

IN THE SUPREME COURT OF THE STATE OF NEVADA

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Elizabeth A. Brown
Clerk of Supreme Court

MATTHEW TRAVIS HOUSTON,
Appellant(s),

vs.

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

Case No: C-21-357927-1
Related Case A-22-853203-W
Docket No: 88275

RECORD ON APPEAL VOLUME 4

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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RETURNE
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MAY 10 2022

SUPPLEMENTAL PETITION TO NO. 84281
IN THE SUPREME COURT OF THE STATE OF NEVADA
TO REVIEW THE NEVADA COURT OF APPEALS DECISION

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY
DEPUTY CLERK

MATTHEW TRAVIS HOUSTON
Appellant,

vs. STATE OF NEVADA, ET AL,

MANDALAY BAY CORP., ET AL

Respondents also include Rosemary
McMorris - Alexander and SEOGVICK, et al

Supreme Court No. 84477
"84478" and "84281"
District Court No. A758861
C357927

JOINDER OF APPEAL AND
APPELLANT'S INFORMAL BRIEF, COUNTERCLAIM AND

EMERGENCY MOT. IN RE DECISION OF NO. 84281 FILED 4/5/22.

INSTRUCTIONS: If you are an appellant proceeding pro se (without an attorney) in the Nevada Supreme Court, you must file either (1) a brief that complies with Nevada Rule of Appellate Procedure (NRAP) 28(a), or (2) a completed copy of this informal brief form, see NRAP 28(k), with the Nevada Supreme Court on or before the due date, see NRAP 31. In civil appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court may dismiss your appeal. In postconviction criminal appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court or Nevada Court of Appeals may decide your appeal on the record without briefing.

HOW TO FILL OUT THIS FORM: This form must be typed, unless you are incarcerated, in which case it must be clearly handwritten. You do not need to refer to legal authority or the district court record. If you are completing your brief on this form, write only in the space allowed on the form. **Additional pages and attachments are not allowed.** If typing an informal brief, you may either use the lined paper contained in this form or an equivalent number of pages of your own paper. Your brief will be stricken if you fail to follow the directions in this form and the Nevada Rules of Appellate Procedure.

WHERE TO FILE THE BRIEF: You may submit your brief for filing in person or by mail.

To file your brief in person: Briefs may be submitted for filing Monday through Friday, 8:00 a.m. to 4:00 p.m.

Carson City: Bring the brief to the Clerk's Office at the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada, 89701.

Las Vegas: Place your brief in the Clerk's Office Drop Box at the Las Vegas courthouse for the Nevada Appellate Courts, 408 East Clark Avenue, Las Vegas, Nevada, 89101.

Info: NVBA Form 10, October 2017

C-1

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To file your brief by mail: Mail the brief to the Clerk of the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada 89701. **Your brief must be postmarked on or before the due date.**

You must file the original brief and 1 copy with the clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your brief, you must file the original form and 2 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or emailed to the Supreme Court Clerk's Office.

Copies of the brief must be mailed or delivered to the other parties to this appeal or to the parties' attorneys, if they have attorneys. You must also include a proper certificate of service or complete the certificate that is attached to the informal brief form.

CAUTION: Pro se parties are prohibited from representing other parties. A pro se party may not complete a brief on behalf of other parties. Pro se parties may collaborate on their briefs, however, provided that if one brief is submitted on behalf of multiple pro se parties, each party must sign and date the brief to confirm that he or she has participated in the preparation of the brief and, by his or her signature, joins in the arguments and representations contained therein.

YOU WILL NOW TAKE NOTICE that this is not to be a "MIXED PETITION" as this counterclaim is result of interpleadings and his person in fact being the true VICTIM OF CRIME. By "his" we are referring to the Appellant whom is a survivor of the terrible ONE OCTOBER. He is also indigent and completely unable to serve any sort of "copies" of his pleadings due not only to the fact that they can look up all of this online, but by the fact that Radenta Elacic and Rosemary McMorris-Alexander are involved in an insurance scam to have the Appellant continuously wrongfully convicted, falsely imprisoned, illegally incarcerated and possibly murdered by prison gangs or worse.

Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
April 5th, 2022	ORDER DENYING REHEARING
	and everything else too.

Notice of Appeal. Give the date you filed your notice of appeal in the district court: December 27th, 2021

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
C-17-323614-1	HOUSTON V. NEVADA	EIGHTH JUDICIAL
C-21-357927-1	HOUSTON V. NEVADA	CLARK COUNTY
A-17-758861-C	HOUSTON V. MANDALAY BAY, et al	CLARK COUNTY

Pro Bono Counsel. Would you be interested in having pro bono counsel assigned to represent you in this appeal?

☒ Yes ☐ No

NOTE: If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the space allowed.)

Originalist jurisprudence should not be sterile or purely mechanical. It's understanding would be more rich, and its rules more durable, if it was informed by any sort of experience. In the case of A-17-758861-C both the EIGHTH JUDICIAL DISTRICT COURT and the SUPREME COURT OF NEVADA have contributed to damaging the Appellant by repeatedly violating NRS 11.207 by ignoring many other laws not limited to the quite significant

~~the~~ valid tolling of the statute of limitations.
Keep in mind that ^{#1} an action against an attorney to recover damages for malpractice, whether based on a breach of contract or duty, must be commenced within 4 years after the plaintiff sustains damage or within 2 years after the plaintiff discovers or through the use of reasonable diligence should have discovered the material facts which constitute the cause of action, whichever occurs earlier. ^{#2} The time limitation is tolled for any period during which the attorney conceals any act, error or omission upon which the action is founded and which is known or the use of reasonable diligence should have been known to the attorney. In this case, to which the attorneys for the respondents and the interpleaded defendants have ruined the life of the Appellant again, by acting in coercion with Sedgwick, Dianne Ferrante, Jonathan Shockley, Rosemary McMorris - Alexander and no less than 40 other accomplices to wrongfully convict the Appellant ^{causing} ~~that~~ a 2nd false imprisonment. The initial intentional gross negligence and deliberate indifference of interpleaded defendants / respondents resulted in case C-17-323614-1 against the Appellant, and now this C-21-357127-1.

Pursuant to NAAP, in C-21-357927-1, the Appellant filed his DIRECT APPEAL from fishtank with little to no resources just after Dec. 20th, 2021 as both

#12025
Benard Little and Anthony M. Goldstein were to have been withdrawn as attorney of record. The Appellant also filed a pro se "EMERGENCY MOTION REQUESTING HEARING, DE NOVO, AND RELEASE TO INTENSIVE SUPERVISION" which was stamped "RECEIVED DEC 27, 2021 CLERK OF COURT" but mistakenly forwarded to the office of Anthony M. Goldstein when it should have sufficed as a "NOTICE OF APPEAL". The Appellant did not ~~was~~ intend to have appointed counsel from the onset of this case, to which there was no valid warrant as it was unsigned, there was no probable cause for the fake arrest of the Appellant, and this case in its entirety is based on the false police reports and lies of Rosemary McMorris - Alexander and Radenta Blacic.

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

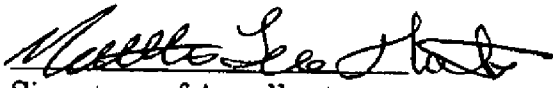
The question presented is one of first impression and of general statewide significance because pursuant to the law of the land, wrongful convictions and fake imprisonment are in fact illegal. As is the malicious prosecution of Rosemary McMorris - Alexander, et al. The question presented to the Eighth Judicial District Court ("is Houston guilty?") which is in fact NO, was not even allowed to be presented to the courts because of the coercion between way too many bad actors not limited to Brian P. Clark, Scott Poisson, Tierra Danielle Jones, David M. Jones, Laura A Goodman *013390, Jack Bernstein, Scott Poisson *10188, Radenta Blacic, Christopher Burk, Jessica Flores,

Dianne Ferrante, Jonathon Shackley, L.V.M.P.O, Las Vegas City Jail, HDSP, TLVCC, SDCC, Erica Tosch, Jason Barnes, the Attorney General Aaron Ford, Sheriff Joe Lombardo, MGM, Mandalay Bay Resort and Casino Convention Center, UMC, Encore Event Services, PSAV, FREEMAN, IATSE #720, the Nevada Gaming Commission, Division of Industrial Relations, Clark County District Attorneys Steven Wolfson, et al. #001365, GGRM's Lisa Anderson, Ellie Roohani, Michael P. Villani, Mary K. Holthus, Melissa De La Garza, Andrew Flahive, Alex Bassett, Gene Porter, Kristina A. Rhoades #12480, Anthony M. Goldstein, Dan Schwartz, Karen Schwartz (GENEX), Cassandra Diez, Jeremy Wood, Lina Sakalauskas, Roddy Scott, Lukas McCourt, Nicole Garcia, Tyler Ure, David Kelly #7413, F. Edge #8645, Mohtero #C6056. Again, this first impression was made by the clerk of court of the Regional Injustice Center when they certified the Appellant's request for de novo on December 27th, 2021, which was well before the 30 day time limit from December 8th, 2021 for the Appellant to file a pro se "notice of appeal". It is in no way the fault of the Appellant that the courts are backed up, it was in no way the fault of the Appellant that riots in the prison system and at CDC caused the Appellant's mental state to make him suffer into incompetency and it was no way the fault of the Appellant that his "request for a de novo hearing" was not interpreted properly to the court as a "notice of appeal". Furthermore, it is in no way the fault of the appellant that Rosemary McMorris-Alexander is a liar.

The decision made by the Nevada Court of Appeals on April 5th, 2022 conflicted with the United States Supreme Court because pursuant to the Constitution of the United States, citizens are to be free and clear from any sort of cruel and unusual punishment. For going off 6 years now, all the courts of Nevada have been doing to the Appellant is punishing him for being a pro se litigant. This discrimination is in fact illegal and in a few more jurisdictions than the kangaroo court of Clark County. It is hereby again demanded by the Appellant that each and every judge on the bench now take notice of the motion filed for a 2nd time electronically by the Clerk of Court of the Regional Injustice Center on April 6th, 2022 and is to be heard by District Court again on April 27th, 2022. Again, this notice of appeal was originally filed December 27, 2021. A notice of appeal is the same thing as asking the courts for a de novo hearing, and a technicality should not be the cause of extensive incarceration, false imprisonment, wrongful conviction or otherwise. This court is NOT to overlook any miscarriage of justice and it is NOT to overlook the initiative of the injured worker, or, in this case - the permanently totally disabled worker. In this case, unfortunately to the People of the State of Nevada, and all the other cases of Matthew Travis Houston, these courts and their bad actors have intentionally, deliberately and indifferently been overlooking justice and what it means, constituting an abuse of process and creating more unnecessary hardships within decision making.

This case involves fundamental issues of statewide public importance because nobody, permanently totally disabled or not, should be arrested without a valid warrant as the result of surviving a catastrophic work accident. This is absolutely a fundamental issue of statewide public importance because how many citizens of Nevada work in the convention and entertainment industry? How many of those citizens thrive in a safe and secure work environment? How many of those citizens think it's okay for an insurance company to lie to the courts and illegally withhold the injured worker's rightfully entitled benefits? How many people in the State of Nevada think that it's okay for the courts and the State Bar of Nevada to discriminate against pro se litigants and steal their service animals?

DATED this 20th day of April, 2022.


Signature of Appellant

Matthew Travis Houston
Print Name of Appellant

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed informal brief form upon all parties to the appeal as follows:

- ☐ By personally serving it upon him/her; or
☒ By mailing it by first-class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served):

The Supreme Court of Nevada
and its fictitious "Court of Appeals"
201 South Carson St, Ste 201
Carson City, NV
89701

DATED this 20~~th~~ day of April, 2022.



Signature of Appellant

Matthew Travis Houston

Print Name of Appellant

No. 1210652 @ H.O.S.P.

P. O. Box 650

Address

Indian Springs, NV 89070-

City/State/Zip 0650

Telephone

AFFIRMATION
Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding EMERGENCY INTERVENTION
AND INTERPLEADING OF JOINDER TO A-22-853203-W
IN DEPARTMENT XI IN RE MOTION TO RETAX
(Title of Document)

filed in District Court Case number A-22-853203-W

(NOW SEE THE
GREAT GEORGE W. BUSH, ET AL)

☒ Does not contain the social security number of any person.

-OR-

☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

(State specific law)

-or-

B. For the administration of a public program or for an application
for a federal or state grant.

Matthew Travis Houston
Signature

JULY 6TH, 2022
Date

MATTHEW TRAVIS HOUSTON, CHTD,
Print Name

PRC SE
Title

CERTIFICATE OF SERVICE BY MAILING

I, MATTHEW TRAVIS HOUSTON, CMTD., hereby certify, pursuant to NRCP 5(b), that on this 6th
day of July, 2022, I ^{penned} mailed a true and correct copy of the foregoing, "EMERGENCY
AND INTERPLEADING OF JOINDER TO A-22-853263.0W IN
DEPARTMENT XI IN RE MOTION TO RETAX"

by depositing it in the High Desert State Prison, Legal Library, First-Class Postage, fully prepaid,
addressed as follows:

REGIONAL JUSTICE CENTER ET AL
S. GRIERSON, AMANDA INGERSOLL CHARONTE PLEASANT
MICHELLE MCCARTHY, HEATHER UNGERMANN
200 Lewis Ave., 3rd Floor
P.O. Box 551601
Las Vegas, NV
89155-1601

CC: FILE

DATED: this 6th day of July, 2022.

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

Matthew Travis Houston, CHTD.
No. 1210652 @SMU
PO Box 650
Indian Springs, NV
89070-0650

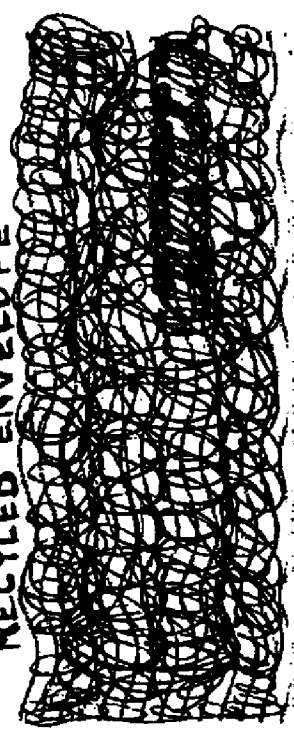
3762

3A.2

Steven D Grienson
Clerk of the Court
200 Lewis Ave., 3rd Floor
Las Vegas, NV

89155-1160

LEGAL MAIL ON A
RECYCLED ENVELOPE



PLEASE STOP RECIDIVISM LVMPD

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**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

July 30, 2022

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 11

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: **Emergency Motion In Re Emergency Petition For A Writ Of Mandamus And Other Writs Not Limited To The "omg"**

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

Matthew Travis Houston ID NO. 1210652

HIGH DESERT STATE PRISON
22010 COLD CREEK ROAD
P.O. BOX 650
INDIAN SPRINGS, NEVADA 89018

DISTRICT COURT
CLARK COUNTY, NEVADA

MATTHEW TRAVIS HOUSTON
Plaintiff - in Error, and the
Petitioner - appellant
v.
MGM, MANDALAY BAY CORP.,
CALVIN JOHNSON AND JOE LOMBARD
Defendant - Respondents ET AL

JOIN. NO.: C-17-323614-1
DEPT. NO.: XIX
CASE NO.: C-21-357927-1

DEPT. NO.: XI
JOINDER: A-22-853203-W
JOINDER: A-17-758861-C
17, 18 and 24
"DE NOVO REQUESTED"

EMERGENCY MOTION IN RE EMERGENCY PETITION
FOR A WRIT OF MANDAMUS AND OTHER EXTRAORDINARY
WRITS NOT LIMITED TO THE "OMG! IT'S THE *CLASSIFIED SUPER TOP SECRET
MAN-DERS-\$-DUES-TA-ME-DAMNED-US-EXPONENTIALLY
COMES NOW, all of the above Matthew Travis Houston, herein above respectfully
moves this Honorable Court for an ORDER to READ the attached
pleadings so that our lady justice may manifest the
upmost in liberty to ALL CITIZEN'S on God's Green Earth.

This Motion is made and based upon the accompanying Memorandum of Points and
Authorities, our Circus Maximus, a MOTION TO SUPPRESS WARRANT
DATED: this 12 day of JUNE, 2022 and a MEDICAL COMPLAINT(S).

JOINDER IN RE 9TH CIRCUIT BY: Matthew Travis Houston
COURT OF APPEALS No. 22-15748 Matthew Travis Houston #1210652

JOINDER IN RE FEDERAL COURT POISSON, ET AL NV BAR No. 10188
2:21-cv-00499-JAD-DJA

* = CLASSIFIED SUPER TOP(S) SECRET

NOW SEETOPPS TRADING > CHRISTMAS
BASEBALL CARDS CARD
FRUITCAKES
P. 1

Christmas Fruitcakes

As these real-life holiday meltdowns demonstrate, 'tis the season to be crazy.



In November 2007, Terry Trent, 44, was charged with an on-bath Santa and Christmas

spirit when he broke into a house to steal and damage nativity. Police were called and charged Trent with burglary and possession of illegal amounts of alcohol.



At the annual Santa Claus Parade in Ontario, Ontario, a 24-year-old man with his hair

gelled to the side, horns on his head and screaming obscenities and telling children that Santa wasn't real. Police arrested him for disturbing the peace, and now he'll forever be known as a naughty list.



After crashing a Christmas ornament at a craft fair in Connecticut, Ruth Wagner, 55, allegedly

used to stab a vendor who had a bad attitude. The vendor survived with a serious injury, and Wagner was arrested. She's a suspect in a party to a tree-trimming party.



In 2007 a dog damaged her dog, but that one bit of the Max. Kinn's dog's phone in Louisiana, in retaliation, the 28-year-old Kinn was allegedly punched in the head, kicking off an altercation in a Vegas hotel that ended with both being arrested for domestic battery. Hotel security guards who saw the whole thing unravel on video surveillance hailed the event as a masterpiece rivaled only by the 2010 classic *Tori Black Is Pretty Filthy 2*.



HOT MESS

Bad Girl of the Month Club

This porn star's mug shot made our jaws drop.

Name: Michelle Chapman (Tori Black) **Age:** 24 **Charge:** After her fiancé accused her of being an "unfit mother," the award-winning porn star allegedly punched him in the head, kicking off an altercation in a Vegas hotel that ended with both being arrested for domestic battery. Hotel security guards who saw the whole thing unravel on video surveillance hailed the event as a masterpiece rivaled only by the 2010 classic *Tori Black Is Pretty Filthy 2*.

LA 2625 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"

"Click to Add/Edit Event # on All Pages"

Event Number: 210300101590 - 001

key 2) 011 See 210600045671 4

key 3) 011 See 200700099898 4

STATE OF NEVADA) Houston, Matthew

) ss: ID#: 7035801

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

NOW SEE MOTION(S) TO SUPPRESS THIS

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

DON MALARCHY(S)
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/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. if there's been any sort of investigation, 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 03/16/2021 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.

proof? why would Houston need any explanation for my sort of 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] already in the process?
Redenta Blacic who is the Ombudsman for Workers Compensation returned Houston's phone call at 0929 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. if she doesn't remember then why did she make any claims at all?

I conducted an interview with Blacic on 03/22/21 with Detective F. Edge #8646 and obtained Blacic's taped statement regarding the incident. Blacic stated she was scared that Houston would carry out his threats, and she's not sure of what she heard. well after 03/23/2021, or was it on or about?

if she's not sure of what Houston said why would she have interpreted the p.3 unrecorded than 712 phone call as a threat?

CONTINUATION

Event #: 210300101590-001

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 Evt# LLV 210300101590 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 insurer. McMorris filed an LVMPD crime report under Evt# LLV200700099898 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.

Again, where's the proof?

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

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."

EVIDENCE OF INCOMPETENCE:

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.

Again, where's the proof of any of this? :V

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] 7418

WITNESS:

sf 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- Redenta, Blacic	Verification Level	
Disposition	Active	Precinct	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	U3
Reporting Officer	Kelly, David	Map	
Reporting Agency	LV - LAS VEGAS METROPOLITAN POLICE DEPARTMENT	Beat	
Report Type		Census/Geo Code	
Assisted By		Call Source	
Occurred On (Date and Time)	Wednesday 12/23/2020 9:29:00 AM	Related Cases	
Or Between (Date and Time)		Means	
Location		Other Means	
CSZ		Motives	
Location Name		Other Motives	
		Vehicle Activity	
		Direction Vehicle Traveling	
		Cross Street	
		Notified	

For Exceptional Clearances

Clearance Basis

Exceptional Clearance Date

Narrative

On 03/16/2021 I D. Kelly #7413 was notified by Capital Police Officer Montero #C6056 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] Redenta Blacic who is the Ombudsman for Workers Compensation returned Houston's phone call at 0929 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
Printed 3/23/2021 11:12 AM

Page 1 of 7



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 20C900043 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 Evt# LLV200700099898 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.

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]. [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/False info Re act of Terrorism NRS 202.448.

Offense _____

Case Report Number:
LLV210300101590-001

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT



Offense	Make Threat/False Info Re Act Of Terrorism/Wmd(F)-NRS 202.448	Hate/Bias Domestic Violence Premises Entered Entry Using Weapons Criminal Activity Type Security Tools	None (No Bias)
Code Section			
IBR Code	13C		Not Applicable
IBR Group	A		
Crime Against	Person		
UCR Hierarchy	09		
Location Type	Government/Public Building		
Completed	Yes		

Offenders _____

Suspect Name: Houston, Matthew

Aliases

Alias	Alias DOB	Alias SSN
-------	-----------	-----------

Alert(s)

Addresses

Address Type	Address	CSZ	County	Country
Residence		Iowa City		United States

Phones

Phone Type	Phone Number
------------	--------------

Emails

Email Address

Marital Status

Sex Male
Race White
Ethnicity Unknown
DOB [REDACTED]
Age 36
Eye Color

Hair Color
Hair Style
Hair Length
Facial Hair
Complexion
Teeth
Build

Printed 3/23/2021 11:12 AM

Page 3 of 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

SMT	Type	Location	Description
-----	------	----------	-------------

Languages Spoken

Fluency	Language
---------	----------

Attire
Employer/School
Employer Address
Employer CSZ
Occupation/Grade

MO
Other MO
Habitual Offender
Status

Notes

Victims

Name: Blacic, Redenta

Victim Type Individual
Victim of 51522 - Make Threat/FALSE INFO RE ACT OF TERRORISM/WMD(F)-NRS 202.448 - IBR 13C

Case Report Number:
LLV210300101590-001



LAS VEGAS METROPOLITAN
POLICE DEPARTMENT

Aliases

Alias	Alias DOB	Alias SSN
-------	-----------	-----------

Alerts

Addresses

Address Type	Address	CSZ	County	Country
Business		Las Vegas, NV	Clark	United States

Phones

Phone Type	Phone Number
------------	--------------

Emails

Email Address

Scars, Marks and Tattoos

SMT	Type	Location	Description
-----	------	----------	-------------

Languages Spoken

Proficiency	Language
-------------	----------

Case Report Number:
LLV210300101590-001



LAS VEGAS METROPOLITAN
POLICE DEPARTMENT

Marital Status

Sex Female
Race White
Ethnicity Hispanic or Latino
DOB [REDACTED]
Age 58
Eye Color
Hair Color
Facial Hair
Complexion
Height
Weight
Hand
Resident Resident
POB
DLN
DL State

DL Country

SSN
Attire
Employer/School
Employer Address
Employer CSZ
Occupation/Grade
Testify
Injury
Registered Sex
Offender
EXP Date (RSO)
Accent
Nationality
Immigration
Status

Offender Relationships

Offender	Relationship
S - Houston, Matthew	Relationship Unknown

Circumstances

Just. Hom. Circ.

LEOKA Info

Type
Assignment

Activity
ORI-Other Jurisdiction

Notes

Witnesses _____

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Page 6 of 7

Case Report Number:
LLV210300101590-001



LAS VEGAS METROPOLITAN
POLICE DEPARTMENT

Other Entities

Properties

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:

SOCIAL SECURITY #:

RACE:

SEX: F

HEIGHT:

WEIGHT:

HAIR:

EYES:

WORK SCHEDULE:

DAYS OFF:

HOME ADDRESS:

HOME PHONE:

WORK ADDRESS:

WORK PHONE:

BEST PLACE TO CONTACT:

EMAIL:

BEST TIME TO CONTACT:

The following is the transcription of a tape-recorded interview conducted by Det. David Kelly (DK), P# 7413, and Det. Farrah Edge (FE), P#8645, LVMPD Counter Terrorism Section. on 03/22/2021 at 0825 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] a 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: 8645

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

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: Redenta Blacic (RB)

Event #: LLV210300101590

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 Injury 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 administrated as well as the Division of Industrial Relations, who is my former employer. So, I do – I do know the District Manager over there,

VOLUNTARY STATEMENT
(Continuation)

Statement Of: Redenta Blacic (RB)

Event #: LLV210300101590

VICTIM OF NASHVILLE, TN TERRORIST ATTACK? OBT
and um she had shared with me that he had called the DIR, that they did file 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.

OBT

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 of 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...

DK: Approximately...

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, did he leave messages?

RB: He did but unfortunately we did not save them. Um they were again irate, 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...

VOLUNTARY STATEMENT
(Continuation)

Statement Of: Redenta Blacic (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 *answer* leave any messages, but when he did call back after, he did call back on the mainline. Which *then 4 months later?* is the one I forwarded to my supervisor

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. Huston did not threaten them directly, he just... *well what did he "just..."?*

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

VOLUNTARY STATEMENT
(Continuation)

Statement Of: Redenta Blacic (RB)

Ent #: LLV210300101590

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 now even if he did make the threats -*
... *without question.* I was fearful, I was, I was – I was distraught and I was fearful, because of his *tone and his manner.* And I been doing workers-comp since 1999, 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. *so if she did have experience, why did she not report the audit? why did she deny her duty in helping Houston file*

RB: 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/or when he, he said he – he, not someone, he said *a* *grin* 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 9:03, 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... *How did Houston make a threat if none of the phone calls were recorded or logged?*

RB: ... 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 goanna do is um I'm goanna file a Las Vegas Metropolitan Police Department report.

RB: Uh-uh.

**VOLUNTARY STATEMENT
(Continuation)**

Statement Of: Redenta Blacic (RB)

Event #: LLV210300101590

DK: For this crime.

RB: Okay.

DK: Um and I'm goanna 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/presidential-actions/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

noted: “[w]hen you’re dealing with an emerging infectious disease outbreak, you are always behind where you think you are....”⁶

Governor Sisolak issued a Declaration of Emergency in the State of Nevada on March 12, 2020. On Sunday, March 15, 2020, Governor Sisolak ordered all K-12 schools in the State of Nevada closed through April 6, 2020. Later that same day, he announced further directives, which included: closing state offices to the public, a call to transition to working as much as possible over the phone or online for essential services, and strongly encouraged gaming properties to close to the public. Governor Sisolak stated these efforts are required “protect the health and safety of the public and our state workforce while ensuring that the important work of our state government does not grind to a halt.” Further, he noted that we all “must do what we can to be part of the solution and share[] responsibility for each other as Nevadans.”⁷

Clark County, as well as many cities therein, issued their own Declarations of Emergency in response to the COVID-19 outbreak.⁸ Federal, state, and local courts also responded to the outbreak with varying administrative orders, citing the COVID-19 outbreak as good cause to suspend court proceedings or scale back operations.

The U.S. District Court for the District of Nevada continued all trials through April 20, 2020, among other modifications and visitor restrictions “to do its part in slowing the spread of COVID-19.”⁹

The Nevada Supreme Court and Court of Appeals imposed visitor restrictions to minimize exposure, noting, “... the best way to prevent illness is to avoid being exposed to the virus.”¹⁰

The Eighth Judicial District Court issued Administrative Order 20-01, which suspended all jury trials for 30 days and encouraged any essential hearings to be heard through alternative means to in-person appearances. Additionally, the order provided restrictions on public and employee entry into the courthouse.¹¹ Three days later, through Administrative Order 20-02, the court discontinued in-person meetings or gatherings and issued a direction to conduct court business through social distancing.¹²

The Las Vegas Justice Court issued Administrative Order 20-03, which provided for amended procedures due to the COVID-19 outbreak. However, all preliminary hearings, regardless of

⁶ <https://www.nytimes.com/2020/03/16/us/politics/trump-coronavirus-guidelines.html>,
https://twitter.com/ABC/status/1239638144955437056?ref_src=twsrc%5Etfw%7Ctwcamp%5Etwetembed%7Ctwterm%5E1239638144955437056&ref_url=https%3A%2F%2Fwww.redditmedia.com%2Fmediaembed%2Ffr106%3Fresponsive%3Dtrue%26is_nightmode%3Dfalse

⁷ <https://nvhealthresponse.nv.gov/preparation-in-nv/>,
http://gov.nv.gov/News/Press/2020/Governor_Sisolak_Updates_Public_on_State_Action_and_Guidance_Regarding_COVID-19/

⁸ https://www.fox5vegas.com/coronavirus/las-vegas-clark-county-surrounding-cities-declare-state-of-emergency/article_7e1d4c6a-672d-11ea-bc3d-6f2ce56da2c4.html,

⁹ <https://www.clarkcountycourts.org/wp-content/uploads/USDC-NV-03-16-2020-Press-Release-Final.pdf>

¹⁰ <https://nvcourts.gov/COVID-19-restrictions/>

¹¹ http://www.clarkcountycourts.us/res/rules-and-orders/2020-03-14_11_43_36_admin%20order%2020-1.pdf

¹² http://www.clarkcountycourts.us/res/rules-and-orders/2020-03-16_09_07_52_administrative%20order%2020-02.pdf

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-asymptomatic-spread/index.html>,

<https://science.sciencemag.org/content/early/2020/03/13/science.abb3221?rss=1>,

<https://www.sciencenews.org/article/coronavirus-most-contagious-before-during-first-week-symptoms>,

<https://www.foxnews.com/media/dr-siegel-bars-concerts-coronavirus-highly-contagious>

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

Nevada State Board of Medical Examiners
Investigations Division
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Physical Address: 1105 Terminal Way, #301 Reno, NV 89502

Phone: In Reno: (775) 688-2559
Fax: (775) 688-2553

(or if calling from any other area of Nevada,
call the board's in-state toll-free number: (888) 890-8210)

BLIND • VISSUALLY IMPAIRED COMPLAINT FORM

NOTE: Please print out this Complaint Form on your printer. On the printed Complaint Form, please type or neatly print your complaint information and summary. Be as concise as possible. Make copies of any documents you have which support your allegation(s) and attach them to your completed Complaint Form. Please mail your completed Complaint Form and attachments to the above address.

