessment Tool
1354402

Revised 3.2021



NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant's Name: MATTHEW HOUSTON

Booking #: 7035801

Felony convictions: 1

YEAR	STATE	CHARGE
2019	NV	DUI, ABOVE LEGAL LIMIT, (3+)

Misdemeanor Convictions: 7 (13 IN DUI x2 Counts)

FTAS: 2

Detainers: N/A

Pending Cases: FTA WANT LV MUNI COURT #C1237802A

Event # 2007 00099898

Revised 3.2021

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT**

TCR1149369

☐ County Jail☐ City Jail☐ Adult☐ Juvenile

Bureau: NWAC

ID#		EVENT #		ARRESTEE'S NAME (LAST)			(FIRST)		(MIDDLE)		SSN#	
		LLV210700065245		HOUSTON			MATTHEW		TRAVIS			
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB					
ARRESTEE'S ADDRESS			STREET		BLDG/APT #		CITY		STATE		ZIP CODE	
OCCURRED		ARREST		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE)								
DATE: 7/14/2021		TIME: 21:50		DATE: 7/14/2021		TIME: 21:50		3041 ST ROSE PKWY HENDERSON NEVADA 89052				
LOCATION OF CRIME (NUMBER, STREET, CITY, STATE, ZIP CODE)												
3041 ST ROSE PKWY HENDERSON NEVADA 89052												
CHARGES / OFFENSES												
BW - LVJCR - 51622 - F - MAKE THREAT/FALSE INFO RE ACT OF TERRORISM/WMD												
CONNECTING REPORTS (TYPE OR EVENT NUMBER)												
TCR / DOAR												

The undersigned makes the following declarations subject to the penalty of perjury and says: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of approximately 5 year(s).

That I learned the following facts and circumstances which lead me to believe that the above named subject committed or was committing the offenses above at the location of 3041 ST ROSE PKWY HENDERSON NEVADA 89052 HENDERSON NEVADA 89052 and that the offense(s) occurred at approximately 21:50 hours on the 14th day of July, 2021.

Details for Probable Cause:

On July 14, 2021, I, Officer M. Mulligan P# 15657, operating as marked patrol unit 8X1, along with Officer J. Carroll P# 16715, operating as marked patrol unit 8X3, were conducting an investigation follow up at the Best Western Hotel, located at 3041 St. Rose Pkwy, Henderson, NV 89052, in regards to subject Houston, Matthew DOB () with a social of () Houston was wanted out of Clark County for terroristic threats and harassment.

As Officers arrived at the Best Western Hotel, Officers made contact with management and conducted a ruse to get Houston out of his hotel room. As Houston walked up to the front desk, Officers made contact with Houston, and verbally asked him if his name was Houston, Matthew, where Houston said it was. Once Officers confirmed it was our subject, Officers arrested Houston on his warrants, and transported him down to GDC where he was booked accordingly.

***** End *****

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Arresting Officer: M MULLIGAN

PE: 15657

LVMPD 803 (Rev 02/18) Word 2013

[illegible]

**Received
Las Vegas Justice Court
7/15/2021 1:00 AM**

Electronically Filed
8/4/2021 8:48 AM
Steven D. Grierson
CLERK OF THE COURT



1 CASE NO. C357927

2

3 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
4 CLARK COUNTY, STATE OF NEVADA

5

6 STATE OF NEVADA,

7 PLAINTIFF,

8 VS.

9 MATTHEW TRAVIS HOUSTON,

10 DEFENDANT,

11

12 REPORTER'S TRANSCRIPT OF UNCONDITIONAL WAIVER

13

14 BEFORE THE HONORABLE HARMONY T. LETIZIA, JUSTICE OF THE PEACE

15

16 MONDAY, AUGUST 2, 2021

17

9:40 O'CLOCK A.M.

18

19 FOR THE PLAINTIFF:

W. JAKE MERBACK,
DEPUTY DISTRICT ATTORNEY

20

21 FOR THE DEFENDANT:

BENARD H. LITTLE,
DEPUTY PUBLIC DEFENDER

22

23

* * * *

24 REPORTED BY: KIT MACDONALD, C.C.R.
25 CERTIFICATE NO. 65

1 LAS VEGAS, CLARK COUNTY, NEVADA, MONDAY, AUGUST 2, 2021

2 9:40 O'CLOCK A.M.

3 * * * * *

4 THE COURT: MATTHEW HOUSTON, 21CR019840.

5 GOOD MORNING.

6 MR. LITTLE: AND, YOUR HONOR, I BELIEVE WE HAVE THIS
7 MATTER RESOLVED. WITH THE COURT'S PERMISSION, MR. HOUSTON IS
8 GOING TO WAIVE HIS RIGHT TO -- UNCONDITIONALLY WAIVE HIS RIGHT
9 TO PRELIMINARY HEARING TODAY. IN DISTRICT COURT HE'S GOING TO
10 PLEAD GUILTY TO ONE COUNT OF AGGRAVATED STALKING, CATEGORY B
11 FELONY, NAMING ALL VICTIMS. THE STATE HAS NO OPPOSITION TO
12 PROBATION FOR 24 MONTHS, WITH A TWO TO FIVE YEAR SUSPENDED
13 SENTENCE. HE'S TO HAVE NO CONTACT WITH THE NAMED VICTIM, AND
14 STAY AWAY. IF HE'S SUCCESSFUL DURING PROBATION, IT WILL BE
15 REDUCED DOWN TO A GROSS MISDEMEANOR, NON-FELONY OFFENSE FOR
16 AGGRAVATED STALKING, WAIVING ANY DEFECTS IN THE PLEADINGS.
17 HE'S ALSO TO RECEIVE, UPON ENTRY OF HIS PLEA, AN O.R. AT HIS
18 ENTRY OF PLEA, WITH LOW LEVEL ELECTRONIC MONITORING, AND HE'S
19 TO STAY AWAY AND A NO CONTACT ORDER WITH THE NAMED VICTIM
20 REN -- RED -- I'M ALWAYS GOING TO HAVE PROBLEMS WITH HIS NAME,
21 R-E-D-E-N-T-A, B-L-A-C-I-C, AND THE OFFICE OF CONSUMER HEALTH
22 ASSISTANCE.

23 ADDITIONALLY, THE STATE WILL DISMISS CASE NO. 21CR033713.

24 MR. MERBACK: SO -- THAT'S ALL CORRECT. THE ONLY ISSUE
25 IS, THAT THERE'S ACTUALLY THREE DIFFERENT VICTIMS HE'S SUPPOSE

1 TO STAY AWAY FROM, AND THE ADDRESS, SO CAN I PUT THOSE ON THE
2 RECORD?

3 THE COURT: OF COURSE.

4 MR. MERBACK: IS THAT WHAT --

5 MR. LITTLE: YES.

6 MR. MERBACK: SO IT'S ROSEMARIE MCMORRIS, REDENTA HLACIC,
7 AND ROSEMARIE -- DO YOU HAVE THAT LAST...

8 MR. LITTLE: I BELIEVE JASON LEWIS WAS THE THIRD --

9 MR. MERBACK: OKAY.

10 MR. LITTLE: -- ALLEGATION.

11 MR. MERBACK: AND SO THEN THE ADDRESS IS 9930 WEST
12 CHEYENNE. OTHER THAN -- WITH THAT INCLUDED, THAT'S ALL
13 CORRECT.

14 THE COURT: OKAY. SIR, IS THAT YOUR UNDERSTANDING OF THE
15 NEGOTIATIONS?

16 THE DEFENDANT: YES, YOUR HONOR.

17 THE COURT: YOU UNDERSTAND THAT THIS IS AN UNCONDITIONAL
18 WAIVER OF YOUR RIGHT TO HAVE A PRELIMINARY HEARING, WHICH
19 MEANS IT'S A PERMANENT WAIVER OF YOUR RIGHT TO HAVE A
20 PRELIMINARY HEARING?

21 THE DEFENDANT: YES, YOUR HONOR.

22 THE COURT: WHAT THAT MEANS FOR YOU IS ONCE YOU GET UP TO
23 DISTRICT COURT IF YOU DECIDED NOT TO GO THROUGH WITH THESE
24 NEGOTIATIONS YOU WOULD BE GOING DIRECTLY TO TRIAL ON THE
25 ORIGINAL CHARGES BUT YOU WOULD NOT BE COMING BACK TO THIS

1 COURT TO HAVE A PRELIMINARY HEARING, DO YOU UNDERSTAND?

2 THE DEFENDANT: YES, YOUR HONOR.

3 THE COURT: KNOWING ALL OF THIS, DO YOU WISH TO

4 UNCONDITIONALLY WAIVE YOUR RIGHT TO HAVE A PRELIMINARY

5 HEARING?

6 THE DEFENDANT: YES, YOUR HONOR.

7 THE COURT: IT APPEARS TO ME FROM THE CRIMINAL COMPLAINT

8 ON FILE THAT THE CRIMES OF MAKING THREATS OR CONVEYING FALSE

9 INFORMATION CONCERNING ACT OF TERRORISM, HAVE BEEN COMMITTED

10 AND THAT THE DEFENDANT, MATTHEW HOUSTON, HAS COMMITTED THESE

11 CHARGES. SIR, YOU'RE GOING TO APPEAR IN THE EIGHTH JUDICIAL

12 DISTRICT COURT ON THIS DATE.

13 THE CLERK: AUGUST 4TH AT 8 A.M.

14

15 (AT 9:42 A.M. THE PROCEEDINGS WERE RECESSED.)

16 * * * *

17 ATTEST: FULL, TRUE AND CERTIFIED TRANSCRIPT.

18 /S/KIT MACDONALD
19 KIT MACDONALD, C.C.R.
20 COURT REPORTER
C.C.R. NO. 65

21

22

23

24

25

1 REPORTER'S DECLARATION

2 STATE OF NEVADA)

3 COUNTY OF CLARK)

4

5 I, KIT MACDONALD, A CERTIFIED COURT REPORTER IN AND
6 FOR THE STATE OF NEVADA, HEREBY DECLARE THAT PURSUANT TO NRS
7 239B.030 I HAVE NOT INCLUDED THE SOCIAL SECURITY NUMBER OF ANY
8 PERSON WITHIN THIS DOCUMENT.

9 I FURTHER DECLARE THAT I AM NOT A RELATIVE OR
10 EMPLOYEE OF ANY PARTY INVOLVED IN SAID ACTION, NOR A PERSON
11 FINANCIALLY INTERESTED IN THE ACTION.

12

13

/S/KIT MACDONALD
KIT MACDONALD, C.C.R.
C.C.R. NO. 65

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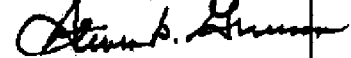
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Electronically Filed
8/3/2021 10:56 AM
Steven D. Grierson
CLERK OF THE COURT



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

DISTRICT COURT
CLARK COUNTY, NEVADA

12 I.A. 8/4/21
13 8:00 A.M.
14 PD

15 THE STATE OF NEVADA,
16
17 Plaintiff,

CASE NO: C-21-357927-1

18 -vs-

DEPT NO: X

19 MATTHEW HOUSTON, aka,
20 Matthew Travis Houston,

INFORMATION

21 Defendant.

22 STATE OF NEVADA }
23 COUNTY OF CLARK } ss.

24 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State
25 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

26 That MATTHEW HOUSTON, aka, Matthew Travis Houston, the Defendant(s)
27 above named, having committed the crime of **AGGRAVATED STALKING (Category B**
28 **Felony - NRS 200.575 - NOC 50333)**, on or between December 23, 2020 and June 10, 2021,
within the County of Clark, State of Nevada, contrary to the form, force and effect of statutes
in such cases made and provided, and against the peace and dignity of the State of Nevada, did
willfully, unlawfully, feloniously, and maliciously engage in a course of conduct directed
towards REDENTA BLACIC and/or ROSEMARIE MCMORRIS and/or JONATHAN
SHOCKELY that would cause a reasonable person to feel terrorized, frightened, intimidated,
harassed, or fearful for their immediate safety or the immediate safety of a family or household
member, by threatening to go on a mass shooting rampage similar to 1 October and/or making

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1 verbal demands for payment to Defendant of the sum of "Workers Comp Claim" lawful money
2 of the United States, and that course of conduct did, in fact, cause REDENTA BLACIC and/or
3 ROSEMARIE MCMORRIS and/or JONATHAN SHOCKELY to feel terrorized, frightened,
4 intimidated, harassed, or fearful for their immediate safety or the immediate safety of a family
5 or household member and in conjunction therewith defendant did threaten REDENTA
6 BLACIC and/or ROSEMARIE MCMORRIS and/or JONATHAN SHOCKELY and/or with
7 the intent that REDENTA BLACIC and/or ROSEMARIE MCMORRIS and/or JONATHAN
8 SHOCKELY and/or be placed in reasonable fear of death or substantial bodily harm.

9 STEVEN B. WOLFSON
10 Clark County District Attorney
Nevada Bar #001565

11 BY

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

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27 21CR019840/erg/L-4
28 LVMPD EV#210300101590
(TK3)

Electronically Filed
5/4/2021 8:56 AM
Steven D. Grierson
CLERK OF THE COURT



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

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

11 -vs-

CASE NO: C-21-357927-1

12 MATTHEW HOUSTON, aka,
13 Matthew Travis Houston,

DEPT NO: X

14 Defendant.

15 GUILTY PLEA AGREEMENT

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

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

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

\\CLARKCOUNTY\TDA.NET\CRM\CASES\2023\357927-1\5750-GPA-04\MATTHEW TRAVIS HOUSTON-001.DOCX

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

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

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

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

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

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

CONSEQUENCES OF THE PLEA

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

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

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

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

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

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

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

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

///

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

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

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

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

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

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

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

26 **WAIVER OF RIGHTS**

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

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

VOLUNTARINESS OF PLEA

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

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

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

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

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

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

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

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

6 DATED this 3rd day of August, 2021. *Signature affixed with the*
7 *express consent of:*

8 *Matthew Houston*
9 MATTHEW HOUSTON, aka,
10 Matthew Travis Houston
11 Defendant

12 *By: Benard Little*

13 *Br #12005*

14 *[Signature]*
15
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21
22
23

24 AGREED TO BY:

25 *#9598*
26 *[Signature]*
27 KRISTINA AIRHOADES
28 Chief Deputy District Attorney
Nevada Bar #612480

1 CERTIFICATE OF COUNSEL:

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

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

18 Moreover, I have explained that regardless of what Defendant may have been
19 told by any attorney, no one can promise Defendant that this conviction will not
20 result in negative immigration consequences and/or impact Defendant's ability
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of guilty offered by the Defendant pursuant to this agreement are
23 consistent with the facts known to me and are made with my advice to the
24 Defendant.
25 5. To the best of my knowledge and belief, the Defendant:
26 a. Is competent and understands the charges and the consequences of
27 pleading guilty as provided in this agreement,
28 b. Executed this agreement and will enter all guilty pleas pursuant hereto
voluntarily, and
c. Was not under the influence of intoxicating liquor, a controlled
substance or other drug at the time I consulted with the Defendant as
certified in paragraphs 1 and 2 above.