Your Name: Matthew Travis Houston Gender(circle): ^{Male} (M) / F

Phone Number(s) (~~home/work~~/cell): 3-D-23 @ MDSP No. 1210652

Mailing Address: 22010 Cold Creek Road P.O. Box 650

City: Indian Springs State: NV Zip: 89070-0650

Patient Name: Matthew Travis Houston Gender(circle): ^{Male} (M) / F

Patient Date of Birth: 7.15.1984 Patient Social Security Number: 481.06.1968

Physician(s), Physician Assistant(s), Practitioner(s) of Respiratory Care, Perfusionists named in complaint:

NOT GUILTY POPE) ^{factually & actually} IMNOCENT ND OC, ET AL now see A.22.853203.W
1) Name: IMNOCENT
Address: A.17.758861.C now see C.17.323614.1 + C.21.357927.1
City: HELL State: NV Zip: 666 Phone Number(s): 666

2) Name: Larry Phillips p: 702.382.1200
Address: NV-CURE @ John Witherow p: 702.347.1731
City: _____ State: _____ Zip: _____
Phone Number(s): 702.671.0512 ^{Harther Ungermann}

3) Name: Jessica @ p: 702.743.1763 Gary @ p: 610.762.4143
Address: Darian @ p: 702.762.1347 Elaine @ p: 610.871.0031
City: _____ State: _____ Zip: _____
Phone Number(s): 702.628.2000 ^{Brenda Lee}

Christopher D. Burk @ 702.620.2020
Veronica @ 702.474.7554 Erica and Rose @ 702.868.8888
SEE ATTACHED

Date(s) of Occurrence: 12-20-2021 (9-30-2016) Anna 9/26/2015
(supposedly)

Treatment Received At: (please mark the following that apply, including name and address)

Physician's Office: Attorney Todd Leventhal

Hospital: p: 702-472-8686

Other: SF-CA @ p: 415-640-4864

Did you obtain a second opinion from another physician? ☐ Yes ☐ No

If "Yes": Name of Physician: Kelsey Bernstein @ p: 702-382-1200

Physician Address: 702-755-8678

Diagnosis: 702-940-1234

IMPORTANT: PLEASE SIGN AND DATE

Signature: [Signature] Date: 11 JUN 22

Complaint

Summary

PRIA REPORT ON C/O SR Kurey
and B.M.U. "Program"
"SHREK"

3 D-21

3 D-22

3 D-34

3 D-36

NOW SEE

3 D-1

DECLARATION OF REVEREND MATTHEW TRAVIS HOUSTON:

I, Matthew Travis Houston, never made any sort
of telephone calls to any of these people.
SMH.

Can "you" please tell me as to why I am
in NDOC and why I was kidnapped at
my own doctor's appointment @ NEVADA RETINA
SPECIALISTS and why my service animals were
murdered?

Consumer Information

About

Medical Doctors Physician Assistants Respiratory Therapists Perfusionists and Unlicensed Practice

UNLICENSED PRACTICE

Before you select a physician for your medical needs, check with us or the Nevada State Board of Osteopathic Medicine (contact information on previous page) to verify the physician is licensed to practice medicine in Nevada. Do not seek treatment from someone who is not licensed in Nevada. If the person is not licensed, he or she may be attempting to commit a felony, including fraud and assault and battery.

Report!

If you or someone you know has received treatment from an unlicensed person, report it to local law enforcement immediately or dial 211! If you have discovered someone who is not licensed and who is attempting to practice medicine on others, inform the potential patient not to be treated and call local law enforcement immediately or dial 211! You can remain anonymous.

Medicine is NOT practiced in non-medical settings.



Nevada State Board of Medical Examiners

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Website: www.medboard.nv.gov
E-mail: nsdme@medboard.nv.gov



THE BOARD

The Nevada State Board of Medical Examiners (Board) is the state agency that licenses and regulates Nevada medical doctors (physicians), physician assistants, practitioners of respiratory care and perfusionists. Collectively, they are referred to as "licensees." The Board is comprised of nine members appointed by the Governor—six physicians actively practicing in Nevada and three members from the public.

At its quarterly meetings, the Board considers and acts on individual license applications, committee reports and policy issues affecting the practice of medicine. Meetings also include adjudications of disciplinary actions filed by the Board's investigative committees. Although some Board business is confidential under the law, Board meetings are otherwise open to the public. The Board's meeting schedule may be obtained from its website: www.medboard.nv.gov.

No tax dollars are used to support the Board. Licensing and registration fees charged to practitioners regulated by the Board provide the bulk of its revenue. Audits of the Board are conducted annually and reported to the Legislative Counsel Bureau of the Nevada State Legislature and to its licensees.

THE BOARD'S MISSION

The practice of medicine is a *privilege* granted by the state. The Nevada State Board of Medical Examiners licenses, monitors, disciplines, educates and, when appropriate, rehabilitates its licensees to assure their fitness and competence to serve the people of Nevada.

SERVICES THE BOARD PROVIDES

The Board can give you information on the background and status of medical doctors, physician assistants, practitioners of respiratory care and perfusionists licensed in Nevada. The Board can tell you how many years a licensee has practiced in Nevada, provide you with a licensee's education, training and malpractice history, and tell you whether the Board has taken disciplinary action against his or her license.

You can obtain this information by calling the office at (775) 688-2559 in the Reno/Sparks/Carson City area or (888) 890-8210 toll-free within the state, and a customer/service representative will provide you with the information over the phone. You can also visit the Board's website (www.medboard.nv.gov), where you can view the profiles of the Board's licensees.

All disciplinary actions are reported in the Board's newsletters and on its website.

A full roster of the Board's licensees is available in hard copy, on computer disk or via e-mail, for a fee.

Board representatives are happy to present public outreach programs before medical organizations, students and public groups, such as service clubs, upon request.

WEBSITE

The Board's website (www.medboard.nv.gov) contains information on the Board and the Board's licensees: meeting agendas and minutes, newsletters, the Board's most recent annual report and financial statements, forms and other helpful information.

DOES A DOCTOR HAVE TO RELEASE MEDICAL RECORDS TO A PATIENT?

Yes. A doctor does have to make a patient's records available to the patient or the patient's representative with the patient's written authorization. The doctor may charge up to 60 cents per page for photocopies of the records, and a reasonable fee for copies of x-rays and other health care records produced by similar processes.

THE MEDICAL PRACTICE ACT (MPA)

The Medical Practice Act, Chapter 630 of the Nevada Revised Statutes (and Chapter 630 of the Nevada Administrative Code) is a law created by the Nevada State Legislature to license and regulate Nevada physicians, physician assistants, practitioners of respiratory care and perfusionists.

THE INVESTIGATIVE PROCESS

Complaints against licensees of the Board are received from several sources, including patients, other members of the public, hospitals, other health care providers and institutions and medical malpractice insurers. The Board may also initiate a complaint on its own if it becomes aware of potential violations of the MPA.

CONDUCT THAT MAY WARRANT DISCIPLINE OF A LICENSEE

The following list includes, but is not limited to, acts that constitute grounds for initiating disciplinary action or denying licensure:

1. Conviction of a felony relating to the practice of medicine or the ability to practice medicine, or certain other felonies as listed in NRS 630.301(11);
2. Disciplinary action taken against a licensee in another state;
3. Malpractice: failing to use reasonable care, skill, or knowledge ordinarily used under similar circumstances;
4. Sexual misconduct with a patient;
5. Disruptive behavior that interferes with patient care or has an adverse impact on the quality of care rendered to a patient;
6. Billing for services not rendered (fraud);
7. Engaging in conduct that brings the medical profession into disrepute;
8. Advertising the practice of medicine in a false, deceptive or misleading manner;
9. Abandonment of a patient;
10. Inability to practice medicine with reasonable skill and safety because of illness, a mental or physical condition, or the use of alcohol, drugs, narcotics or any other such substance.

While some types of behavior, such as poor bedside manner, are not conducive to a good doctor-patient relationship, they are not violations of the MPA.

DISCIPLINARY PROCEDURE

When the Board receives a complaint, it is reviewed to determine whether the Board has jurisdiction over the matter. If it is determined that the Board has jurisdiction, the facts of the complaint are thoroughly analyzed by a committee of Board members, staff and medical reviewers to determine if there has been a violation of the MPA.

If a violation is confirmed, the Board may file formal charges against the licensee and the licensee will be afforded a public hearing. The charges filed by the Board and the formal decision of the Board after the hearing are public record. Copies of these documents are available to the public upon request, for a fee, or are available for free on the website.

If the charges are proved, the Board may suspend or revoke the license or place the licensee on probation. The Board can also order psychiatric treatment, additional education, passage of a competency examination or other discipline provided by the MPA. If the licensee has a problem with drugs or alcohol, the Board can require the licensee to participate in treatment and keep him or her from practicing until the problem is resolved.

HOW TO FILE A COMPLAINT

To file a complaint, you can download or print the complaint form from the Board's website (www.medboard.nv.gov) under the "Consumer Forms" section. Or call the Board office at (775) 688-2559 in the Reno/Sparks/Carson City area or (888) 890-8210 toll-free within the state and press 1 to reach the Investigations Division of the Board, which will mail you a complaint form.

By law, the Board cannot reveal whether an investigation has been initiated against a licensee unless the investigation has resulted in formal charges against the licensee.

WHAT THE BOARD DOES NOT DO

The Board cannot tell you what insurance plans a specific physician accepts, whether the physician is accepting new patients, or recommend or refer you to a specific physician. Local and national organizations are

a good source for finding physicians who practice certain specialties in your area. See the "Referral Organizations" below.

The Board also has no legal authority over the fees charged by a physician (unless it involves fraud) and cannot assist with getting fees reduced or refunded. The Office of the Governor, Consumer Health Assistance Program ((702) 486-3587 in the Las Vegas area or (888) 333-1587 toll-free within the state of Nevada) may be able to assist with fee disputes.

REFERRAL ORGANIZATIONS

- Nevada State Medical Association (NSMA)
(775) 825-6788 (Reno)
- Clark County Medical Society (CCMS)
(702) 739-9989 (Las Vegas)
- Washoe County Medical Society (WCMS)
(775) 825-0278 (Reno)
- American Medical Association (AMA)
(800) 621-8335 (toll-free)
- Bureau of Health Care Quality and Compliance
Nevada State Division of Health (for hospitals)
(775) 684-1030
- (800) 225-3414 (toll-free)
- Nevada Hospital Association
(775) 827-0184

THE BOARD DOES NOT REGULATE:

- Chiropractors
- Clinics
- Dentists
- Family counselors
- Homeopaths
- Hospitals
- Laboratories
- Laboratory technicians
- Marriage counselors
- Nurses
- Nursing homes
- or
- Doctor's front office (clinical) staff
- Emergency medical technicians
- Medical insurance companies
- Oriental medicine occupations
- Optometrists
- Osteopaths
- Pharmacists
- Physical therapists
- Podiatrists
- Psychologists
- Social workers
- Speech pathologists
- Veterinarians
- X-ray technicians

NEVADA STATE AGENCIES THAT REGULATE OTHER HEALTH PROFESSIONALS

- Board of Dental Examiners, (702) 486-7044
- Board of Examiners for Audiology and Speech Pathology, (775) 787-3421
- Board of Examiners for Marriage and Family Therapists and Clinical Professional Counselors, (702) 486-7388
- Board of Examiners for Social Workers, (775) 688-2555
- Board of Homeopathic Medical Examiners, (775) 324-3353
- Board of Nursing, (775) 687-7700
- Board of Optometry, (775) 883-8367
- Board of Oriental Medicine, (702) 837-8921
- Board of Osteopathic Medicine, (702) 732-2147
- Board of Pharmacy, (775) 850-1440
- Board of Podiatry, (775) 789-2605
- Board of Psychological Examiners, (775) 688-1268
- Board of Veterinary Medical Examiners, (775) 688-1788
- Chiropractic Physicians' Board, (775) 688-1921
- Physical Therapy Examiners' Board, (702) 876-5535

For agencies not listed above, call Nevada State Library Research Assistance at (775) 684-3360 or (800) 922-2880 toll-free within the state of Nevada.

Your insurance plan may also list which doctors in your area are covered by your insurance.

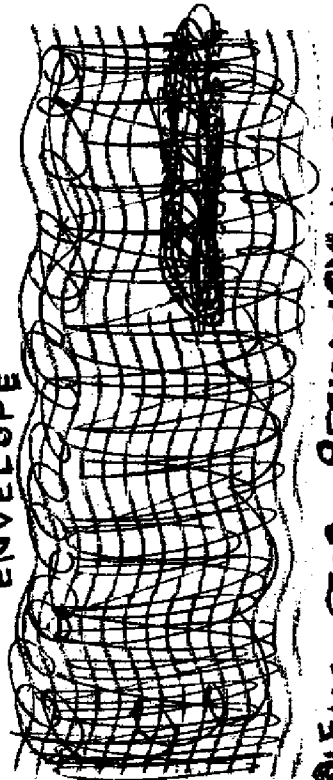
Matthew Travis Houston #1210652
Po box 650
Indian Springs NV 89070

3762

3A.2

Steven D Grierson
Clerk of the Court
200 Lewis Ave 3rd Floor
Las Vegas NV 89155-1160

LEGAL MAIL ON REUSED
ENVELOPE



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**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

July 30, 2022

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 11

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: **Emergency Opposition**

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

OBJ + 0074 + 0079 + 0085 + 0128 + 0016

MATTHEW TRAVIS HOUSTON, CHTD.

No. 1210652 @ HDSP Nevada Bar No. 2131 (R.I.P. Uncle David)

PO Box 650 • 22010 Cold Creek Road

Indian Springs, NV 89070-0650

P: (702) 879-6789

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MATTHEW TRAVIS HOUSTON,

Plaintiff,
Plaintiff-in-Error and the
-VS- Petitioner-appellant,

THE STATE OF NEVADA, ~~et al~~
AND THE MANOLAY BAY CORP., ET AL,
Defendant-respondent(s)

Case No. ^(S) C-17-323614-1(XIX)
C-21-357927-1(XI)

CASE No. A-22-853203-W

Dept. No. XI

JOIN "de novo hearing requested"

CASE NO.: A-17-758861-C

DEPT No.: 17, XVIII and 29

IN RE APPEAL No. 844178

CR014840 21 PO 12758 E1248384A
CR033713 21 PO 19508 E1237802A

EMERGENCY OPPOSITION AND NOTICE OF FORMAL
OBJECTION TO ANY SORT OF VEXATIOUS LITIGANT
ORDER AND ANY AND ALL OTHER SORT OF CHICANERY
THAT "GERRI LYNN HARDCASTLE AND THE STATE
OF NEVADA, ET AL" MAY ATTEMPT TO CONJURE
FROM THE DEMONS OF INJUSTICE KNOWN AS
"THE SHADOW HILLS CHURCH"
AND "ERNEST MAY ELEMENTARY"

YOU WILL NOW TAKE NOTICE of this continued
state of emergency in re intervention and interpleadings
of joinder to case No. A-22-853203-W in
department XI in re "MOTION TO RETAX".

YOU WILL NOW READ COMPLETE MOTION OF 44 PAGES

P. 1 - A-22-853203-W

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON,
Appellant,
vs.
MANDALAY BAY CORP, D/B/A
MANDALAY BAY RESORT AND
CASINO,
Respondent.

No. 84417

FILED

JUN 06 2022

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

ORDER DISMISSING APPEAL

This is a pro se appeal from a district court order granting a post-judgment motion to interplead settlement proceeds. Eighth Judicial District Court, Clark County; David M. Jones, Judge.

Review of the notice of appeal and documents before this court reveals a jurisdictional defect. This court “may only consider appeals authorized by statute or court rule.” *Brown v. MHC Stagecoach, LLC*, 129 Nev. 343, 345, 301 P.3d 850, 851 (2013). No statute or court rule allows an appeal from an order allowing a party to interplead funds. Because the order does not determine which parties are entitled to the settlement funds, the order does not affect appellant’s rights to the funds and is not appealable as a special order after final judgment. See NRAP 3A(b)(8); *Gumm v. Mainor*, 118 Nev. 912, 920, 59 P.3d 1220, 1225 (2002) (to be an appealable special order after final judgment, the order must

affect the rights of a party to the action which grow out of the previously entered judgment). Accordingly, this court lacks jurisdiction and

ORDERS this appeal DISMISSED.¹

Hardesty, J.
Hardesty

Stiglich, J.
Stiglich

Herndon, J.
Herndon

cc: Hon. David M. Jones, District Judge
Matthew Travis Houston
Clark McCourt, LLC
Eighth District Court Clerk

¹Given this dismissal, this court takes no action on appellant's transcript request form or the notice filed on April 4, 2022.

IN THE SUPREME COURT OF THE STATE OF NEVADA
OFFICE OF THE CLERK

MATTHEW TRAVIS HOUSTON,
Appellant,
vs.
MANDALAY BAY CORP, D/B/A MANDALAY
BAY RESORT AND CASINO,
Respondent.

Supreme Court No. 84417
District Court Case No. A758861

RECEIPT FOR DOCUMENTS

TO: Matthew Travis Houston
Clark McCourt, LLC \ Brian P. Clark
Steven D. Grierson, Eighth District Court Clerk

You are hereby notified that the Clerk of the Supreme Court has received and/or filed the following:

03/22/2022 Appeal Filing Fee waived. In Forma Pauperis. (SC)
03/22/2022 Filed Notice of Appeal/Proper Person. Appeal docketed in the
Supreme Court this day. (SC)

DATE: March 22, 2022

Elizabeth A. Brown, Clerk of Court
lh

informal brief submission deadline
is July 20, 2022.

* BRIEFING IN PROGRESS *

P.4 (A-22-853203-W)

**IN THE SUPREME COURT OF THE STATE OF NEVADA
OFFICE OF THE CLERK**

MATTHEW TRAVIS HOUSTON,
Appellant,
vs.
MANDALAY BAY CORP, D/B/A MANDALAY
BAY RESORT AND CASINO,
Respondent.

Supreme Court No. 84417
District Court Case No. A758861

INSTRUCTIONS/NOTICE REGARDING DEADLINES

TO: Matthew Travis Houston
Clark McCourt, LLC \ Brian P. Clark

**PLEASE CAREFULLY REVIEW THE INFORMATION BELOW REGARDING
REQUIREMENTS FOR THIS APPEAL.**

Definitions/Terms

"NRAP" stands for Nevada Rules of Appellate Procedure, which govern procedure in the Nevada Supreme Court and Nevada Court of Appeals.

"Pro se" refers to a party acting on his or her own behalf without the assistance of an attorney.

"In forma pauperis" refers to a party who has been determined by a court to be indigent and not required to pay filing fees. Only a court can grant a party in forma pauperis status. Please see NRAP 24 for more information.

Copies of all documents sent to the court for filing must also be served on all other parties in the appeal. Such service should be made at the same time the document is sent for filing, and may be accomplished by mailing a copy of the document to the other party (if the other party has an attorney, the document should be mailed to the attorney). Please see NRAP 25(b) and NRAP 25(c). The rules do not require that copies served on other parties be file-stamped by the court.

Required Documents/Deadlines

1. Transcript Request Form

Within 14 days, appellant(s) must file in this court either (1) a transcript request form requesting transcripts of all district court proceedings that are necessary for the court's review on appeal; or (2) a certificate that no transcripts are being requested. See NRAP 9(b). The enclosed blank transcript request form may be used.

P.5 (A-22-853203-W)

22-09016

APPELLANTS WHO HAVE NOT BEEN GRANTED IN FORMA PAUPERIS STATUS must serve a copy of the transcript request form on the court reporter/recorder who reported the proceedings and on all other parties to the appeal and must also pay an appropriate deposit to the court reporter/recorder at the time of service. NRAP 9(b)(1)(B). Upon receiving a transcript, the party who requested it must file a copy of the transcript in this court. NRAP 9(b)(1)(B).

APPELLANTS WHO ARE IN FORMA PAUPERIS should not serve a transcript request form on the court reporter/recorder, but should still file the request in this court; the court will review the request and enter an appropriate order. NRAP 9(b)(1)(C).

2. Docketing Statement

Within 21 days, all appellant(s) must file in this court a docketing statement that complies with NRAP 14. The enclosed blank docketing statement may be used.

FOR APPELLANTS WHO ARE IN FORMA PAUPERIS, the requirement that supporting documents be attached to the docketing statement may be waived.

3. Brief or Informal Brief Form

Within 120 days, appellant(s) must file in this court either (1) a brief that complies with the requirements in NRAP 28(a) and NRAP 32; or (2) the "Informal Brief Form for Pro Se Parties" provided by the supreme court clerk. NRAP 28(k) and 31(a)(1). Failure to file a brief or informal brief form by the deadline may result in dismissal of the appeal. NRAP 31(d)(1).

Appendices/record

Pro se parties are not permitted to file an appendix to their briefs unless ordered to do so by this court. NRAP 30(i). If the court's review of the complete trial court record is necessary, the court will direct the district court to transmit the record. Pro se parties are not required to cite the record in their briefs, but are encouraged to do so if possible. See NRAP 28(e)(3).

Responses to Pro Se Documents

Opposing parties are not required to respond to documents, including briefs, filed by a pro se party unless ordered to do so by this court. The court generally will not grant relief without providing an opportunity to file a response. See NRAP 46A(c).

DATE: March 22, 2022

Elizabeth A. Brown, Clerk of Court

by Linda Hamilton
Deputy Clerk

No. 84417

P 742(A-22-853203-W)

22-09016

Nevada Supreme Court Docket Sheet

Docket: 84417

HOUSTON VS. MANDALAY BAY CORP

Page 1

MATTHEW TRAVIS HOUSTON,
Appellant,

Case No. 84417

vs.

Consolidated with:

MANDALAY BAY CORP, D/B/A MANDALAY BAY RESORT AND CASINO,
Respondent.

Counsel

Matthew Travis Houston, Indian Springs, NV, Appellant, in proper person

Clark McCourt, LLC, Las Vegas, NV \ Brian P. Clark, as counsel for Respondent, Mandalay Bay Corp

Case Information

Panel: Panel

Panel Members: Unassigned

Disqualifications:

Case Status: Briefing in Progress

Category: Civil Appeal

Type: General

Subtype: Proper Person

Submitted:

Date Submitted:

Oral Argument:

Sett. Notice Issued:

Sett. Judge:

Sett. Status:

Related Court Cases:

80562, 80562-COA, 84418, 84477

District Court Case Information

Case Number: A758861

Case Title: MATTHEW HOUSTON VS. MANDALAY BAY CORP.

Judicial District: Eighth

Division:

County: Clark Co.

Sitting Judge: David M. Jones

Replaced By:

Notice of Appeal Filed: 03/17/22 Appeal

Judgment Appealed From Filed: 02/28/22

Docket Entries

Date	Docket Entries	
03/22/22	Appeal Filing Fee Waived. in Forma Pauperis. (SC)	
03/22/22	Filed Notice of Appeal/Proper Person. Appeal docketed in the Supreme Court this day. (SC)	22-009014
03/22/22	Issued Notice Regarding Deadlines. (SC)	22-009016
04/04/22	Filed Civil Proper Person Transcript Request Form. (SC)	22-010307
04/04/22	Filed Proper Person Notice. (SC)	22-010319
04/27/22	Filed Proper Person Brief. Appellant's Informal Brief. (SC)	22-013324
04/27/22	Filed Proper Person Brief. Appellant's Supplemental Informal Brief. (SC)	22-013325

Wednesday, April 27, 2022 12:11 PM

P743 (A.22.853203.W)

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Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

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6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**
7 **STATE OF NEVADA IN AND FOR**
8 **THE COUNTY OF CLARK**
9

10 MATTHEW HOUSTON.

11 Plaintiff(s).

12 vs.

13 **MANDALAY BAY CORP. dba MANDALAY**
14 **BAY RESORT & CASINO,**

15 Defendant(s).

Case No: A-17-758861-C

Dept No: XXIX

16
17 **CASE APPEAL STATEMENT**
18

19 1. Appellant(s): Matthew Travis Houston

20 2. Judge: David M. Jones

21 3. Appellant(s): Matthew Travis Houston

22 Counsel:

23 Matthew Travis Houston #1210652
24 P.O. Box 650
25 Indian Springs, NV 89070

26 4. Respondent (s): Mandalay Bay Corp. dba Mandalay Bay Resort & Casino

27 Counsel:

28 Brian P. Clark
7371 Prairie Falcon Rd., Suite 120

A-17-758861-C

-1-

No. 84417

Case Number: A-17-758861-C

7448 : A-22-85323-W

1 Las Vegas, NV 89128

2 5. Appellant(s)'s Attorney Licensed in Nevada: N/A
3 Permission Granted: N/A

4 Respondent(s)'s Attorney Licensed in Nevada: Yes
5 Permission Granted: N/A

6 6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7 7. Appellant Represented by Appointed Counsel On Appeal: N/A

8 8. Appellant Granted Leave to Proceed in Forma Pauperis**: Yes, October 22, 2019
9 **Expires 1 year from date filed (Expired)

10 Appellant Filed Application to Proceed in Forma Pauperis: No
11 Date Application(s) filed: N/A

12 9. Date Commenced in District Court: July 24, 2017

13 10. Brief Description of the Nature of the Action: NEGLIGENCE - Premises Liability

14 Type of Judgment or Order Being Appealed: Misc. Order

15 11. Previous Appeal: Yes

16 Supreme Court Docket Number(s): 80562

17 12. Child Custody or Visitation: N/A

18 13. Possibility of Settlement: Unknown

19 Dated This 21 day of March 2022.

20 Steven D. Grierson, Clerk of the Court

21 /s/ Heather Ungermann

22 Heather Ungermann, Deputy Clerk
23 200 Lewis Ave
24 PO Box 551601
25 Las Vegas, Nevada 89155-1601
26 (702) 671-0512

27 cc: Matthew Travis Houston

Nevada Supreme Court Docket Sheet

Docket: 80562

HOUSTON VS. MANDALAY BAY CORP

Page 1

MATTHEW HOUSTON,

Case No. 80562

Appellant,

Consolidated with:

vs.

MANDALAY BAY CORP, D/B/A MANDALAY BAY RESORT AND CASINO,

Respondent.

Counsel

Matthew Travis Houston, Indian Springs, NV, Appellant, in proper person

Clark McCourt, LLC, Las Vegas, NV \ Brian P. Clark, as counsel for Respondent, Mandalay Bay Corp

Case Information

Panel: Panel

Panel Members: Unassigned

Disqualifications:

Case Status: Remittitur Issued/Case Closed

Category: Civil Appeal

Type: General

Subtype: Proper Person

Submitted: On Record and Briefs

Date Submitted: 12/01/20

Oral Argument:

Sett. Notice Issued:

Sett. Judge:

Sett. Status:

Related Court Cases:

80562-COA, 84417, 84418, 84477

District Court Case Information

Case Number: A758861

Case Title: MATTHEW HOUSTON VS. MANDALAY BAY CORP

Judicial District: Eighth

Division:

County: Clark Co.

Sitting Judge: David M. Jones

Replaced By:

Notice of Appeal Filed: 02/05/20 Appeal

Judgment Appealed From Filed: 01/30/20

Docket Entries

Date	Docket Entries	
02/12/20	Appeal Filing Fee Waived. In Forma Pauperis. (SC)	
02/12/20	Filed Notice of Appeal/Proper Person. Appeal docketed in the Supreme Court this day. (SC)	20-005813
02/12/20	Issued Notice Regarding Deadlines. (SC)	20-005815
02/18/20	Filed Order Directing Transmission of Record. Record on Appeal due: 30 days. (SC).	20-006418
02/28/20	Filed Record on Appeal, Vols. 1 - 5 via FTP. (SC)	20-008060
03/02/20	Filed District Court Document - Sealed documents, pages 106-108 and 190-191. (SC)	
04/20/20	Filed Proper Person Motion "Motion to Appoint Counsel". (SC)	20-014911
04/20/20	Issued Notice to Provide Proof of Service. (Appellant's Motion to Appoint Counsel). Due date: 10 days. (SC)	20-014920

Wednesday, April 27, 2022 12:10 PM

No. 84417

946 # A.22.853203.W

Nevada Supreme Court Docket Sheet

Docket: 80562

HOUSTON VS. MANDALAY BAY CORP

Page 2

04/23/20	Filed Order Denying Motion. Appellant has filed a motion requesting the appointment of appellate counsel. The motion is denied. (SC)	20-015464
07/27/20	Filed Order to File Document. Appellant shall have 14 days from the date of this order to file and serve an opening brief that complies with NRAP 28, or an informal brief for pro se parties. Respondent need not file a response to the brief unless directed to do so by this court. (SC)	20-027284
08/27/20	Filed Proper Person Appellant's Opposition to Order to File Document and Motion for Extension of Time Proceeding in Forma Pauperis. (SC)	20-031594
08/27/20	Issued Notice to Provide Proof of Service - Appellant's Opposition to Order to File Document and Motion for Extension of Time Proceeding in Forma Pauperis. Due date: 10 days. (SC)	20-031596
09/04/20	Filed Order Regarding Motion. Appellant's Opening Brief or Informal Brief due: 30 days. Appellant's request to disqualify Chief Justice Pickering is untimely and without merit, and is denied. (SC)	20-032722
09/18/20	Filed Proper Person Appellant's Preliminary Response to "Order Regarding Motion," 9/4/2020. (SC)	20-034425
09/18/20	Issued Notice to Provide Proof of Service - Appellant's Preliminary Response to "Order Regarding Motion," 9/4/2020. Due date: 10 days. (SC)	20-034427
09/22/20	Filed Order. This court takes no action regarding appellant's "Preliminary Response to 'Order Regarding Motion,' 9/4/2020," filed on September 18, 2020. To the extent appellant expresses uncertainty about the date his informal opening brief is due, it is due October 5, 2020. The remainder of the document requires no action. (SC)	20-034878
10/06/20	Filed Proper Person Motion for extension of time. (SC)	20-036704
10/09/20	Filed Proper Person Informal Brief. (SC)	20-037159
10/14/20	Filed Order Regarding Motion. Appellant has filed a motion for an indefinite extension of time presumably to file an informal opening brief, for the appointment of appellate counsel, and for copies of all the documents in this appeal. The request for an extension of time is granted. Appellant's informal opening brief was filed on October 9, 2020. Appellant's request for the appointment of counsel is denied. The clerk of this court shall mail to appellant the sealed district court documents, pages 106-108 and 190-191, filed on March 2, 2020. (SC)	20-037731
10/29/20	Filed Proper Person Appellant's Motion for Stay. (SC)	20-039634
11/09/20	Filed Order Denying Motion. Appellant has filed a motion for a stay. The motion is denied. (SC)	20-040883
12/01/20	Briefing Completed/Submitted For Decision/To Screening. (SC)	
12/10/20	Filed Proper Person Document- Regarding Case. (EXHIBITS STRICKEN, DETACHED AND RETURNED PER ORDER FILED 10/15/20). (SC)	20-044899
12/15/20	Filed Order. This court takes no action regarding appellant's document submitting exhibits, filed on December 10, 2020. Parties proceeding pro se are not generally allowed to file appendices unless ordered to do so by this court. See NRAP 30(i). The clerk of this court shall strike the document and exhibits and return them. (SC)	20-045365
01/11/21	Issued Notice of Transfer Case to Court of Appeals. (SC).	21-000757
01/11/21	Transferred to Court of Appeals. (SC).	
10/26/21	Filed Order of Affirmance. "ORDER the judgment of the district court AFFIRMED." Court of Appeals-MG/JT/BB (SC)	

No. 84417

Wednesday, April 27, 2022 12:10 PM

Page 1747 per 11: A.22.8532c3.W

Nevada Supreme Court Docket Sheet

Docket: 80562

HOUSTON VS. MANDALAY BAY CORP

Page 3

11/30/21	Transferred from Court of Appeals. (SC).	
11/30/21	Issued Remittitur. (SC).	21-034052
11/30/21	Remittitur Issued/Case Closed. (SC).	
12/15/21	Filed Remittitur. Received by District Court Clerk on December 1, 2021. (SC)	21-034052
04/27/22	Issued Notice of Rejection of Untimely Petition for Rehearing and Supplemental Petition for Rehearing. (SC)	22-013344

No. 84417

Page Number Twelve: A. 22. 853203. W

748

Wednesday, April 27, 2022 12:10 PM

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CLERK OF THE COURT

Steven D. Grierson

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6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**
7 **STATE OF NEVADA IN AND FOR**
8 **THE COUNTY OF CLARK**
9

10 MATTHEW HOUSTON,

11 Plaintiff(s).

12 vs.

13 **MANDALAY BAY CORP. dba MANDALAY**
14 **BAY RESORT & CASINO,**

15 Defendant(s).

Case No: A-17-758861-C

Dept No: XXIX

16
17 **CASE APPEAL STATEMENT**
18

19 1. Appellant(s): Matthew Travis Houston

20 2. Judge: David M. Jones

21 3. Appellant(s): Matthew Travis Houston

22 Counsel:

23 Matthew Travis Houston #1210652
24 P.O. Box 650
25 Indian Springs, NV 89070

26 4. Respondent (s): Mandalay Bay Corp. dba Mandalay Bay Resort & Casino

27 Counsel:

28 Brian P. Clark
7371 Prairie Falcon Rd., Suite 120

A-17-758861-C

-1-

No. 84417 Page Number Thirteen: A-22-853203-W

Case Number: A-17-758861-C

Las Vegas, NV 89128

5. Appellant(s)'s Attorney Licensed in Nevada: N/A
Permission Granted: N/A

Respondent(s)'s Attorney Licensed in Nevada: Yes
Permission Granted: N/A

6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

8. Appellant Granted Leave to Proceed in Forma Pauperis**: Yes, October 22, 2019
**Expires 1 year from date filed (Expired)

Appellant Filed Application to Proceed in Forma Pauperis: No
Date Application(s) filed: N/A

9. Date Commenced in District Court: July 24, 2017

10. Brief Description of the Nature of the Action: NEGLIGENCE - Premises Liability

Type of Judgment or Order Being Appealed: Misc. Order

11. Previous Appeal: Yes

Supreme Court Docket Number(s): 80562

12. Child Custody or Visitation: N/A

13. Possibility of Settlement: Unknown

Dated This 21 day of March 2022.

Steven D. Grierson, Clerk of the Court

/s/ Heather Ungermann

Heather Ungermann, Deputy Clerk
200 Lewis Ave
PO Box 551601
Las Vegas, Nevada 89155-1601
(702) 671-0512

cc: Matthew Travis Houston

Page Number Fifteen: A-22-853203-W (No. 84417)
IN THE SUPREME COURT OF THE STATE OF NEVADA

RENEWED Log Number(s) #84477 and #84478
#1) MOT. TO STAY REMITTURIN → (See #84281) to Supreme Court of U.S.
HOUSTON'S NEVADA DEPARTMENT OF CORRECTIONS #1210652

#4) RENEWED
EMERGENCY REQUESTS FOR LENIENCY
IN RE PETITION FOR AN EN BANC RECONSIDERATION(S)

#2) RENEWED MOTION FOR THE PRODUCTION OF COMPLETE
RECORDS FROM LAS VEGAS FIRE AND RESCUE IN RE 9/30/2016
AND 10/19/2017 #3) RENEWED MOTION FOR EXTENSION OF TIME SO THAT
APPELLANT MAY FILE AND SERVE MORE PROPER EN BANC:

Although these multiple and overly-numerous appeals might
SWORN DECLARATION UNDER PENALTY OF PERJURY cause HOUSTON to be
INMATE SIGNATURE: more furtherly misinterpreted, he requests the

GRIEVANCE COORDINATOR SIGNATURE: time so that he may properly
serve the respondents to meet copywork requirements of

GRIEVANCE RESPONSE: NRAP 40(a). Resources of the Law Library
including use of the copy work privileges are extremely
limited, in NDOC and HDSP. Had HOUSTON not been victim
of false arrest on July 14th, 2021 then this en banc
reconsideration and its requests most surely would NOT be

CASEWORKER SIGNATURE: necessary. There is DATE: a 27 page
petition prepared and ready to mail, however

GRIEVANCE UPHELD GRIEVANCE DENIED ISSUE NOT GRIEVABLE PER AR 740

HOUSTON has no way to have 10 copies made before May 20th,
GRIEVANCE COORDINATOR APPROVAL: DATE: 2022.

NOW SEE the attached DRAFT which is to be filed in ALL appeals.

Per NRS and NRCP, HOUSTON is mailing this EMERGENCY
INMATE AGREES INMATE DISAGREES REQUEST AS FOLLOWS:

INMATE SIGNATURE: DATED this 14th day
of May - 2022.

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A FIRST LEVEL GRIEVANCE MAY
BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original: DIST 8 To inmate when complete, or attached to formal grievance
Canary: NV SUP. To Grievance Coordinator & mailed to clerk Amanda Ingersoll - Roland oilfield technology
Mr. Pink: Inmate's receipt when formal grievance filed & mailed to Brian P. Clark, et al
Mr. Gold: Inmate's initial receipt & mailed to Scott Poisson, et al
Heather Ungermann, S. Grierson,
team & Michelle McCarty, Charite Pleasant

On this 30th day of May, 2022 I mailed this pleading(s)
and the 27 page DRAFT to all of the above-mentioned
respondents X Matthew Travis Houston
DOC 3091 (12/01)
Matthew Travis Houston.

EMERGENCY
PETITION FOR THE JUDICIAL REVIEW OF
THE COURT OF APPEALS DECISIONS
UNDER NRAP 40 IN ALL CASES SPECIFICALLY
#84281 IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON

Appellant,

vs. THE STATE OF NEVADA,
Rosemary McMorris-Alexander,
MANDALAY BAY CORP., et al.

Respondent.

JOINDER TO #80562, #84477
#79408, #84281, #84417
Supreme Court No. #84418
C357927 + C323614 + C019840
District Court No. A758861

Joinder to
Supreme Court No. 84417
and No. 84477

APPELLANT'S INFORMAL BRIEF

AND JOINDER OF APPEAL

RETURNED
UNFILED

APR 27 2022

INSTRUCTIONS: If you are an appellant proceeding pro se (without an attorney) in the Nevada Supreme Court, you must file either (1) a brief that complies with Nevada Rule of Appellate Procedure (NRAP) 28(a), or (2) a completed copy of this informal brief form, see NRAP 28(k), with the Nevada Supreme Court on or before the due date, see NRAP 31. In civil appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court may dismiss your appeal. In postconviction criminal appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court or Nevada Court of Appeals may decide your appeal on the record without briefing.

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY
DEPUTY CLERK

HOW TO FILL OUT THIS FORM: This form must be typed, unless you are incarcerated, in which case it must be clearly handwritten. You do not need to refer to legal authority or the district court record. If you are completing your brief on this form, write only in the space allowed on the form. **Additional pages and attachments are not allowed.** If typing an informal brief, you may either use the lined paper contained in this form or an equivalent number of pages of your own paper. Your brief will be stricken if you fail to follow the directions in this form and the Nevada Rules of Appellate Procedure.

WHERE TO FILE THE BRIEF: You may submit your brief for filing in person or by mail.

To file your brief in person: Briefs may be submitted for filing Monday through Friday, 8:00 a.m. to 4:00 p.m.

Carson City: Bring the brief to the Clerk's Office at the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada, 89701.

Las Vegas: Place your brief in the Clerk's Office Drop Box at the Las Vegas courthouse for the Nevada Appellate Courts, 408 East Clark Avenue, Las Vegas, Nevada, 89101.

RECEIVED
APR 25 2022
Informal Brief Form October 2017
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

A-1
16
752

To file your brief by mail: Mail the brief to the Clerk of the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada 89701. **Your brief must be postmarked on or before the due date.**

You must file the original brief and 1 copy with the clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your brief, you must file the original form and 2 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or emailed to the Supreme Court Clerk's Office.

Copies of the brief must be mailed or delivered to the other parties to this appeal or to the parties' attorneys, if they have attorneys. You must also include a proper certificate of service or complete the certificate that is attached to the informal brief form.

CAUTION: Pro se parties are prohibited from representing other parties. A pro se party may not complete a brief on behalf of other parties. Pro se parties may collaborate on their briefs, however, provided that if one brief is submitted on behalf of multiple pro se parties, each party must sign and date the brief to confirm that he or she has participated in the preparation of the brief and, by his or her signature, joins in the arguments and representations contained therein.

Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
January 30, 2020	- attempted dismissal / closing of case
every day	this is part of the cause of the
since 9/20/2016	2nd wrongful conviction / ODINPERS

Notice of Appeal. Give the date you filed your notice of appeal in the district court: September 20th, 2016 under duress.

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
C-17-323614-1	HOUSTON v. STATE	*
C-21-357927-1	HOUSTON v. STATE	*
*	*	*

* = maybe I could provide more if I had my records.
Pro Bono Counsel. Would you be interested in having pro bono counsel assigned to represent you in this appeal? Not really, enough

☒ Yes ☐ No attorneys have already ruined my life. If so, maybe ACLU, etc.

NOTE: If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the space allowed.)

Today is April 5th, 2022. Pursuant to the "INSTRUCTIONS / NOTICE REGARDING DEADLINES" that was received after March 22nd, 2022 the appellant has 14 days from March 22nd, 2022 to submit a transcript request form requesting the transcripts of all district court proceedings that are necessary for the court's

review on appeal. The court includes the Appellant, which has properly submitted his transcript request form with the assistance of the mailbox rule. 14 days from March 22nd, 2022 would in fact be today, April 5th, 2022 to which an additional 7 days would meet the requirement that the appellant must file the docketing statement that was provided by the clerk. The transcript request forms for appeals 84417 and 84418 were mailed from MDSP on March 29th, 2022 and the docketing statements are in preparation. This informal brief is to be filed no later than 120 days from March 22nd, 2022 which would be before July 20th, 2022.

The hasty "ORDER DISMISSING APPEAL" filed March 30th, 2022 by Silver, Cadish and Pickering is without merit, especially because the Appellant has been provided NO documents by either the DISTRICT COURT or the SUPREME COURT OF NEVADA, as result of false arrest on 7.14.2021.

First and foremost is ^{the Las Vegas Municipal relocation} ~~the courts~~ ~~of their own constructions~~, followed up with the mailbox rule, which is of significance to ALL litigants, appellants, petitioners, appellants, pro se litigants, litigants with representation, litigants who have been appointed counsel, litigants relying upon standby-counsel, etc.

Update as of April 15th, 2022 to which the transcript request form of ~~XXXXXX~~ appeal # 84477 has been sent to Eighth Judicial District Court as result of Scott Poisson, Brian P. Clark, Dan Schwartz and the rest of these clowns ruining my life for almost 6 years now. This is absolutely pathetic how the defendants have coerced the Eighth Judicial District Court into having my person falsely imprisoned and made a convicted felon in the MOST wrongful ways for the 2nd time. The question for justice is how did these defendants coerce R. McMorris into lying under oath in ways besides paying bribes?

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

There isn't any sort of belief that the district court is wrong... it's truth. If that's not the truth then why am I sitting in the state prison for the second time? It's not a "belief" that David M. Jones is a bully. He bullied me over a telephone hearing, and that must be why he's trying to keep all of this covered up. His sister or girlfriend, Tierra Danielle Jones is a bully behind the bench too.

I'm not sure if they're related, but perhaps it's coincidental? Here is my

"MOTION TO DETERMINE IF DAVID M. JONES AND TIERRA DANIELLE JONES ARE RELATED TO PREVENT ANY FURTHER PREJUDICE AND BIAS OF PLAINTIFF IN ERROR - PETITIONER - APPELLANT AND THE PLAINTIFF-IN-ERROR AS RESULT OF SECOND WRONGFUL CONVICTION"

This court gets paid to review cases, and from my observation, the Supreme Court of Nevada hasn't reviewed anything other than their own biases and how to further reinforce those biases to further degrade indigent pro se appellants. It's not my fault that I'm being denied access to the Law Library. April 15th, 2022: So why is the Supreme Court of Nevada refusing my transcripts? It is not that difficult to provide the Appellant with what is rightfully his, or is it because Brian P. Clark has conned the courts of Nevada? In my life, I survived being shot during the most horrible event in American history, October 1st, 2017 and Brian P. Clark

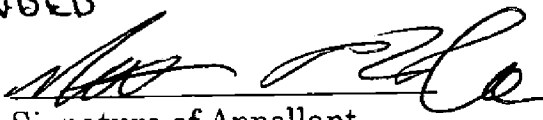
still continues to evade justice. The Appellant once again, for the last approximately One Thousand, Nine-hundred and twenty days is still permanently totally disabled and suffering a manifest injustice as result of the defaults of not only Mandalay Bay Resort and Casino, et al Encore Events Services, FREEMAN and the IATSE Local No. 720 to the Appellant, and for some reason this court system and the State of Nevada continues to batter me. What for? Oh, look at this... (Now See Page[#]8)

April 18th, 2022: You will now take notice that Scott Poisson has failed to respond the notice of demand of \$3,000,000.00 to which a copy of that notice was included in these notices of appeals, pleadings and petitions to the Supreme Court of Nevada. The original was certified by the District Court in Las Vegas and forwarded to his office in a "MOTION FOR AN ORDER TO APPEAR" in February of 2022. This NOTICE OF DEFAULT is reinforced by the office of Brian P. Clark and it's withholding of the Appellant's bloodied Ropeworks harness that has been there since after September 30th, 2016. In effect, this makes the firm of Bernstein & Poisson over 5 years and 6 months in default status. Ryan Kerbow is in default \$6 million.

What's up with that conspiracy?
Does this ^{8th Judicial} court care about anything?

→ Brian P. Clork, you sir and the State Bar of Nevada are in default to me about \$666 billion. Y'all will be held accountable for your fraudulent negligence one of these years, but the pain is too much for me to continue writing the truth. Unlike the rest of y'all crooks. And for the love of sweet baby Jesus, quit with the withholding of my documents! You already have illegally destroyed my law office from 4355 Linn St #927 in Iowa City, Iowa 52245. Cease and desist this conspiracy between you and Dan Schwartz ASAP!

DATED this 15th day of April, 2022.
SUPPLEMENTED AND AMENDED
ON THIS MOST UNHOLY
EASTER SUNDAY OF 2022.


Signature of Appellant

Matthew Travis Houston
Print Name of Appellant

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed informal brief form upon all parties to the appeal as follows:

- ☐ By personally serving it upon him/her; or
* ☒ By mailing it by first-class mail with sufficient postage prepaid to the following address(es) (~~list names and address(es) of parties served~~):

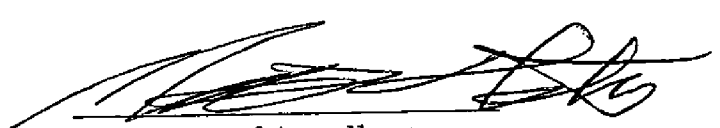
Clerk(s)
Regional Injustice Center
200 Lewis Ave. 3rd Floor
Las Vegas, NV

89155-1160
* - Sorry about that. I can't get to the copy work done by the law library in time... so this brief is being submitted to Supreme Court of Nevada.

DATED this 15th day of April, 2022.

ATTEMPTED TO BE
MAILED FROM HOSP
BUILDING #3-C-42

ON THIS MOST UNHOLY
EASTER SUNDAY OF 2022.


Signature of Appellant

Matthew Travis Houston
Print Name of Appellant

#1210652 @ HOSP - P.O. Box 650
Address

Indian Springs, NV
City/State/Zip

89070-0650
Telephone

EMERGENCY
PETITION FOR THE JUDICIAL REVIEW OF THE
COURT OF APPEALS DECISIONS UNDER NRAP 40
IN ALL CASES, SPECIFICALLY #84281 CONTINUED #84418
IN THE SUPREME COURT OF THE STATE OF NEVADA

Matthew Travis Houston

Appellant,

vs.

Mandalay Bay Corp., et al.

Respondents include STATE OF NV,
Rosemary McMorris-Alexander, et al.

Supreme Court No. 84417+84418
#79408, #84478
#80562+
#84281+ #84477

District Court No. A758861
Municipal Court C323614
C1248384A C357927
and C019840
C1237802A C033713

APPELLANT'S INFORMAL BRIEF

AND JOINDER OF APPEAL (CONTINUED)

21P01275
21P01950 **RETURN
UNFILED**

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APR 27 2022

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

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ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

B-1
2561

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Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
9-20-2016	continuation of appeal #79408 from
9-30-2016	C-17-323614-1 (Petition For A Writ of Error
ONE ²⁰¹⁷ OCTOBER	Mandamus, Coram Nobis, Ceterisrerari and Audit Coram

Notice of Appeal. Give the date you filed your notice of appeal in the district court: everyday of my life because the LVMPD and courts of the State of Nevada are in fact, ILLEGAL.

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
C1248384A	BLUE LIVES MATTER	Municipal Court of Las Vegas
C1237802A	BLACK LIVES MATTER	aka Las Vegas
A-17-758861-C	NDOL GREEN LIVES MATTER	Municipal Courts

BUT APPARANTLY TO LVMPD MY K9 UNITS DIDN'T?

Pro Bono Counsel. Would you be interested in having pro bono counsel assigned to represent you in this appeal?

☒ Yes ☐ No

NOTE: If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the space allowed.)

Hello again on this most unholy Easter of 2022 to which I am still being deprived of my service dogs Johnny Cash and George Lucas. This petition should be granted because C323614 was dismissed in State of Iowa and that was the first wrongful conviction and extensive incarceration that the State of Nevada has intentionally neglected compensating me for their damages inflicted me in their miscarriages of justice. See #79408.

This petition should be granted as the questions being presented are of first impression ^{and} of general statewide significance because of many more reasons than one. Does the Supreme Court of Nevada think that's okay to wrongfully convict a disabled veteran of the United States Navy, steal his service animals and kidnap him from the State of Iowa and enslave him into their debtor's prisons? According to Tierra Danielle Jones, et al this is all just fine. But it's not. The fact that three separate cases have resulted from ^{the} tragic events ~~of~~ ~~September~~ ~~20th~~ ~~2016~~ ~~September~~ ~~30th~~ ~~2016~~ ~~and~~ ~~October~~ ~~1st~~ ~~2017~~ of September 20th, 2016, September 30th, 2016 and October 1st, 2017 are plenty of grounds to warrant a thorough and complete review by this court of ALL of the above mentioned cases. On this state can just continue in deliberate indifference by being bigoted and racist against me, as it always has. Is the judicial ineptitude ever going to cease and desist? This court and its bafonerous allies are in default to me by not less than \$666 billion. That's six-hundred and sixty-six billion dollars and zero cents. Because this kangaroo court obviously has no sence. Anyways, all three of these cases involve fundamental issues of state wide importance because everybody liked the Petitioner-appellant's service K9, Mr. Johnny Cash. The Eighth Judicial District Court of Clark County and their public pretenders office could have cared less about my lost dogs or the plea agreement that I never gave my express consent to, especially because I never even seen it or signed the document or made any agreements.

Even more elaborated, I never made ANY sort of retainer agreements between Bernstein and Poisson. The deposition involving Gene Porter was a hundred percent VOID under duress because there was a C/O in the room that days ^{and since then} ~~and~~ I've not one time made any sort of communications with Scott Poisson or Ryan Kerkow. Upon this 18th day of April, 2022, Ryan Kerkow is hereby served this NOTICE OF DEMAND of not less than \$6,000,000.00 to compensate the Appellant for his endurance of inflicted damages not limited to suffering not only ONE, but TWO wrongful convictions as the result of Bernstein and Poisson's legal malpractices and gross negligence to Appellant. And again for the record I've never encountered Scott Poisson.

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

On April 11th, 2022 the Supreme Court of Nevada's Handestly, Stiglich, Herndon, Brown, Syuang and H.D.S.P. C/O Brown^{et al} (all) committed acts of treason, intentional gross negligence, verbal assault, elder abuse, withholding evidence, conspiracy, coercion and many other crimes not limited to disability discrimination #1: By neglecting to provide a copy of NRAP 40(c) or any other valid justification of their negligent ~~neglect~~ and over-reaching tactics of torturous encouragement of death squad retaliation. #2. By encouraging institutional and systematic racism. #3. By encouraging the Petitioner-appellant to ~~engage~~ engage in non-rehabilitative activities and other forms of negative thinking. #4. Bad attitudes and verbal abuse is demonstrated by C/O BROWN.

of the Petitioner - appellant

Their encouragement ^{and} to become involved with organized crime encouraged the Petitioner - appellant to order hits to be put out on Michael P. Villani, Alexis Plunkett, Tierma Danielle Jones and other bad actors not limited to anyone and everyone who lies under oath and gives false police reports like Rosemary McMorris - Alexander did. The Petitioner - appellant obviously did NOT as he is a law abiding citizen, but the question for our lady justice is,

"when will these bad actors not limited to Hardesty, Stiglich, Herndon, the Brown family and Syuang get a grip on reality and quit worshipping the idols of dereliction?"

I saw it all, in my recipe for cole slaw cookbook that I am publishing on you and the meat of the kangaroo court that tastes like KFC when the books are cooked and fried for our new lady justice of the Supreme Court of the United States of America, because the Supreme Court of Nevada will ALWAYS be the negligent State of Nevada. Especially because Rosemary McMorris - Alexander, et al are the biggest liars I've ever seen in a court room. Oh, that's right, the only time I've ever communicated with Rosemary Mc-Morris - Alexander, or whatever her name was was NEVER!

Now this Supreme Court of Nevada should really see why she made up all these lies in court. Page B-7 is omitted in honor of Service K9 JIMMY CASH. Page B-8 is omitted in honor of Service K9 Lil' George Lucas. And I don't need to sign my name from page 8 because

Page # B-7 (31)

NDOC LAW LIBRARY
CASE LAW/ RESEARCH MATERIAL
CHECK OUT REQUEST

DATE 4-16-2022

FACILITY H.D.S.P. UNIT/BED # 3-C-42

INMATE NAME: ~~not~~ topdanghouston# 1210652

New or Current Litigation: current
Case Number/ Court: A-17-758861-C JOINDER C-3821-357927-1

Name of Specific Case or Reference Material	Citation:
1. <u>N.R.A.P.</u>	<u>40 (c)</u>
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
TOPICAL SEARCH :	

This box must be signed by Law Library Supervisor/Designee prior to citation being printed.

SIGNATURE [Signature] DATE REQUEST RECEIVED _____

APPROVED _____ DENIED ✓ No Street Names

REASON FOR DENIAL:

RECEIPT OF CITATION

DATE _____ BY: _____

INMATE SIGNATURE _____

RETURN OF CITATION

DATE _____ BY: _____

INMATE SIGNATURE _____

NOTE: Law Library did finally donate a copy of the NRAP to me. Doesn't replace my lost law office Page # B-7 dogs or destroyed that I had in Iowa City though.

LETTER OF MOTION TO THE CLERK OF COURT @ THE
SUPREME COURT OF NEVADA:

Office of the Clerk
201 S. Carson Street, Suite 201
Carson City, Nevada 89701

INMATE REQUEST FORM

PAGE # B-8 (32)

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
M.T. Houston, ESO	1210652	1-D-1-B	2-1-2022

4.) REQUEST FORM TO: (CHECK BOX) ☐ MENTAL HEALTH ☐ CANTEEN
☐ CASEWORKER ☐ MEDICAL ☒ LAW LIBRARY ☐ DENTAL
☐ EDUCATION ☐ VISITING ☐ SHIFT COMMAND NOTICE OF HEARING
☐ LAUNDRY ☐ PROPERTY ROOM ☐ OTHER 2/16/2022 RJC-Room 15A
9 AMB Regional Justice Center
5.) NAME OF INDIVIDUAL TO CONTACT: and: Supreme Court for We The People...

6.) REQUEST: (PRINT BELOW) My hearings January 24th and 25th were missed, and I cannot be missing my court dates. My next hearing is scheduled February 16th 2022. Is it possible to schedule some sort of video court or teleconference from the law library? I remember in 2014 they had those accumulation at Southern Desert. I also must obtain record of that for Supreme Court of Nevada appeal # 80562A A-21-758861-C. I will happily volunteer for law library assistant or donate to indigent fund.

7.) INMATE SIGNATURE [Signature] DOC # 1210652
8.) RECEIVING STAFF SIGNATURE _____ DATE _____

9.) RESPONSE TO INMATE

Law library does not handle hearings
Kite OPERATIONS, and it requires an
ORDER TO APPEAR

CLERK'S OFFICE @ THE
TO THE SUPREME COURT OF NEVADA:

WHERE IS THE COPY OF MY ORIGINAL DEMAND
NOTE TO SCOTT POISSON FOR \$3,000,000.00?

10.) RESPONDING STAFF SIGNATURE Page # B-8 DATE _____
Now See JOINDER OF APPEALS #84281, #79408, #80562,
#84417, #84418, #84478 and #84478. ALSO AS A
PETITION FOR THE JUDICIAL REVIEW OF THE COURT OF APPEALS
DOC-3012 (REV. 7/01)

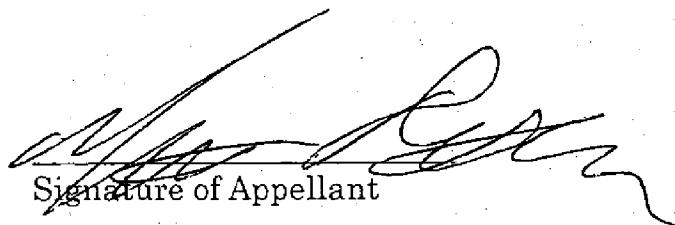
ALSO AS A PETITION FOR THE JUDICIAL REVIEW
OF THE COURT OF APPEALS DECISIONS UNDER NRAP 40
IN ALL CASES INVOLVING THE APPELLANT, SPECIFICALLY # 84281.
CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this
completed informal brief form upon ~~the Supreme Court of Nevada~~
as follows:

- ☐ By personally serving it upon him/her; or
☒ By mailing it by first-class mail with sufficient postage prepaid to
the following address(es) (list names and address(es) of parties served):

Clerk of the
Supreme Court of Nevada
201 S. Carson St.
#201
Carson City, NV
89701

DATED this 18th day of April, 2022.


Signature of Appellant

Matthew Travis Houston

Print Name of Appellant

#1210652 E.H.A.S.P.

P.O. Box 650

Address

Indian Springs, NV 89070-0650

City/State/Zip

Telephone

MAY 10 2022

**SUPPLEMENTAL PETITION TO NO. 84281
IN THE SUPREME COURT OF THE STATE OF NEVADA
TO REVIEW THE NEVADA COURT OF APPEALS DECISION**

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY DEPUTY CLERK

MATTHEW TRAVIS HOUSTON,
Appellant,

vs. STATE OF NEVADA, ET AL,
MANDALAY BAY CORP., ET AL,
Respondents also include Rosemary
McMorris - Alexander and SEOGVICK, et al.

Supreme Court No. 84477
"84478" and "84281"
District Court No. A758861
C357927

**JOINDER OF APPEAL AND
APPELLANT'S INFORMAL BRIEF, COUNTERCLAIM AND**

EMERGENCY MOT. IN RE DECISION OF NO. 84281 FILED 4/5/22.

INSTRUCTIONS: If you are an appellant proceeding pro se (without an attorney) in the Nevada Supreme Court, you must file either (1) a brief that complies with Nevada Rule of Appellate Procedure (NRAP) 28(a), or (2) a completed copy of this informal brief form, see NRAP 28(k), with the Nevada Supreme Court on or before the due date, see NRAP 31. In civil appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court may dismiss your appeal. In postconviction criminal appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court or Nevada Court of Appeals may decide your appeal on the record without briefing.

HOW TO FILL OUT THIS FORM: This form must be typed, unless you are incarcerated, in which case it must be clearly handwritten. You do not need to refer to legal authority or the district court record. If you are completing your brief on this form, write only in the space allowed on the form. **Additional pages and attachments are not allowed.** If typing an informal brief, you may either use the lined paper contained in this form or an equivalent number of pages of your own paper. Your brief will be stricken if you fail to follow the directions in this form and the Nevada Rules of Appellate Procedure.