Dated: This 31st day of August, 2021.

ATTORNEY FOR DEFENDANT

erg/L-4

C-21-357927-1

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Felony/Gross Misdemeanor

COURT MINUTES

August 04, 2021

C-21-357927-1 State of Nevada
vs
Matthew Houston

August 04, 2021 8:00 AM Initial Arraignment

HEARD BY: Villani, Michael

COURTROOM: RJC Lower Level Arraignment

COURT CLERK: Samantha Albrecht

RECORDER: Kristine Santi

REPORTER:

PARTIES

PRESENT:	Gutierrez, Seth	Attorney
	Houston, Matthew	Defendant
	Public Defender	Attorney

JOURNAL ENTRIES

- Deputized Law Clerk, Haley Beza present on behalf of the State.

NEGOTIATIONS are as contained in the Guilty Plea Agreement filed on 8/4/2021 and placed on the record by Mr. Gutierrez. DEFT. HOUSTON ARRAIGNED AND PLED GUILTY TO AGGRAVATED STALKING (F). Court ACCEPTED plea, and ORDERED, matter REFERRED to the Division of Parole and Probation (P&P) and SET for sentencing. Pursuant to negotiations, COURT FURTHER ORDERED, Deft. GRANTED Own Recognizance (OR) Release with LOW LEVEL ELECTRONIC MONITORING and Defendant shall stay away and have NO CONTACT with Redenta Blacic, Rosemarie McMorris and/or Jonathan Shockely; additionally Defendant shall STAY AWAY from 9930 West Cheyenne Avenue, Las Vegas, Nevada. Court DIRECTED Deft. to report to P&P within 24 hours of release.

OR/LOW LEVEL EMP

11/29/2021 8:30 AM SENTENCING (DEPT. 10)

PRINT DATE: 10/07/2022

Page 1 of 8

Minutes Date: August 04, 2021

C-21-357927-1

PRINT DATE: 10/07/2022

Page 2 of 8

Minutes Date: August 04, 2021

IN THE JUSTICE COURT OF THE Las Vegas TOWNSHIPCOUNTY OF Clark, STATE OF NEVADARosemarie McMorris-Alexander

Applicant (print your name above),

vs.

Matthew Travis HoustonAdverse Party (print the name of the person you want
protection from above).

21PO1950

CASE NO.: _____

DEPT: Case Reassigned to Dept.#14

APPLICATION FOR PROTECTION ORDER

1. Your information (you are the "Applicant").

Your name: Rosemarie McMorris-Alexander

(first)

(middle)

(last)

2. Who do you want to be protected from (this person is the "Adverse Party")?

Name: Matthew Travis Houston

(first)

(middle)

(last)

3. Who needs protection (check all that apply)?

☒ Me.☒ Minor child (see definition on bottom of page 2).☒ The following household members, including minor children not included in definition
on page 2.

Name	Date of Birth	Relationship to Applicant	Relationship to Adverse Party
Alyssa L Alexander	10/9/2017	Child	she is my daughter
Lillian R McMorris	12/23/1954	Parent	she is my mother

4. Why do you need to be protected from the person named above (you must check one)?

☒ The Adverse Party committed acts of stalking or aggravated stalking against me.

Definition of stalking, aggravated stalking and harassment:

Stalking: A person commits the crime of stalking when, without lawful authority, that person willfully or maliciously engages in a course of conduct directed towards a victim that would cause a reasonable person under similar circumstances to feel terrorized, frightened, intimidated, harassed or fearful for his or her immediate safety or the immediate safety of a family or household member, and that actually causes the victim to feel terrorized, frightened, intimidated, harassed or fearful for his or her immediate safety or the immediate safety of a family or household member. NRS 200.575(1)

Aggravated Stalking: A person who commits the crime of stalking and in conjunction therewith threatens the person with the intent to cause the person to be placed in reasonable fear of death or substantial bodily. NRS 200.575(2)

Harassment: A person commits harassment when: (a) Without lawful authority, the person knowingly threatens: (1) To cause bodily injury in the future to the person threatened or to any other person; (2) To cause physical damage to the property of another person; (3) To subject the person threatened or any other person to physical confinement or restraint; or (4) To do any act which is intended to substantially harm the person threatened or any other person with respect to his or her physical or mental health or safety; and (b) The person by words or conduct places the person receiving the threat in reasonable fear that the threat will be carried out. NRS 200.571

☐ The Adverse Party committed a sexual assault on me.

Definition of sexual assault: A person commits sexual assault if they subject another person to sexual penetration, or forces another person to make a sexual penetration on himself or herself or another, or on a beast, against the will of the victim or under conditions in which the perpetrator knows or should know that the victim is mentally or physically incapable of resisting or understanding the nature of his or her conduct. NRS 200.366

☒ **Protection of Children:** The parent or guardian of a child may petition any court of competent jurisdiction on behalf of the child for a temporary or extended order against a person who is 18 years of age or older and who the parent or guardian reasonably believes has committed or is committing a crime involving: (a) Physical or mental injury to the child of a nonaccidental nature; or (b) Sexual abuse or sexual exploitation of the child. NRS 33.400

Are you applying on behalf of a minor child? ☐ No ☒ Yes

Child's name: Aria S Alexander

(first)

(middle)

(last)

As you complete the application, please keep in mind that you are filling in the questions as they pertain to the actions/incident committed upon the child.

5. How do you know the person you need protection from (check all that apply)?

- ☐ We are related by blood or marriage. Explain _____
- ☐ We are or used to be friends/acquaintances.
- ☐ We are neighbors or reside in the same neighborhood.
- ☐ We are or were co-workers.
- ☒ Other: (specify relationship): Workers Comp Claim

Are there any other current or prior court cases that involve you and the Adverse Party in any court?

- ☒ No. *? Really? So these cases*
- ☐ Yes. If you know, please list the case type, county, state, and case number:

don't have anything to do with why HOUSTON was not being taken care of?

Firearms / Guns. Once again Sedgwick has taken everything.

Does the Adverse Party own a gun or have a gun in his/her possession or control?

- ☐ No ☐ Yes ☒ I don't know.

Most Recent Event. *intentionally neglected to discipline* Think about the most recent event. These questions ask about the most recent event only.

for our lady justice, Dianne Ferrante for neglecting her duty.

Approximate date it happened: 10/2021

City / State / Location where it happened: 34% or greater
Las Vegas NV

Did the other person use or threaten to use a weapon? ☒ No ☐ Yes.

everyday of my life since 10/1/2017

What Happened? Explain the most recent event and describe any injuries. Give specific and detailed information about the event. You can list past events on the next page. If you are filing on behalf of a child, include details about what happened to the child.

Event # LLV210600045671 (case no C357927/21CR019840): Matthew Houston called me and advised, 'I know where you live...I will rape and murder you your 2 daughters.' For this case he was arrested and entered into a plea agreement that he will not be sentenced for until 11/29/2021. In the interim he has been released with an ankle monitor.

and everyday of my life

I was encouraged by the detective and DA for the case above to obtain a protective order. A TPO was obtained under case no 21PO1275 which expired 09/30/2021. Mr. Houston called and left a threatening message on 10/01/2021.

since 9/30/2016. x

Message forwarded to DA who again encouraged me to file for a protective order as his actions indicate he may not abide by the plea agreement as he has already violated it with the message left considering he was not to make

records show that Matt Houston, P.C. -

records show that Houston never went anywhere near the northwest side of town.

©2020 Nevada Supreme Court

Application for Protection Order

The whole time of ankle bracelet, Page 3 of 8 Houston was between EXALIBUR and 3041 Saint Rose Parkway trying to find his service animals.

See attached

Attach more pages if you need more room (pages 4a, 4b, 4c).

9. Past Event(s).

Think about any other times the person you want protection from threatened or abused you and/or the child/children. The following questions ask about any past events that may have happened.

Approximate Date: 06/11/2021

What Happened:

Event # LLV210600045671: Matthew Houston called me and advised. 'I know where you live...I will rape and murder you and your 2 daughters.'

OBJECTION, first and foremost,
I, Matthew Travis Houston
NEVER said any of this.

Never said anything at the
Court.

why would Matthew Travis Houston
provide the advice of raping anybody? Let alone
children for the love of sweet baby Jesus?

And I/he sure as heck did NOT have any of these
Approximate Date: people's addresses until

What Happened:

Benard Little sent me this
information. when I/he was served this
October 28th, 2021 at CCDC I/he
threw the paperwork in the
garbage can, because not only is
this case a complete lie but it's
based on nothing more than hearsay,
falscheeds and coercion of the State
of Nevada and its banking Commission and
insurance companies to have me/his person
commit suicide. At Anthony M.

10. Law enforcement involvement.

Was law enforcement informed? ☒ No ☐ Yes

a. If so, please provide a copy of the police/incident report.

Was anyone arrested? ☐ No ☐ Yes (Who): to have filed a Motion to

Is the Adverse Party in jail? ☒ No ☐ Yes WITHDRAW PLEA, according to the
records received thus far, but this kangaroo court and
prison industry screwed that up too? Now whats up Nevada?

11. Temporary Protections Requested (*check all that apply*).

Do not list any confidential addresses.

The other person will get a copy of this application and will see any addresses you write down.

☒ **Prohibited Activities.** The Adverse Party should not threaten, physically injure, or harass me and/or the minor child, either directly or through someone acting on his/her behalf.

☒ **No Contact or Restricted Contact.** The Adverse Party should not contact me and/or the minor child at all, either in person, by phone / text, by email or through social media.

☒ **Current Residence.** The Adverse Party should stay away from my current residence.

Do you and the Adverse Party live together? ☒ No ☐ Yes

If yes, whose name is listed on the lease/title? _____

Does the Adverse Party know where you live? ☐ No ☒ Yes

If no, is your address confidential? ☒ No ☐ Yes (*don't list your address*)

5504 Morningcross St.

Address

Las Vegas, NV 89130

Clark

City, State, Zip Code

County

Do you and the Adverse Party live in the same complex/property/trailer park? ☒ No ☐ Yes

☒ No. Should the Adverse Party stay away from the entire complex/property/trailer park? ☐ No ☒ Yes

☐ Yes. If so, explain the distance and need for protection in that complex/property/trailer park:

The distance between us is unknown. Mr. Houston indicated prior that he knew where I lived.

☐ **Personal Belongings.**

☐ I need to get my belongings. I want law enforcement to come with me to the Adverse Party's residence so I can pick up my belongings. The address I need to go to is (*list street address, apartment number, city, state, zip*):

☐ The other party needs to get his/her belongings. Law enforcement should come with the Adverse Party to my residence to pick up his/her belongings.

☒ **Work.** The Adverse Party should stay away from my workplace.

Do you and the Adverse Party work at the same place? ☒ No ☐ Yes

Is your work address confidential? ☐ No ☒ Yes (do not write details below)

Because she's obviously not
 Employer doing her job, I was
 Address told by Sedgwick to report
 City, State, Zip Code County City, State, Zip Code County

☒ **School/Daycare.** The Adverse Party should stay away from my school and/or the child's school/daycare.
 Dianne Ferrante grievance
 to her supervisor,

Is the school/daycare address confidential? ☒ No ☐ Yes (do not write details below)

which is R.M.M.
 Ernest May Elementary School
 School/Daycare
 6350 W Washburn Rd
 Address
 Las Vegas, NV 89130 Clark
 City, State, Zip Code County
 School/Daycare
 Address
 City, State, Zip Code County

☒ **Other Places.** The Adverse Party should stay away from the following places that I and/or the minor children go to regularly.

Shadow Hills Church
 Location
 We are there weekly
 Why?
 7811 Vegas Dr.
 Address
 Las Vegas, NV 89128 Clark
 City, State, Zip Code County

Location
 Why?
 Address
 City, State, Zip Code County

About Extended Protection Orders:

*This application automatically asks the judge to issue a 45-day temporary protection order
without notifying the other person first.*

You can also ask for an extended order that could last for up to 2 years.

*If you do, the judge will set a hearing. You and the other person will have to appear in court and
explain your side before the judge can extend the protection order.*

12. Length of Protection Order.

☐ I want an order up to 45 days only.

→ ☒ I want an order up to 45 days PLUS an extended order that could last up to 2 years. Why did she choose the more extensive option? This is further evidence of her malicious prosecution,

13. **Other Exhibits.** You may attach documents, pictures, or anything else that you would like the judge to look at and consider when reviewing your application. The Adverse Party will receive a copy of all documents/evidence you provide.

Describe what you are attaching:

OR, the question to the prosecution is: DID THEY COERCE HER INTO CHOOSING THE MORE MALICIOUS OPTION SO SEDEWICK WOULDN'T HAVE TO PAY HIM?
14. This document does not contain the personal information of any person as defined by NRS 603A.040.

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

Dated 10/5/2021

Submitted by: /s/ Rosemarie McMorris-Alexander

(your signature)

Rosemarie McMorris-Alexander

(print your name)

VERIFICATION

I declare that I am the applicant in the above-entitled action; that I have read the foregoing application and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true. I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Dated 10/5/2021

Submitted by: /s/ Rosemarie McMorris-Alexander

(your signature)

Rosemarie McMorris-Alexander

(print your name)

PLEASE TYPE OR PRINT CLEARLY

CONTINUATION PAGE

APPLICANT'S NAME: Rosemarie McMorris-Alexander

(NOTE: BE SPECIFIC AS TO WHO COMMITTED WHAT ACT OR ACT(S), AGAINST WHOM, WHEN, WHERE, WHETHER COMMITTED OR THREATENED; INDICATE APPROXIMATE DATE(S) AND LOCATION(S).)