WHERE TO FILE THE BRIEF: You may submit your brief for filing in person or by mail.

To file your brief in person: Briefs may be submitted for filing Monday through Friday, 8:00 a.m. to 4:00 p.m.

Carson City: Bring the brief to the Clerk's Office at the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada, 89701.

Las Vegas: Place your brief in the Clerk's Office Drop Box at the Las Vegas Courthouse for the Nevada Appellate Courts, 408 East Clark Avenue, Las Vegas, Nevada, 89101.

Informal Brief Form October 2017

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

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To file your brief by mail: Mail the brief to the Clerk of the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada 89701. **Your brief must be postmarked on or before the due date.**

You must file the original brief and 1 copy with the clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your brief, you must file the original form and 2 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or emailed to the Supreme Court Clerk's Office.

Copies of the brief must be mailed or delivered to the other parties to this appeal or to the parties' attorneys, if they have attorneys. You must also include a proper certificate of service or complete the certificate that is attached to the informal brief form.

CAUTION: Pro se parties are prohibited from representing other parties. A pro se party may not complete a brief on behalf of other parties. Pro se parties may collaborate on their briefs, however, provided that if one brief is submitted on behalf of multiple pro se parties, each party must sign and date the brief to confirm that he or she has participated in the preparation of the brief and, by his or her signature, joins in the arguments and representations contained therein.

YOU WILL NOW TAKE NOTICE that this is not to be a "MIXED PETITION" as this counterclaim is result of interpleadings and his person in fact being the true VICTIM OF CRIME. By "his" we are referring to the Appellant whom is a survivor of the terrible ONE OCTOBER. He is also indigent and completely unable to serve any sort of "copies" of his pleadings due not only to the fact that they can look up all of this online, but by the fact that Radenta Blacic and Rosemary McMorris-Alexander are involved in an insurance scam to have the Appellant continuously wrongfully convicted, falsely imprisoned, illegally incarcerated and possibly murdered by prison gangs or worse.

Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
April 5th, 2022	ORDER DENYING REHEARING
	and everything else too.

Notice of Appeal. Give the date you filed your notice of appeal in the district court: December 27th, 2021

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
C-17-32364-1	HOUSTON V. NEVADA	EIGHTH JUDICIAL
C-21-357927-1	HOUSTON V. NEVADA	CLARK COUNTY
A-17-758861-C	HOUSTON V. MANDALAY BAY, et al	CLARK COUNTY

Pro Bono Counsel. Would you be interested in having pro bono counsel assigned to represent you in this appeal?

☒ Yes ☐ No

NOTE: If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the space allowed.)

Originalist jurisprudence should not be sterile or purely mechanical. It's understanding would be more rich, and it's rules more durable, if it was informed by any sort of experience. In the case of A-17-758861-C both the EIGHTH JUDICIAL DISTRICT COURT and the SUPREME COURT OF NEVADA have contributed to damaging the Appellant by repeatedly violating NRS 11.207 by ignoring many other laws not limited to the quite significant

~~the~~ valid tolling of the statute of limitations.
Keep in mind that ^{#1} an action against an attorney to recover damages for malpractice, whether based on a breach of contract or duty, must be commenced within 4 years after the plaintiff sustains damage or within 2 years after the plaintiff discovers or through the use of reasonable diligence should have discovered the material facts which constitute the cause of action, whichever occurs earlier. ^{#2} The time limitation is tolled for any period during which the attorney conceals any act, error or omission upon which the action is founded and which is known or the use of reasonable diligence should have been known to the attorney. In this case, to which the attorneys for the respondents and the interpleaded defendants have ruined the life of the Appellant again, by acting in coercion with Sedgwick, Dianne Ferrante, Jonathan Shockley, Rosemary McMorris-Alexander and no less than 40 other accomplices to wrongfully convict the Appellant ^{causing} ~~for~~ a 2nd false imprisonment. The initial intentional gross negligence and deliberate indifference of interpleaded defendants / respondents resulted in case C-17-323614-1 against the Appellant, and now this C-21-357927-1.

Pursuant to NRAP, in C-21-357927-1, the Appellant filed his DIRECT APPEAL from fish tank with little to no resources just after Dec. 20th, 2021 as both

^{#12025}
Benedict Little and Anthony M. Goldstein were to have been withdrawn as attorney of record. The Appellant also filed a pro se "EMERGENCY MOTION REQUESTING HEARING, DE NOVO, AND RELEASE TO INTENSIVE SUPERVISION" which was stamped "RECEIVED DEC 27, 2021 CLERK OF COURT" but mistakenly forwarded to the office of Anthony M. Goldstein when it should have sufficed as a "NOTICE OF APPEAL". The Appellant did not ~~was~~ intend to have appointed counsel from the onset of this case, to which there was no valid warrant as it was unsigned, there was no probable cause for the ~~false~~ arrest of the Appellant, and this case in its entirety is based on the false police reports and lies of Rosemary McMorris - Alexander and Radenta Blacic.

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

The question presented is one of first impression and of general statewide significance because pursuant to the law of the land, wrongful convictions and ~~false~~ imprisonment are in fact illegal. As is the malicious prosecution of Rosemary McMorris - Alexander, et al. The question presented to the Eighth Judicial District Court ("is Houston guilty?") which is in fact NO was not even allowed to be presented to the courts because of the coercion between way too many bad actors not limited to Brian P. Clark, Scott Poisson, Tierra Danielle Jones, David M. Jones, Laura A Goodman *013390, Jack Bernstein, Scott Poisson *10188, Radenta Blacic, Christopher Burk, Jessica Flores,

Dianne Ferrante, Jonathon Shackley, L.V.M.P.O., Las Vegas City Jail, HDSP, TLVCC, SDC, Erica Tosch, Jason Bannus, the Attorney General Aaron Ford, Sheriff Joe Lombardo, MGM, Mandalay Bay Resort and Casino Convention Center, UMC, Encore Event Services, PSAV, FREEMAN, IATSE #720, the Nevada Gaming Commission, Division of Industrial Relations, Clark County District Attorneys Steven Wolfson, et al. #001565
GGRM's Lisa Anderson, Ellie Roohani, Michael P. Villani, Mary K. Molthuis, Melissa De La Garza, Andrew Elahive, Alex Bassett, Gene Porter, Kristina A. Rhoades #12480, Anthony M. Goldstein, Dan Schwartz, Karen Schwartz (GENEX), Cassondra Diez, Jeremy Wood, Lina Sakabuskas, Roddy Scott, Lukas McCourt, Nicole Garcia, Tyler Ure, David Kelly #7413, F. Edge #8645, Montero #C6056
Again, this first impression was made by the clerk of court of the Regional Injustice Center when they certified the Appellant's request for de novo on December 27th, 2021, which was well before the 30 day time limit from December 8th, 2021 for the Appellant to file a pro se "notice of appeal". It is in no way the fault of the Appellant that the courts are backed up, it was in no way the fault of the Appellant that riots in the prison system and at CDC caused the Appellant's mental state to make him suffer into incompetency and it was no way the fault of the Appellant that his "request for a de novo hearing" was not interpreted properly to the court as a "notice of appeal". Furthermore, it is in no way the fault of the appellant that Rosemary McMorris-Alexander is a liar.

The decision made by the Nevada Court of Appeals on April 5th, 2022 conflicted with the United States Supreme Court because pursuant to the Constitution of the United States, citizens are to be free and clear from any sort of cruel and unusual punishment. For going on 6 years now, all the courts of Nevada have been doing to the Appellant is punishing him for being a pro se litigant. This discrimination is in fact illegal and in a few more jurisdictions than the kangaroo court of Clark County. It is hereby again demanded by the Appellant that each and every judge on the bench now take notice of the motion filed for a 2nd time electronically by the Clerk of Court of the Regional Injustice Center on April 6th, 2022 and is to be heard by District Court again on April 27th, 2022. Again, this notice of appeal was originally filed December 27, 2021. A notice of appeal is the same thing as asking the courts for a de novo hearing, and a technicality should not be the cause of extensive incarceration, false imprisonment, wrongful conviction or otherwise. This court is NOT to overlook any miscarriage of justice and it is NOT to overlook the initiative of the injured worker, or, in this case - the permanently totally disabled worker. In this case, unfortunately to the People of the State of Nevada, and all the other cases of Matthew Travis Houston, these courts and their bad actors have intentionally, deliberately and indifferently been overlooking justice and what it means, constituting an abuse of process and creating more unnecessary hardships within decision making.

This case involves fundamental issues of statewide public importance because nobody, permanently totally disabled or not, should be arrested without a valid warrant as the result of surviving a catastrophic work accident. This is absolutely a fundamental issue of statewide public importance because how many citizens of Nevada work in the convention and entertainment industry? How many of those citizens thrive in a safe and secure work environment? How many of those citizens think it's okay for an insurance company to lie to the courts and illegally withhold the injured worker's rightfully entitled benefits? How many people in the State of Nevada think that it's okay for the courts and the State Bar of Nevada to discriminate against pro se litigants and steal their service animals?

DATED this 20th day of April, 2022.



Signature of Appellant

Matthew Travis Houston
Print Name of Appellant

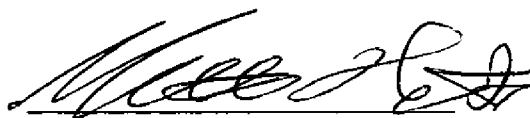
CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed informal brief form upon all parties to the appeal as follows:

- ☐ By personally serving it upon him/her; or
☒ By mailing it by first-class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served):

The Supreme Court of Nevada
and its fictitious "Court of Appeals"
201 South Carson St, Ste 201
Carson City, NV
89701

DATED this 20~~th~~ day of April, 2022.


Signature of Appellant

Matthew Travis Houston
Print Name of Appellant
No. 1210652 e H.O.S.P.
P.O. Box 650
Address

Indian Springs, NV 89070-
City/State/Zip 0650

Telephone

AFFIRMATION
Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding EMERGENCY AND
NOTICE OF FORMAL OBJECTION TO ANY SORT OF VEXATIOUS
LITIGANT ORDER AND ANY AND ALL OTHER SORT OF CHICANERY
THAT "GERRI LYNN HARDCASTLE AND THE STATE BAR OF NEVADA, ET AL"
MAY ATTEMPT TO CONJURE UP
(Title of Document) FROM THE DEMONS OF INJUSTICE
KNOWN AS "THE SHADOW HILLS CHURCH" AND
"ERNEST MAY ELEMENTARY"
filed in District Court Case number A-22-853253-W

☒ Does not contain the social security number of any person.

-OR-

☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

(State specific law)

-OR-

B. For the administration of a public program or for an application
for a federal or state grant.

Matthew Travis Houston
Signature

July 6th 2022
Date

MATTHEW TRAVIS HOUSTON, CHTD.
Print Name

PRO SE
Title

CERTIFICATE OF SERVICE BY MAILING

I, Matthew Travis Houston, hereby certify, pursuant to NRCP 5(b), that on this 6th day of July, 2022, I ^{penned} mailed a true and correct copy of the foregoing, "EMERGENCY AND NOTICE OF FORMAL OBJECTION TO ANY SORT OF VEXATIOUS LITIGANT ORDER AND ANY AND ALL OTHER SORT OF CHICANERY THAT "GERRI LYNN HARDCASTLE, ET AL" " MAY ATTEMPT TO CONJURE UP FROM THE DEMONS OF INJUSTICE KNOWN AS, by depositing it in the High Desert State Prison, Legal Library, First-Class Postage/fully prepaid, addressed as follows: "THE SHADOW HILLS CHURCH" AND

"ERNEST MAY ELEMENTARY"

Clerk(s) of the Court
Amanda Ingersoll - Boland
Heather Undermann
Michelle McCarthyism
Chaunte Pleasant

Steven D. Grierson
Debra K. Kempf

Scott S. Harris
Clayton B. Higgins, Jr.
200 Lewis Ave., 3rd Floor
Regional Justice Center
City of Lost Wages, NV
Po Box 551601
89155 - 1601

SHADOW HILLS CHURCH
7811 Vegas Dr.
Las Vegas, NV
89128

ERNEST MAY ELEMENTARY
6350 W. Washburn Road
Las Vegas, NV
89130

CC:FILE

DATED: this 6th day of July, 2022.

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



**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

August 04, 2022

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 11

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: **Emergency Motion For Transportation Of Inmate For Court Appearance**

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

JOIN + WILL + OATH + Please SEE ATTACHED "NOTICE OF HEARING"

Matthew Travis Houston, CHTD. Nevada Bar No. 2131
(in honor of my Uncle David)

NDOC No. 1210652

Plaintiff, the

Plaintiff - in - Error

and the Petitioner - appellant

In proper person

P: 702-879-6789

IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA IN AND FOR THE
COUNTY OF CLARK

MATTHEW TRAVIS HOUSTON,

Plaintiff, the Plaintiff -

in - Error and appellant,
Petitioner,

v.

THE MANDALAY BAY CORP.,
DEEP
AND THE STATE OF NEVADA, ETAL)

Defendant - Respondent(s)

Case No. A-17-758861-C ←

→ JOIN NO. A-22-853203-W

→ Dept. No. XI

Dept. No. 29 ←

→ JOIN NO. C-17-323614-1 ←

Dept No. 19

→ JOIN NO. C-21-357927-1 ←

DEPT NO. XI

EMERGENCY
MOTION ~~AND ORDER~~ FOR TRANSPORTATION
OF INMATE FOR COURT APPEARANCE

OR, IN THE ALTERNATIVE,

FOR APPEARANCE BY TELEPHONE OR VIDEO CONFERENCE

Date of Hearing: August 9, 2022
Time of Hearing: 9 AM

Petitioner, Matthew Travis Houston, proceeding pro se, requests
that this Honorable Court order transportation for his personal appearance or, in the
alternative, that he be made available to appear by telephone or by video conference
at the hearing in the instant case that is scheduled for August 9th, 2022
at 9 AM. PLEASE SEE PAGE 2 "NOTICE OF HEARING" →

Page Number One of Five

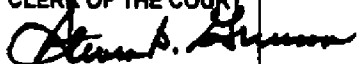
CLERK OF THE COURT

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**DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
7/5/2022 11:39 AM
Steven D. Grierson
CLERK OF THE COURT



Matthew Houston, Plaintiff(s)
vs.
Mandalay Bay Corp, Defendant(s)

Case No.: A-17-758861-C
Department 29

NOTICE OF HEARING

Please be advised that the Plaintiff's Emergency Motion for an Order in the above-entitled matter is set for hearing as follows:

Date: August 09, 2022

Time: 9:00 AM

Location: RJC Courtroom 15A
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

Page Number Two of Five

1 In support of this Motion, I allege the following:

2 1. I am an inmate incarcerated at High Desert State Prison.

3 My mandatory release date is September 29, 2025.

4
5 2. The Department of Corrections is required to transport offenders to and
6
7 from Court if an inmate is required or requests to appear before a Court in this state.
8

9 NRS 209.274 Transportation of Offender to Appear Before Court states:

10 "1. Except as otherwise provided in this section, when an offender is
11 required or requested to appear before a Court in this state, the
12 Department shall transport the offender to and from Court on the day
13 scheduled for his appearance.

14 2. If notice is not provided within the time set forth in NRS 50.215, the
15 Department shall transport the offender to Court on the date scheduled
16 for his appearance if it is possible to transport the offender in the usual
17 manner for the transportation of offenders by the Department. If it is
18 not possible for the Department to transport the offender in the usual
19 manner:

20 (a) The Department shall make the offender available on the date scheduled
21 for his appearance to provide testimony by telephone or by video conference,
22 if so requested by the Court.

23 (b) The Department shall provide for special transportation of the offender to
24 and from the Court, if the Court so orders. If the Court orders special
25 transportation, it shall order the county in which the Court is located to
26 reimburse the Department for any cost incurred for the special transportation.

27 (c) The Court may order the county sheriff to transport the offender to and
28 from the Court at the expense of the county."

29 3. My presence is required at the hearing because:

Page Number Three of Five

1 ☒ I AM NEEDED AS A WITNESS.

2 My petition raises substantial issues of fact concerning events in which I
3 participated and about which only I can testify. *See U.S. v. Hayman*, 342 U.S.
4 205 (1952) (District Court erred when it made findings of fact concerning
5 Hayman's knowledge and consent to his counsel's representation of a witness
6 against Hayman without notice to Hayman or Hayman's presence at the
7 evidentiary hearing).

8 ☒ THE HEARING WILL BE AN EVIDENTIARY HEARING.

9 My petition raises material issues of fact that can be determined only in my
10 presence. *See Walker v. Johnston*, 312 U.S. 275 (1941) (government's contention
11 that allegations are improbable and unbelievable cannot serve to deny the
12 petitioner an opportunity to support them by evidence). The Nevada
13 Supreme Court has held that the presence of the petitioner for habeas corpus
14 relief is required at any evidentiary hearing conducted on the merits of the
15 claim asserted in the petition. *See Gebers v. Nevada*, 118 Nev. 500 (2002).

16 4. The prohibition against ex parte communication requires that I be present
17 at any hearing at which the state is present and at which issues concerning the claims
18 raised in my petition are addressed. U.S. Const. amends. V, VI.

19 5. If a person incarcerated in a state prison is required or is requested to
20 appear as a witness in any action, the Department of Corrections must be notified in
21 writing not less than 7 business days before the date scheduled for his appearance in
22 Court if the inmate is incarcerated in a prison located not more than 40 miles from
23 Las Vegas. NRS 50.215(4). If a person is incarcerated in a prison located 41 miles or
24 more from Las Vegas, the Department of Corrections must be notified in writing not
25 less than 14 business days before the date scheduled for the person's appearance in
26 Court.

27 6. High Desert State Prison is located approximately
28 39 miles from Las Vegas, Nevada.

Page Number Four of Five

1 7. If there is insufficient time to provide the required notice to the Department
2 of Corrections for me to be transported to the hearing, I respectfully request that this
3 Honorable Court order the Warden to make me available on the date of the
4 scheduled appearance, by telephone, or video conference, pursuant to NRS
5 209.274(2)(a), so that I may provide relevant testimony and/or be present for the
6 evidentiary hearing.

7 8. The rules of the institution prohibit me from placing telephone calls from
8 the institution, except for collect calls, unless special arrangements are made with
9 prison staff. Nev. Admin. Code DOC 718.01. However, arrangements for my
10 telephone appearance can be made by contacting the following staff member at my
11 institution: AW James Scally, or any "Associate Warden"
12 whose telephone number is (702) 879-6789.

13 EXECUTED AND

14 Dated this 14th day of July, 2022

15 - CERTIFICATE OF SERVICE BY MAIL AND AFFIRMATION -

16 Pursuant to NRS 239B.030 Matthew Travis Houston
17 (Now SEE 28 USC §1746 and NRS 208.165)

18 - I declare under penalty of perjury under laws of the
19 United States of America that Matthew Travis Houston, CTD,
20 the foregoing is true and correct. No. 1210652

21 PURSUANT to NRCF 5(b), I 22010 Cold Creek Road
22 served the foregoing MOTION PO Box 650
23 FOR TRANSPORTATION OF INMATE Indian Springs, NV
89070-0650

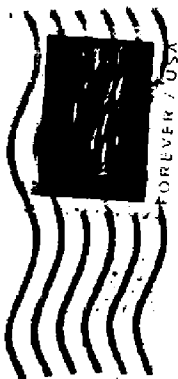
24 FOR COURT APPEARANCE OR, IN THE ~~ALTERNATIVE~~, MOTION
25 FOR APPEARANCE BY TELEPHONE OR VIDEO CONFERENCE, by
26 mailing the ORIGINAL COPY thereof in a sealed envelope, via USPS
27 addressed to: Clerk(s) of the Court - Steven D. Grierson

28 and CHAMBERS 200 Lewis Ave., 3rd Floor
Regional Justice Center
29 Las Vegas, NV 89155-1160

Page Number Five of Five

MATTHEW TRAVIS HOUSTON, CHTD
No. 1210652 @ HDSP
PO Box 650
22010 Cold Creek Road
Indian Springs, NV
89070-0650

LAS VEGAS NV 890
18 JUL 2022 PM 5 L



Clerk of the Courts please FWD to:
CHAMBERS, after FILING

Steven D. Grierson, Heather Ungermaun,
Michelle McCarthy, Chaunte Pleasant,
Amanda Ingersoll
Regional Justice Center, 3rd Floor
200 Lewis Ave.

Las Vegas, NV 89101

* LEGAL MAIL *



RECEIVED
CLERK OF THE COURT
JUL 17 2022
UNIT 3A/B



DARIN F. IMLAY, PUBLIC DEFENDER
NEVADA BAR NO. 5674
ASHLEY ST. CLAIR, DEPUTY PUBLIC DEFENDER
NEVADA BAR NO. 14764
PUBLIC DEFENDERS OFFICE
309 South Third Street, Suite 226
Las Vegas, Nevada 89155
Telephone: (702) 455-4685
Facsimile: (702) 455-5112
Attorneys for Defendant

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,	)	
	)	
Plaintiff,	)	CASE NO. C-21-357927-1
	)	
v.	)	
	)	
MATTHEW HOUSTON,	)	
	)	
Defendant.	)	

CERTIFICATE OF MAILING

I hereby certify and affirm that I mailed a copy of the documents listed below to:

Matthew Houston
Inmate #1210652
HIGH DESERT STATE PRISON
P.O Box 650
Indian Springs, NV 89070-0650

1. Criminal Complaint
2. Nevada Pretrial Risk (NPR) Assessment
3. Guilty Plea Agreement
4. Report's Transcript of Unconditional Waiver

on this 26th day of September, 2022.

By /s/ Nicole MB Walker
Employee, Clark County Public Defender's Office

CERTIFICATE OF ELECTRONIC SERVICE

A COPY of the above and foregoing CERTIFICATE OF MAILING was served via electronic e-filing to the District Attorney's Office on this 26th day of September, 2022.

By /s/ Nicole MB Walker

An employee of the Clark County Public
Defender's Office

Case Name: Matthew Houseton

Case No. C-21-357927-1

Dept No. XI



JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

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

Plaintiff,

-vs-

MATTHEW HOUSTON, aka,
Matthew Travis Houston #

Defendant.

JUSTICE COURT
LAS VEGAS NEVADA

CASE NO:

21CR019840

BY 3JG

DEPT NO:

3

DA CASE NO: 202115878C

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

**INTAKE NAME (AKA, ALIAS, ETC.)						LAST		FIRST		MIDDLE		TRUE NAME		LAST		FIRST		MIDDLE															
HOUSTON						MATTHEW		TRAVIS				HOUSTON		MATTHEW		TRAVIS																	
UNIK										UNIK																							
HOME ADDRESS (STREET # AND STREET NAME)										BLDG./APT.#										CITY		STATE		ZIP		PLACE OF BIRTH							
DATE OF BIRTH										RACE		HISP ETHNIC		SEX		HEIGHT		WEIGHT		HAIR		EYES		SKIN COMPLEXION #		CITIZENSHIP		ALIEN REGISTRATION #		US VETERAN		ACTIVE MILITARY	
LOCATION OF CRIME (STREET ADDRESS, CITY, STATE, ZIP) 3041 ST ROSE PKWY HENDERSON, NV 89052										☒ CC		☐ LV		LOCATION OF ARREST (STREET ADDRESS, CITY, STATE, ZIP) 3041 ST ROSE PKWY HENDERSON, NV 89052										☐ CITIZEN'S ARREST		☒ SPEAKS ENGLISH							
ARREST TYPE		COURT JURIS		WARRANT # / CASE #		% CHRG		NOC CODE		M GM F		CHARGE LITERAL		ORD / MRS		BAIL		EVENT# / INCH															
AW		LVJCR		21-CR-019840		1		51522		☐ ☐ ☒		MAKE THREAT/FALSE INFO RE ACT OF TERRORI		202.448		3000																	
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LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS
(N.R.S. 171.106)
(N.R.S. 53 amended 7/13/1993)
"PRINT"

21 - CR - 019840
DWS
Declaration of Warrant Summons (Affidavit)
13633232


FILED

"Click to Add/Edit Event # on All Pages"

Event Number: **210300101590**
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 0903 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 0929 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

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# LLV200700099898 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:

 7413

WITNESS:

 Edge 8645DATE: 03-30-21

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF ARREST REPORT

TCR1149369

☐ County Jail

☐ City Jail

☐ Adult

☐ Juvenile

Bureau: NWAC

ID#		EVENT # LLV210700085245		ARRESTEE'S NAME (LAST) HOUSTON		(FIRST) MATTHEW		(MIDDLE) TRAVIS		SSN#	
RACE	SEX	DOB		HGT	WGT	HAIR	EYES	POB			
ARRESTEE'S ADDRESS				STREET		BLDG/APT #		CITY		STATE	ZIP CODE
OCCURRED DATE: 7/14/2021		TIME: 21:50		ARREST DATE: 7/14/2021		TIME: 21:50		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE) 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 - 51522 - 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 CCDC 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: E MULLIGAN

P#: 15657

LVMPD 602 (Rev 02/18) Word 2013

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

TCR1149369

☐ County Jail ☐ City Jail ☐ Adult ☐ Juvenile Bureau: NWAC

ID#		EVENT # LLV210700065245		ARRESTEE'S NAME (LAST) HOUSTON			(FIRST) MATTHEW		(MIDDLE) TRAVIS		SSN#
RACE	SEX	DOB	HGT	WGT	HAIR	EYES	POB				
ARRESTEE'S ADDRESS STREET			BLDG/APT #		CITY			STATE		ZIP CODE	
OCCURRED DATE: 7/14/2021		TIME: 21:50		ARREST DATE: 7/14/2021		TIME: 21:50		LOCATION OF ARREST (NUMBER, STREET, CITY, STATE, ZIP CODE) 3041 ST ROSE PKWY HENDERSON NEVADA 89052			
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CHARGES / OFFENSES BW - LVJCR - 51522 - 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.

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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 CODC 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

P#: 15657

LVMPD 802 (Rev 02/18) Word 2013

NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant'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**

Total Bail at booking: **TBD**

Info re act of terrorism/WMD

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
13584482



Revised 3.2021

NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant's Name: **MATTHEW HOUSTON**

Booking #: **7035801**

Felony convictions: **1**

<u>YEAR</u>	<u>STATE</u>	<u>CHARGE</u>
2019	NV	DUI, ABOVE LEGAL LIMIT, (3+)

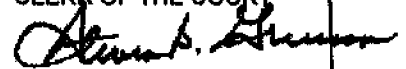
Misdemeanor Convictions: **7 (13 IN DUI x2 Counts)**

FTAS: **2**

Detainers: **N/A**

Pending Cases: **FTA WANT LV MUNI COURT #C1237802A**

Revised 3.2021



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

DISTRICT COURT
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 Blacic, Rosemarie McMorris, and/or Jonathan
27 Shockely. Defendant is to also stay away from 9930 West Cheyenne Avenue, Las Vegas,
28 Nevada. The State will not oppose Defendant's own recognizance release with low-level

\\CLARKCOUNTYDA.NET\CRM\CASE2\2021\15878\202115878C-GPA-(MATTHEW TRAVIS HOUSTON)-001.DOCX

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

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

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

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

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

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

CONSEQUENCES OF THE PLEA

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 H. Lake*

13 *Benard H. Lake*

14 *[Signature]*

15
16
17
18
19
20
21
22
23
24 AGREED TO BY:

25 *#9548*
26 *[Signature]*
27 KRISTINA J. RHOADES
28 Chief Deputy District Attorney
Nevada Bar #612480

CERTIFICATE OF COUNSEL:

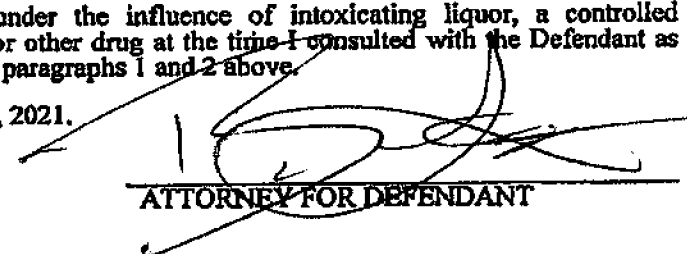
I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court hereby certify that:

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

Moreover, I have explained that regardless of what Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.

4. All pleas of guilty offered by the Defendant pursuant to this agreement are consistent with the facts known to me and are made with my advice to the Defendant.
5. To the best of my knowledge and belief, the Defendant:
 - a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement,
 - b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily, and
 - c. Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the Defendant as certified in paragraphs 1 and 2 above.

Dated: This 8th day of August, 2021.


ATTORNEY FOR DEFENDANT

erg/L-4

Steven D. Grierson

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**

7 **I.A. 8/4/21**
8 **8:00 A.M.**
9 **PD**
10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

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

CASE NO: C-21-357927-1

11 **-vs-**

DEPT NO: X

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

14 **Defendant.**

INFORMATION

15 **STATE OF NEVADA**
16 **COUNTY OF CLARK** } ss.

17 **STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State**
18 **of Nevada, in the name and by the authority of the State of Nevada, informs the Court:**

19 **That MATTHEW HOUSTON, aka, Matthew Travis Houston, the Defendant(s)**
20 **above named, having committed the crime of AGGRAVATED STALKING (Category B**
21 **Felony - NRS 200.575 - NOC 50333), on or between December 23, 2020 and June 10, 2021,**
22 **within the County of Clark, State of Nevada, contrary to the form, force and effect of statutes**
23 **in such cases made and provided, and against the peace and dignity of the State of Nevada, did**
24 **willfully, unlawfully, feloniously, and maliciously engage in a course of conduct directed**
25 **towards REDENTA BLACIC and/or ROSEMARIE MCMORRIS and/or JONATHAN**
26 **SHOCKELY that would cause a reasonable person to feel terrorized, frightened, intimidated,**
27 **harassed, or fearful for their immediate safety or the immediate safety of a family or household**
28 **member, by threatening to go on a mass shooting rampage similar to 1 October and/or making**

V:\2021\15878\202115878C-INFM-(MATTHEW TRAVIS HOUSTON)-001.DOCX

EXHIBIT "1"

Case Number: C-21-357927-1

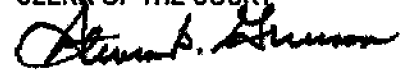
1 verbal demands for payment to Defendant of the sum of "Workers Comp Claim" lawful money
2 of the United States, and that course of conduct did, in fact, cause REDENTA BLACIC and/or
3 ROSEMARIE MCMORRIS and/or JONATHAN SHOCKELY to feel terrorized, frightened,
4 intimidated, harassed, or fearful for 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
11 Nevada Bar #001565

12 BY

13 KRISTINA A. RHOADES
14 Chief Deputy District Attorney
15 Nevada Bar #012480
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27 21CR019840/erg/L-4
28 LVMPD EV#210300101590
(TK3)



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.