CONTINUED FROM PAGE 2:

My fear is that it appears Mr. Houston is/ or may be withdrawing his guilty plea and if he is not going to abide by the agreement or be incarcerated, he remains a threat to my children and I given he knows where I live. Houston never knew where anybody lived until already being in custody @ N.P.S.P.

This is what he agreed to and has already violated: (Houston never agreed to anything on August 4th, 2021 as he was in a state of reverential fear from the fact that Michael P. Villani was the same Minutes kangaroo who caused Houston's wrongful conviction & in dismissed case C-17-323614-1, C-17-323614-1

Initial Arraignment (8:00 AM)(Judicial Officer Villani, Michael)
08/04/2021

- Deputized Law Clerk, Haley Beza present on behalf of the State. NEGOTIATIONS are as contained in the Guilty Plea Agreement filed on 8/4/2021 and placed on the record by Mr. Gutierrez. DEFT. HOUSTON ARRAIGNED AND PLED GUILTY TO AGGRAVATED STALKING (F). Court ACCEPTED plea, and ORDERED, matter REFERRED to the Division of Parole and Probation (P&P) and SET for sentencing. Pursuant to negotiations, COURT FURTHER ORDERED, Deft. GRANTED Own Recognizance (OR) Release with LOW LEVEL ELECTRONIC MONITORING and Defendant shall stay away and have NO CONTACT with Redenta Blacic, Rosemarie McMorris and/or Jonathan Shockely; additionally Defendant shall STAY AWAY from 9930 West Cheyenne Avenue, Las Vegas, Nevada. Court DIRECTED Deft. to report to P&P within 24 hours of release. OR/LOW LEVEL EMP 11/29/2021 8:30 AM SENTENCING (DEPT. 10)

THE ATTACHED APPLICATION INCORPORATES THE CONTINUATION PAGE BY REFERENCE.

Page 1 of 1

Electronically Filed
10/05/2021 2:09 PM

Alvin J. Smith
CLERK OF THE COURT

RENEWED COMPLAINT: AS

RESULT OF PLAINTIFFS FALSE
MOT STEVEN B. WOLFSON POLICE REPORTS, MALICIOUS
Clark County District Attorney PROSECUTION, FALSE ARREST
Nevada Bar #001565
KRISTINA A. RHOADES AND FALSE IMPRISONMENT OF
Chief Deputy District Attorney THE DEFENDANT, DEFORMATION
Nevada Bar #012480
200 Lewis Avenue
Las Vegas, Nevada 89155-2212 OF CHARACTER OF THE
(702) 671-2500
Attorney for Plaintiff DEFENDANT AND OTHER CRIMES
AGAINST PLAINTIFF - IN ERROR, MATTHEW TRAVIS HOUSTON
DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW HOUSTON, aka,
Matthew Travis Houston,
#7035801

Defendant.

CASE NO: C-21-357927-1

DEPT NO: X

**STATE'S NOTICE OF MOTION AND MOTION TO REMAND DEFENDANT
AND INCREASE BAIL PURSUANT TO NRS 178.484(12) FOR VIOLATING HIS
PLEA AGREEMENT, HIS RELEASE CONDITIONS, AND
DISOBEYING DISTRICT COURT ORDERS**

DATE OF HEARING: OCTOBER 11, 2021
TIME OF HEARING: 9:30 A.M.

HEARING REQUESTED

COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through KRISTINA A. RHOADES, Chief Deputy District Attorney, and files this Notice of Motion and Motion to Remand Defendant and Increase Bail Pursuant to NRS 178.484(12) for Violating His Plea Agreement, His Release Conditions, and Disobeying District Court Orders.

This Motion is made and based upon all the papers and pleadings on file herein, the attached Points and Authorities in support hereof, and oral argument at the time of hearing, if deemed necessary by this Honorable Court. *"hearsay" she means*
the question for our Lady Justice
is, "how is this court to be
/// deemed to be any sort of "honorable" when Taleen Pandokht
cannot even type properly, has no clue how to publish addresses
accurately and neglects her duty to read pleadings in full?

\\clarkcountydc.net\formcase2\2021\158178\2021\15878C-NOTM-(MATTHEW TRAVIS HOUSTON)-001.docx

NOTICE OF HEARING

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing Motion on for setting before the above-entitled Court, in Department X thereof, on the 11th day of October, 2021, at the hour of 9:30 o'clock A.M., or as soon thereafter as counsel may be heard.

DATED this 5th day of October, 2021.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY


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

/// The question(s) from our lady justice to Kristina A. Rhoades
/// (in any sort of Honorable Court) would be, or why did she
/// type out this fraudulent motion based on hearsay
/// without ANY ~~other~~ sort of proof?

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what's going on here?
is the "statement of the case"
the "points and authorities"?

POINTS AND AUTHORITIES

STATEMENT OF THE CASE

As result of Redenta Blacic's lies and exaggerations to the Defendant Matthew Houston ("Defendant") was originally charged in the instant case in Las Vegas Justice Court case number 21CR019840 with one (1) count of Making Threats or Conveying False Information Concerning Act of Terrorism (Category B Felony), naming victims Redenta Blacic and/or the Office of Consumer Health Assistance. At Initial Arraignment Court, the Court imposed monetary bail of \$3,000 with the added condition of mid-level electronic monitoring and no contact orders. Defendant's monetary bail was later reduced to \$500 after argument in justice Court, with the added conditions of high-level electronic monitoring and no contact orders. (the record will reflect that these bond amounts were lies too, when the transcripts are transcribed.)

Defendant was also charged in Las Vegas Justice Court case number 21CR033713 with one (1) count of Extortion, naming victims Rosemarie McMorris and/or Jonathan Shockely. Monetary bail was imposed in 21CR033713 in the amount of \$5,000 with high-level electronic monitoring and no contact orders, which was dismissed December 8th 2021 per fraudulent GPA as result of an ILLEGAL and unsigned "warrant". On August 3, 2021, pursuant to negotiations, an Information was filed in the instant case charging Defendant with one (1) count of Aggravated Stalking (Category B Felony), naming victims Redenta Blacic, Rosemarie McMorris, and Jonathan Shockely. there were NO negotiations

On August 4, 2021, Defendant pled guilty to Aggravated Stalking. Pursuant to the plea agreement, the State had no opposition to probation with a mental health evaluation and any recommended treatment as conditions of probation. The State agreed to dismiss case number 21CR033713 after sentencing, and further agreed to not oppose Defendant's own recognizance release with low-level electronic monitoring after entry of plea. because he's deaf, incompetent and blind - visually impaired

Also pursuant to the signed plea agreement, Defendant was ordered to stay away and have no contact with Redenta Blacic, Rosemarie McMorris, and/or Jonathan Shockely. that did NOT contain any express consent

On or about September 7, 2021, after house arrest obtained the contact information for the named victims, Defendant was released on low-level electronic monitoring. Defendant's sentencing is currently scheduled for November 29, 2021. After he served

time in city jail for CX CX2 which constituted double jeopardy and violated his right to ...
So July 14th, 2021 to September 7th because of false police reports...?

So was ~~the~~ on the alleged telephone call ^{ON OCTOBER 1, 2021} or was ~~the~~ the alleged telephone call ^{about Friday, OCTOBER 1ST, 2021 - the very day of the Defendant's 5th anniversary of surviving} ^{ONE OCTOBER}

1 On or about Friday, October 1, 2021, Defendant called Jonathan Shockley at his place
2 of employment and left an aggressive and threatening voicemail that will be provided to the
3 Court at the time of filing the instant Motion. Exhibit 1. Defendant is violent and aggressive
4 in this voicemail where he proceeds to verbally abuse both Jonathan Shockley and Rosemarie
5 Judge in fact hear this alleged telephone call before ~~the~~ the alleged voice
6 McMorris. Based on his concerning actions that are a direct violation of this Court's orders,
7 mail was played to Tierra Danielle Jones in the date of 12/6/2021.
8 reset to at least the originally imposed total amount from both justice Court cases of \$8,000
9 with the added condition of high-level electronic monitoring. (it was actually \$20,000)

10 That's a pretty penny for a made up voice mail that STATEMENT OF FACTS (none of this is fact.
11 In December 2020, Defendant left a voicemail on the main line for the Office of
12 Consumer Health Assistance. Defendant was and is contesting findings that had previously
13 been made regarding his Workers' Compensation issues. Victim Redenta Blacic called
14 Defendant back and tried to assist Defendant. Defendant became verbally aggressive and told
15 Ms. Blacic "They shouldn't be surprised if he goes on a mass shooting rampage like the one
16 committed on October 1". Ms. Blacic tried to calm Defendant down but was unsuccessful
17 and the call ended. Defendant called Ms. Blacic back twice, but she did not answer. Ms. Blacic
18 was scared that Defendant would carry out his threats. See police report stating that
19 none of the phone calls were taped or recorded.

20 Capitol Police investigated and discovered that Defendant also made threats to the
21 Department of Administration Hearings Division of Northern Nevada by leaving a voicemail
22 stating, "I need immediate assistance because I am going to fucking murder every fucking
23 employee at Mandalay Bay, MGM and everyone in the state of Nevada if you fucking people
24 don't give me my fucking money." Although absolutely NO proof of this was
25 provided to the courts during ANY of the hearings in ANY of the cases
26 In June 2021, Rosemarie McMorris, a Claims Operations Manager for Sedgewick (a
27 third-party administrator that handles workman compensation claims) reported to LVMPD
28 that Defendant, an injured worker who was denied compensation, was angry about being
29 denied and was directing his anger toward her, although no sort of evidence is
30 proven of this in the Discovery documents mailed to the
31 Defendant until AFTER he was already moved to H.D.S.P.

OBJECTION: Houston never made any telephone calls. Over a telephone call, Defendant told Ms. McMorris "I know where you fucking live, you cunt. You and your 2 daughters will be raped and murdered if I don't get my fucking money." Ms. McMorris was concerned because she in fact has two daughters, and never gave Defendant that information. She was also concerned that Defendant obtained her home address from the Internet. why would def. do that? He was living in Texas.

Ms. McMorris reported that Defendant threatened another employee, Jonathan Shockely, as well, and further indicated that she previously reported similar behavior from this same Defendant to the LVMPD in July 2020. In July 2020, Defendant left voice messages threatening to murder every employee of Sedgwick and their families and "eat their hearts."

ARGUMENT So, why didn't this

NRS 178.487 provides that: character show up in court? Is this NOT proof that insurance has abused

Every release on bail with or without security is conditioned upon the Defendant's good behavior while so released, and upon a showing that proof is evident or the presumption great, (the presumption, Defendant has committed a felony during the period of release, the Defendant's bail may be revoked, after a hearing by the Magistrate (here, they charge is pending. Pending such revocation, the Defendant may be held without bail by order of the Magistrate before whom he is brought after arrest upon the second charge. original charge to utilize

Tierra Danielle Jones as a "kangaroo" whereas she jumping off too next? Subsection (11) of NRS 178.484, titled "Right to bail before conviction; exceptions; (these) were blatantly ignored by court

imposition of conditions; arrest for violation of condition," states that "Before releasing a person arrested for any crime, the Court may impose such reasonable conditions on the person as it deems necessary to protect the health, safety and welfare of the community and to ensure that the person will appear at all times and places ordered by the Court..." (Emphasis added).

NRS 178.484(12) further states as follows:

If a person fails to comply with a condition imposed pursuant to subsection 11, the Court may, after providing the person with reasonable notice and an opportunity for a hearing:

- (a) Deem such conduct a contempt pursuant to NRS 22.010; or
- (b) Increase the amount of bail pursuant to NRS 178.499.

NRS 178.499 states as follows: (SEE VOID GPA) Further, the "No III CONTACT ORDER" HAD EXPIRED, so even if Houston did leave an alleged voicemail for somebody, it was nothing more than a FACT of law based on hearsay.

1. At any time after a District or justice's Court has ordered bail to be set at a specific amount, and before acquittal or conviction, the Court may upon its own Motion or upon Motion of the District attorney and after notice to the Defendant's attorney or record or, if none, to the Defendant, increase the amount of bail for good cause shown.

2. If the Defendant has been released on bail before the time when the Motion to increase bail is granted, the Defendant shall either return to custody or give the additional amount of bail.

(Emphasis added).

NRS 178.498 states "If the Defendant is admitted to bail, the bail must be set at an amount which in the judgment of the Magistrate will reasonably ensure the appearance of the Defendant and the safety of other persons and of the community, having regard to:

1. The nature and circumstances of the offense charged;
2. The financial ability of the Defendant to give bail;
3. The character of the Defendant; and
4. The factors listed in NRS 178.4853.

NRS 178.4853 factors are as follows:

1. The length of his residence in the community;
2. The status and history of his employment;
3. His relationship with his spouse and children, parents or other member of his family and with his close friends;
4. His reputation, character and mental condition;
5. His prior criminal record, including, without limitation, any record of his appearing or failing to appear after release on bail or without bail;
6. The identity of responsible members of the community who would vouch for the reliability of the person;
7. The nature of the offense with which he is charged, the apparent probability of conviction and the likely sentence insofar as these factors relate to the risk of his not appearing;
8. The nature and seriousness of the danger to the alleged victim, any other person or the community that would be posed by the person's release;
9. The likelihood of more criminal activity by him after he is released; and
10. Any other factors concerning his ties to the community or bearing on the risk that he may willfully fail to appear.

Defendant has brazenly disregarded both the orders of the Court regarding his release conditions and the conditions of his plea agreement, filed on August 4, 2021, that he has no contact whatsoever with the three (3) named victims in this case. Defendant knowingly called one of the named victims (Jonathan Shockely) and states "Jonathan, Jonathan, Jonathan," and continues his voicemail to indicate that he has "figured out" who Rosemarie McMorris is.

where's the
proof?
Daniel
Schwartz
that
call
not Def.