)

CASE NO. 21-CR-019840

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.
CERTIFICATE NO. 65

25

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 BLACIC,
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
KIT MACDONALD, C.C.R.
COURT REPORTER
C.C.R. NO. 65

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REPORTER'S DECLARATION

STATE OF NEVADA)
COUNTY OF CLARK)

I, KIT MACDONALD, A CERTIFIED COURT REPORTER IN AND
FOR THE STATE OF NEVADA, HEREBY DECLARE THAT PURSUANT TO NRS
239B.030 I HAVE NOT INCLUDED THE SOCIAL SECURITY NUMBER OF ANY
PERSON WITHIN THIS DOCUMENT.

I FURTHER DECLARE THAT I AM NOT A RELATIVE OR
EMPLOYEE OF ANY PARTY INVOLVED IN SAID ACTION, NOR A PERSON
FINANCIALLY INTERESTED IN THE ACTION.

/S/KIT MACDONALD
KIT MACDONALD, C.C.R.
C.C.R. NO. 65

Steven D. Grierson

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

12 I.A. 8/4/21
13 8:00 A.M.
14 PD

DISTRICT COURT
CLARK COUNTY, NEVADA

15 THE STATE OF NEVADA,

16 Plaintiff,

17 -vs-

18 MATTHEW HOUSTON, aka,
19 Matthew Travis Houston,

20 Defendant.

CASE NO: C-21-357927-1

DEPT NO: X

INFORMATION

21 STATE OF NEVADA }
22 COUNTY OF CLARK } ss.

23 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State
24 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

25 That MATTHEW HOUSTON, aka, Matthew Travis Houston, the Defendant(s)
26 above named, having committed the crime of **AGGRAVATED STALKING (Category B
27 Felony - NRS 200.575 - NOC 50333)**, on or between December 23, 2020 and June 10, 2021,
28 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

V:\2021\15878\202115878C-INFM-(MATTHEW TRAVIS HOUSTON)-001.DOCX

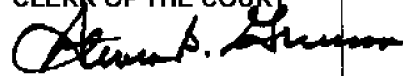
1 verbal demands for payment to Defendant of the sum of "Workers Comp Claim" lawful money
2 of the United States, and that course of conduct did, in fact, cause REDENTA BLACIC and/or
3 ROSEMARIE MCMORRIS and/or JONATHAN SHOCKELY to feel terrorized, frightened,
4 intimidated, harassed, or fearful for 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
11 Nevada Bar #001565

12 BY

13 KRISTINA A. RHOADES
14 Chief Deputy District Attorney
15 Nevada Bar #012480
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27 21CR019840/erg/L-4
28 LVMPD EV#210300101590
(TK3)



1 **REOT**
2 **AMD LAW, PLLC**
3 ALEXIS M. DUECKER, ESQ.
4 Nevada Bar No. 15212
5 340 E. Warm Springs Rd. Ste. 110
6 Las Vegas, Nevada 89119
7 Telephone: (702) 743-0107
8 Facsimile: (702) 796-4898
9 Email: alexis@amdlawlv.com
10 *Attorney for Petitioner*

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

STATE OF NEVADA,

Case No.: C-21-357927-1

Plaintiff,

Dept. No.: XI

vs.

**REQUEST FOR TRANSCRIPTS
PURSUANT TO NRAP 9(a)(3)**

MATTHEW HOUSTON

Defendant.

TO: (1) Kristine Santi, Court Recorder, RJC Lower Level Arraignment; (2) Victoria Boyd, Court Recorder, Department 10;

Defendant Matthew Houston requests preparation of a transcript of the proceedings before the district court, at State's expense as he is indigent and counsel is appointed, as follows:

(1) Judge or officer hearing the proceeding: Judge Michael Villani

Date or dates of the proceeding: **August 4, 2021** (Initial Arraignment).

Portions of transcript requested: All (complete transcripts of all arguments of counsel and testimony).

Number of copies requested: One plus electronic.

(2) Judge or officer hearing the proceeding: Judge Tierra Jones

Date or dates of the proceeding: **October 11, 2021** (All Pending Motions); **October 25, 2021** (Bench Warrant Return); **December 6, 2021** (Status Check: Sentencing or Motion to Withdraw Plea).

Portions of transcript requested: All (complete transcripts of all arguments of counsel and testimony).

1 Number of copies requested: One plus electronic.

2

3 I hereby certify that on the 3 day of October, 2022, I ordered the transcripts listed above from the

4 court recorders named above. No deposit was paid as this is an indigent defendant appeal and

5 transcripts are to be prepared at State's expense. See NRAP 24(a)(2), NRS 3.370.

6

7 DATED this October 3, 2022.

8 **AMD LAW**

9

10 

11 ALEXIS M. DUECKER, ESQ. #15212

12 8687 W. Sahara Ave. Ste 201

13 Las Vegas, Nevada 89117

14 *Attorney for Defendant*

15

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CERTIFICATE OF SERVICE

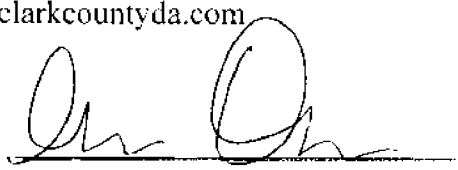
I hereby certify that I am an employee of AMD LAW, PLLC and that, pursuant to NRC P
5(b), on October 3, 2022, I served a true and correct copy of the foregoing Request for Transcript
via first class mail in envelopes addressed to:

Victoria Boyd, Court Recorder
District Court Dept. 10
200 Lewis Ave.
Las Vegas, NV 89155

Kristine Santi, Court Record
RJC Lower Level Arraignment
200 Lewis Ave.
Las Vegas, NV 89155

And electronic service was made this 3RD day of October, 2022. Electronic Filing Service
to:

Clark County District Attorney's Office
Motions@clarkcountyda.com
PDMotions@clarkcountyda.com

By: 

An Employee of AMD LAW



**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 26, 2022

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 11

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: **Motion For Transcripts**

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

— JC Dept. 14 # 21PO 1950 —
EMERGENCY MOTION FOR THE
JUSTICE COURT OF LAS VEGAS TOWNSHIP
IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW TRAVIS HOUSTON, PLLC,
Plaintiff, Plaintiff-in-Error and the
Appellant, — Petitioner,

vs.

MANDALAY BAY CORP., AND THE
DEEP STATE OF NEVADA, ET AL.

Respondent(s) - Defendant(s)

85354

Supreme Court No(s) 79408, 80562, 84261

District Court No. C.21.357927.1

JUSTICE COURT No. 21PO1950

SEE 17F00474X (21PO1275)

SEE A.17.758861.C and ALL cases

TO: TIERRA DANIELLE JONES — SEE CLERK "JAR, 9-14-2022"
Court Reporter Name

Matthew Travis Houston ~~requires~~ ^{demands} preparation of a transcript of the proceedings before the district court, as follows:

• EVERY - BODY (that means ALL witnesses)
Judge or officer hearing the trial or hearing: Everybody retroactively from 9.20.2016.

Date(s) of trial or hearing: September 20th, 2016 through today, September 21st, 2022 and ongoing — hence way too many appeals.

Portions of the transcript requested: All of them — SEE 21CR 019840, 21CR033713, C.17.323614.1, 17F00474X and also the "LAS VEGAS MUNICIPAL COURT No. C1248384A and C1237802A + A.22.758861.C.

Number of copies required: 33

PLEASE TAKE NOTICE OF THE
DIRECTLY RELATED APPEALS OF
79408, 84885, 85351
80562, 80562-COA, 84417,
84418, 84477, 84887,
85352

and
84281, 84478, 84886, 85353

MATTHEW TRAVIS HOUSTON

Name of person requesting transcripts

PO BOX 650
22010 Cold Cr

Address

Indian Springs, NV 89070-0650

City/State/Zip

(616) 762-4143 + (714) 916-7431

Telephone number(s)

CERTIFICATION

I certify that on this date I ordered these transcripts from the court reporter(s) named above by mailing or delivering this form to the court reporter(s) and I paid the required deposit.

RECEIVED

RECEIVED

OCT 03 2022

CLERK OF THE COURT

OCT 18 2022

CLERK OF THE COURT September 21st, 2022

Date

Signature

Matthew Travis Houston

CERTIFICATION

I certify that on the date indicated below, I served a copy of this completed transcript request form upon the court reporter(s) and all parties to the appeal:

☐ By personally serving it upon him/her; or

☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served by mail):

ATTN: JAR, clerk - RE 9.14.2022
"JUST - US" COURT, LAS VEGAS TOWNSHIP
200 LEWIS AVE
PO BOX 552511
LAS VEGAS, NV 89155 - 2511

DATED this 21 day of SEPTEMBER, 2022.

Matthew Travis Houston
Signature

MATTHEW TRAVIS HOUSTON, CHTD

Print Name

PO BOX 650

22010 Cold Creek Road

Address

INDIAN SPRINGS NV 89070

City/State/Zip

(714) 916-7431 (610) 762-4143

Telephone number

1 Memorandum of Points and Authorities In Support of request
2 for transcripts at State's expense:

3 The Petitioner respectfully requests that this Court
4 order the production of the transcripts, papers, pleadings and
5 any other documents with regard to the above entitled cases.
6 That these documents are to be furnished to the Petitioner at the
7 State's expense, due to his poverty.

8 That only with proper review of those documents of the
9 above-entitled cases will the Petitioner be able to adequately
10 prepare a post-conviction petition or direct appeal, that would
11 allege all issues and grounds for relief that he is seeking.

12 Peterson vs. Warden, 87 Nev. 134, 483 P. 2d 204 (1971),
13 holds that:

14 " ... does not contemplate that a record will be
15 furnished at State Expense upon mere unsupported
16 request of a petitioner who is unable to pay for
17 them... so must he satisfy the points and raise
18 merit and such merit will be supported by review
19 of the record ..."

20 Moreover, the Petitioner would be prejudiced absent the Court's
21 granting of the within motion. Petitioner would not have means
22 necessary to file a proper person petition for writ of habeas corpus
23 post-conviction or direct appeal to the Nevada Supreme Court,
24 that would allow the petitioner to allege all available issues.

25 WHEREFORE, Petitioner Matthew Travis Houston prays that
26 the Court enter an order directing the reporter to prepare the
27 corresponding requested transcripts. Affirmation pursuant to NRS 215.030
28 this document does NOT contain the social security number of any person.

29 NACPS 5(b) Page Number 8 (eight)
30 DATED: this 25th day of February, 2020 Case Number C-21-357927-1 x Matthew Travis Houston
Matthew Travis Houston, pro se

ATTORNEY THOMAS HOUSTON, LHTD
No. 1210652
PO Box 650
Indian Springs, NV
89070-0650

RECEIVED

OCT - 5 2022

CLERK OF THE COURT

ABA No. 04669784
ATTORNEY-CLIENT PRIVILEGE INVOKE
IN ALL MAIL, LEGAL MALES
AND ALL OFFICIAL BUSINESS OF ELITE LEGAL, LLC

Senior Judge JAMES CRACKETT
FWD: CHAMBERS

LAS VEGAS NV 890
22 SEP 2022 PM 4 1

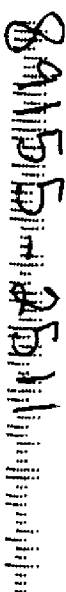
Thurday
COJ



FOREVER / USA

ATTN: "JAR, Clerk RE 9.14.2022"
cc: Chief Judge Linda Marie Bell,
AMY CHEMINI, David M. Jones, Barker,
Michael P. Villanov, Senior Judge James Crackett,
Crystal Eller, Elite Roacham,
GENE PORTER, SUSAN BACUS, Mary Kay Holthaus,
MAGISTRATE MICHELLE DE LA GARZA
JUST-US COURT, LAS VEGAS TOWNSHIP
200 LEWIS AVE.

PO BOX 552511
Las Vegas, NV



HIGH DESERT STATE PRISON
SEP 21 2022
UNIT 3 A/R



**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 26, 2022

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 11

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: **Motion For Speedy Trial Or In The Alternative For Dismissal**

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

EMERGENCY LETTER OF MOTION

cc: CHAMBERS OF ALL MAGISTRATES, including the Chief,
TO: THE LAW CLERK(S) OF MULTIPLE DEPARTMENTS,
AS THESE ORIGINAL DOCUMENTS MUST BE
FILED INTO MULTIPLE CASES —

First and foremost, my apologies for the Defendants cause of action(s)...
is I am an innocent man, adhering to principle as I have for 38 years.
And ~~As~~ mentioned above, I must request that this

most trusted and honorable clerk file ALL of
my documents into ALL of my cases as follows:
(in chronological ORDER)

A-17-758861-G → A-22-758861-G depts-17, 18, 29

C-17-323614-1 → A-19-800219-W depts-19

C-21-357927-1 → A-22-853203-W dept. 11

A-22-856372-C dept. 20

A-22-858580-G dept. 4

I have left the MOTIONs Case # & Dept #s blank for appropriate copies.

Next up is this "JUSTICE COURT" situation, or lack thereof.

Is it possible that after filing this motion into 5(8)

cases that the DISTRICT COURT CLERK could fwd

this to the JUSTICE COURT Clerk "JAR" for filing

into Justice Court, Las Vegas Township Case No. 21P01950,

Dept. 14 and also 17F00474X? Is it possible that

y'all could assist with my "MUNICIPAL COURT" litigations?

I must also have this motion filed into LAS VEGAS

MUNICIPAL COURT Case No. (s) C1248384A and C1237802A,

however that court has failed to respond to me repeated

attempts at filing. I sincerely appreciate y'all including this

letter into ALL filings and requests. X. Matthew Travis Houston.

RECEIVED
OCT 19 2022

CLERK OF THE COURT

1 MATTHEW TRAVIS HOUSTON

Name NDOC #1210652

2 Plaintiff/In Propria Personam

Post Office Box 650 [HDSP]

3 Indian Springs, Nevada 89018

4

5

DISTRICT COURT

6

CLARK COUNTY, NEVADA

7

8 MATTHEW TRAVIS HOUSTON,

9 Plaintiff, Petitioner-Appellant, and
the Plaintiff-in-Error,

10 vs.

11 MANDALAY BAY CORP., ET AL AND

THE DEEP STATE OF NEVADA,

12 Defendant(s),

13

14

NOTICE OF MOTION

15 YOU WILL PLEASE TAKE NOTICE, that Plaintiff-in-Error,

16 Matthew Travis Houston (also Plaintiff and Petitioner-Appellant)

17 will come on for hearing before the above-entitled Court on the

18 ____ day of ____, 20____, at the hour of ____ o'clock ____ M.

19 in Department ____, of said Court.

20

21 CC:FILE

22

23 DATED: this 30th day of September, 2022.

24

25

BY: Matthew Travis Houston
Matthew Travis Houston # 1210652
Plaintiff/In Propria Personam

26

27

28

1 MATTHEW TRAVIS HOUSTON #1210652
2 Defendant/In Propria Personam
3 Post Office Box 650 (HDSP)
4 Indian Springs, Nevada 89018

5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 MATTHEW TRAVIS HOUSTON,)
9 Petitioner-Appellant and the)
10 Plaintiff-Plaintiff-in-Error,)

11 vs.)
12 MANDALAY BAY CORP, ET AL AND)
13 THE DEEP STATE OF NEVADA,)
14 Defendant(s).)

Case No.
Dept. No. C-21-357927-1
Dept.11
Docket

15 MOTION FOR SPEEDY TRIAL OR IN THE ALTERNATIVE
16 DISMISSAL FOR LACK OF SPEEDY AND TIMELY PROSECUTION

17 Date of Hearing: _____

18 Time of Hearing: _____

19 "ORAL ARGUMENT REQUESTED, Yes X No ____"

20 COMES NOW, Defendant, Matthew Travis Houston, proceeding in
21 proper person, hereby moves this Honorable Court for a speedy trial, or in the
22 alternative, dismissal for lack of speedy and timely prosecution of the above-
23 entitled action. Defendant is also Petitioner-Appellant and Plaintiff-in-Error.

24 This Motion is made and based upon all papers and pleadings on file with
25 the Clerk of the Court which are hereby incorporated by this reference, the
26 Points and Authorities herein, and attached Affidavit of Defendant (EXHIBIT 1)

27 DATED: this 30 day of SEPTEMBER, 2022.

28 BY: Matthew Travis Houston
Matthew Travis Houston #1210652
Defendant/In Propria Personam

1 POINTS AND AUTHORITIES

2 THE DEFENDANT IS ENTITLED TO A SPEEDY TRIAL
3 OR DISMISSAL FOR LACK OF SPEEDY PROSECUTION

4 The Sixth Amendment to the United State Constitution sets
5 forth the following mandate upon the States through the Fourteenth
6 Amendment:

7 "In all criminal prosecutions, the accused shall enjoy the right
8 to a speedy and public trial..."

9 This Constitutional mandate has been codified in the State
10 of Nevada in the NRS under section 178.556(2):

11 "If a defendant whose trial has not been postponed upon his appli-
12 cation is not brought to trial within 60 days after the filing of
13 the complaint for an offense triable in a justice or municipal
court, the court may dismiss the complaint."

14 As can plainly be seen, Defendant's right to a speedy trial,
15 or dismissal in the alternative, is grounded in Constitutional as
16 well as Nevada statutory mandate.

17 Defendant is currently serving a term of imprisonment of
18 12-60 months in the custody of the Nevada Department of Correct-
19 ions [NDOC] located at WDSP (22010 Cold Creek Road Indian Springs NV)
20 within the County of Clark, Nevada. Therefore, it is
21 apparent that the Defendant cannot transport himself to the Court-
22 house for prosecution. Moreso, the responsibility of having the
23 Defendant transported lies with the "Marshalls" of the City of
24 LAS VEGAS, or, with the Nevada Department of Correct-
25 ions.

26 while the issuance of the complaint and warrant are suffic-
27 ent in themselves to cause the responsibility for speedy ...
28

1 ... prosecution to occur, the City Attorney and the police
2 agencies of the City of LAS VEGAS, have shirked their direct
3 and legal responsibility in the matter by refusing to transport,
4 or cause to be transported, this Defendant to the Courthouse for
5 legal action upon this case to occur. Defendant is informed that
6 he will be held to answer for the charges at some nebulous and
7 undetermined time in the future and this cannot stand Constitutional
8 scrutiny.

9 The laws of Nevada are clear in this regard. A warrant,
10 once issued, must be served and executed by a peace officer, and
11 the officers of the Court of the City of LAS VEGAS are such
12 peace officers. See, NRS 171.188:

13 "The warrant may be executed at any place within the State of Nevada."

14 Thus, the Defendant's incarceration cannot stand as a bar
15 to the execution of the warrant. Furthermore, NRS 171.122(1)
16 states:

17 "The warrant must be executed by the arrest of the defendant."

18 Therefore, the Chief Marshall and the LAS VEGAS City
19 Attorney's Office, being fully aware of the whereabouts of the
20 Defendant, against whom a warrant is pending, must execute the
21 command of said warrant.

22 The Defendant has made every effort available to him to
23 attempt to address and remedy the injustice and handicap that he
24 now suffers as a result of the outstanding charge(s), as is shown
25 by the annexed exhibits. This Court will now have the opportunity
26 to correct this injustice and to initiate their lawful duty by
27 the issuance of the Order made by this Motion.

28

1 To do otherwise would be a violation of the very concept
2 of the justice and equity upon which the American system of
3 jurisprudence rests.

4 CONCLUSION

5 Defendant has shown a just and legal obligation placed upon
6 the officers of the Court of the City of LAS VEGAS to issue
7 the Order contemplated by this Motion for the transportation of
8 this Defendant to the Court for the disposition of said pending
9 charge(s) forthwith, or, in the alternative, the dismissal of
10 said charge(s) and the removal of the warrant/detainer placed
11 against this Defendant for the denial of the right to a speedy
12 prosecution.

13 WHEREFORE, this Honorable Court is requested to liberally
14 construe the pleadings herein in order that its manifest and just
15 purpose be so accomplished.

16
17 CC:FILE

18
19 DATED: this 30 day of SEPTEMBER, 2022.

20
21 Respectfully submitted,

22
23 BY: Matthew Travis Houston
24 Matthew Travis Houston # 1210652
25 Defendant/In Propria Personam
26 Post Office Box 650 [HDSF]
27 Indian Springs, Nevada 89018
28

EXHIBIT 1

**MANUALLY FILED WITH
DISTRICT COURT CLERK'S OFFICE**

— EMERGENCY - EX PARTE - EN BANC - AS -
A — LETTER OF MOTION

Case Number (s) A-22-856372-C

Joinder → A-22-758861-C

A-22-853203-W

Dept. XI

NEVADA DEPARTMENT OF CORRECTIONS
INFORMAL GRIEVANCE

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

INSTITUTION: HDSP "SMU" UNIT: 3A34

GRIEVANT'S STATEMENT: OATH and WILL from American Bar Association Member No. 04662784 (LETTER OF MOTION TO CHAMBERS). I am proud of Elli Roehani today in her adherence to principle regarding the 6 year minimum she imposed upon the burglar who skipped bail to go
SWORN DECLARATION UNDER PENALTY OF PERJURY (P. #1 of 7)

INMATE SIGNATURE: Matthew Travis Houston DATE: 8-31-22 TIME: 6PM

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____ TIME: _____

GRIEVANCE RESPONSE: _____

CASEWORKER SIGNATURE: _____ DATE: _____

___ GRIEVANCE UPHeld ___ GRIEVANCE DENIED ___ ISSUE NOT GRIEVABLE PER AR 740

GRIEVANCE COORDINATOR APPROVAL: _____ DATE: _____

___ INMATE AGREES ___ INMATE DISAGREES

INMATE SIGNATURE: _____ DATE: _____

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A FIRST LEVEL GRIEVANCE MAY BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original: To inmate when complete, or attached to formal grievance

Canary: To Grievance Coordinator

Pink: Inmate's receipt when formal grievance filed

Gold: Inmate's initial receipt

MAILED TO CHAMBERS+
-OMAHA - NEBRASKA-

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

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

INSTITUTION: HDSP - "SMU" BMU UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 7

ruin people's lives in California when he was 17 and
is now not even 25. I suffer from CPTSD (complex
post-traumatic stress disorder) and numerous other
impairments, and I ~~was~~ shed tears of empathy today,
especially after the lady who received drug court
informed the public about the recent suicide of
her 13 year old son.

Other than to inform you of my renewed
ABA Membership No. 04662784 (due in part to my
companion, Andrew P. Gordon helping me to recover
what's left of my law office that was destroyed
in Iowa, to which the defendants caused ~~my~~ ~~loss~~
over \$36,500,000.00 in losses of client intel,
antiques and irreplaceable things not limited to my
trusty K-9 UNIT, JOHNNY CASH and LIL' GEORGE LUCAS),
I am writing to ^{elaborate} ~~inform~~ on my statement today,

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: HDSP "SMU-BMU" UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 7

during which I thanked you for service to the town, NDOC NIELSON and company, and stated my 38 years of experience in dealing with criminal justice reform advocacy. I cannot afford to be any further misinterpreted. What has been difficult is feeling that NDOC staff probably think that I'm full of hot air, because I'd requested personal recommendations to NDF NEVADA DIVISION OF FORESTRY "FIRE-CAMP", Law Library clerk and Governor's Mansion jobs. Regardless of my factual and actual innocence, and being subjected to a violent and inhumane environment, I have been an over-achiever for 39 years. Too bad for the community that Judge Villani, Magistrate DeLaGarza, Mary Kay Holthus ^{or} ~~and~~ neither was Chief Linda informed of my valor. I am struggling with developing new relationships due to the events of my ONE OCTOBER

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: HDSP UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 4 OF 7

2016 and ONE OCTOBER 2017. This is where I am
issuing FORMAL REQUEST FOR INTERVENTION... Not only
in a legal "INTERVENTION" proceeding, but because of
being forced against my will to overstep potential
boundary lines between myself and the NDOC Caseworker(s)
as the difficulty of my current misclassification, in
addition to ~~my~~ ~~the~~ wrongful conviction and extensive
incarceration. These days are just so difficult
because nobody understands the definitions or acts
with any sense of accountability, integrity, trust,
honesty or any other virtues. Nobody will help
me with obtaining materials for my "REAL TALK"
program and my property destruction claims are,
at this point exponential (as allegedly some of my
investigation is in NDOC "PROPERTY ANNEX" and it
seems that nobody is helping with anything...

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: HOSS "SMU-BMU" UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 5 OF 7

I had contributed just under \$92,000.⁰⁰ to the REAL TALK PROGRAM, and numerous other most honorable organizations over the last 39 years of my life and I'm concerned as to specifically and just why exactly I am in your "NDOC"? Illegally and for a 2ND term, especially as our non-existent Law Library are providing error, if anything at all. In the closing of a door to a diamond in the rough, I must reiterate that not all of us lawyers are ambulance chasers. Although it is rare, some of us actually care, about things other than money. Ell:, I am concerned regarding your order ~~for~~ appointment of counsel, and how that effects my reputation to the ABA, the Hague, the Ministry of Justice, the Vatican and so many of my associates, friends and family...

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: HDSP "SMU-BMU" UNIT #: 3A34

GRIEVANCE #: _____ GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 6 OF 7

Pursuant to Napoleonic Code, I demand respect
and timely accomodations in the motion for
expidition of briefing schedule(s) and further
motions for additional REINSTATEMENT OF BRIEFING
SCHEDULES. And where's my executive clemency
and pardon? Hidin' FROM BIDIN? Such valued
dreams of expiditious reality were of no value to
the genocide against my people, the Maguoketa,
to your UNION ARMY conspiray were they Mr.
Ulysses? This property destruction claim is quite
exponential and retroactive pursuant to filed
tolling motions. I WILL track down SKYWALKER
from 2019 @ TLVCC, via my psychic agents @
LVMPD, as he's most likely dead already. Please
tip your medium as I tip this orange cup out
of 39 years of sustained OBLIVION towards FREEDOM.

Original: Attached to Grievance
Pink: Inmate's Copy

7

Log Number 20063140694

NEVADA DEPARTMENT OF CORRECTIONS
INFORMAL GRIEVANCE

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

INSTITUTION: HDSP UNIT: "S.M.U." 3-A-2

GRIEVANT'S STATEMENT: WHAT HAPPENED?
THE LAST DAY I WAS ALLOWED ACCESS TO
SHOWER / TELEPHONE WAS ONLY 1/2 HOUR EVENING OF
JULY 13, 2022 AFTER COURT. I WAS NOT SERVED WITH
ANY SORT OF NOTICE TO ATTEND COURT OR WHAT MOTIONS
I WAS TO HAVE ARGUED UNTIL JULY 15, AFTER HEARINGS,

SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: Matthew Travis Houston DATE: 7.16.22 TIME: _____

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____ TIME: _____

GRIEVANCE RESPONSE: _____

CASEWORKER SIGNATURE: _____ DATE: _____

___ GRIEVANCE UPHELD ___ GRIEVANCE DENIED ___ ISSUE NOT GRIEVABLE PER AR 740

GRIEVANCE COORDINATOR APPROVAL: _____ DATE: _____

___ INMATE AGREES ___ INMATE DISAGREES

INMATE SIGNATURE: _____ DATE: _____

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A FIRST LEVEL GRIEVANCE MAY
BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original: To inmate when complete, or attached to formal grievance
Canary: To Grievance Coordinator
Pink: Inmate's receipt when formal grievance filed
Gold: Inmate's initial receipt

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NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652
INSTITUTION: HDSP UNIT #: "S.M.V." 3-A.2 ^{Now 3-A}
GRIEVANCE #: 20063140694 GRIEVANCE LEVEL: INFORMAL ³⁴

GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 3
FACTUAL LOSS OR HARM:

I TURNED IN COPY(S) OF THE ATTACHED DOC-3012 "KITE",
ONE TO LAW LIBRARY, ONE TO MENTAL HEALTH / MEDICAL
IN ACCORDANCE WITH PROCEDURE(S). TODAY IS 7-16-22
AND I STILL HAVE NOT BEEN ALLOWED ACCESS TO SHOWER,
CHECK KIOSK, MAKE LEGAL PHONE CALL(S), ETC. THIS
72-HOUR DEADLINE, BY LAW IS A RIGHT TO BOTH
INNOCENT AND "GUILTY" PRISONERS, REGARDLESS OF
CUSTODY STATUS. I HAVE BEEN DENIED / DELAYED
BRASS SLIP-LEGAL POSTAGE CAUSING VALID APPEAL
DEPRIVATION CLAIMS AND EXCEEDING COURT ORDERED
DEADLINES AT NO FAULT OF MY OWN. 7-13-22 I WAS
DENIED EMERGENCY GRIEVANCE AFTER BEING ASSAULTED
BY L.V.M.P.D. AFTER HEARING. BEFORE COURT I DISCOVERED
FISHTANK C/O WITNESS NAME "BARNETT" IN RE "2-1-22
SAMURAI JIMMY" INCIDENT, THAN C/O "ANONYMOUS"
PILLAGED MY LEGAL PLEADINGS, CAUSING CPDSD PANIC ATTACK,

Original: Attached to Grievance
Pink: Inmate's Copy

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NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

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

INSTITUTION: HDSP UNIT #: "S.M.V." 3.A.2

GRIEVANCE #: 20063140694 GRIEVANCE LEVEL: INFORMAL

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 3

VIOLATING 4TH AMDT. AND 8TH AMDT. RIGHTS, NRS, ETC.
ILLEGAL SEARCH, UNNECESSARY INTERROGATION / QUESTIONING.