1 Defendant proceeds to scream into the phone stating "that's the piece of shit [referring to Ms.
2 McMorris] that made me more disabled." Defendant yells in a threatening manner that "they,"
3 referring to Shockely and McMorris are "pedophiles" and "worthless fucks." Defendant tells
4 Jonathan that he needs to "put [his] fucking address in that paperwork to you fucking little
5 fucker." The question for our lady justice is, or how could this GPA
6 had been his without it containing his "express consent" unsigned

7 Defendant's brazen violations of this Court's orders, and his plea agreement, provide
8 good cause to increase/impose monetary bail. Defendant's underlying behavior in both justice
9 Court cases is concerning and aggressive. Defendant was given the opportunity to behave and
10 abide by the orders of the Court while out of custody, and he has utterly failed to do so in a
11 continued aggressive, violent, and frankly terrifying manner. The victims should not be
12 subjected to this behavior. Defendant's threats cause safety concerns for all involved in this

13 case. What about the safety of the Defendant and the 5
14 evictions SEDGWICK caused. What about the doctors
15 appointment Petitioner CONCLUSION was arrested at ? 7/4/21

16 Based upon the above, the State respectfully requests that this Court GRANT the
17 State's Motion to Remand Defendant and increase/impose monetary bail and high-level
18 electronic monitoring pending sentencing pursuant to NRS 178.484(12)(b) and NRS 178.499.

19 DATED this 5th day of October, 2021. So in essence, the State wasn't
20 moving this court for a conviction according to this "CONCLUSION",
21 Kristina A. Rhoades STEVEN B. WOLFSON SEE LINE 29
22 Clark County District Attorney OF THIS PAGE
23 Nevada Bar #001565

24 BY KRISTINA A. RHOADES
25 Chief Deputy District Attorney
26 Nevada Bar #012480
27 has not one time seen, heard, observed or
28 witnessed the behavior of
29 the Def. so why did she
30 publish these lies for any other reason than to ridicule, slander and
commit defamation of character towards the Def.

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of the above and foregoing was made this 5th day of
October, 2021, by Electronic Filing to:

BENARD LITTLE, Deputy Public Defender
benard.little@clarkcountynv.gov

BY /s/ E. Goddard
E. Goddard

21CR019840/erg/L-4

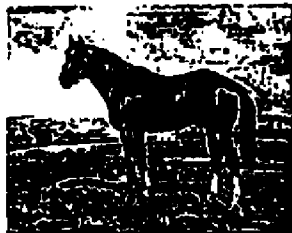
Secretary - District Attorney's Office

The question for our lady justice is: What was the intent of
Kristina A. Rhoades in her authoring and filing of this MOT.?

Evelyn Goddard

From: Evelyn Goddard
Sent: Tuesday, October 5, 2021 10:39 AM
To: Benard Little
Subject: C357927 - NOTM - STATE V HOUSTON
Attachments: Black and White1466.pdf

*Evelyn R. Goddard – Legal Secretary
Clark County District Attorney's Office
Litigation Team L-4
Ph. (702) 671-2818
E-Mail – evelyn.goddard@clarkcountydade.com*



**AFFIDAVIT OF KRISTINA A. RHOADES IN SUPPORT
OF ORDER SHORTENING TIME**

STATE OF NEVADA }
COUNTY OF CLARK } ss:

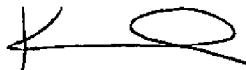
KRISTINA RHOADES, being first duly sworn, deposes and says:

Your affiant requests the Court's permission for an Order Shortening Time for a hearing on State's Notice of Motion to Remand because the State is concerned for the safety of the community, particularly the safety of the named victims in the instant case, and requests that this issue be addressed as soon as possible.

Hence, the State of Nevada requests a hearing on or before October 11, 2021.

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

Executed on October 5, 2021
(Date)


(Signature) ^{ec} Honorable court is okay with that?

So in effect, we have some liars at an insurance claim group in our community with the power to ruin claimants lives by coercing both law enforcement, the courts (and the judges). No wonder this is the city of lost wages. The citizens work to become ultimately successful, then they're made permanently totally disabled, abducted into the L.V.M.F.D. and ~~create~~ prison industry and for what? An artificial voice mail that some liars conjured up?

erg/L-4

IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
COUNTY OF CLARK, STATE OF NEVADA

Rosemarie McMorris-Alexander, Applicant
vs.
Matthew Travis Houston, Adverse Party(s)

ORDER SETTING HEARING

Case # 21PO1950
JC DEPARTMENT 14

IT IS HEREBY ORDERED that this matter is set for hearing on the 28th day of
October at 9:45 am in Department 14 located at 200 Lewis Ave.
in Courtroom 1A, Floor 1st, Las Vegas, NV 89155.

IT IS FURTHER ORDERED that:

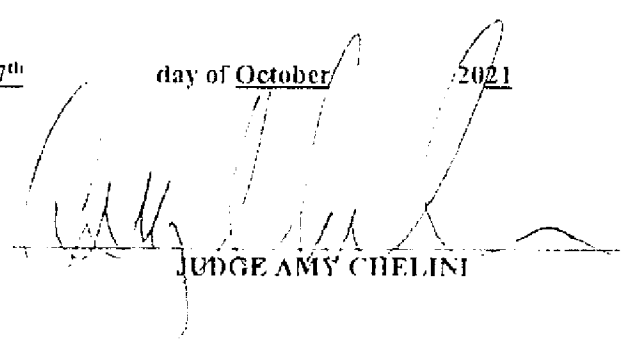
☐ The previously granted Temporary Order for Protection will remain
in effect until this hearing.

☒ At the scheduled hearing, the Court will decide whether or not
an Order for Protection should be issued.

☐ OTHER: _____

The Adverse Party(s), Matthew Travis Houston, is hereby advised that a failure
to appear at the scheduled hearing may result in an Order for Protection being
issued to the Applicant.

DATED this 7th day of October, 2021


JUDGE AMY CHELINI

C-21-357927-1

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Felony/Gross Misdemeanor

COURT MINUTES

October 11, 2021

C-21-357927-1 State of Nevada
vs
Matthew Houston

October 11, 2021 8:30 AM All Pending Motions

HEARD BY: Jones, Tierra

COURTROOM: RJC Courtroom 14B

COURT CLERK: Teri Berkshire

RECORDER: Victoria Boyd

REPORTER:

PARTIES

PRESENT: Ramsey, Scott A. Attorney
Rhoades, Kristina A. Attorney
State of Nevada Plaintiff

JOURNAL ENTRIES

- APPEARANCES CONTINUED: Mr. Ramsey present via video on behalf of deft. through bluejeans technology.

State's Notice of Motion and Motion to Remand Defendant and Increase Bail Pursuant to NRS 178.484(12) For Violating

Deft. not present. Court noted there's a motion to withdraw filed, however deft. is not here. Ms. Rhoades requested a bench warrant. COURT ORDERED, BENCH WARRANT, NO BAIL.

B.W. / LLEM

PRINT DATE: 10/07/2022

Page 3 of 8

Minutes Date: August 04, 2021

ORDER SHORTENING TIME

TO: MATTHEW HOUSTON, aka, Matthew Travis Houston, and/or your legal counsel,
BENARD LITTLE, DEPUTY PUBLIC DEFENDER

In appearing to the satisfaction of the Court, and good cause appearing therefor,

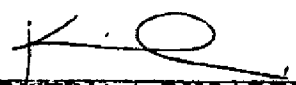
IT IS HEREBY ORDERED that the forgoing Notice of Motion and Motion to Remand
Defendant and Increase Bail Pursuant to NRS 178.484(12) for Violating His Plea Agreement,
His Release Conditions, and Disobeying District Court Orders will be heard in Department X
on the 11th day of October, 2021, at the hour of 9:30 o'clock.

Dated this 5th day of October, 2021

this was malicious prosecution because
the court knew the Def was poor
indigent have been incompetent
to make payment to
Pitarro and Fumo and rely upon the public pretender
who showed absolutely no
compassion for his client or his
clients disabilities or his clients stolen service animals.

288 84B 42E7 FF18
Tierra Jones
District Court Judge

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

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

erg/L-4

Page 1 of 1 ☐ UOF ☒ BODY CAM
 "CASE# 7035801 ☐ NEW ID
☐ JUVENILE ☐ DNA SAMPLE TAKEN ☐ DNA NOT REQ'D
 CO. SGT APPROVAL ☐ REBOOK ☐ ABSENTIA ☐ FORM 8 ☐ NOOC ☐ EXT TO LAS VEGAS ☐ LVC ☐ HMO ☐ NLV ☐ COURTESY HOLD ☐ DETAINER

H/A Retiree (see back of sheet)
 LAS VEGAS METROPOLITAN POLICE DEPARTMENT
TEMPORARY CUSTODY RECORD
 ("DENOTES OFFICER REQUIRED FIELD")

TCR1103912
 "ARREST DATE: 10/17/2021 "ARREST TIME: 09:15
 "EVENT S: _____

"CO-OP": ☐ N ☐ M. ESTAB. BY: _____ SCOPE _____

"ATTORNEY NAME (AKA, ALIAS, ETC.)

LAST FIRST MIDDLE
 HOUSTON, MATTHEW TRAVIS

TRUE NAME LAST
 Houston

STATE
 NEVADA

"ZIP
 89101

"PLACE OF BIRTH
 IOWA CITY, IOWA

MIDDLE
 Travis

"HOME ADDRESS (STREET & MAIL STREET NAME)

330 S CASINO CENTER

DATE OF BIRTH

7/16/1984

"RACE
 W

"SEX
 M

"HEIGHT
 5'10"

"WEIGHT
 170

"HAIR
 BRN

"EYES
 BLU

"CITIZENSHIP
 USA

"ALIEN REGISTRATION #

"ARMED / WEAP
 200.576.3

"TAX
 20000

"TELETYPE / NICK
 ABBA1

"LOCATION OF CRIME (STREET ADDRESS, CITY, STATE, ZIP)

330 CASINO CENTER S LAS VEGAS NV 89101

"LOCATION OF ARREST (STREET ADDRESS, CITY, STATE, ZIP)

330 CASINO CENTER S LAS VEGAS NV 89101

"CHARGE / VIOLATION
 AGGR STALKING

"CHARGE / VIOLATION
 200.576.3

"CHARGE / VIOLATION
 200.576.3

"CHARGE / VIOLATION
 200.576.3

"CHARGE / VIOLATION
 200.576.3

"ARREST TYPE

DC

"WARRANT # / CASE #

C-21-167027-1

"CHARGE / VIOLATION
 1

"CHARGE / VIOLATION
 60333

"CHARGE / VIOLATION
 F

"CHARGE / VIOLATION
 AGGR STALKING

"CHARGE / VIOLATION
 200.576.3

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"OT - ON ARRESTION:

PC - PROBABLE CAUSE

BS - BONDSMAN SURRENDER

BW - BENCH WARRANT

AW - ARREST WARRANT

RM - REMAND

GA - GRAND JURY INDICTMENT

"ARREST TYPE:

"BOOKING

"ARRESTING OFFICER SIGNATURE

ROBERT JONES

"WARRANT NAME

ROBERT JONES

"WARRANT NAME

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ROBERT JONES

"WARRANT NAME

1. NUMBER OF RELEASES: 10/17/2021 09:52:15

ask for intensive supervision unit trial

DOC DIST #8
 RT LT RI LI SCORE:
☐ POLICE RECORDS COPY ☐ COURTS COPY ☐ DSD RECORDS COPY ☐ PROCESSING COPY

1:IN RT LT
 RT LT
 RI LI SCORE: 7035801 3463

REL REV #8

7/14 arrest caused cruel and unusual punishment to be inflicted upon Houston what with him being denied his medical disability rating of Dr. Quasler's impoundment of his service dogs and him being forced to relocate from Iowa and recover from an unnecessary eviction from his out-of-home legal advocacy office at 435 S Linn St #927, IA City, IA 52240

Sedgwick used overreaching tactics to force Houston into an unmanageable state of homelessness. B. M. Murnighan's culpable omission and neglect of Houston's reports to D. Ferrante caused not only further injury to Houston, not other injured workers under D. Ferrante's mishandling and odious irresponsibility. Sedgwick is an abatable nuisance and must be held accountable for depriving Houston of his service animals.

get address

for
San Luis
Colorado

discuss
for 20% back (3500)

use

rebuild, cashier, bottles

etc. use agency

to pay credit card

use other 25k

25k to Diversified

25k to BSA

25k to U.S. F. Corp

25k to Cash App

pay phone yearly the year

700 insurance (pay for

512.01 pay off

monthly

2021 1/7/200 2023 1/37,700

117,000 12/1600

110,000 2024

2023-7200

10000-600/month

5000 25/month

C-21-357927-1

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Felony/Gross Misdemeanor

COURT MINUTES

October 25, 2021

C-21-357927-1 State of Nevada
 vs
 Matthew Houston

October 25, 2021 8:30 AM Bench Warrant Return

HEARD BY: Becker, Nancy

COURTROOM: RJC Courtroom 14B

COURT CLERK: Teri Berkshire

RECORDER: Victoria Boyd

REPORTER:

PARTIES

PRESENT:	Houston, Matthew	Defendant
	Little, Bernard G.	Attorney
	Merback, William J.	Attorney
	State of Nevada	Plaintiff

JOURNAL ENTRIES

- APPEARANCES CONTINUED: Deft. present via video from the Jail. Mr. Little present via video through bluejeans technology.

DEFT. HOUSTON RETURNED ON THE WARRANT. Court noted there are some competing motions. Upon Court's inquiry, Counsel requested to respond orally to the motion to remand. Following arguments and statements by deft, COURT ORDERED, Motion to Remand, GRANTED. FURTHER COURT ORDERED, Bail INCREASED to \$15,000 plus HIGH LEVEL ELECTRONIC MONITORING. Court admonished deft. to make no more contact or phone calls to the victim. Further, Court admonished deft. to talk to his attorney. COURT FURTHER ORDERED, matter SET for confirmation of counsel for limited purpose on the date given.

CUSTODY

PRINT DATE: 10/07/2022

Page 4 of 8

Minutes Date: August 04, 2021

IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
COUNTY OF CLARK, STATE OF NEVADA

LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT

JC DEPARTMENT 14 / HEARING DATE: 10/28/2021

Case No: 21PO1950

OCT 28 2021

Rosemarie McMorris-Alexander, Applicant

vs.