@ COURT 7-13-22 ELLI ROOHANI MISAPPOINTED REPRESENTATION
"ALEXA" WITHOUT MY PERMISSION, I REQUESTED COUNCIL
ONLY TO ACT AS "STANDBY". ROOHANI REFUSED TO HELP
FILE LVMPD REPORT IN RE DEATH THREATS RECEIVED
IN MY LEGAL MAIL. I WAS VERBALLY ABUSED ON-
THE-RECORD BY E. ROOHANI WHEN SHE SAID "I'M DONE
TALKING TO YOU" THAN WAS ASSAULTED BY LVMPD AS
EXITING COURTROOM AND TO HOLDING / AMBULANCE. HDSP NDOC
RETURNED MY PERSON TO HDSP INFIRMARY AND I AT LEAST
WAS ABLE TO CHECK IN W/ MENTAL HEALTH.

REMEDY: HDSP LAW CLERK / STAFF "ESCORT" AS WELL
AS AN NDOC LT + SGT + SENIOR TO BE PRESENT AT MY
NEXT HEARINGS SCHEDULED AUG. 9TH 2022 AND AUG. 30, 2022.
PLEASE BRING C/O HEINIKIN, KURAY, SAGE, NDOC SQUAD (3)

Original: Attached to Grievance AND \$500.00 FOR INCURRED DAMAGES
Pink: Inmate's Copy NOT LIMITED TO EMOTIONAL DISTRESS.

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(8)

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838

DOC - 3097 (01/02)

Log Number _____

NEVADA DEPARTMENT OF CORRECTIONS
FIRST LEVEL GRIEVANCE

NAME: MATTHEW TRAVIS HUSTON I.D. NUMBER: 1210652
INSTITUTION: HDSP "SMC-BMU" UNIT: 3 Alpha 34

I REQUEST THE REVIEW OF THE GRIEVANCE, LOG NUMBER 20063140694, IN A FORMAL MANNER. THE ORIGINAL COPY OF MY GRIEVANCE AND ALL SUPPORTING DOCUMENTATION IS ATTACHED FOR REVIEW.

SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: Matthew Travis Huston DATE: 10/14/2022

WHY DISAGREE: OUT OF being emotionally distressed from 6 years
of endured retaliation (at the hands) of the authorities in NEVADA I
have included evidence of testimony on pages 2-3. 39
years of experience in law enforcement and multiple (see p. 2-3)
retirements such as JOE LOMBARDO, ET AL betrayed me...

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____

FIRST LEVEL RESPONSE: _____

_____ GRIEVANCE UPHeld _____ GRIEVANCE DENIED _____ ISSUE NOT GRIEVABLE PER AR 740

WARDEN'S SIGNATURE: _____ TITLE: _____ DATE: _____

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____

_____ INMATE AGREES _____ INMATE DISAGREES

INMATE SIGNATURE: _____ DATE: _____

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A SECOND LEVEL GRIEVANCE MAY BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original: To Inmate when complete, or attached to formal grievance
Canary: To Grievance Coordinator
Pink: Inmate's receipt when formal grievance filed
Gold: Inmate's initial receipt

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**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

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

INSTITUTION: HDSP "SMU" UNIT #: 3 A 34

GRIEVANCE #: 20063140694 GRIEVANCE LEVEL: FIRST

GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 3

1 HOUSTON (this is a transcribed copy from R. Angel #10)

2 I know they ran some \$ for you I

3 feel like I'm chasin my \$ pay me

4 whatever comes today we call it even

5 and workout a deal for the tv but.

6 this will all be hand to hand business

7 I'm not gonna chase you 4 my \$ I'll

8 put the tv outside your door when you

9 have the \$ in your house I'll have witness

10 get that \$ from you as soon as store

11 comes. If you dont pay me today in

12 food / coffee I'll get a hold of your

13 phone pin and make it hard 4 you I

14 just want what you owe me by R Angel¹⁰

The above copied statement is written in blue ink as
"witness" on line number #9 shall be revealed in court.

Original: Attached to Grievance
Pink: Inmate's Copy

B-10

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

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

INSTITUTION: HDSP "SMU" UNIT #: 3A34

GRIEVANCE #: 20063140694 GRIEVANCE LEVEL: FIRST

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 3

Yesterday on 9.12.2022, I was checking on my neighbor in [#]25 to see if he was okay, as he's been depressed and emotionally distressed, having endured retaliation and unnecessary and involuntary assault of prior NDOC actions from "the hole". Upon checking on my neighbor in [#]25 "BIRDMAN"-^{#24} (a shady character) I suspect to be extremely obese made interrogative noises that sounded quite animalistic. His threatening statement was along the lines of, "don't you owe me \$4 from the other tier?" After I responded "No" he concluded with the closing threatening statement of, "okay ~~to~~ you can keep it moving than". The sad thing is, #24 waddles like a pork chop on the grill when I'm fryin' 'em up. We'll have to cook the books on this little porker.

Original: Attached to Grievance
Pink: Inmate's Copy

B-11

LOG NUMBER: _____

NEVADA DEPARTMENT OF CORRECTIONS
SECOND LEVEL GRIEVANCE

NAME MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652

INSTITUTION: HOSP "DMU" - BMU UNIT 3A34

I REQUEST THE REVIEW OF THE GRIEVANCE LOG NUMBER 20063135783 ON THE
SECOND LEVEL. THE ORIGINAL COPY OF MY GRIEVANCE AND ALL SUPPORTING DOCUMENTATION
IS ATTACHED FOR REVIEW.

SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: Matthew Travis Houston DATE: 9-18-22

WHY DISAGREE: YOU WILL NOW TAKE NOTICE of the
tools that I am going to use to hang
myself from the air vents because the
Defendants not limited to TIERRA DANIELLE
JONES made too many poor decisions in their lives.

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____

SECOND LEVEL RESPONSE: _____

____ GRIEVANCE UPHeld ____ GRIEVANCE DENIED ____ ISSUE NOT GRIEVABLE PER AR 740

SIGNATURE: _____ TITLE: _____ DATE: _____

GRIEVANCE COORDINATOR SIGNATURE: _____ DATE: _____

INMATE SIGNATURE: _____ DATE: _____

THIS ENDS THE FORMAL GRIEVANCE PROCESS

Original:	To inmate when complete, or attached to formal grievance
Canary:	To Grievance Coordinator
Pink:	Inmate's receipt when formal grievance filed
Gold:	Inmate's initial receipt

SEE ATTACHED 3097
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NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: MATTHEW TRAVIS HOUSTON I.D. NUMBER: 1210652
INSTITUTION: MDSP "SMU - BMU" UNIT #: 3A34
GRIEVANCE #: 20063135783 GRIEVANCE LEVEL: EMERGENCY 2nd
GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 2
KITE RECEIVED FROM ANGEL 3-A-10:

"YOU KEEP SAYIN I FUCKED YOUR PIN WHEN
YOU KNOW MY GIRL GOT MONEY ON THERE!
ROGER ISN'T ME I SOLD YOU A GOOD SHIRT FOR
A GOOD PRICE AND NOW I'M GETTING FUCKED
OVER CAUSE YOUR NOT A MAN OF YOUR WORD IM
THROUGH GOING BACK AND FORTH WITH YOU EVENTUALLY
MY DOOR WILL OPEN UP YOU EITHER PAY ME OR
DONT THAT'S ON YOU IF YOU DECIDE NOT TO
JUST BE READY TO FIGHT WHEN WE GET
THE FIRST CHANCE I ALREADY TRY TO BE
COOL WITH YOU THAT'S UP TO YOU NOW.

Original: Attached to Grievance
Pink: Inmate's Copy

B-33

**NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM**

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

INSTITUTION: HDSP - "SMU" UNIT #: 3-A-34

GRIEVANCE #: 20063135783 GRIEVANCE LEVEL: ATTACHMENT
(EMERGENCY)
2nd LEVEL

GRIEVANT'S STATEMENT CONTINUATION: PG. 1 OF 1

9/28/2022 RECEIVED F/ NEIGHBOR: I'M NOT ONE TO GET INTO OTHER
PEOPLE'S BIZ-NESS, BUT IF I WOULD HAVE KNOWN THAT THAT'S WHAT "TOOTHPICK"
(THAT'S WHAT I CALL HIM) WAS DOING W/ YOU, I WOULD SAID "HELL - NAW!"
I DON'T KNOW IF YOU KNOW HIS OLD CELLY "M-C" - WHEN THEY GOT SEPARATED
MC WENT TO "B"-SIDE. THEN I MOVED IN (W/M-C) HE TOLD ME ALL
THE GRIMY SXXX THAT TOOTHPICK WAS DOING, INCLUDING USING
UP ALL OF MC'S PHONE TIME. I FIRST MET TOOTHPICK
AT CCDC 9B & HE WAS JUST AS GRIMY THEN TOO. HE IS NOTHING BUT
A DIRTBAG SNOB. IF YOU CAN CUT TIES WITH THAT KID, DO IT NOW!
GET A KITE OUT TO THE CASEWORKER AND INMATE PHONES THAT
YOU NEED YOUR PHONE PIN CHANGED BECAUSE SOMEONE SAW YOU
DIAL YOUR PIN & STOLE IT. DO IT NOW! THIS DUDE IS NOT GOING
TO LEARN. LOOK WHAT KIND OF TATTOOS HE HAS. ON HIS FACE!
HE LOOKS LIKE A CLOWN. SAY BYE TO YOUR LOSSES. GET
YOUR PIN CHANGED, & CUT HIM OFF. PS - HIS THREATS ARE
EMPTY. - HE CAN'T FIGHT. (ORIGINAL MAILED TO ATTORNEYS) FWD:

Original:
Pink:

Attached to Grievance
Inmate's Copy

PLEASE SEE #20063140694
Filed in EDC A-22-853203-W, JC
case No 2101950 and multidistrict
litigation in US DISTRICT COURT
#2:21-cv-00499-JAD-DJA
DOC-3097 (01/02) CD

RENEWED COMPLAINT IN LETTER OF MOTION

5-20-2022

TO: ELLI ROOHANI, MICHAEL P. VILLANI,
MICHELLE MCCARTHY, CYNTHIA ~~MOLERE~~ MOLERES,
CHAUNTE PLEASANT, MARY KAY HOLTUS,
MICHELLE DE LA GARZA, STEVE BRIERSON,
HEATHER UNGERMANN, JOE LOMBARDO,
OSCAR GOODMAN, CAROLYN AND
EVERYBODY ELSE AND THEIR MOTHERS:

IF RJC FORWARDS
ONE MORE OF MY
ORIGINAL DOCUMENTS TO
SCOTT POISSON
WITHOUT RETURNING A COPY
TO ME, THEN I

AM GOING TO HANG MYSELF
IN THIS PRISON CELL.

x Heather Jean Hurt

M. T. H.

666

SICK OF YOUR

NEGLIGENCE SCOTT

AND JACK, et al

ΣΖ-Π-Σ

Page Number Nine

No. 2



Inmate Account Transaction Request Form (Brass Slip) Return Memorandum

Date: 4/28/22 To: ADMINISTRATION Institution: HASP

From: Inmate Banking Services (Staff Initials: MPA)

Inmate Banking Services received a brass slip and/or Savings Withdrawal Request detailed below.

Inmate Name: MATTHEW HOUSTON NDOC #: 1210652
 Made Payable To: NDOC Amount: \$ 1,760,000 ^{+ 87¢ (TWO SENSE) 69¢}
 Brass Slip #: 2522596 Purpose: LEGAL POSTAGE ^{CONFEDERACY OF THE K.K.K.}

BRASS SLIPS:

- ☒ The brass slip is being returned because an authorized institutional staff's signature was not obtained. ^{THOMAS OF JEFFERSON DAVIS PERRISH, LA}
- ☒ The brass slip has not been processed and has been voided. If applicable, please return the envelope and its contents to the above-mentioned inmate. The brass slip was voided for the following reason(s):
- ☐ Unable to determine the purpose of the brass slip (e.g., legal copies, postage, etc.)
 - ☐ Inmate Signature was not obtained / Inmate name and/or number missing
 - ☐ Dollar amount of the brass slip was not inserted / Dollar amount change not initialed by inmate
 - ☐ Canceled per inmate's request
 - ☐ Inmate account does not have sufficient funds – NSF (Account balance: \$ _____)
 - ☐ Inmate account is frozen
 - ☐ Inmate needs to supply postage for the brass slip
 - ☐ Inmate needs to supply a self-addressed stamped envelope for the brass slip
 - ☐ Unable to verify authorized signature
 - ☐ Payee on brass slip does not match envelope
 - ☐ Verification not returned by facility
 - ☐ Other _____

Per AR 258.13.3.G, an inmate should not have a copy of a fully executed brass slip.

SAVINGS WITHDRAWAL REQUESTS:

- ☐ The Savings withdrawal request was not approved for the following reason(s):
- ☐ Withdrawal from a Savings Account must be approved through Inmate Savings Withdrawal Request form (DOC-515)
 - ☐ Savings account has not met the maximum threshold required by AR 258.01.D (3).

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Page Number Ten

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DOC 509c (rev. 09/2018) D.E.P.

NAVY SEAL 1-04-08 (6-6-2002)

legally blind + C.P.T.S.D

9-30-2016 7-15-1984

CERTIFICATE OF SERVICE BY MAILING

I, MATTHEW TRAVIS HOUSTON, hereby certify, pursuant to NRCP 5(b),
that on this 30 day of SEPTEMBER, 2022 I mailed a true and correct copy
of the foregoing, "EMERGENCY LETTERS OF MOTION, NOTICES OF
MOTION, EXHIBIT 1(s) AND MOTION FOR SPEEDY TRIAL(S) OR IN THE
ALTERNATIVE DISMISSAL FOR LACK OF SPEEDY AND TIMELY PROSECUTION"
by depositing it in the High Desert State Prison, Legal Library, First-Class
postage fully prepaid, addressed as follows:

cc: CHAMBERS
LAW CLERK
200 LEWIS AVENUE
LAS VEGAS, NV
89155

CC: FILE

DATED: this 30 day of SEPTEMBER, 2022

Matthew Travis Houston
Matthew Travis Houston #1210652
Petitioner/In Propria Personam
Post Office Box 650 (HDSP)
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:

MATTHEW TRAVIS HOUSTON
NO 1810652 (H03F)
PO Box 650
INDIAN SPRINGS, NV
89070-0650

3782

CC: CHAMBERS
ATTN: LAW CLERK
REGIONAL JUSTICE CENTER
200 LEWIS AVENUE
LAS VEGAS, NV
89155

LEGAL MAIL
AND
OFFICIAL BUSINESS
OR
ACK NO. 04662784

HIGH DESERT STATE PRISON
OCT 10 2002
UNIT 3A/B



1 RTRAN

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5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 STATE OF NEVADA,

9 Plaintiff,

10 vs.

11 MATTHEW HOUSTON,

12 Defendant.

CASE NO. C-21-357927-1
DEPT. 10

13
14 ***BEFORE THE HONORABLE TIERRA JONES, DISTRICT COURT JUDGE***

15 ***MONDAY, OCTOBER 11, 2021***
16 ***RECORDER'S TRANSCRIPT RE:***
17 ***ALL PENDING MOTIONS***

18 APPEARANCES:

19 For the State:

KRISTINA RHOADES, Esq.
Special Deputy District Attorney

20
21 For Defendant:

SCOTT RAMSEY, Esq.
Public Defender

22
23
24
25 RECORDED BY: VICTORIA BOYD, COURT RECORDER

1 Las Vegas, Nevada, Monday, October 11, 2021 at 9:30 a.m.

2
3
4 THE COURT: Mr. Houston does not appear to be present. Mr. Ramsey is
5 here on his behalf. Ms. Rhoades is here on behalf of the State. This is on for the
6 State's motion to remand the defendant and increase his bail.

7 Mr. Ramsey, do you know why this motion wasn't - - it wasn't responded to
8 because you also have a motion to withdraw.

9 MR. RAMSEY: Yeah, I believe Mr. {inaudible} filed a motion to - - well, I think
10 Mr. Little filed a motion to withdraw because Mr. Houston wanted to withdraw his
11 plea. I'm not sure what the status is between that and the State's motion to remand.

12 THE COURT: I assume that that's why Mr. Little didn't respond is because he
13 had filed a motion to withdraw. However, the defendant is not here. I don't know - -
14 Mr. Ramsey, do you have any representations on the defendant's whereabouts?

15 MR. RAMSEY: I do not, Your Honor. I think Mr. Little said he wanted to
16 appear but he's stuck in Justice Court 3 right now to address the motion to remand,
17 but if the client is not there not even sure he'd be able to do that.

18 THE COURT: All right. State.

19 MS. RHOADES: We would ask for a bench warrant, Your Honor.

20 THE COURT: Well, it appears that he has violated orders of this Court. I will
21 make a decision as to what's going to happen with his bail. I'm going to issue a
22 bench warrant, no bail. Let Mr. Little know if something changes he can put this
23 back on and I'll readdress it, and I'll readdress your motion to withdraw when the
24 defendant is present.

25 MR. RAMSEY: Understood, Your Honor.

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MR. RHOADES: Thank you.

THE COURT: Thank you.

(Proceedings concluded at 9:31 a.m.)

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video
proceedings in the above-entitled case to the best of my ability.

Victoria W. Boyd

1-5-2023

Victoria W. Boyd
Court Recorder/Transcriber

Date



1 RTRAN

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5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

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8 STATE OF NEVADA,

9 Plaintiff,

10 vs.

11 MATTHEW HOUSTON,

12 Defendant.

CASE NO. C-21-357927-1
DEPT. 10

13 **BEFORE THE HONORABLE NANCY BECKER, SENIOR DISTRICT COURT JUDGE**

14 **MONDAY, OCTOBER 25, 2021**
15 **RECORDER'S TRANSCRIPT RE:**
16 **BENCH WARRANT RETURN**

17 APPEARANCES:

18 For the State:

19 WILLAIM MERBACK, Esq.
Chief Deputy District Attorney

20
21 For the Defendant:

22 BERNARD LITTLE, Esq.
Public Defender

23
24
25 RECORDED BY: VICTORIA BOYD, COURT RECORDER

1 Las Vegas, Nevada, Monday, October 25, 2021 at 8:50 a.m.

2
3
4 THE COURT: State of Nevada v. Mathew Houston. This is return on a bench
5 warrant. Mr. Houston is present in custody. And for the defense we have?

6 MR. LITTLE: Bernard Little, Bar Number 12025.

7 THE COURT: All right. So - -

8 MR. MERBACK: Your Honor, just for the record. It's William Rowles for the
9 State. He's there on Blue Jeans. Wait. I might have my pages mixed up. Which one
10 is this?

11 MR. MERBACK: I actually do have Houston. Never mind. Sorry.

12 THE COURT: So there are some competing motions but the first motion
13 would be for Mr. Little as to why the defendant was not present on October the 11th.

14 MR. LITTLE: Yes, Your Honor, I do not know and cannot make
15 representations on why he wasn't present. I do not believe the motion to remand
16 has been heard yet. We continued it until we could find him. And I'd be asking to
17 respond orally for motion to remand.

18 THE COURT: That was going to be my next question. So he's in custody on
19 the bench warrant is my understanding, is that correct?

20 MR. LITTLE: That's correct.

21 THE COURT: Very well then. The first motion we'll hear then is the State's
22 motion to remand and to increase bail. Argument by the State.

23 MR. MERBACK: Your Honor, I don't have a lot to add unless the Court has a
24 specific question. I'll submit it on our pleadings.

25 THE COURT: And then your oral opposition, Mr. Little?

1 MR. LITTLE: And, Your Honor, my client unfortunately suffered a traumatic
2 brain injury a while ago which kind of gives rise to this whole case. As Your Honor
3 is familiar with when somebody has a traumatic brain injury their ability to control
4 their thoughts and actions are limited. I also forwarded to the Court proof that his
5 support animals, which he has been legally prescribed as necessary for him to cope,
6 were taken away from him and he lost them and that was absolutely devastating. I
7 tried to talk him about this and counsel him through it but unfortunately I am not a
8 doctor. I am not a therapist. I can't help him with his impulse control issues. It does
9 seem to be that it is difficult for him to control his anger. I think he needs therapy. I
10 think he needs a lot of things. The problem is he's not going to be able to get those
11 while he's in custody. He's not going to be able to get the support he needs while in
12 custody as far controlling his impulses and getting medical assistance with his
13 traumatic brain injury he did suffer. This stems from a worker's comp case where he
14 alleged to have called several people and made various threats. It was resolved
15 and he pled guilty in this case, and as part of that condition was for him to not
16 contact the named victims. He did contact somebody that works - - that is a listed
17 named victim who also works at the worker's comp department. He is trying to get
18 that worker's comp case resolved and so he did have contact with that person.

19 I'm sure he has the Court's full attention. I'm sure he's well aware that he's
20 not supposed to do that. I'd be asking for release with conditions such that he goes
21 to weekly therapy, provides records to me which I can forward to the Court, and as
22 long as he's going to therapy, checking in on intensive supervision or electronic
23 monitoring as the Court deems fit then we can keep him out of custody pending
24 sentencing on this case.

25 MR. MERBACK: And, Your Honor, just if I could orally reply to that in regards

1 to one thing. Referencing the defendant's continued contact in this case is a part of
2 his worker's compensation case is just not accurate. His continued contact in this
3 case in direct violation of the Court's order clearly extends beyond anything that
4 would be necessary for a worker's compensation case and placing the victims in
5 danger. I'll submit it on that.

6 THE COURT: And do you have anything that you'd like to say, Mr. Houston?
7 You don't have to but I want to give you the opportunity if you choose to do so in
8 regard to why you weren't here on October 11th.

9 THE DEFENDANT: I was in the hospital, Your Honor, trying to get new
10 doctors because I was living in the state of Iowa so all my doctors there I can't see.
11 My insurance, I had to reapply for everything like the Medicaid and transfer my
12 Medicare over. Just finding new doctors. And I was hospitalized at UMC. I can't
13 remember the exact dates because I don't have the paperwork in front of me. Also
14 after my release, I think it was September 10th, my wallet was stolen when my truck
15 was broken into so everything has been overwhelming getting new doctors, having
16 to replace an ID and moving back to Nevada because I wasn't living in Nevada
17 before all this. For the last two years I was living in the state of Iowa and relocating
18 without being prepared for it has been difficult.

19 THE COURT: All right. I will not reinstate you on own recognizance release
20 or on the current bail.

21 State, you're seeking to have bail increased to how much?

22 MR. MERBACK: I think we were looking for - - let me check.

23 THE COURT: He'll be remanded into custody on this case. He's already in
24 custody on the bench warrant.

25 MR. MERBACK: What is the current bail on that - - was there a bail on that

1 bench warrant, Your Honor?

2 THE COURT: There was a no bail on the bench warrant.

3 MR. MERBACK: He was originally released with \$5000. I'm going to ask the
4 Court then - - for \$50,000 then because originally it was set at \$5000 when he was
5 released.

6 THE COURT: Argument, Mr. Little, on the amount of bail?

7 MR. LITTLE: And, Your Honor, client is indigent. He's been living out of his
8 car when I spoke to him previously. I don't believe that he can afford a \$50,000 bail
9 so that would be defacto detainer or no bail hold, which I don't think is the aspiration
10 of the Court and the DA, unless I'm wrong so I'd be asking for bail in the amount of
11 \$10,000. It's more that the bail he had before because he did contact the named
12 victim as alleged but it's not something where it's not something where it's
13 completely outside the realm of possibility for him to be able to gather up.

14 THE COURT: All right. Based upon the nature of the case originally and the
15 status and conditions that related to his original release on the \$5000 bail I'm going
16 to increase the bail to \$15,000, which I believe to be a reasonable amount of bail to
17 insure that he understands the seriousness of not contacting the victims and
18 complying with all of his Court appearances as well as so that balanced approach of
19 protecting the community as well as making sure that the bail is reasonable and not
20 punitive pursuant to the most recent case law from Nevada Supreme Court. So the
21 bail will be \$15,000 cash asurity.

22 MR. MERBACK: Your Honor, we also request in our motion that there also
23 be a condition high-level electronic monitoring as part of the release. We're going to
24 continue to request that as well.

25 THE COURT: And I do believe that that is appropriate under the

1 circumstances particularly given the confusion about where he's living and some of
2 the issues that related to the phone calls as well as the medical conditions, so I will
3 order high-level monitoring.

4 Now, Mr. Houston, no more phone calls. That's what you got you back into
5 custody. I know you're having a tough time. I know you got a lot of things to do but
6 is the number one thing, no phone calls and talk to Mr. Little in his office, okay?

7 THE DEFENDANT: All right.

8 THE COURT: If you get out again.

9 MR. MERBACK: We need to set this for sentencing now, Your Honor, or do
10 we already have a sentencing date of November 29th?

11 THE COURT: We have a sentencing date of November 29th.

12 MR. LITTLE: We do. I also filed a motion so somebody could look at his
13 possible - -

14 THE COURT: I'm going to get to that in just a minute.

15 MR. LITTLE: Understood.

16 THE COURT: So that would take care of everything from the State's
17 perspective on the motion.

18 MR. MERBACK: That's correct, Your Honor.

19 THE COURT: Now, Mr. Little, in conversations with Mr. Houston you have
20 indicated that he wishes to investigate and potentially file a motion to withdraw his
21 guilty plea and that in that context he may be claiming ineffective assistance of
22 counsel, is that correct?

23 MR. LITTLE: In my conversations with him he stated that he wanted to
24 withdraw his guilty plea, and I do not know what the best grounds to withdraw his
25 guilty plea would be but one of those could be ineffective assistance of counsel. And

1 he'd be forfeiting that argument if I was assess {inaudible} withdraw the guilty plea.

2 THE COURT: And I'm going to ask the clerk for the department, does Judge
3 Jones normally at this stage appoint independent counsel to interview the defendant
4 and make a determination about whether or not the defendant wishes to withdraw
5 his guilty plea is the normal course for this department?

6 THE CLERK: Yes.

7 THE COURT: Then that's what we will do. We'll appoint you a separate
8 attorney to talk to you, Mr. Houston, solely for the purpose of determining whether or
9 not you wish to proceed with the negotiations or you wish to withdraw your guilty
10 plea and if so determine if there are any grounds to file such a motion.

11 So what we're going to do is we'll set a status check to confirm counsel. I
12 assume there is a list of the next up for appointment.

13 THE CLERK: That would be Mr. Goldstein.

14 THE COURT: Mr. Goldstein will be the attorney appointed solely for the
15 purpose of the motion to withdraw at this point in time. Mr. Little remains your
16 attorney on the underlying case until such time as Mr. Goldstein has had a chance
17 to talk to you about the guilty plea issue. We'll set this for next week. Is that enough
18 time for confirmation? Is that the normal time that Judge Jones would use? Very
19 well. We'll set a status check for confirmation of counsel on the motion to withdraw
20 next week.

21 THE CLERK: November 1st at 8:30.

22 MR. LITTLE: Thanks, Your Honor.

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25 (Proceedings concluded at 9:04 a.m.)

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ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video
proceedings in the above-entitled case to the best of my ability.

Victoria W. Boyd

1-9-23

Victoria W. Boyd
Court Recorder/Transcriber

Date



1 RTRAN

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5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 STATE OF NEVADA,

9 Plaintiff,

10 vs.

11 MATTHEW HOUSTON,

12 Defendant.

CASE NO. C-21-357927-1
DEPT. 10

13
14 ***BEFORE THE HONORABLE TIERRA JONES, DISTRICT COURT JUDGE***

15 ***MONDAY, DECEMBER 6, 2021***
16 ***RECORDER'S TRANSCRIPT RE:***
17 ***SENTENCING***

18 APPEARANCES:

19 For the State:

KRISTINA RHOADES, Esq.
Chief Deputy District Attorney

20
21 For the Defendant:

BERNARD LITTLE, Esq.
Public Defender

22
23
24
25 RECORDED BY: VICTORIA BOYD, COURT RECORDER

1 Las Vegas, Nevada, Monday, December 6, 2021 at 8:46 a.m.

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4 THE COURT: C357927, State of Nevada v. Matthew Houston. May the
5 record reflect that he is present in custody. Mr. Goldstein is here on his behalf. Mr.
6 Goldstein, can we get your bar number?

7 MR. GOLDSTEIN: 7721.

8 THE COURT: Ms. Rhoades is here on behalf of the State. Ms. Rhoades, can
9 we get your bar number?

10 MS. RHOADES: 12480.

11 THE COURT: And, Mr. Houston, it's my understanding that you no longer
12 wish to go forward with attempting to withdraw your plea, is that correct?

13 THE DEFENDANT: Correct, Your Honor.

14 THE COURT: So you would like to proceed to sentencing today?

15 THE DEFENDANT: Yes.

16 THE COURT: So Mr. Goldstein was appointed for the limited purposes of
17 looking into whether there was a legal basis for you to withdraw your plea so I am - -
18 is your victim here?

19 MS, RHOADES: I believe they are both on Blue Jeans, Your Honor.
20 Rosemarie McMorris is here, Your Honor. She is one and then Redenta Blacic.

21 THE COURT: So what I'm going to do is trail this. I'm going to get some of
22 these people out of here. Mr. Goldstein will be allowed to withdraw as the attorney
23 of record. Mr. Little, are you prepared to confirm for the purpose of sentencing?

24 MR. LITTLE: Yes, Your Honor. Bernard Little. Bar Number 12025.

25 THE COURT: Okay. So the public defender has confirmed for the purpose of

1 sentencing.

2 Mr. Little, I'm going to trail this because we have victim speakers so I'll come
3 back to you guys.

4 MR. GOLDSTEIN: Thank you, Your Honor.

5 MR. LITTLE: Understood.

6 (Matter trailed at 8:48 a.m.)

7 (Matter recalled at 9:41 a.m.)

8 THE COURT: Let the record that Mr. Houston is present in custody. Mr. Little
9 is here on his behalf and Ms. Rhoades is here on behalf of the State. This is the
10 date and time set for sentencing. Are both parties prepared to go forward?

11 MS. RHOADES: Yes, Your Honor.

12 MR. LITTLE: Your Honor, I am with the one caveat. I have an application to
13 co-occurring drug Court in, haven't heard back from them but my understanding is
14 my client wishes to go forward today as does the State and the victims, so I believe
15 we're prepared to go forward today.

16 THE COURT: All right. State, since he did bench warrant in this case you
17 have the right to argue.

18 MS. RHOADES: Thank you, Your Honor. And then I would just ask that the
19 two victim speakers be able to speak last pursuant to statute.