Matthew Travis Houston, Adverse Party(s)

BY:

PROTECTION ORDER RETURN OF SERVICE

TYPE OF ORDER SERVED

I DECLARE UNDER THE PENALTY OF PERJURY THAT ON 10/28/2021 I SERVED A COPY OF THE:

(DATE)

☐ Temporary Protection Order

☐ Stalking / Harassment

☐ Harm to Minor

☐ Sexual Assault

☐ Workplace

☐ Extended Protection Order

☐ Stalking / Harassment

☐ Harm to Minor

☐ Sexual Assault

☐ Workplace

- ☒ Order Setting Hearing on Initial Application (no TPO in place)
☐ Order Setting Hearing (to determine if an Extended Order for Protection will be issued - TPO has issued)
☐ Motion Order Re: Motion to
☐ Referral to Mediation
☒ Other (describe): Application for Protection Order - Protection of Children

ON THE FOLLOWING PARTY:

☒ Adverse Party

Matthew Travis Houston

(Name)

☐ Applicant

Rosemarie McMorris-Alexander

(Name)

☐ Other

Relationship:

(Name)

on 10/28/21
(Date)

at 10:15 a.m. / p.m.
(Time)

at Las Vegas Justice Court, Courtroom 1A, Las Vegas NV 89155

PETERSON, D
(Printed Name of Server)

D Peterson
(Server Signature)

1169
P#:

[Signature]
SIGNATURE OF INDIVIDUAL BEING SERVED

Matthew Travis Houston

1 Main Street

300

Las Vegas NV 89101

Print Name and Address

IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
COUNTY OF CLARK, STATE OF NEVADA

JC DEPARTMENT 14 / HEARING DATE: 10/28/2021

Case No: 21PO1950

Rosemarie McMorris-Alexander, Applicant
vs.
Matthew Travis Houston, Adverse Party(s)

PROTECTION ORDER RETURN OF SERVICE

LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT
OCT 28 2021
BY: 

TYPE OF ORDER SERVED

I DECLARE UNDER THE PENALTY OF PERJURY THAT ON 10/28/2021 I SERVED A COPY OF THE:
(DATE)

☐ Temporary Protection Order

☐ Stalking / Harassment

☐ Harm to Minor

☐ Sexual Assault

☐ Workplace



Extended Protection Order

☐ Stalking / Harassment

☒ Harm to Minor

☐ Sexual Assault

☐ Workplace

☐ Order Setting Hearing on Initial Application (no TPO in place)

☐ Order Setting Hearing (to determine if an Extended Order for Protection will be issued - TPO has issued)

☐ Motion Order Re: Motion to

☐ Referral to Mediation

☐ Other (describe):

ON THE FOLLOWING PARTY:

☒ Adverse Party

Matthew Travis Houston

(Name)

☐ Applicant

Rosemarie McMorris-Alexander

(Name)

☐ Other

Relationship: _____

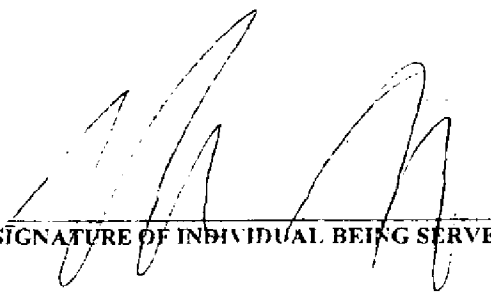
(Name)

on 10/28/21 at 1043 a.m. p.m. at Las Vegas Justice Court, Courtroom 1A, Las Vegas NV 89155
(Date) (Time)

PETERSON D
(Printed Name of Server)

D. Peterson
(Server Signature)

1169
P#:


SIGNATURE OF INDIVIDUAL BEING SERVED

Matthew Travis Houston

1 Main Street

300

Las Vegas NV 89101

Print Name and Address

JUSTICE COURT OF LAS VEGAS TOWNSHIP
COUNTY OF CLARK, STATE OF NEVADA

BY: *[Signature]*
OCT 28 2021
LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT

Rosemarie McMorris-Alexander, Applicant CASE NO.: 21PO1950
vs.
Matthew Travis Houston, Adverse Party(s) JC DEPARTMENT 14

EXTENDED PROTECTION ORDER ON BEHALF OF MINOR CHILD

Expiration: This order was issued by the Court on October 28, 2021 and will expire on October 28, 2022 at 11:59 P.M. unless the Court orders otherwise.

The Applicant filed a verified application for a protective order. The Court has jurisdiction over this matter. See NRS 33.400, et seq. The Court finds that the above-named Adverse Party received actual notice of the hearing and was given an opportunity to participate. The Court finds that crime has been committed and the minor child is in need of protection. Accordingly, and good cause appearing, it is the ORDER of the Court that the following orders apply to the Adverse Party:

1. ☒ **YOU ARE PROHIBITED** from threatening, physically injuring, or harassing the Applicant and/or the following persons:

Protected Parties: The following persons are protected under this order:

Applicant:	<u>Rosemarie McMorris-Alexander</u> (first, middle, last)	
Protected Person:	<u>Alyssa L. Alexander</u> (first, middle, last)	<u>Minor</u> (Age)
Protected Person:	<u>Aria S. Alexander</u> (first, middle, last)	<u>Minor</u> (Age)
Protected Person:	<u>Lillian R. Morris</u> (first, middle, last)	<u>66</u> (Age)
Protected Person:	_____ (first, middle, last)	_____ (Age)

1 2. ☒ **YOU ARE ORDERED** to not contact the protected parties at all in any way,
2 including but not limited to in person, by phone/text, by email, or through
3 social media.

4 3. ☒ **YOU ARE ORDERED** to stay 100 feet away from Applicant's residence
5 located
6 at:

7 ☐ CONFIDENTIAL.

8 ☒ 5504 Morningcross St.

9 Address

Las Vegas, NV 89130, Clark

10 City, State, Zip Code, County

11 ☒ This is a complex/property/trailer park; the entire complex/property/
trailer park is located.

12 4. ☐ A law enforcement officer located within the jurisdiction of the residence listed
13 below shall on **ONE OCCASION ONLY** accompany ☐ Applicant ☐ Adverse
14 Party to:

15 Address

16 Las Vegas, NV, Clark

17 City, State, Zip Code, County

18 and shall stand by while ☐ Applicant ☐ Adverse Party obtains clothing, toiletries, and
19 the following additional items: _____
20 _____

21 5. ☒ **YOU ARE ORDERED** to stay 100 feet away from these place(s) of employment
22 or any other place that Applicant may be employed. **YOU ARE PROHIBITED**
23 from any contact whatsoever with these place(s) of employment in person, by
24 telephone, mail, or any other means of communication.

25 ☒ CONFIDENTIAL.

26 ☐

27 (Employer)

28 (Address)

Las Vegas, NV, Clark

(City, State, Zip Code, County)

☐

(Employer)

(Address)

Las Vegas, NV, Clark

(City, State, Zip Code, County)

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6. ☒ **YOU ARE ORDERED** to stay 100 feet away from the Applicant's and/or protected person's school(s)/day care, including, but not limited to, the places listed below:

☐ **CONFIDENTIAL.**

☒ **Ernest May Elementary School**

(School/Day Care Name)

6350 W. Washburn Rd.

(Address)

Las Vegas, NV 89130, Clark

(City, State, Zip Code, County)

☐

(School/Day Care Name)

(Address)

Las Vegas, NV , Clark

(City, State, Zip Code, County)

☐ This order does not preclude the adverse party from attending school, activities, and functions at school. This order does prohibit the adverse party from interfering with the education and extracurricular activities of the parties protected by this order.

7. ☒ **YOU ARE ORDERED** to stay 100 feet away from the following places frequented regularly by Applicant and/or the protected person(s):

☒ **Shadow Hills Church**

(Location Name)

7811 Vegas Dr.

(Address)

Las Vegas, NV 89128, Clark

(City, State, Zip Code, County)

☐

(Location Name)

(Address)

Las Vegas, NV , Clark

(City, State, Zip Code, County)

☐ **YOU ARE PROHIBITED FROM**

///

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VIOLATION OF THIS ORDER IS A CRIME

You are further notified of the penalty for violation of an order. A person who intentionally violates an extended order is guilty of a category C felony (NRS 33.400) which is punishable by imprisonment in the state prison for not more than 5 years, and a fine of not more than \$10,000.00. (NRS 193.130) Each act that constitutes a violation of the extended order may be prosecuted as a separate violation of this order.

Only the court can change this order.

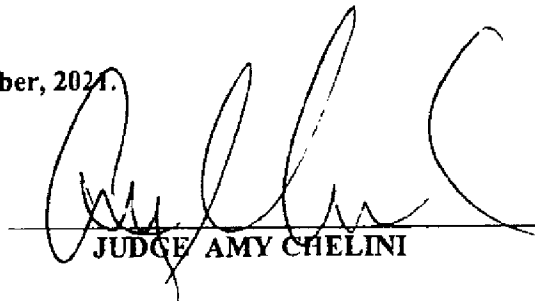
ORDER TO LAW ENFORCEMENT

Any law enforcement officer, with or without a warrant, may arrest and take into custody the Adverse Party, when the law enforcement officer has probable cause to believe that (a) an Order has been issued pursuant to NRS 33.400 against the Adverse Party; (b) the Adverse Party has been served with a copy of the Order; and (c) the Adverse Party is acting or has acted in violation of the Order. This arrest may occur regardless of whether the violation occurred in the officer's presence.

Any law enforcement agency in this state may enforce a Court Order issued pursuant to NRS 33.400 without regard to the county in which the Order is issued.

All fees are deferred.

Dated this 28th day of October, 2021.



JUDGE AMY CHELINI

C-21-357927-1

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Felony/Gross Misdemeanor

COURT MINUTES

November 01, 2021

C-21-357927-1 State of Nevada
 vs
 Matthew Houston

November 01, 2021 8:30 AM

Confirmation of Counsel

**Confirmation of
Counsel: Goldstein**

HEARD BY: Becker, Nancy

COURTROOM: RJC Courtroom 14B

COURT CLERK: Teri Berkshire

RECORDER: Victoria Boyd

REPORTER:

PARTIES

PRESENT:	Goldstein, Anthony M.	Attorney
	Houston, Matthew	Defendant
	Little, Bernard G.	Attorney
	Rhoades, Kristina A.	Attorney
	State of Nevada	Plaintiff

JOURNAL ENTRIES

- Mr. Little stated this case was on today for confirmation of alternate counsel. MATTER TRAILED.

MATTE RECALLED. All parties present as before. Anthony Goldstein Esq. present. Mr. Goldstein stated he can accept the appointment adding that he visited with the Defendant last week, and requested thirty days to investigate if there are grounds to file a Motion to Withdraw. COURT DIRECTED Mr. Goldstein to file a motion by the continued hearing date, and ORDERED Sentencing hearing VACATED.

CUSTODY

11/29/2021 8:30 A.M. STATUS CHECK: MOTION TO WITHDRAW PLEA

PRINT DATE: 10/07/2022

Page 6 of 8

Minutes Date: August 04, 2021

C-21-357927-1

11/01/21 8:30 A.M. CONFIRMATION OF COUNSEL - LIMITED PURPOSED

PRINT DATE: 10/07/2022

Page 5 of 8

Minutes Date: August 04, 2021

WHISKEY LICKER UP SALOON
202 FREMONT ST
LAS VEGAS NV 89101

2384141
OKAI KOI, KARL N.

Route:
Advice No: 27553
Deposit Date: 11/12/21
Pay Period: 10/25/21
11/07/21

Period	Earnings	Hours	Rate	Amount	Description	Period Amount	Year to Date Amount
Regular		80.00	19.231	1,538.48	---Gross---	1,538.48	21,461.60
					FED Income T	153.93	2,148.68
					FED FICA w/h	92.91	1,310.78
					FED Medicare	21.72	306.55
					HMO UP	40.00	320.00
					Parking		140.00

* Gross	80.00	1,538.48	* Deductions	308.56	* Net	1,229.92
* Taxable		1,498.48				

WHISKEY LICKER UP SALOON
202 FREMONT ST
LAS VEGAS NV 89101

*** DEPOSIT ADVICE ***

Emp ID	Date	Advice #	Deposit Total
2384141	11/12/21	27553	1,229.92

Bank No.	Name of Bank / Savings & Loan	Account Number	Amount
256074974	Navy Federal Credit Union	*****2700	1,229.92

Deposited for: KARL N. OKAI KOI
5087 ELDORA AVE. APT 4
LAS VEGAS NV 89146

THIS IS NOT A CHECK
THIS IS NOT A CHECK

C-21-357927-1

CLERK S NOTE: This Minute Order was prepared by listening to the JAVs recording system. (11-20-2021 ks)

PRINT DATE: 10/07/2022

Page 7 of 8

Minutes Date: August 04, 2021

C-21-357927-1

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Felony/Gross Misdemeanor

COURT MINUTES

November 29, 2021

C-21-357927-1 State of Nevada
 vs
 Matthew Houston

November 29, 2021 8:30 AM Status Check

HEARD BY: Jones, Tierra

COURTROOM: RJC Courtroom 14B

COURT CLERK: Madalyn Kearney

RECORDER: Victoria Boyd

REPORTER:

PARTIES

PRESENT:	Goldstein, Anthony M.	Attorney
	Houston, Matthew	Defendant
	Jones, Jr., John T.	Attorney
	State of Nevada	Plaintiff

JOURNAL ENTRIES

- Mr. Goldstein requested a week continuance so he can have another opportunity to visit Deft.
COURT ORDERED, matter CONTINUED.

CUSTODY

CONTINUED TO: 12/6/21 8:30 AM

PRINT DATE: 10/07/2022

Page 8 of 8

Minutes Date: August 04, 2021



DEPARTMENT OF VETERANS AFFAIRS

VA Southern Nevada Healthcare System

P.O. Box 360001

North Las Vegas, Nevada 89036

(702) 791-9000

December 3, 2020

KARL BENJAMIN NII-BOI OKAIKOI
6997 HUCKLEBERRY DR
MINNETRISTA, MINNESOTA 55331

--
Dear Mr. Okaikoi,

I have been trying to get hold of you since yesterday, but I have not been able to get hold of you with all your contact numbers (702-574-3358, 758-574-3358). I also left a message on Lyndsey's phone to have you call me back.

We need to follow up with you regarding your blood pressure.

Can you pls give me a call at 702-365-3065, I would like to set up a video conference with you while you check your blood pressure.

Please ensure that you are taking your blood pressure medications as directed, do your daily exercises and observe a low salt, low fat diet.

You can also register for MyHealthEvet by going to myhealth.va.gov so you can email us and we can email you back.

If you will need assistance registering, pls call 702-791-9000 ext 15436.

I will be waiting for your until then.

Thank you.

Dina L., RN, BSN
SWC PACT 2 Team
VA Southwest Clinic
7235 South Buffalo Drive
Las Vegas, NV 89113

C-21-357927-1

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Felony/Gross Misdemeanor

COURT MINUTES

December 06, 2021

C-21-357927-1 State of Nevada
vs
Matthew Houston

December 06, 2021 8:30 AM Status Check

HEARD BY: Jones, Tierra

COURTROOM: RJC Courtroom 14B

COURT CLERK: Michaela Tapia

RECORDER: Victoria Boyd

REPORTER:

PARTIES

PRESENT:	Goldstein, Anthony M.	Attorney
	Houston, Matthew	Defendant
	Little, Bernard G.	Attorney
	Rhoades, Kristina A.	Attorney
	State of Nevada	Plaintiff

JOURNAL ENTRIES

- Upon Court's inquiry, Deft. confirmed he no longer wished to withdraw his guilty plea. COURT ORDERED, Mr. Goldstein WITHDRAWN as counsel; Ben Little, Deputy Public Defender, CONFIRMED as counsel. Argument by the State. Argument by counsel. Victim Speaker SWORN and TESTIFIED to the Court. DEFT. HOUSTON ADJUDGED GUILTY of AGGRAVATED STALKING (F). COURT ORDERED, in addition to the \$25.00 Administrative Assessment fee, \$250.00 Indigent Defense Civil Assessment fee, and \$3.00 DNA Collection fee, Deft. SENTENCED to a MAXIMUM of NINETY-SIX (96) MONTHS and a MINIMUM of TWENTY-FOUR (24) MONTHS in the Nevada Department of Corrections (NDC), with NINETY-THREE (93) DAYS credit for time served. FURTHER, \$150.00 DNA Analysis fee WAIVED. BOND, if any, EXONERATED.

NDC

PRINT DATE: 10/07/2022

Page 1 of 5

Minutes Date: December 06, 2021

Electronically Filed
12/08/2021 4:17 PM


CLERK OF THE COURT

JOCP

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

CASE NO. C-21-357927-1

-VS-

DEPT. NO. X

MATTHEW HOUSTON aka
Matthew Travis Houston
#7035801

Defendant.

JUDGMENT OF CONVICTION
(PLEA OF GUILTY)

The Defendant previously appeared before the Court with counsel and entered a plea of guilty to the crime of AGGRAVATED STALKING (Category B Felony) in violation of NRS 200.575; thereafter, on the 6th day of December, 2021, the Defendant was present in court for sentencing with counsel BENJAMIN LITTLE, Deputy Public Defender, and good cause appearing,

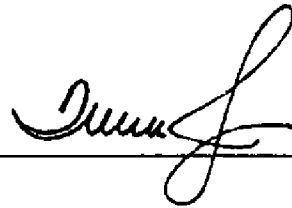
THE DEFENDANT IS HEREBY ADJUDGED guilty of said offense and, in addition to the \$25.00 Administrative Assessment Fee, \$250.00 Indigent Defense Civil Assessment

Statistically closed: A. USJR - CR - Guilty Plea With Sentence (Before trial) (USGPB)

1 Fee and \$3.00 DNA Collection Fee, the Defendant is sentenced as follows: a MAXIMUM of
2 NINETY-SIX (96) MONTHS with a MINIMUM parole eligibility of TWENTY-FOUR (24)
3 MONTHS in the Nevada Department of Corrections (NDC); with NINETY-THREE (93)
4 DAYS credit for time served. As the \$150.00 DNA Analysis Fee and Genetic Testing have
5 been previously imposed, the Fee and Testing in the current case are WAIVED.
6

7 Dated this 8th day of December, 2021

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BBA 372 C2DB D8C3
Tierra Jones
District Court Judge

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 State of Nevada

CASE NO: C-21-357927-1

7 vs

DEPT. NO. Department 10

8 Matthew Houston
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Judgment of Conviction was served via the court's electronic eFile
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 12/8/2021

15 G. Cox Coxgd@clarkcountynv.gov

16 Ben Little Benard.Little@ClarkCountyNV.gov

17 DA . Motions@ClarkCountyDA.com
18
19
20
21
22
23
24
25
26
27
28

MATTHEW TRAVIS HOUSTON, pro se
No. 1210652 @ H.D.S.P.
PO Box 650

NO(s) 80562, 84886,
85351 and 85747

Indian Springs, NV 89070-0650

ALSO IN UNITED STATES DISTRICT COURT

FILED

FROM THE DISTRICT COURT (EIGHTH)

MAY 19 2022

OF CLARK COUNTY, NEVADA

2:23-cv-00031-RFB-DJA

MATTHEW TRAVIS HOUSTON,
Plaintiff-in-Error and
Petitioner-appellant,

-VS-

THE STATE OF NEVADA, et al
Respondent(s)

SEE

Case No. 2:22-cv-01285-MMD-VCF

CASE No.: C-21-357927-1

DEPT No.: XI

C-17-323614-1

A-17-758861-C June 13, 2022

Dept. No(s) 17, 18, 29 9:00 AM

"suppression hearing requested" and a
"de novo hearing requested"

APPELLANT'S OPENING BRIEF(S) - PART III - AND

EMERGENCY MOTION TO STRIKE FROM THE RECORD IN THE EJDC

THE "INFORMATION" FILED AUGUST 3RD, 2021, "UNDER NRS 27(e)
emergency relief is necessary retroactively from September 30th, 2016"
"Hearing Requested"

Plaintiff-in-Error moves this court for an ORDER TO SUPPRESS

and strike from the record the illegal "INFORMATION" due

in part not only to the following facts: N.R.S. 178.145 clearly
states that there must NOT be any agreements made before a defendant is

found competent. However, misconduct committed by certain individuals not

limited to: TIERRA DANIELLE JONES, NANCY BECKER, Jake W. Merback,
KRISTINA A. RHOADES and STEVEN B. WOLFSON/John T. Jones, Jr.
BENARD H. LITTLE, AMY CHELINI, JEREMY WOOD, STEPHANIE DIEZ, HARMONY T. LETIZIA,
turned into prosecutorial malice when they ignored the fact

that the warrant in event number 210300101590 was not

authorized by any magistrate, judge or judicial officer. Their negligence and
continued misconduct included ignoring the NRS General Provisions

178.145, 178.417, 178.420 and 178.425 among other laws of

the land in the State of Nevada, the United States of America in the 9th.

Cir. and showed the upmost disrespect towards the Declaration

of Human Rights, in blatant disregard of our nation's Fourth Amendment,
the 5th AMDT, the 6th AMDT, the 7th AMDT, the 8th AMDT and the 14th AMDT.(s).

MATTHEW TRAVIS HOUSTON NOW PRESENTS:

No. 1210652 @ HDSP

P.O. Box 650

Indian Springs, NV 89070-0650

1 "A Failure to Investigate Competency," in defense of the
2 Plaintiff-in-Error's Battered Person's Syndrome, C.P.T.S.D., i.e.
3 Complex Post-Traumatic Stress Disorder and Traumatic Brain Injuries. Very
4 many judicial standards have been developed in the following cases:

5 Medina v. California, 505 U.S. 437, 439,
6 112 S.Ct. 2572 L.Ed. 2d 353 (1992)

7 "It is well established that the Due Process
8 Clause of the Fourteenth Amendment prohibits
9 the criminal prosecution of a defendant who
10 is not competent to stand trial." That was set thirty
11 years ago, before the false arrest of the Plaintiff-in-Error on July 14, 2021.

12 United States v. Kauffman, 109 F.3d 186 (3d Cir. 1997)

13 "Failure to conduct any investigation into possible
14 insanity defense was ineffective assistance" Especially because
15 the false arrest caused Plaintiff-in-Error to miss his doctor's appointments.

16 See Taylor v. Horn, 504 F.3d 416, 438 (3d Cir. 2007)

17 "a failure to request a competency hearing may
18 violate the right to effective assistance of
19 counsel if (1) there was sufficient indicia of
20 incompetence to give objectively reasonable
21 counsel reason to doubt the defendant's
22 competency; and (2) there is a reasonable
23 probability that the defendant would have been
24 found incompetent to stand trial had the
25 issue been raised and fully considered" The Plaintiff-
26 in-Error's appointment with Dr. Tyson Ward, at Nevada Retina Specialists,
27 right next door to the Best Western was missed on July 15, 2021,
28 because of the false arrest which deprived him of his service animals.

MATTHEW TRAVIS HOUSTON
 No. 1210652C HOSP
 P.O. Box 650
 Indian Springs, NV 89070-0650

1 Failure to Investigate Competency in Defense
 2 of Battered Person's Syndrome, Complex Post Traumatic (C.P.T.S.D.)
 3 Stress Disorder and Traumatic Brain Injury (continued)
 4 In further elaboration of Standards, the record shall reflect the following: See
 5 Bouchillon v. Collins, 907 F.2d 589, 592
 6 (5th Cir. 1990)
 7 "a court cannot accept a guilty plea from an
 8 individual that is mentally incompetent; failure
 9 to investigate competency is prejudicial if there
 10 is a reasonable probability that the defendant
 11 was incompetent to plead guilty." The false arrest also
 12 deprived Plaintiff-in-Error of his neurological exam with Dr. Awagleri.
 13 McLuckie v. Abbot, 337 F.3d 1193, 1199 (10th Cir. 2003)
 14 ("a failure to timely investigate a client's mental
 15 state, let alone a failure to assert a mental state
 16 defence at trial, falls well below an objective standard
 17 of reasonableness" where a defendant exhibits
 18 "severe mental problems"). Had Plaintiff-in-Error been able to attend
 19 his check-up with Dr. Awagleri on August 14, 2021, his diminished mental
 20 state declined. ^{See} Cases to which Benard Little and the court ignored:
 21 Hull v. Tyler, 190 F.3d 88, 110 (3d Cir. 1999)
 22 (trial counsel was ineffective when he failed to present any of
 23 the numerous pieces of available evidence regarding competency
 24 or to challenge the government's single witness at defendant's
 25 short competency hearing). The now withdrawn counsel was given
 26 access to Plaintiff-in-Error's team of almost a hundred experts,
 27 including Dr. Okekee at Grand Desert Psychiatry however, his
 28 dereliction of duty was a direct cause of multiple wrongful convictions.

MATTHEW TRAVIS HOUSTON

No. 1210652 e H.D.S.P.

P.O. Box 650

Indian Springs, NV 89070-0650

1 This Failure to Investigate Competency of Plaintiff-in-
2 Error was furthered into the ~~double-jeopardy~~ cases in Las Vegas
3 Municipal Court(case(s) C1248384A and C1237802A). Not once did
4 Benard Little discuss Cases(s) with the Plaintiff-in-Error. See
5 Hummel v. Rosemeyer, 564 F.3d 290, 322-03 (3d Cir. 2010).

6 (~~trial counsel was ineffective when he stipulated~~
7 ~~to defendant's competency when he had never met~~
8 ~~with defendant~~). Benard Little did not ask Plaintiff-in-Error
9 or his alibi witnesses about anything whatsoever, quite similar to the case
10 of Thomas v. Lockhart, 738 F.2d 304 (8th Cir. 1984).

11 (failure to investigate alibi witnesses and
12 defendant's competency was ineffective assistance
13 and rendered defendant's plea unknowing and ~~involuntary~~
14 involuntary). As Clark County Public Defender's Cassandra Diez
15 failed to provide the court with ANY of Plaintiff-in-Error's medical records,

16 See, Evans v. Lewis, 855 F.2d 631, 636-639
17 (9th Cir. 1988).

18 (counsel's failure to pursue the possibility
19 of establishing the defendant's mental instability
20 constituted ineffective assistance). Her dereliction of duty is
21 put further on record and her neglect is reflected and summarized by
22 Dwetcher v. Whitley, 884 F.2d 1152, 1159-60
23 (9th Cir. 1998).

24 ("counsel made no tactical decision not to investigate
25 [the defendant's] possible mental impairment. He simply
26 failed to do so"). Causing a disabled person to become wrongfully
27 convicted is in no way ANY sort of "tactical decision" as this case
28 demonstrated the upmost brutality of law enforcement. The truth is
29 that an insanity defense inculpates bias, prejudice and injustice; 4

MATTHEW TRAVIS HOUSTON
 No. 1210652 @ H.D.S.P.
 P.O. Box 650
 Indian Springs, NV 89070-0650

1. in that a Failure to Investigate Competency, in Defence of Battered
 2. Person's Syndrome; for an Insanity Defense) which, incinerates bias, even more
 3. Bias from the general public, the legal system and big insurance claims. [T] insanity defense has often provided meritorious reason to overturn fraudulently erroneous
 4. convictions. is oftentimes abused by [redacted] defendants in the criminal justice system. [redacted]
 5. SEE *Madlock v. Lord*, 818 F.2d 1058, 1061-62 (2d Cir. 1987). The insanity defense portrays how the Appellant was abused by the Respondents.
 6. (failure to develop psychiatric testimony to support
 7. extreme emotional disturbance defense was deficient
 8. performance; case remanded for a determination of
 9. prejudice). In this case, the Clark County Public Defender's social worker,
 10. Rosandra Diaz neglected her duty in providing court with Appellant's files. See
 11. *Jacobs v. Horn*, 395 F.3d 92 (3d Cir. 2005).
 12. (counsel's failure to investigate defendant's competency
 13. was ineffective assistance; error was compounded by
 14. attorney's failure to notify psychiatrist examining
 15. defendant that defendant was facing death penalty). To elaborate on a
 16. remedy: *Becton v. Barnett*, 920 F.2d 1190 (4th Cir. 1990) shows what we
 17. ignored; (remanding for a hearing on claim that attorney was
 18. ineffective for failing to investigate defendant's competency
 19. despite signs of instability). Obviously, this case should be remanded. As
 20. was *Lockett v. Anderson*, 230 F.3d 645, 715-17 (5th Cir. 2000).
 21. (defendant was prejudiced under *Strickland* based on
 22. counsel's failure to investigate mitigating evidence relating to mental
 23. condition). This case should be remanded because the court failed
 24. in considering the competence of the Plaintiff-in-Error even
 25. before the criminal complaint was filed on April 26, 2021.
 26. If the fraudulent hearsay within that complaint would have been
 27. even remotely truthful, it would have revealed that (according to Capital
 28. Police Officer Montero's communications with Iowa Police) the Appellant
 29. was in fact the victim, having been abused by the criminal justice system.