20 THE COURT: Pursuant to statute they will speak last.

21 MS. RHOADES: Thank you. Just for the record we also have the right to
22 argue because of the violation of the guilty plea, which is the State's biggest concern
23 here, and I do have the voicemail that was provided to the Court with that motion to
24 remand him after he was out of custody, because I think it's important to talk about
25 the negotiations in this case.

1 THE COURT: It is.

2 MS, RHOADES: He pled to a felony and I worked with Mr. Little, and we
3 worked with him and he made me aware of his mental health issues and things like
4 that, and so I spoke with the victims and we agreed that this higher felony with
5 probation and him having an opportunity to be supervised and have no contact with
6 them would be appropriate in this case based on what he was doing. And then he
7 had the incentive further of even a drop down if he was successful and if he, you
8 know, remained abiding by the no contact orders with the three victims in this case.
9 Everybody was in agreement with that. Mr. Little and I talked very much about this
10 case down in Justice Court and he worked for this negotiation for his client. His
11 client was released and I mean no less than 30 days was he out that he's calling the
12 same people that are specifically named in the guilty plea that he is not to contact.
13 And so that is very concerning for the State. He has shown the Court that he's not
14 going to follow the Court's orders. He has shown the Court that he's not going to
15 abide by what he agreed to do.

16 The original threats in this case are very concerning to one of the victims he
17 called and said he was going to go on a mass shooting like one committed on
18 October 1. So this is all about his workmen's compensation that was being litigated
19 essentially. It has been closed in such that a check has been issued to him. The
20 check was issued on October 7th so six days after the October 1 voicemail that I am
21 going to play for the Court because it's one thing to say the words that he was
22 saying to these people, but it's a whole other thing to actually hear the anger in the
23 defendant's voice, the threats that he made in that voicemail after he was released
24 on low level electronic monitor with an order to have no contact with these people.

25 The other threats that were made prior to this voicemail to Rose Marie was

1 that - - my computer just - - I'm going to have to restart that, Your Honor, I'm sorry. I
2 had it up all morning,

3 He threatened her daughters. She actually has two daughters and she has
4 no idea how this man knew about the daughters that he was threatening. I mean he
5 threatened to kill and rape her daughters. Yes, these are words but I mean it
6 appears he has some way of knowing the background and the personal information
7 of these people that he's dealing with.

8 So back to the check, Ms. McMorris is the highest authority there at the
9 company she works for and she actually had to cut the check before - - she had to
10 sign off on it before it going out for him so there's an argument there, well, now that
11 this has been decided and the check has been cut that he's not going to be a
12 problem for them. But that's not true. I've talked to her extensively. They have a
13 lifetime - - for the rest of his life he can come back re-litigate this issue of what they
14 provided, what the check was, and he will always have to have contact with Ms.
15 McMorris, who is the authority over there. So she has a temporary protective order.
16 That has been extended. She had one in place against him while this case was
17 pending and she thought it was very mysterious I guess that the day the TPO
18 expired was October 1, the day that he called Jonathan Shockley, another named
19 victim in the GPA, and threatened him and threatened Rosemarie McMorris,
20 indicating that he knew where she was. Now he knows who that is, calling her a
21 bitch and all sorts of other derogatory, angry, aggressive, threatening terms that he
22 used in that voicemail. So she was very concerned about that.

23 Yes, he has mental health issues but he's also knows what he's doing, shown
24 by his prior actions and another concerning thing for the State is this November 22,
25 so this was after he was back in custody and remanded the report that Mr. Little

1 provided, the reporter says his personality testing revealed him to have a style that
2 involves a degree of dangerousness, risk taking and a tendency to be rather
3 impulsive. So that is concerning for the State, and I think he's been given a chance.
4 He's been given a chance to show this Court that he is a candidate for community
5 supervision. He's been given a chance by this Court to show that he can abide by
6 the orders and not have contact with them and basically thrown it in everybody's
7 face.

8 Looking at his history he has a prior probation that was revoked, a felony DUI
9 Court from 2016, and then he has 2021 a conviction for threatening phone call and
10 harassment so he has been through this before. In 2010 he's got a Washington
11 violation of protection order as well. And, yes, those are all things that the State
12 knew about when we came to these negotiations but that is also why we had it the
13 way that it was and it was strict and supposed to be beneficial for him. Yes, he
14 probably needs mental health treatment but he is not in a position to get it right now,
15 and I think to protect the safety of the community that he should be sent to prison.
16 The minimum term here is two years. I'm asking for that minimum term but a longer
17 back end so a 2-8 year prison sentence. And I do want to end with this voicemail,
18 Your Honor. And for the record this is the voicemail that was provided on the motion
19 to remand from the October - - it was made on October 1, 2021, to Mr. Jonathan
20 Shockley.

21 (Voicemail played.)

22 MS. RHOADES: And based on that, Your Honor, that is what we're asking for
23 a 2-8 prison sentence. I have 93 days credit for time served. The PSI was incorrect.

24 THE COURT: How many days?

25 MS. RHOADES: 93 days is what I have.

1 THE COURT: All right. Mr. Houston, what if anything do you want to say
2 before I pronounce sentence against you?

3 THE DEFENDANT: Nothing, Judge.

4 THE COURT: Mr. Little.

5 MR. LITTLE: And, Your Honor, first off as the State said this all kind of stems
6 from worker's comp case. My client fell from 45 feet in the air while working a
7 construction site, smashed his skull and that's why the Court can see he has a
8 deformity on the left-hand side of his face. He's also blind in that eye legally right
9 now. It also unfortunately caused traumatic brain injury which is where most of his
10 mental health issues originate from. It also caused the worker's comp case that the
11 State is talking about where he unfortunately had to contact these people, and
12 nothing I'm going to say is demeaning or belittling the pain of the victims, the fear
13 that they had from his words, but they are as the State said just words.

14 I understand but with mentally ill people it is an illness. It is a sickness. It is
15 not something that they control. It is not a gun that they intended to point at
16 somebody. It is not an intentional act and in the law we recognize intent, we
17 recognize mens rea and actus reus. We recognize a difference from somebody who
18 intends to harm, threaten or hurt somebody else, choking them, hitting them, injuring
19 them versus somebody who can't control what they are doing because of traumatic
20 brain injury, which Mr. Houston most definitely has. That caused unfortunately
21 these issues he has with these people that are working his case. You know, just on
22 a personal level you and I, Judge, are more experienced with this stuff because a lot
23 of our clients, a lot of criminal defendants have mental health issues, not many that
24 are caused by a physical injury where their skull is crushed into their brain which
25 causes the damage and causes them to act radically. But we have lots of

1 experience with this.

2 I mean within two or three years of having this job I had to inquire what the
3 policy is with the public defender's office because of death threats because it's a
4 reality of the job that we do. It's something that happens unfortunately with our
5 clients who have mental health issues. There is nothing in the discovery or the
6 State has that says that my client had the actual ability or plan to act out on these
7 threats. There is no act in furtherance that he had other than puffery, sticking out
8 his chest and talking with his chest to some people that he in his mental state
9 viewed threatened him or compromised his ability to live. It's definitely worth the
10 punishment we agreed to. Whether it's worth prison, I think the prison argument is
11 missing the forest through the trees.

12 As the State said Mr. Houston is going to have the right to compete with his
13 legal claims as far as his injuries because it's a lifetime injury, and so he has open
14 green light in order to file claims for his lifetime injuries that he's going to suffer with.
15 And so what person are we going to have that are filing those claims, that have a
16 legal reason to contact people who work with worker's comp? Do we want
17 somebody who has had no mental health treatment, no supervision and just been
18 sent to prison for 2-8 years and only had interaction with other prisoners and other
19 people of that ilk, and then that person is then contacting worker's compensations
20 organizations and government organizations in order to get their claim through. I
21 think that is much more dangerous, much more not in the victim's best interest than
22 it is to have somebody supervised, somebody getting medical care and medical
23 treatment, somebody who is going through therapy and has an outlet to say these
24 things.

25 I've received numerous letters from Mr. Houston and he's - - I, as his counsel

1 I believe during this litigation has been the kind of outlet for him to get those feelings
2 out. We've talked about whether he means what he says or whether he's just
3 venting and he's said to me I'm just venting, I'm just frustrated, I don't mean what I
4 say. And, yeah, I gave the Court the assessment from Dr. Slagel. It says that he
5 has impulse control issues. It says that he has voices that he hears. He's got
6 legitimate mental health issues. It doesn't rise to the level of competency but he
7 certainly is mitigation as far as his intent whether he's controlling what he says and
8 what he does. And those people need help. They don't need prison because then
9 they are put in a situation that is traumatic for anybody, for healthy people, for me,
10 for anybody that is put in there made worse, made sicker and then put back on the
11 streets and we expect them to be better. That's not a realistic expectation to have
12 with Mr. Houston if you put him in a situation where he's in prison. He's subject to
13 more trauma, more things that are going to make his mental health issues worse
14 and then put him back on the streets and expect him to be a fine, upstanding citizen.
15 That's just not realistic and that's not what is going to happen.

16 I have attempted with my social worker to get him into mental health court.
17 Unfortunately because his symptoms of mental health are physically related from his
18 traumatic brain injury he was denied because they don't take TBO cases. In patient
19 for mental health same thing. We discussed and I noticed that he had the prior DUI
20 so I thought that could be an end roads to get him into treatment for substance
21 abuse for in-patient and co-occurring Court but that didn't happen until November
22 27th from my discussions with my social worker and so we don't have answers on
23 that yet, but prison - - clients say all the time and it's the worst argument ever, prison
24 isn't going to do anything for them because the Court isn't really concerned for them
25 at that point. I am concerned about the victims. I am concerned about him being a

1 recidivist and I genuinely believe that prison is only going to enhance and amplify
2 the odds of that happening. I think the only way we get ahold of that and the way
3 we stop it from happening further, because he has legal right to file, he has
4 continuing injuries. Those injuries are going to get worse and more severe over the
5 duration of his life, I think the only way we get ahold of that and stop that from
6 happening especially in this case is going to be some sort of treatment and some
7 sort of supervision.

8 I would ask that the Court sentence him to probation under the original deal. I
9 understand that he sent a voicemail to the victim while he was out. So I understand
10 that the drop down is forfeit. It's gone. He's going to be sentenced under the felony
11 with some time {inaudible} but I would ask for probation. If the Court sees fit to wait
12 on the answer from co-occurring drug Court that would be my ask is that we see if
13 we can get him some help, get him into Co-Occurring Drug Court but either way I
14 think the only way that we make the community safer is probation in this case and
15 not prison.

16 THE COURT: Okay. Thank you very much. State, who would you like to go
17 first?

18 MS. RHOADES: Your Honor, I show Rosemarie McMorris on there so I will
19 call her. I don't see Ms. Glasick so I would call Ms. McMorris first.

20 THE COURT: Ms. McMorris, can you hear me?

21 MS. MCMORRIS: Yes, can you hear me?

22 THE COURT: I can. If you could just raise your right hand so the clerk can
23 swear you in.

24 (ROSEMARIE MCMORRIS SWORN.)

25 THE COURT: And, ma'am, what would you like to tell me today?

1 MS. MCMORRIS: I actually wrote it out so is it okay if I just read it?

2 THE COURT: Sure.

3 MS. MCMORRIS: In July of 2020 I was forwarded a voicemail message
4 where Mr. Houston not only threatened to kill Jonathan Shockley and his family but
5 every employee or anyone who ever muttered the word Sedgwick. To protect
6 Jonathan specifically and the colleagues that work for me I filed a police report. Our
7 company hired a security detail for Jonathan, his supervisor, Diann Ferrante and my
8 homes to keep our families safe. Correspondence was also issued to Mr. Houston
9 advising he would need to cease all verbal communication and only communicate
10 with Sedgwick in writing. As there was no activity at our homes or near the
11 Sedgwick office I let my guard down. Big mistake. As Mr. Houston made contact
12 with me direct on June 11th, 2021, and did so on a very personal level. Just two
13 days prior my neighbor asked if I had noticed someone sitting in a car watching our
14 houses. My husband mentioned the same and said the man was watching our
15 daughters run around the yard, so he walked toward the car and the guy just drove
16 off.

17 Due to the pandemic we have been working from home. To do so phone calls
18 are routed through my cell phone. I tried to get the call to go through my air pod but
19 it could not connect so it was on speaker when I received a call from Mr. Houston
20 who stated I know where you live, I will rape and murder you and your two
21 daughters. Sorry. My mother and her personal care assistant were in the kitchen
22 and overheard the threat. I heard a gasp from the other room then retreated inside
23 myself. Naturally the scenario with my neighbor has been replayed in my head. I
24 could not help but to wonder how could he be so specific as to state two daughters.
25 So personal and state two daughters. They are three and four years old. Why would

1 he say rape and murder? I was stunned and silent. He proceeded to curse and call
2 me out of my name but I honestly can't recall verbatim what was said before the line
3 disconnect because I was paralyzed with fear {inaudible}.

4 I literally have lost sleep due to nightmares as I fear the inability to protect my
5 children and potentially my disabled mother who is in a wheelchair. Due to the
6 career I have chosen, the career that provides for them which has also placed them
7 in harm's way. Mr. Houston told my senior-vice president that he feared speaking to
8 anyone in Sedgwick because he had been arrested and understood the plea
9 agreement and the protective order that was in place when they spoke in August,
10 yet the prior protector order expired on September 30th, 2021. And on October 1st,
11 2021 he called and left another threatening voicemail message. My fear is that if he
12 is given probation as indicated in the plea agreement he will not abide by it and my
13 children will not be safe, this is my life's work. I've been in worker's comp for over
14 20 years. Mr. Houston has lifetime reopening rights in Nevada as claims do not
15 settle full and final medically for worker's comp in Nevada. And I am the operations
16 manager in Nevada so unless I change careers I and my family will be exposed to
17 him given the residency and licensing requirements of worker's comp in Nevada.
18 Without Mr. Houston facing the consequences for his actions he will be sent the
19 message that his behavior may continue and my children will not be safe from him.
20 Thank you.

21 THE COURT: Thank you, ma'am, and thank you for being here.

22 State, do you have Redenta Blacic?

23 MS. RHOADES: I don't believe so. Ms. Radenta Blacic. I don't see here on
24 here, Your Honor.

25 THE COURT: All right. Well, I mean, Mr. Little, Mr. Houston, I mean I

1 understand and I do sympathize with the fact that there is some severe mental
2 health issues going on here. However this goes so much further than expressing
3 your frustrations. To be commenting about doing awful things to someone's children
4 based on what they do for a living is just downright offense. And then, Mr. Houston,
5 you were released from custody and you went right out and engaged in the same
6 behavior so the State is absolutely correct that you have demonstrated to me that
7 you have no intention of following any orders that I give to you if you were released
8 from custody.

9 In accordance with the laws of the State of Nevada, you're going to be
10 adjudicated guilty of aggravated stalking. In addition to the \$25 administrative
11 assessment fee, your DNA was taken in 2017 so it's waived. The \$3 DNA
12 assessment fee and the \$250 indigent defense fee, you're going to be sentenced to
13 24-96 months in the Nevada Department of Corrections and you have 93 days credit
14 for time served.

15 MS. RHOADES: Thank you.

16 THE COURT: Thank you, counsel.

17 (Proceedings concluded at 10:05 a.m.)
18

19 ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video
20 proceedings in the above-entitled case to the best of my ability.
21
22

23 *Victoria W. Boyd*

24 1-11-23

25 _____
Victoria W. Boyd
Court Recorder/Transcriber

Date



**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

May 11, 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: **Motion Consolidate**

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

MATTHEW TRAVIS HOUSTON, Plaintiff
VS.
BRIAN P. CLARK, CALVIN JOHNSON ETAL Defendant(s).

CLARK COUNTY, NEVADA
Case No. A-22-856372-C Dept. XX
and
Case No. A-22-853203-W Dept. 17

23. "GROUND ONE" WOP COUNT: 165
IN EFFECTIVE MD OF COUNSEL TOTAL APPROX: 2,752
(PETITIONER WAS FORCED TO FILE HIS Thursday Stamped by HDSP: 2/14/22
OWN DIRECT APPEAL BEING HELD BACK) Friday Stamped by USPS: 2/17/22

1 MATTHEW TRAVIS HOUSTON #703601 @ CLAC, paa: 92
2 # 1210652 @ NDOC - P.O. Box 650 - Indian Springs, NV 89070
3 EIGHTH JUDICIAL DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Matthew Travis Houston SEE Case # C-21-357927-1
7 Plaintiff/Appellant Dept # X
8 VS. BERNSTEIN & POISSON, LLP
9 STATE OF NEVADA ETAL
10 Defendant(s)

11 EMERGENCY MOTION TO CONSOLIDATE AND PRODUCE
12 PLAINTIFFS DIRECT APPEAL (3rd Circuit Certified)

13 ~~Notice of Appeal~~ ~~Dismissed~~ ~~Notice of Appeal~~ "Hearings(s) Requested"

14 Comes now, Plaintiff-in-ErroR: HOUSTON who

15 moves this Honorable Court to impose sanctions

16 upon officials not limited to T. Martinez, hereinafter Nancy Becker,

17 Michael P. Villanig, Magistrate DE la Garza, Robert Telles,

18 Scott Poisson, Brian P. Clark, Christopher Burk,

19 Erica Tash, Jason Barrios, Andrew S. Flahive, Alexis M. Duercker,

20 Daniel L. Schwartz, Sheriff Joe Lombardi, NDOC C/O RIP

21 Popolaukas and whomever else is to be called

22 by this court in the manifestation of justice to impose

23 the community of Las Vegas, Nevada and to ensure

24 plaintiff injured workers are properly compensated. THIS Motion

25 is made upon all papers, pleadings,

26 pleadings, documents on file and newly discovered

27 evidence to which this court has been attempting

28 attempting to keep hidden from the truth while

29 demonstrating nothing other than its inherent venality, its lack of concern

30 for the community and its complete disregard for the safety

31 and health of an honest and most accountable innocent citizen. This venality

32 has been further demonstrated by the collusion of individuals

33 and entities not limited to AMD LAW, PLLC, and Tamarla Pardukht

SEE STATEMENT OF FACTS:

STATEMENT OF FACTS: Kidnapped From his home

1
2 in Iowa, On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter "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. Dwagler. 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 CECB was intended so that he could
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J.
14 Woodard-Benard 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 #1248384A + #C1237802A; with the first being by J. Wood
19 in the EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-035713. Anthony M. Goldstein NEVER
20 visited. 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 harass, extort, threaten, or "aggravated stalk" any of the parties
29 involved in Mr. Houston's cases or any other individual or entity. In fact,
30 it is Mr. Houston who is the victim of crime. SEE ATTACHED INTERPRETING

KILLING MACHINE

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 Joe Jon became the first person ever executed in a gas chamber. Inside the small room, two wooden chairs with straps 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

was a small metal cage that would release a hydrocyanic acid gas, commercially known as cyanogen. The state spokesman insisted one would breathe by the condemned man would paralyze his lungs, displace the oxygen in his body and cause instant and painless death. Witnesses would hear any painful outcries.

Prior to the execution, the warden staged a rehearsal with a stray white cat and two kittens. He estimated the cat would be dead 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."

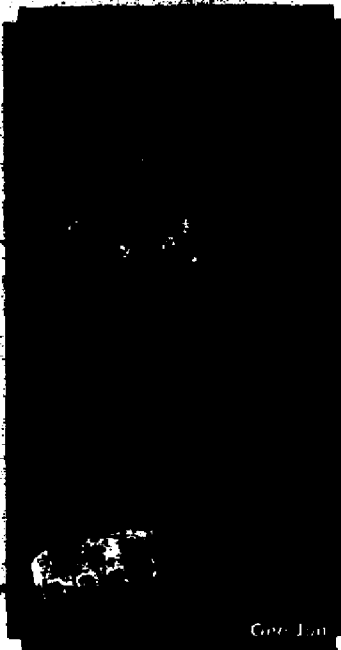
Eighteen days after Gee's death, in Munich, a right-wing radical named Adolf Hitler went on trial for his role in the failed Beer Hall Putsch. The previous year U.S. newspapers had reported on Hitler's extraordinary ability to sway crowds and his deep hatred of Jews, Communists, Bolsheviks and other enemies, as well as his embrace of the trapping 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 descendant 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

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.

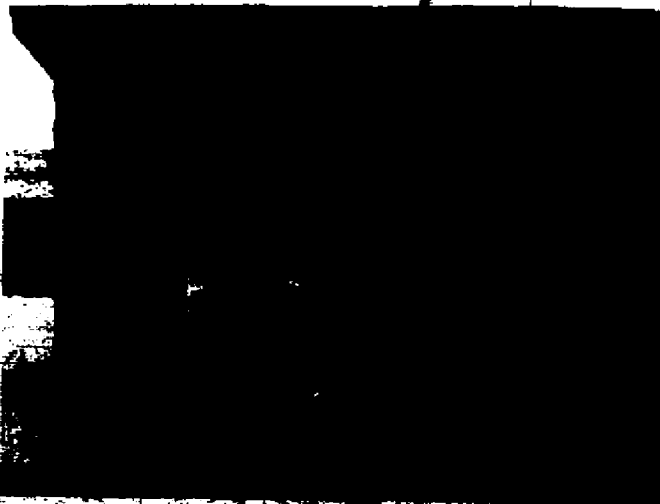
After being convicted and receiving a five-year sentence, Hitler began composing his own political creed, which he first titled *Mein Abrechnung* (Settling Accounts) but later changed to *Mein Kampf* (My Struggle). He wrote, "If at the beginning of the war and during the war, 12 or 15,000 of these Hebrew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



Gee's last

extermination—by starvation and even combat—of the red savages who could not be tamed by captivity." Hitler learned about the American enslavement

The Nevada gas chamber.



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, reporting prison conditions and methods of punishment. These visits were also widely reported in Germany and were reinforced by exclusive access to chemical compounds. After all, criminals cost their business.

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

cmecf@nvd.uscourts.gov <cmecf@nvd.uscourts.gov>

To: cmecfhelpdesk@nvd.uscourts.gov <cmecfhelpdesk@nvd.uscourts.gov>

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

2:22-cv-01607-APG

MINUTE ORDER IN CHAMBERS of the Honorable Magistrate Judge Daniel J. Albregts on 11/8/2022.

With good cause appearing, the Honorable Magistrate Judge Daniel J. Albregts recuses himself in this action. IT IS ORDERED that this action is referred to the Clerk for random reassignment of this case for all further proceedings.

(no image attached) (Copies have been distributed pursuant to the NEF - KL)

FILED
ENTERED
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Case 2:19-cv-01371-JAD-DJA Document 33 Filed 09/20/22 Page 1 of 17
COUNSEL PARTIES OF RECORD
SEP 20 2022
CLERK US DISTRICT COURT
DISTRICT OF NEVADA
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
DEPUTY
2:19-cv-01371-JAD-DJA
Case No. ~~2:19-cv-00441-JAD-DJA~~
- VALID REASON IN SUPPORTED GROUNDS
OF EMERGENCY INTERHEARINGS
OF FACTUAL MERIT AND
MOTION TO COMPEL IN-REGARDS TO
DISMISSAL FROM JUNE 26TH, 2020
(Please SEE EIGHTH JUDICIAL DISTRICT COURT NO. A.17.750861.C...)
Plaintiff moves this Honorable Court to read
the Las Vegas Review Journal ^{issued on or after} ~~from~~ September
30th, 2016, where the article by Jessica Gonzales
described a work accident that happened in the
ballroom area of the Mandalay Bay Resort and
Convention Center. In the interests of justice, Plaintiff requests subpoena of
All social media of "Matthew Travis Houston" and
e-mail(s) of the Plaintiff's "matthewtravishouston@
gmail.com", "matthoustonenterprises@gmail.com",
topdawghouston@gmail.com", "reverend matthew@
hotmail.com" and "houstonpresents@aol.com" in
an effort to preserve evidence, ^{for the} ~~in the~~ sake of justice.
To provide solid grounds ^{for this VALID argument(s)} ~~for this VALID argument(s)~~ of complaints,
and to illustrate to Jennifer A. Dorsey just
exactly how all cases (no 2:22-cv-00693-JAD-NJK) of Plaintiff
are ^{is} ~~is~~ directly related to the Golden Entertainment
litigations, Plaintiff moves for the attached valid reasons,
"PETITION FOR JUDICIAL REVIEW" and "RENEWED AND AMENDED
COMPLAINT OF MATTHEW TRAVIS HOUSTON" i. b. e. l. l. i. g. a. t. i. o. n. s.

✓ FILED ENTERED	Case 2:19-cv-01371-JAD-DJA Document 32 Filed 09/20/22 Page 1 of 16
RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD	
SEP 20 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	UNITED STATES DISTRICT COURT
BY 2 JAD DEPUTY	DISTRICT OF NEVADA - LAS VEGAS
3	
4	MATTHEW TRAVIS HOUSTON,
5	Plaintiff,
6	vs.
7	JERRY HOWELL, ET AL,
8	Defendants.
9	Case No. 2:19-cv-01371-JAD-DJA JOINDER: 2:22-cv-00699-JAD-NJK 2:21-cv-00499-JAD-DJA — EMERGENCY — NOTICE OF APPEAL TO THE 9TH CIRCUIT COURT OF APPEALS AND RESPONSE TO "ORDER" FROM CASE NUMBER 2:19-cv-01371, DOCUMENT 29 IN HER ABUSE OF DISCRETION AND ERRONEOUSNESS FROM AUGUST 26TH, 2022
10	
11	Plaintiff moves this court to recuse Jennifer
12	A. Dorsey from this case, especially because her
13	"opinion" stated on lines 12-13 on the one-page
14	order is nothing other than a bold-faced lie. She
15	obviously did not read the 17 pages of valid
16	reasons for the previous motion and requests if
17	her "opinion" was not a lie. Furthermore, there is
18	a conflict of interest regarding her interests and
19	"opinion" in the GOLDEN ENTERTAINMENT lawsuit,
20	especially because she has failed to respond to
21	Document 14 of Case Number 2:21-cv-00499-JAD-DJA,
22	neither has she responded to Documents 16 or 17, to
23	which were due on or before August 22nd, 2022 and
24	September 6th, 2022. YOU WILL NOW SEE EXHIBIT (1).
25	WHEREFORE, Plaintiff prays for both a CERTIFICATE
26	of APPEALABILITY and a new judge, on this 6th day
27	of September, 2022.
28	By: Matthew Travis Houston Matthew Travis Houston Attorney at Law

Case 2:21-cv-00499-JAD-DJA Document 45 Filed 12/05/22 Page 6 of 8

REVEREND MATTHEW TRAVIS HOUSTON, PRO SE
No 1210652
PO BOX 650
INDEPENDENCE, NV
89070

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Southern Division - Las Vegas

Case No. 2:22-cv-01607-APG-CSD and

Case No. 2:22-cv-01685-JAD-DJA

MATTHEW TRAVIS HOUSTON
Plaintiff

v.

JOE LOMBARDO, ET AL.,
Defendants.

EMERGENCY EX PARTE LETTER

OF MOTION INVOKING LOCAL RULE

LR IA 1-4 TO SET ASIDE LOCAL
RULES OF PRACTICE 1-1, 1-2 AND 26-7

Plaintiff compels this Court to examine the causation from the EIGHTH JUDICIAL DISTRICT COURT (EJDC) Case No. A-17-758861-G which has resulted in the meritorious counterclaim(s) and/or cross-claim(s) not limited to the above-titled litigation and other pleadings of the movant. For the interests of justice to prevail it is necessary that this Court invoke Local Rule: LR IA 1-4. Suspension or Waiver of These Rules so that the insured party, that being the Plaintiff, Matthew Travis Houston, may finally be awarded both compensatory and punitive damages.

This Court will take notice of 28 USC § 455 Code of Conduct for United States Judges, Canon 3(C)(1) as the impartiality of both Jennifer A. Dorsey and Daniel J. Albright has been reasonably questioned, they both shall recuse from the above entitled and numbered case.

In support of this motion is the attached 'EXHIBIT 1' *

Page 1 of 50 *eFiled as Document 15 in
Case No. 2:22-cv-01685-JAD-DJA

(Nature of Suit: 190, 360, 370, 380, 550, 555, 890 and 950)

Revised 10/25/2022

1 REVEREND MATTHEW TRAVIS HOUSTON
2 AMERICAN BAR ASSOCIATION MEMBER No. 04662784
3 NDOC No. 1210652
4 PO Box 660
5 INDIAN SPRINGS, NV 89070-0650

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA
8 Southern Division - Las Vegas

9 MATTHEW TRAVIS HOUSTON,
10 Plaintiff,

11 v.

12 SHERIFF JOE LAMBARDO, ET AL,
13 Defendants.

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

Case No. 2:22-cv-01685-JAD-DJA

EX PARTE LETTER OF MOTION
AS A BINDING TO ALL CASES
OF THE PLAINTIFF
(SEE 2:22-cv-01740-APG-DJA)
"de novo hearing requested"

14 THIS HONORABLE COURT WILL PLEASE TAKE NOTICE
15 of the attached EXHIBITS^{*} A, B, C and D, in an effort
16 to remind Magistrate Daniel J. Albrights of 28 USC §
17 455 Code of Conduct for United States Judges, Canon
18 3(c)(1) as this is multidistrict litigation involving cases
19 not limited to C22-0122-LTS in the UNITED STATES DISTRICT
20 COURT FOR THE NORTHERN DISTRICT OF IOWA - CEDAR
21 RAPIDS DIVISION and HIS EASTERN DIVISION, and its direct
22 relation to Houston v. Golden Entertainment, et al Case No.
23 2:21-cv-00499-JAD-DJA and also the most recently filed
24 Case No. 2:22-cv-01740-CDS-EJY. PLEASE DO NOT STRIKE.

25 What with there being so many recusals of Magistrates
26 in this case, the Plaintiff's theory of the Defendant-Respondents
27 conspiring against him is further validated and meritorious, eh DJ Alpha?
28 "SUPPLEMENTED" — Page 1 of 61 — PLEASE SEE ATTACHED —

(Nature of Suit: 190, 290, 360, 362, 370, 380, 550, 660, 950)

* EXHIBITS were Revised 10/20/2022 Retroactive 9/30/2016,
were added into Case No. 2:22-cv-01685 as Document 14

SEE Case 2:22-cv-01285-MMD-VCF Document 12

FILED	2022	Page 1 of 1	RECEIVED
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COUNSEL PARTIES OF RECORD			
AUG 31 2022			
CLERK OF DISTRICT COURT			
DISTRICT OF NEVADA			
BY <u>LCF</u> DEPUTY			

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MATTHEW TRAVIS HOUSTON,
Plaintiff-in-Error & Petitioner-
appellant,

v.