MATTHEW TRAVIS Houston
 No. 126652 @ H.D.S.P.
 P.O. Box 650
 Indian Springs, NV 89070-0650

1. As the Plaintiff-in-Error had requested help for his mental illness, a most
 2. real illness, and was off his medication, is A perfect reason that
 3. hearsay evidence is not to be admissible in court, even if the
 4. alleged evidence meets the admission requirements set forth by
 5. the BUSINESS RECORDS EXEMPTION, See, e.g. Uniform Rule
 6. 63(13), is that there is no such thing as an "Iowa Police
 7. Department" and a false police report defines 'manifest injustice'.

8. This case is a perfect example of how hearsay exceptions
 9. jeopardize the constitutional guarantee of confrontation, especially
 10. because criminal exceptions are more narrow in allowing any sort
 11. of exception. Here in Nevada, the NRS 171.146 allows hearsay
 12. evidence to be admissible ONLY if the defendant was charged
 13. with a sexual offense committed against a child, abuse of a child,
 14. or an act which constitutes domestic violence. Even more strict
 15. requirements are set forth in NRS Chapter 11 - Limitations of
 16. actions, Chapter 47 limiting weight and credibility, effect of error,
 17. preliminary questions of admissibility, limited admissibility, matters
 18. of fact and law (most especially 47.160 granting a party an
 19. opportunity to be heard), limits on presumptions (making such
 20. presumptions disputable) and Chapter 48 - placing even more strict
 21. requirements to limit the admissibility of falsehood, NRS 178.145
 22. clearly states that there may not be any sort of indictment or an agreement
 23. to any sort of plea until the defendant was supposed to have been
 24. determined by the court to be found competent. In no way, shape
 25. or form were ANY of those requirements met. See page 76 (attached) MOTION

26. WHEREFORE, the undersigned prays that the court grant Plaintiff-
 27. in-Error / Petitioner-appellant's Motion To Strike. x. Matthew Travis Houston

28. DATED: this 29th day of April, 2022. BY: Matthew Travis Houston, pro se #126652. And
 29. so that the SUPREME COURT shall rule in favor of Mr. Houston in all of his appeals.

FILED

MAY 25 2022

CLERK OF COURT

1 0203

2 Matthew Travis Houston, pro se
#1210652 a Hosp3 American Bar Association Student Member # classified
PO Box 650

4 Indian Springs, NV 89070-0650

5 IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF

6 NEVADA IN AND FOR THE COUNTY OF CLARK

7
8
9
10 THE STATE OF NEVADA,
11 Plaintiff

CASE NO. C-21-357927-1

12 v.

DEPT. NO. XI

13 MATTHEW TRAVIS HOUSTON,
14 Defendant,14 ~~Petitioner-appellant and Plaintiff-in-Error.~~June 15, 2022
9:00 AM

15 RENEWED MOTION TO WITHDRAW PLEA

16 COMES NOW, Defendant, Matthew Travis Houston, proceeding in proper

17 person, and moves this Honorable Court for an Order granting him permission to withdraw his Plea

18 that he in fact NEVER AGREED TO,

19 Agreement in the the case number C-21-357927-1, on the date of 4 in the month

20 Cassandra DEZ, Benard Little, Anthony M. Goldstein and
of August in the year 2021 where defendant was then represented by Jeremy Wood as

21 counsel. This Motion is based on all papers and pleadings on file with the Clerk of the Court which are

22 hereby incorporated by this reference, and Points and Authorities herein and attached Affidavit of

23 Defendant, entitled "PLAINTIFF-IN-ERROR'S RESPONSE TO THE PERP
STATES OPPOSITION TO DEFENDANT'S EMERGENCY MOTION TO
Dated this 17th day of May, 2022, WITHDRAW PLEA", that
was supposed to have been submitted by Anthony M.
Goldstein. Instead of that, Respectfully submitted,24 he was too worried about the ~~State of Nevada~~ ~~State of Nevada~~ ~~State of Nevada~~

25 guilty thief who stole my Defendant in Proper Person

26 identity in the court of the "SUBSTITUTE JUDGE".

MAY 23 2022

RECEIVED

MEMORANDUM OF POINTS AND AUTHORITIES

NRS. 176.165 PROVIDES:

A motion to withdraw a plea of guilty or nolo contendere may be made only before sentence is imposed, or imposition of sentence is suspended. To correct manifest injustice, the court, after sentencing, may set aside the judgment of conviction and permit the defendant to withdraw his or plea.

Failure to adequately inform a defendant of the full consequences of his/her plea creates manifest injustice which could be corrected by setting aside the conviction and allowing him/her to withdraw the guilty plea. Meyer v. State, 603 P.2d 1066 (Nev. 1979), and Little v. Warden, 34 P.3d 540 (Nev.2001).

Defendant herein alleges that his/her plea is in error and must withdraw the plea pursuant to the following facts: The courts have refused to provide any transcripts from any of the cases that caused this and wrongful conviction, including C-17-323634-1, A-17-758861-C, 21CR019810, 21CR033713, 21P01275 and in Las Vegas Municipal Court C1248384A and C1237802A the failure of Las Vegas Municipal Court to respond to 3 separate petitions to 3 separate addressees constitutes an additional 2 miscarriages of manifest injustice and 3 separate dereliction of duties after the double jeopardy of both C1248384A AND C1237802A.

So the question for "our lady justice" to the peanut gallery of Linda Bell, Susan Barrus, Michelle De La Garza, Alexis Plunkett, Jason Barrus, Alex Bassett, Andrew Flahive, Elli Roohani, and a hundred more respondents is, "Is the fictitious Deep State of Nevada so inherently corrupt, bankrupted and disgusting that it cannot even afford to compensate Taken a dollar or two more so that she can learn how to read and oppress documents ^{truthfully} before she publishes more lies, slander, defamation of character and further insults the last man standing?"
Now see attached "Response To Opps From the Deep State"
2

Electronically Filed
4/21/2022 2:46 PM
Steven D. Orlerson
CLERK OF THE COURT

Steven D. Orlerson

1 OPPS
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #1565
5 TALEEN PANDUKHT
6 Chief Deputy District Attorney
7 Nevada Bar #005734
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Respondent

DISTRICT COURT
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,

13 Plaintiff,

14 -vs-

CASE NO: C-21-357927-1

15 MATTHEW HOUSTON
16 ID#1210652,

DEPT NO: XI

17 Defendant, petitioner-

18 ~~appellant and the Plaintiff-in-Error~~

19 PLAINTIFF-IN-ERROR'S RESPONSE TO THE ~~STATE'S~~
20 DEEP STATE'S OPPOSITION TO DEFENDANT'S EMERGENCY MOTION TO
21 WITHDRAW PLEA

22 DATE OF HEARING: MAY 9, 2022

23 TIME OF HEARING: 9:00 AM

24 COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County
25 District Attorney, through TALEEN R. PANDUKHT, Chief Deputy District Attorney, and
26 hereby submits the attached Points and Authorities in Opposition to Defendant's Emergency
27 Motion to Withdraw Plea.

28 This Opposition is made and based upon all the papers and pleadings on file herein, the
29 attached points and authorities in support hereof, and oral argument at the time of hearing, if
deemed necessary by this Honorable Court. OBJECTION YOUR HONOR: IF
"this is so, then why hasn't Miss Pandukht read or
"responded to the 12 page DIRECT APPEAL filed 2/16/2022
"at the 81 56 pages of merited grounds, experts and factual
evidence put on record in RESPONSE filed 3/29/2022?

1 After the ignored POINTS AND AUTHORITIES of the false arrest
2 of Houston on 7-14-21, a STATEMENT OF CASE must be truthful.

3 On August 3, 2021, Matthew ^{Travis} Houston (hereinafter "Defendant") was charged by way
4 of Information with Aggravated Stalking (Category B Felony - NRS 200.575). On August 4,
5 2021, Defendant was arraigned [REDACTED]. That same day,
6 Defendant's ^{unsigned} Guilty Plea Agreement (hereinafter "GPA") was filed, without ^{Def.'s} express
7 consent. On October 5, 2021, ^{Bernard Little} [REDACTED] filed a Motion to Withdraw as Attorney of Record and
8 Appoint Alternate Counsel in Order for Defendant to Withdraw His Guilty Plea. However, ^{where is any proof that he on}
9 December 6, 2021, Defendant confirmed upon Court's inquiry that he no longer wished to
10 withdraw his guilty plea. On that same date, Defendant was sentenced to a maximum of ninety-

11 six (96) months and a minimum of twenty-four (24) months in the Nevada Department of
12 Corrections (hereinafter "NDOC") with ninety-three (93) days credit for time served. ^{on 12/10/21}
13 On December 8, 2021, the Judgment of Conviction was filed, ^{than HOUSTON was}
14 ^{ON FRANK} ^{DECLINED} In PSK Tank he also requested he not DIRECT APPEAL, interviewed by PWG
15 On January 3, 2022, Defendant filed a Motion to Dismiss Counsel. On January 24,
16 2022, this Court granted the Motion to Dismiss Counsel but denied his request to recuse Judge
17 Jones and denied his request for money. The Order Granting In Part, Denying In Part
18 Defendant's Pro Per Motion to Dismiss Counsel was filed on February 1, 2022.

19 On February 18, 2022, Defendant filed a ^{timely and expeditious} Notice of Appeal. On March 29, 2022,
20 Defendant filed another Notice of Appeal to and Response to this Court's Order Granting in
21 Part, Denying in Part Defendant's Pro Per Motion to Dismiss Counsel from February 1, 2022.
22 On March 15, 2022, Defendant filed an Emergency Motion to Oppose Remand and Dismiss
23 Case in its Entirety. On March 31, 2022, Defendant filed a Notice of Motion and Motion for
24 Transcripts at the State's Expense. As of May 15, 2022 not one transcript provided.

25 On April 2, 2022, Defendant filed the Emergency Motion for an Order to Suppress
26 Hearing from December 6, 2021 (hereinafter "Motion"). The State filed its Opposition on
27 April 19, 2022. ^{Def.} ~~he~~ has also filed a Motion For Taleen Pandukht to READ.

28 On April 13, 2022, Defendant filed the instant Motion to Withdraw Plea (hereinafter
29 "Motion"). The State's Opposition ^{was inept.} ~~was~~ (But be careful, because the only
30 grounds Taleen is using against ^{the Def.} ~~the~~ is the hearsay that ~~he~~ ^{he's}
31 already moved the court to have SUPPRESSED and stricken from
the record). why did Taleen blantly lie thru above lines 5-6?
4

1 In regards to freestanding "claims" of innocence,
 2 why doesn't Takeen comment about the
 3 records from House Arrest that this court
 4 blatantly ignored? As this "factual synopsis"
 5 has been suppressed because it was a fictitious
 6 synopsis, it is hereby replaced with this
 7 MOTION TO PRODUCE HOUSE ARREST RECORDS
 8 (pursuant to the Rules of Discovery).

9
 10 After recess, let's see if it's even worth the
 11 judges time for them to read this response
 12 to a fraudulent OPPOSITION on behalf of
 13 the DEEP STATE OF SILVER...

14
 15 Not being read any rights on July 14,
 16 2021 was NOT very cognizable. It wasn't
 17 too recognizable when the "people" or
 18 whoever they were took seeing-eye dogs
 19 from a blind-visually impaired veteran from the
 20 United States Navy at his "self-serving" doctor's
 21 appointment with Dr. Tyson Ward who is NOT
 22 a communist, like Takeen. ^{see} ARGUMENT from a communist:

23 **I. FREESTANDING ACTUAL INNOCENCE CLAIMS ARE NOT**
 24 **COGNIZABLE EVEN IN POST-CONVICTION PROCEEDINGS**

25 Defendant claims he innocent of the crime he pled guilty to in his Motion. Motion at 3.
 26 However, while Defendant's Motion is four (4) pages, this is the only actual claim in his
 27 Motion. Regardless, Defendant's claim he is innocent is not cognizable in the current Motion.
 28 // Well, why don't we ask the judge to read the motion for
 29 themselves, instead of allowing the STATE OF NEVADA to publish
 30 more of the defamation of character against the Defendant?

See "it" = THE STATE OF NEVADA

Because it is inherently and without-a-doubt, the most rotten definition of corrupt, Nevada state law does not recognize freestanding claims of actual innocence in a
 1 Petition for Writ of Habeas Corpus, but rather only provides for claims of actual innocence
 2 where a defendant is attempting to overcome a procedural bar caused by an untimely or
 3 successive petition. See Mitchell v. State, 122 Nev. 1269, 1273-74, 149 P.3d 33, 36 (2006);
 4 See also Clem v. State, 119 Nev. 615, 621, 81 P.3d 521, 525-26 (2003). This is consistent with
 5 the Nevada Supreme Court's adoption of the standard established in Schlup v. Delo. See 513
 6 U.S. 238, 315, 115 S. Ct. 851, 861 (1995) (quoting Herrera v. Collins, 506 U.S. 390, 404, 113
 7 S. Ct. 853, 862 (1993)) ("Schlup's claim of innocence is thus not itself a constitutional claim,
 8 but instead a gateway through which a habeas petitioner must pass to have his otherwise barred
 9 constitutional claim considered on the merits."). In contrast, a freestanding claim of actual
 10 innocence is a claim wherein a petitioner alleges actual innocence alone, rather than actual
 11 innocence supported by a claim of constitutional deficiency, warrants relief. See Herrera, 506
 12 U.S. 390, 113 S. Ct. 853 (1993). The Herrera Court acknowledged that claims of actual
 13 innocence based on newly discovered evidence have never been held as a ground for habeas
 14 relief absent an independent constitutional violation in the underlying criminal proceeding. Id.
 15 violation. ^{if this case is nothing but a constitutional}
 16 The Court noted such claims were traditionally addressed in the context of requests for
 17 executive clemency, which power exists in every state and at the federal level. Id. at 414-15,
 18 113 S. Ct. at 867-68. However, the Court assumed, arguendo, that a federal freestanding claim
 19 of actual innocence may exist where a petitioner was sentenced to death and state law
 20 precluded any relief. Herrera, 506 U.S. at 417, 113 S. Ct. at 869; Schlup, 513 U.S. at 317, 115
 21 S. Ct. at 862. The United States Supreme Court has never found a freestanding claim of actual
 22 innocence to be available in a non-capital case. See, e.g., Herrera, 506 U.S. at 404-405, 416-
 23 417; House v. Bell, 547 U.S. 518, 554, 126 S. Ct. 2064, 2086 (2006); see also Carrier v.
 24 Stewart, 132 F.3d 463, 476 (9th Cir. 1997); Jackson v. Calderon, 211 F.3d 1148, 1165 (9th
 25 Cir. 2000). ^{law library} (Most probable is that Defendant is denied access to court and
 26 is why Defendant fails to cite any Nevada authority which would allow him to raise a
 27 freestanding claim of actual innocence and improperly suggests such a claim before this Court.
 28 "Actual innocence" is a term of art that should only be raised in the context of an attempt to

1 overcome post-conviction procedural bars to petitions for writ of habeas corpus. Even in the
 2 post-conviction context, where at least "actual innocence" claims can be made in order to have
 3 other arguments heard on the merits, there is no such concept as a "freestanding" actual
 4 innocence claim where a person can claim they deserve some kind of relief solely because
 5 they proclaim their innocence. Now "guilty" vs. "not-guilty" is defined by ^{actual}
 6 ~~So "freestanding"~~ Defendant's claim should be denied, because Nevada has no laws. ^{vs. freestanding}

7 II. DEFENDANT FAILED TO ESTABLISH ACTUAL INNOCENCE

8 Should this Court address the merits of Defendant's claim, it still fails because there is
 9 no evidence nor specific factual allegations, and it is belied by Defendant's GPA, which was
 10 unsigned. Actual innocence means factual innocence not mere legal insufficiency. Bousley v.
 11 United States, 523 U.S. 614, 623, 118 S.Ct. 1604, 1611 (1998); Sawyer v. Whitley, 505 U.S.
 12 333, 338-39, 112 S.Ct. 2514, 2518-19 (1992). To establish actual innocence of a crime, a
 13 petitioner "must show that it is more likely than not that no reasonable juror would have
 14 convicted him absent a constitutional violation." Calderon v. Thompson, 523 U.S. 538, 560,
 15 118 S. Ct. 1489, 1503 (1998) (emphasis added) (quoting Schlup v. Delo, 513 U.S. 298, 316,
 16 115 S. Ct. 851, 861 (1995)). Actual innocence is a stringent standard designed to be applied
 17 only in the most extraordinary situations. Pellegrini, 117 Nev. at 876, 34 P.3d at 530.

18 "Without any new evidence of innocence, even the existence of a concededly
 19 meritorious constitutional violation is not itself sufficient to establish a miscarriage of justice
 20 that would allow a habeas court to reach the merits of the barred claim." Schlup, 513 U.S. at
 21 316, 115 S. Ct. at 861. The Eighth Circuit Court of Appeals has "rejected free-standing claims
 22 of actual innocence as a basis for habeas review stating, '[c]laims of actual innocence based
 23 on newly discovered evidence have never been held to state a ground for federal habeas relief
 24 absent an independent constitutional violation occurring in the underlying state criminal
 25 proceeding.'" Meadows v. Delo, 99 F.3d 280, 283 (8th Cir. 1996) (citing Herrera v. Collins,
 26 506 U.S. 390, 400, 113 S. Ct. 853, 860 (1993)). Furthermore, the newly discovered evidence
 27 suggesting the defendant's innocence must be "so strong that a court cannot have confidence
 28 in the outcome of the trial." Schlup, 513 U.S. at 315, 115 S. Ct. at 861. Once a defendant has

1 made a showing of actual innocence, he may then use the claim as a "gateway" to present his
2 constitutional challenges to the court and require the court to decide them on the merits. *Id.*

3 Here, Defendant claimed he never called any of the victims and that he is innocent of
4 the crime he pled guilty to. Motion at 3. However, Defendant has not alleged any specific facts
5 nor provided any evidence of his innocence apart from his ~~own~~^{dog's} self-serving statement. Further,
6 he does not allege any constitutional violations. Outside of the single claim, Defendant only
7 generally complains that the people involved in his case colluded against him, causing
8 unidentified errors and "cluster trucks." Motion at 2-3. Simply put, there is no evidence, let
9 alone coherent argument that Defendant is innocent outside of his one-sentence claim.

10 Furthermore, Defendant pled guilty in this case. Thus, his claim is belied by his signed
11 GPA. Defendant's GPA states, "I hereby agree to plead guilty to: AGGRAVATED
12 STALKING (Category B Felony - NRS 200.575 - NOC 50333) ...I understand that by
13 pleading guilty I admit the facts which support all the elements of the offense(s) to which I
14 now plead as set forth in Exhibit '1'." GPA at 1, 3. Additionally, Defendant was canvassed
15 and affirmatively stated he was entering a plea of guilty freely and voluntarily. Reporter's
16 Transcript of Proceedings, Initial Arraignment 08/04/2021, at 6. Defendant had multiple
17 opportunities to plead not guilty or state his innocence, but he failed to do so. He admitted all
18 of the facts of the elements of the offense and admitted he was guilty of Aggravated Stalking.

19 Therefore, Defendant's claim of innocence should be denied, because Taken

20 // must not have read the title page of the original
21 ~~MOTION~~^{EMERGENCY} TO WITHDRAW PLEA at Lines 18-19,

22 // where Houston reminded the sleepy court of

23 // deliberate indifference that he never seen, read

24 // or had been provided the alleged GPA until after

25 // being wrongfully convicted and moved to NPOC

26 // and then receiving nothing but a fictitious COP9

27 // after February 1st, 2022. So how is that "free-

28 // standing" ?

CONCLUSION

Based on the foregoing, the State respectfully requests Defendant's Emergency Motion to Withdraw Plea should be denied, since they stole my service animals. (3)

DATED this 21 day of April, 2022. and never read any rights to me or presented Respectfully submitted,
any sort of warrant or summons.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #01565

BY


TALEEN R. PANDUKHT
Chief Deputy District Attorney
Nevada Bar #005734

CERTIFICATE OF MAILING

I hereby certify that service of the above and foregoing was made this 21st day of April, 2022, by depositing a copy in the U.S. Mail, postage pre-paid, addressed to:

MATTHEW HOUSTON #1218652
HIGH DESERT STATE PRISON
P.O. BOX 650
INDIAN SPRINGS, NV, 89070

BY


Secretary for the District Attorney's Office

and whose name is this?
Demand for name so they
can be sued too.

Therefore, pursuant to the facts and the law stated herein, Defendant requests that his guilty plea be withdrawn.

Dated this 17th day of May, 2022.

Respectfully Submitted,



It is affirmed pursuant to NRS 239B.030 that the preceding document does NOT contain the social security number of anybody.
CERTIFICATE OF SERVICE BY MAILING

I, Matthew Travis Houston, hereby certify, pursuant to NRCP 5(b), that on this 17th day of May, 2022, I mailed a true and correct copy of the foregoing RENEWED MOTION TO WITHDRAW PLEA, by depositing it in the High Desert State Prison legal mail service provided through the Law Library, with First class Postage prepaid, and addressed to the following:

clerk S. Grierson
200 Lewis Ave, 3rd Floor
Las Vegas, NV
89155-1160

CC: File

Dated this 17th day of May, 2022

BY: Matthew Travis Houston 
Matthew Travis Houston #1210652

10

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW HOUSTON,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Case No. 84886

RESPONDENT'S ANSWERING BRIEF

**Appeal From Denial of a Motion to Withdraw Guilty Plea
Eighth Judicial District Court, Clark County**

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In Proper Person

Counsel for Respondent

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BRIEF.DOCX

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IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW HOUSTON,

Appellant,

v.

THE STATE OF NEVADA,

Respondent.

Case No. 84886

RESPONDENT'S ANSWERING BRIEF

**Appeal from Denial of a Motion to Withdraw Guilty Plea
Eighth Judicial District Court, Clark County**

ROUTING STATEMENT

This appeal is presumptively assigned to the Court of Appeals because it is a post-conviction challenge to a guilty plea involving a category B felony. NRAP 17(b)(3).

STATEMENT OF THE ISSUES

1. Whether the district court properly denied Houston's Motion to Withdraw Plea

STATEMENT OF THE CASE

Preliminarily, it is difficult to determine what case Appellant Matthew Houston is appealing from, much less what order of the district court he is

challenging. The Nevada Supreme Court docket under the instant appeal number, 84886, indicates that the Lower Court Case is C357927. The clerk of the district court transmitted Records on Appeal from that criminal case number as well as A-22-853203-W, a post-conviction habeas case number. Despite Houston listing numerous case numbers on his notice of appeal, the State assumes Houston is challenging proceedings in either C357927 or A853203. Notice of Appeal at 1.

Habeas case A853203 does not appear to have any orders which may be challenged on appeal, the habeas petition has not been decided, and no findings of fact, conclusions of law, and order has been filed in it. It is currently set for hearing on May 5, 2023. Houston already attempted to appeal under this habeas case number, and this Court dismissed the appeal because no decision had been made in that case. Order Dismissing Appeal, Case 85353, filed October 6, 2022. Because there still has been no final decision or other appealable order in that case, to the extent Houston is appealing from any filing in that case this appeal should be dismissed for the same reason.

Accordingly, the State assumes that Houston is challenging some order presented in case C357927. His Notice of Appeal indicates that he is appealing “the decision of the District Court from the 4th day of April, 2022 also April 25, 2022, with the ORDER having been issued in error not until May 10th, 2022.” Notice of Appeal at 1. On May 10, 2022, the district court entered an Order Denying

Defendant's All Pending Motions. 2 ROA 326-328.¹ That Order denied four motions, three of which are not appealable; Defendant's Pro Se Motion For an Order to Suppress Hearing from December 6, 2021, Defendant's Emergency Motion requesting hearing De Novo and Release to Intensive Supervision, and Defendant's Pro-Se Motion for An Order to Appear By Phone Or Video and Notice of Motion. 2 ROA 327. The Order also denied Defendant's Emergency Motion to Withdraw Plea, and the denial of a motion to withdraw plea is an appealable order. NRS 177.015. Accordingly, the State assumes that is the order that Houston is appealing from.

On April 27, 2021, Houston was charged, by way of Criminal Complaint, with one count of Making Threats Or Conveying False Information Concerning Act of Terrorism. 1 ROA 4.

On August 2, 2021, Houston waived his right to a preliminary hearing, agreeing to plead guilty to one count of Aggravated Stalking (Category B Felony) with certain conditions that, if followed, could allow Houston to withdraw his plea and plead guilty to a gross misdemeanor Aggravated Stalking offense. 1 ROA 39-

41. He also received various release benefits and an agreement that the State would not oppose probation. Id. On August 3, 2021, Houston was accordingly charged, by way of Information, with one count of Aggravated Stalking (Category B Felony). 1
LIE. LOSING MY SERVICE ANIMALS WAS NOT ANY SORT OF BENEFIT, NEITHER WAS BEING WRONGFULLY CONVICTED TWICE. GOING TO CITY JAIL TO FACE MORE CHARGES WAS NOT ANY SORT OF A BENEFIT.

¹ For the reasons just explained, ROA refers to the Record on Appeal from case C357927. The Record on Appeal from the A-case appears to be irrelevant to the instant proceedings.

ROA 36-37. A Guilty Plea Agreement reflecting the negotiations was filed on August 4, 2021. 1 ROA 43-51. THE GPA WAS NOT SIGNED.

On October 5, 2021, Houston moved to have alternate counsel appointed to withdraw his plea. 1 ROA 52-54. The same day, the State moved to have Houston remanded for failure to comply with his release conditions and violating his plea agreement. 1 ROA 55-69. The district court entered a bench warrant for Houston's arrest on October 12, 2021, and he was arrested and returned on October 18, 2021. 1 ROA 70-76.

On October 25, 2021, the district court granted the State's motion to remand, increased bail to \$15,000, and imposed high level electronic monitoring. The district court also set a status check for confirmation of counsel to consider a motion to withdraw plea.² Mr. Goldstein confirmed as counsel on November 1, 2021.

THIS IS A LIE. MR. GOLDSTEIN NEVER VISITED MR. HOUSTON,
→ Mr. Goldstein met with Houston several times, and on December 6, 2021, THIS CAUSED MR. HOUSTON TO GIVE UP ON HIS "MOTION TO WITHDRAW GUILTY PLEA"
represented that Houston no longer wished to withdraw his plea. 1 ROA 216; 2 ROA 338. Prior counsel was reinstated, and Houston was adjudged guilty of Aggravated

Stalking (Category B felony) and sentenced to 24-96 months in the Nevada Department of Corrections with 93 days credit for time served. Id. On December 8,

² These minutes do not appear to be part of the Record on Appeal. To the extent information is provided in the procedural history that is not cited, it is not provided in the ROA.

2021, the district court filed a Judgment of Conviction reflecting Houston's Conviction. 1 ROA 94-95.

Houston filed a slew of motions thereafter, including Notices of Appeal on February 22, 2022, and March 30, 2022. Both of those appeals were dismissed. See Houston v. State, 84281, Houston v. State 84478.

Relevant to this appeal, Houston filed an "Emergency Motion to Withdraw Plea" (hereinafter, Motion") on April 13, 2022. 1 ROA 226-230. The State opposed on April 21, 2022. 2 ROA 264-270. The Motion was denied on April 25, 2022, and the order denying the Motion was filed on May 10, 2022. 2 ROA 326-328.

STATEMENT OF THE FACTS

The Court relied on the following factual synopsis in sentencing Houston:

A detective of LVMPD was assigned to investigate the offense of Threat/False Info Regarding Acts of Terrorism, which said investigation developed the defendant, Matthew Houston aka Matthew Travis Houston, as the perpetrator thereof.

On December 23, 2020, Mr. Houston left a voicemail at the Office for Consumer Health Assistance. When victim 1 returned his call, Mr. Houston stated he had a case in the Supreme Court and said he was being harassed by an individual. Victim 1 attempted to explain the process to help Mr. Houston and point him in the right direction. However, Mr. Houston became angry and began yelling and said he should be afforded all the benefits due to him instead of being harassed by the government. He then said that no one should be surprised if/when he goes on a mass shooting rampage like the one committed on October 1st.

**PLEADING
CONTINUES
IN NEXT
VOLUME**