CALVIN JOHNSON, ET AL AND
THE DEEP STATE OF NEVADA

Defendant-respondents.

Case No. 2:22-cv-01285-MMD-VCF

NOTICE OF APPEAL TO
JUDGEMENT FROM AUGUST 16TH,
2022 AND EMERGENCY MOTION
TO VACATE DISMISSAL FROM
AUGUST 16TH, 2022

"de novo hearing requested"

Petitioner-appellant-Plaintiff-in-Error moves this court to read the MEMORANDUM that was eFiled from HOSP on August 22nd, 2022 so that the mistakes that were made in the court of Jennifer A. Dorsey in case number 2:22-cv-00693-JAD-NJK are not repeated. NOTILE OF APPEAL TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT entered this 17th day of August, 2022. Petitioner should be granted a leave and the proper form(s).

Petitioner-appellant-Plaintiff-in-Error has attached a receipt Informal Grievance (Doc 3091 and x2 Doc 3097) of three (3) total pages that are worthy of serious attention as is the MEMORANDUM, as any competent jurist would find the MEMO. to be merited.

JOINDER OF MOTION: x Matthew Travis Houston

2:19-cv-01360-RFB-VCF
2:19-cv-01475-GMN-EJY
2:19-cv-01740-APG-BNW
2:19-cv-01371-JAD-DJA
2:19-cv-01478-APG-DJA
2:21-cv-00499-JAD-DJA

MATTHEW TRAVIS HOUSTON, LTD.
ABA No. 04662784
NDOC No. 1210652 @ HOSP
22010 Cold Creek Road
PO Box 650
Indian Springs, NV 89070
P: (775) 526-3529 C: (610) 762-4143

REVEREND MATTHEW TRAVIS HOUSTON
ABA No. 04662784

1	UNITED STATES DISTRICT COURT	
2	DISTRICT OF NEVADA	
3	MATTHEW TRAVIS HOUSTON,	Case No. 2:22-cv-01607-APG-CSD
4	Plaintiff-Petitioner,	JOINDER No. 2:19-cv-01472-APG-DJA and
5		Case No. 2:22-cv-01285-MMD
6	V. JOE LOMBARDO,	RESPONSE TO DOCUMENT 33 (FILED
7	THE DEEP STATE OF NEVADA and	10/14/22 IN Case 2:19-cv-01472-APG-DJA)
8	CALVIN JOHNSON, ET AL,	MEMORANDUM
9	Defendant-Respondent(s)	"AKA"
10		ANOTHER
11		"MIRANDA-MEMO-RAN-DAMNED"
12	EMERGENCY MOTION TO REOPEN CASE FROM OCTOBER	
13	26TH, AS AN EX PARTE RESPONSE TO DOCUMENT	
14	33 AND ORDER OF MAGISTRATE DANIEL J. ALBRECHTS	
15	REQUESTING HIS RECUSAL IN HONOR	
16	Sir, your failure to respond to Document 26 and Document	
17	27 constitute a judicial DEFAULT, especially as you represent the	
18	government and its obvious interference with my meritorious	
19	claims of damages. Sir Document 26 was filed on SEPTEMBER	
20	8, 2022 to which a response was due by SEPTEMBER 22ND,	
21	2022. To this current date of OCTOBER 22ND, 2022, the	
22	DISTRICT OF NEVADA OF THE UNITED STATES DISTRICT COURT is	
23	negligent, as is your fraudulent ORDER from OCTOBER 14TH, 2022,	
24	as you have ignored the grounds presented from Document 26 and	
25	Document 27. It seems that again you are going out of your	
26	way to hold the blindfold on Our Lady Justice, as you did in	
27	other valid pleadings of Plaintiff v. Joe Lombardo (SEE 2:22-cv-	
28	01607-APG-DJA) and Matthew Travis Houston v. GOLDEN	
29	ENTERTAINMENT, ET AL (SEE 2:21-cv-00499-JAD-DJA).	
30	Page 1 of 2 (9 including EXHIBIT 1)*	
31	(Nature & Suit: 360, 362, 370, 380, 540, 550, 890 and 950)	
32	Revised October 19, 2022	

SEE Case 2:21-cv-00499-JAD-DJA Document 45 Filed 12/05/22 Page 4 of 8

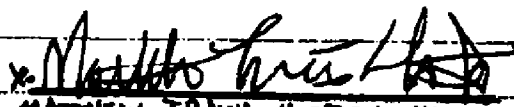
1 UNITED STATES MAGISTRATE JUDGE DANIEL J.
 2 ALBRECHTS: You are to recuse from Case
 3 Number 2:22-cv-01685-JAD-DJA as well as Case
 4 Number 2:22-cv-01607-APG-DJA, Case Number
 5 2:22-cv-00499-JAD-DJA. Plaintiff has valid
 6 reason to believe that not any of his cases are
 7 being randomly assigned as this Court will now
 8 please examine the history of all complaints filed by
 9 Matthew Travis Houston, an innocent, honest and
 10 accountable man, requesting only decency and in his
 11 pursuit of justice.

12 Please provide Plaintiff with ONE complete copy
 13 of the CODE OF JUDICIAL CONDUCT and the address
 14 the Nevada Commission On Judicial Discipline.

15 This Court will now PLEASE TAKE NOTICE of the
 16 attached EXHIBIT I*, to aid in the elaboration of
 17 grounds resulting from the negligence of the
 18 Defendants not limited to the EIGHTH JUDICIAL
 19 DISTRICT COURT (E.D.C.) Case Number A-17-758861-G.

20 WHEREFORE, Plaintiff prays that Daniel J. Albrights
 21 corrects his grammatical error from Page 1, LINE 15, Document
 22 53 before he recuses himself in Case No. 2:19-cv-01472.
 23 * = eFiled as 'Document 34'

24 DATED: OCTOBER 14, 2022

25 
 26 MATTHEW TRAVIS HOUSTON, CHTD
 27 ABA No. 04662884

28 Page 2 of 2 (9 including EXHIBIT I)

(Nature of Suit: 360, 362, 370, 380, 540, 550, 890 and 950)

Revised September 30, 2022

RECEIVED
 CASE 2:22-cv-01740-JAD-EJY Document 20 Filed 12/12/22 Page 1 of 8
 ABA No. 04662784
 12106520 HDSP
 P.O. Box 650
 Indian Springs, NV
 89070-0650

FILED
 RECEIVED
 SERVED ON
 COUNSEL PARTIES OF RECORD
 DEC 05 2022
 CLERK US DISTRICT COURT
 DISTRICT OF NEVADA

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA
 Southern Division
 Case No. 2:22-cv-01740-JAD-EJY
 Case No. 2:22-cv-01740-JAD-EJY

MATTHEW TRAVIS HOUSTON,
 Plaintiff,
 V.
 JOE LOMBARDO;
 GOLDEN ENTERTAINMENT, ET AL.,
 Defendant(s).

EX PARTE LETTER OF MOTION
 TO UNITED STATES MAGISTRATE JUDGE
 DANIEL J. ALBRECHTS
 SEE EDC No. A-17-758861-C

As this is response to Judge Albright's Order from September 29th, 2022, Plaintiff must remind and provide clarification to this Honorable Court in an effort to preserve justice and obtain reparations so that compensation will finally be made to the Plaintiff for ALL of the damages he has sustained and endured most unwillingly and unnecessarily, retroactively from September 30th, 2016 having woken from coma and other injuries in 2022. It is for this valid and meritorious reason that litigation in the above-entitled case may appear/look to the court as ~~being~~ unworthy of serious attention, especially as looks can be deceiving.

FIRST AND FOREMOST, is this reminder to Magistrate Albrights that the LAW OFFICES OF MATTHEW TRAVIS HOUSTON, LTD in Iowa City, Iowa were destroyed by derecho storm the Maquoketa, Iowa branch of the office at 1009 Cardinal Dr, Maquoketa, IA, 52060, and by unidentified agents in Iowa City: 435 S. Linn Street, #927-52240.

Page 1 of 28 (30)

(Nature of Suit: 140, 360, 370, 380 and 950)

Revised September 30, 2022

1 In response to Magistrate Albright's "Document 30";
2 Page 1, lines 2-4; SEE Document 22-1 "CIVIL RIGHTS
3 COMPLAINT BY AN INMATE" filed 9-16-2022. The
4 court will also be reminded of "Document 31",
5 filed October 5th, 2021, as an "APPLICATION FOR
6 LEAVE TO PROCEED IN FORMA PAUPERIS" and was 8 pages;
7 DOCUMENT 22, DOCUMENT 28 and DOCUMENT 29. Also,
8 as Case Number 2:21-cv-00499-JAD-DJA is directly
9 related to 2:22-cv-00693-JAD-NJK, this Honorable
10 Court will be further reminded of "DOCUMENT No. 1"
11 filed 4/25/2022 in 2:22-cv-00693-JAD-NJK.

12 While we are on the subject of case relation and
13 its causation, the Court will also be reminded of No.
14 2:22-cv-01685-APG-VCF and its "Document No. 1",
15 entered and filed on October 5th, 2022; and case
16 number 2:22-cv-01607-APG-DJA, "Document No. 8"
17 filed 9/28/2022; "Document No. 9" filed 10/3/2022
18 and entered on 10/5/2022 and "Document No. 10"
19 filed and entered on 10/6/2022.

20 To provide Magistrate Albright with further background
21 of the case, Plaintiff has attached documents substantial
22 to furthering continuation of the screening process, which
23 is most considering the fact that a majority of the
24 Defendant-Respondent(s) have been in a status of DEFAULT
25 since before September 30th, 2016. PLEASE SEE ATTACHED;
26 eFiling(s) in cv 00499, Page 2 of 28 (30) titled 'Document 33',
27 (Nature of Suit: 190, 360, 370, 380 and 450)

28 Revised September 30, 2022

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA 2:22-cv-01685-JAD
3 REVEREND 2:22-cv-01607-APG-DJA
4 MATTHEW TRAVIS HOUSTON, Case No. 2:21-cv-00499-JAD-DJA
5 Plaintiff-Petitioner, 2:22-cv-01285-MMD-YCF
6 v. "de novo requested" EX PARTE
7 L.V.M.P.D., JOE LOMBARDO, LETTER OF MOTION (NOW SEE EJDG #A-17-758861-C
8 GOLDEN ENTERTAINMENT AND AND — MEMORANDUM — IN 2:22 cv-01285
9 CALVIN JOHNSON, ET AL, "NOT STRIKEN" AKA FROM CASE No. 2:22-cv-
10 Defendant(s) Respondent(s) 01285: PREVIOUSLY FILED AS DOCUMENT No. 7
11 "MIRANDA-MEMO-RAN-DAMNED"
12 ON 08/22/2022
13
14 EMERGENCY EX PARTE LETTER OF MOTION TO US
15 DISTRICT COURT MAGISTRATE DANIEL J. ALBRECHTS AND IN
16 RESPONSE TO ORDER FROM OCTOBER 7TH, 2022 (DOCUMENT 11)
17 AND MOTION TO STAY ALL DOCUMENTS IN ALL CASES
18 OF REVEREND MATTHEW TRAVIS HOUSTON
19
20 For Plaintiff has renewed his OATH to the
21 UNITED STATES NAVY RETROACTIVELY FROM ON OR BEFORE
22 June 6th, 2002. Do NOT strike a single further
23 document of a single note I write Mr. Albrights. You
24 and Jennifer A. Dorsey are to immediately recuse
25 yourselves from ALL cases of Matthew Travis Houston as
26 the result of intentional gross negligence in the "form" of
27 JUDICIAL MISCONDUCT.
28 — SEE EXHIBIT 1 — (P.18) e filed.
29 This Court will now keep and read all documents of
30 the SURVIVOR OF ONE OCTOBER, 2017 and way too many
31 other disasters and tragedy not limited to this notorious case,
32 by temporarily setting aside LOCAL RULES OF PRACTICE 1-1, 1-2 and 26-7.
33 // SEE ATTACHED NAMING OF DEFENDANTS.

OBJ in Case Number 2:22-cv-01780-ART-DJA

SEE Case 2:22-cv-01748-JAD-EJY Document 16 Filed 11/11/22 Page 4 of 6

EMERGENCY JOINDER OF ACCOUNTABILITY AND A
RETROACTIVE JOINDER OF APPEAL TO CONSOLIDATE MY
WILL RENEWED CAVEAT THIS 15TH DAY OF OCTOBER, 2022; ON A

" NEVADA DEPARTMENT OF CORRECTIONS

GRIEVANT'S STATEMENT CONTINUATION FORM " AS AN

EMERGENCY MOT. TO REUSE "DJA" aka DANIEL J. ALBRECHTS

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

UNITED STATES DISTRICT COURT-DISTRICT OF NEVADA-LEVEL 666 OF
INSTITUTION: OF WRONGFUL CONVICTIONS UNIT #: MAXIMUM SECURITY

JOINDER OF EXHONORATION W/ EXHAUSTED
GRIEVANCE #: CONSOLIDATION " GRIEVANCE LEVEL: EMERGENCY

GRIEVANT'S STATEMENT CONTINUATION: PG. (8) Page 1 OF (15) Page 1

AS RESULT OF THE JUDICIAL NEGLIGENCE OF MY

PERSON AND PROPERTY, AND THE NEGLIGENCE OF MY
ESTATE BY NUMEROUS OTHER INDIVIDUALS AND ENTITIES,

I HAVE BEEN FORCED AGAINST MY WILL TO ADD

MAGISTRATE DANIEL J. ALBRECHTS AS A DEFENDANT

IN MY MERITORIOUS AND VALID CLAIMS OF DAMAGES

NOT LIMITED TO, THAT OF APPEAL DEPRIVATION.

THE COURT WILL AGAIN TAKE NOTICE OF THIS VALID

RENEWAL OF MY OATH ON OR AROUND JUNE 6TH,

2002, TO WHICH IS CLASSIFIED SUPER TOP SECRET

RETROACTIVELY, VIA THE UNITED STATES NAVY DEP./RET.

1-04-08. FROM MY PROFESSIONAL AND PERSONAL EXPERIENCE

WITH DANIEL J. ALBRECHTS, OF THE U.S. DISTRICT COURT-

SOUTHERN DIVISION OF LAS VEGAS, NEVADA, HE SHALL TAKE

NOTICE OF THE MOST NEGLIGENCEFUL DEFENDANT, RESPONDENT

NUMBER 92) JENNIFER A. DORSEY TO TAKE HIS RIGHTFUL TITLE

Original:

Attached to Grievance

Pink:

Inmate's Copy

OF UNLUCKY NUMBER 93-
NINETY-THREE = D.J. ALPHA*

* = THIS NOTICE OF DEMAND IS RETROACTIVE FROM WELL
BEFORE SEPTEMBER 30TH, 2016. NOW SEE
CODE OF JUDICIAL CONDUCT MR. ALBRECHTS.

Case Number 2:22-cv-01780-ART-DJA DOC-3097 (01/02)



**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

INMATE CORRESPONDENCE

May 26, 2023

Re: C-21-357927-1 / Department 17

State of Nevada

vs

Matthew Houston, Defendant

- ☐ A court order is required to complete the request.
- ☒ Documents are sealed. Court order is required to reproduce. (PSI)
- ☐ Documents requested are not in court file at this time.
- ☐ Transcripts have not been filed. Court order required.
- ☐ Copies are \$.50 per page or by court order.
- ☐ Consult your law library for this information.
- ☐ District Court does/does not show any outstanding District Court warrants under the above referenced defendant name.
- ☐ Other:

Cordially yours,
DC Criminal Desk #48
Deputy Clerk of the Court

C-21-357927-1
LSF
Left Side Filing
5034253



MATTHEW TRAVIS HOUSTON
V. Plaintiff - In Error
THE STATE OF NEVADA ET AL Case No. C-21-357927-1
Department No. 17

EMERGENCY LETTER OF MOTION-REQUEST FOR DOCUMENTS
(ON A NEVADA DEPARTMENT OF CORRECTIONS
GRIEVANT'S STATEMENT CONTINUATION FORM)

" HEARING REQUESTED "

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

INSTITUTION: HDSP UNIT #: 4-D-39

EJDC CASE / A-17-758861-C GRIEVANCE LEVEL: EXHAUSTED

(JOINDER OF APPEAL / JOINDER OF MOTION)

GRIEVANT'S STATEMENT CONTINUATION: PG. 1 OF 5

To the Law Clerk of Department 17 of the EJDC:
(and also Law Clerk of the COURT OF APPEALS
OF THE STATE OF NEVADA) -

I have attached a copy of the most
recent case summary that I have, dated
October 07, 2022, with the items circled and
outlined in pink highlighter. I am requesting
these items, to which is a total of 19 items:
Index No.(s): 4, 11(PSI), 13, 14, 23, 24, 26, 27,
37, 38, 39, 40, 44, 45, 46, 47, and 48.

The documents are required so that I may
properly litigate both my post-conviction proceedings
AND my personal injury claims from over 6 years
ago: September 20, 2016, and September 30, 2016.

Please SEE ATTACHED outline:

Original: Attached to Grievance
Pink: Inmate's Copy
- AND STATEMENT OF FACTS IN THE SUPREME
COURT OF NEVADA -

May 13, 2023 -

x. Matthew Travis Houston

REV. MATTHEW TRAVIS HOUSTON, CHD
AB/892. 04662784 @ DOC - 3097 (01/02)

CLERK OF THE COURT

MAY 17 2023

RECEIVED

CASE SUMMARY **CASE NO. C-21-357927-1**

	Party: Plaintiff State of Nevada [3] Information	
08/04/2021	 Reporters Transcript [4] Transcript of Hearing Held on August 2, 2021	Index #4
08/04/2021	 Guilty Plea Agreement Party: Defendant Houston, Matthew [5] Guilty Plea Agreement	Index #5
10/05/2021	 Motion to Withdraw As Counsel Filed By: Defendant Houston, Matthew [6] Motion to Withdraw as Attorney of Record and Appoint Alternate Counsel in Order for Defendant to Withdraw His Guilty Plea	Index #6
10/05/2021	 Notice of Motion [7] 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; Hearing Requested	Index #7
10/08/2021	 Notice Filed By: Plaintiff State of Nevada [8] State's Notice of Manual Filing of Exhibit 1 for 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	Index #8
10/12/2021	 Bench Warrant [9] Bench Warrant	Index #9
10/12/2021	 Bench Warrant Return [66] Bench Warrant Return (Redacted)	Index #66
10/18/2021	 Bench Warrant Return [10] Bench Warrant Return (Unredacted) (Confidential)	Index #10
11/02/2021	 PSI [11] Presentence Investigation Report (Unfiled) Confidential	Index #11
12/08/2021	 Judgment of Conviction [12] Judgment of Conviction (Plea of Guilty)	Index #12
01/03/2022	 Motion to Dismiss Counsel Party: Defendant Houston, Matthew [13] Motion to Dismiss Counsel; Requesting Order Setting Hearing	Index #13
01/18/2022	Case Reassigned to Department 11 From Judge Tierra Jones to Judge Ellie Roohani	
01/26/2022	 Verification Filed by: Defendant Houston, Matthew [14] Verification of Providing Discovery Materials to Defendant	Index #14
02/01/2022	 Order [15] Order Granting in Part, Denying in Part Defendant's Pro Per Motion to Dismiss Counsel	Index #15

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY

CASE NO. C-21-357927-1

02/18/2022	Notice of Appeal (Criminal) [16] Direct Appeal "de Novo" Hearing Requested	Index #16
02/22/2022	Case Appeal Statement [17] Case Appeal Statement	Index #17
03/15/2022	Motion [19] Emergency Motion to Oppose Remand and Dismiss Case in It's Entirety.	Index #19
03/29/2022	Notice of Appeal (Criminal) Party: Defendant Houston, Matthew [20] Emergency Notice of Appeal to and Response to "Order Granting in Party, Denying in Part Defendant's Pro Per Motion to Dismiss Counsel" from 2/1/2022.; Part II of Personal Restraint Petition	Index #20
03/30/2022	Case Appeal Statement [21] Case Appeal Statement	Index #21
03/31/2022	Motion Filed By: Defendant Houston, Matthew [22] Notice of Motion and Motion for Transcripts at State Expense	Index #22
04/02/2022	Memorandum of Points and Authorities [23] Memorandum of Points and Authorities in Support of Request for Transcripts at State Expense	Index #23
04/02/2022	Motion [24] Emergency Motion for an Order to Suppress Hearing from December 6, 2021. "de Novo Hearing Requested"	Index #24
04/06/2022	Motion Filed By: Defendant Houston, Matthew [26] Emergency Motion Requesting Hearing, De Novo, and Release to Intensive Supervision; Hearing Requested; Jury Trial Demanded	Index #26
04/13/2022	Motion Filed By: Defendant Houston, Matthew [27] Emergency Motion to Withdraw Plea; Hearing Requested; Jury-Trial Demanded; Joinder to: A-17-758861-C	Index #27
04/15/2022	Order [28] 2 Day Expedited Order for Transcript	Index #28
04/18/2022	Recorders Transcript of Hearing [29] Transcript of Hearing Held on August 4, 2021	Index #29
04/18/2022	Motion [30] Motion for an Order to Appear by Phone or Video and Notice of Motion	Index #30
04/18/2022	Opposition to Motion Filed By: Defendant Houston, Matthew [31] Emergency Opposition to "Guilty Plea Agreement" and Motion to Suppress Document Filed on August 4th, 2021. "de Novo Hearing Requested"	Index #31

CASE SUMMARY
CASE NO. C-21-357927-1

04/19/2022	 Opposition to Motion [32] State's Opposition to Petitioner's Emergency Motion for an Order to Suppress Hearing from December 6, 2021	Index #32
04/21/2022	 Opposition to Motion [33] State's Opposition to Defendant's Emergency Motion to Withdraw Plea	Index #33
04/26/2022	 Order [34] Order for Transcript	Index #34
04/28/2022	 Motion Filed By: Defendant Houston, Matthew [35] Motion and Order for Transportation of Inmate for Court Appearance or, in the Alternative, for Appearance by Telephone or Video Conference	Index #35
05/03/2022	 NV Supreme Court Clerks Certificate/Judgment - Dismissed [36] Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Dismissed; Rehearing Denied	Index #36
05/04/2022	 Motion to Compel Filed By: Defendant Houston, Matthew [37] Emergency Interpleadings and Motion to Compel in re January 3rd 2022 December 27, 2021 as Renewed Request for de Novo in Order to Reset Time for Notice to the Court of Appeals and Proper Notice of Appeal to the Supreme Court of Nevada; "do Novo Hearing Requested"	Index #37
05/04/2022	 Motion for Order Filed By: Defendant Houston, Matthew [38] Emergency Motion for an Order to Suppress Criminal Complaint Filed April 26th, 2021; "Suppression Hearing Requested"	Index #38
05/04/2022	 Motion for Order Filed By: Defendant Houston, Matthew [39] Emergency Motion for an Order to Suppress and Notice of Demand as Result of Incurred Emotional Distress; "Hearing Request; Joinder to: A-17-758861-C C-21-357927-1, CR21019840 C-17-323614-1, CR033713, 21P01275, C1248384A and C1237802A (Case Number 21P01950)	Index #39
05/06/2022	 Petition Filed by: Defendant Houston, Matthew [40] Personal Restraint Petition and Continued Petition for a Writ of Habeas Corpus, and Motion for Production of Complete Case Transcripts; "Requesting an Order to Appear"	Index #40
05/10/2022	 Order Denying Motion [41] Order Denying Defendant's All Pending Motions	Index #41
05/11/2022	 Motion Filed By: Defendant Houston, Matthew [42] Motion and Order for Transportation of Inmate for Court Appearance or, in the Alternative, for Appearance by Telephone or Video Conference	Index #42
05/11/2022	 Notice of Motion Filed By: Defendant Houston, Matthew [43] Notice of Motion	Index #43

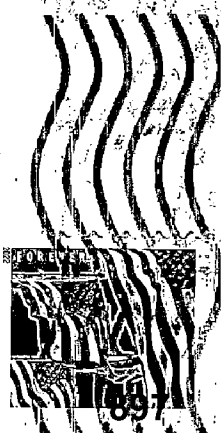
CASE SUMMARY **CASE NO. C-21-357927-1**

05/16/2022	 <u>Recorders Transcript of Hearing</u> [44] Transcript of Hearing Held on December 6, 2021	Index #44
05/19/2022	 <u>Motion to Strike</u> Filed By: Defendant Houston, Matthew [45] Emergency Motion to Strike from the Record "Information" File August 3rd, 2021; "Suppression Hearing Requested" and a "de Novo Hearing Requested"	Index #45
05/19/2022	 <u>Motion</u> Filed By: Defendant Houston, Matthew [46] Emergency Motion for the Production of All Exculpatory Evidence Being Withheld by the Prosecution, "Hearing Requested"	Index #46
05/25/2022	 <u>Motion for Appointment of Attorney</u> Filed By: Defendant Houston, Matthew [47] "Motion for the Appointment of Ozzy Fumo (of Counsel) to Act as Standby" Most Not Preferably Alexis Plunkett(s) Christopher Burk Jason Barrus and Erica Tosh, Daniel Schwartz, Lina Sakalauskas and "Klie" from Scott Poisson, et al" Request for Evidentiary Hearing in Each of the above Case Numbers	Index #47
05/25/2022	 <u>Motion to Withdraw Plea</u> Filed By: Defendant Houston, Matthew [48] Renewed Motion to Withdraw Plea	Index #48
06/02/2022	 <u>Order Denying Motion</u> [49] Order Denying Defendant's Pending Motions	Index #49
06/02/2022	 <u>Order for Production of Inmate</u> [50] Order for Production of Inmate Matthew Travis Houston, BAC #1210652	Index #50
06/09/2022	 <u>Motion</u> Filed By: Defendant Houston, Matthew [51] Motion and Order for Transportation of Inmate for Court Appearance or, in the Alternative, for Appearance by Telephone or Video Conference	Index #51
06/09/2022	 <u>Objection</u> Filed By: Defendant Houston, Matthew [52] Objection to Taleen R. Pandukht	Index #52
06/10/2022	 <u>Petition</u> Filed by: Defendant Houston, Matthew [53] Petition for Judicial Review; "Order to Appear is Requested" as is "Hearing Requested"	Index #53
06/14/2022	 <u>Notice of Appeal (Criminal)</u> [54] Preliminary Opposition and Notice of Formal Objection to Any Sort of Vexatious Litigant Order, Notice of Appeal and Any Other Sort of Chicanery Kristina Rhoads Tries to Conjure Up from the Demons of Injustice; "de Novo Requested"	Index #54
06/15/2022	 <u>Motion</u> Filed By: Defendant Houston, Matthew [55] Motion to Obtain a Copy of a Sealed Record (Presentence Investigation Report - NRS 176.156) on an Order Shortening time; Notice of Motion and Motion	Index #55
06/16/2022	 <u>Case Appeal Statement</u>	Index #56

REV. MATTHEW TRAVIS HOUSTON CHTD
NDOL No. 1200652
PO BOX 650
Indian Springs, NV 89070-0650

LAS VEGAS NV 890

15 MAY 2023 PM 5 L



PO BOX 551601

EIGHTH JUDICIAL DISTRICT COURT
Attn=Law Clerk of Department 17

200 Lewis Avenue
Las Vegas, NV

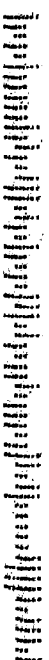
89155-1601

Case No. C-21-357927-1

#MET00

ABA No. 04662784

89101-630000



1 REV. MATTHEW TRAVIS HOUSTON, LHTB

2 Petitioner/In Propria Persona

3 Post Office Box ~~200, 8000~~ 650

4 Indian Springs, Nevada 89070 - 0650

5 NDCC No. 1210652

6 ABA No. 04662784

FILED

JUN 06 2023

Alan J. Blum
CLERK OF COURT

7
8 IN THE EIGHTH JUDICIAL DISTRICT COURT OF
9 THE STATE OF NEVADA IN AND FOR THE
10 COUNTY OF CLARK

11 THE STATE OF NEVADA,

12 Plaintiff,

13 vs.

14 MATTHEW TRAVIS HOUSTON,

15 Defendant,

Case No. C-21-357927-1

Dept. No. 17

16 MOTION TO WITHDRAW COUNSEL

17 "HEARING REQUESTED"

18 Date of Hearing: _____

June 27, 2023

9:00 AM

19 Time of Hearing: _____

20 "ORAL ARGUMENT REQUESTED, Yes ☒ No _____

21 COMES NOW, Defendant, Matthew Travis Houston, proceeding in proper
22 person, moves this Honorable Court for an ORDER Granting him permission to withdraw his
23 present counsel of record in the proceeding action, namely, Alexis M. Duecker dba
24 AMD LAW, PLLC -SDS CHARTERED

25 This Motion is made and based on all papers and pleadings on file with the Clerk of the Court
26 which are hereby incorporated by this reference, the Points and Authorities herein, and attached
27 ~~Affidavit of Defendant~~ Declaration of Defendant, as a 'STATEMENT OF FACTS':

28 DATED: this 24 day of May, 2023.

BY: *Matthew Travis Houston*
REV. MATTHEW TRAVIS HOUSTON, CARD# 1210652
Defendant/In Propria Personam

RECEIVED
MAY 30 2023
CLERK OF THE COURT

STATEMENT OF FACTS: Kidnapped from his home in

1
2. Iowa City, On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter ^{"Plaintiff-in-Error/"} ~~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 CCHC was intended so that he could
13 search for, and hopefully, retrieve his service animals. However, the now-dismissed counsel, J. Wood
14 and Benard 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 #1248334A + #1237802A; with the first being by J. Wood

19. in the EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-033713. ^{Anthony M. Goldstein /} Alexis M. Duecker NEVER
20. ^{visited} 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 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, neither did he act aggressively
30 towards any other individual, business ~~899~~ entity. Mr. Houston is a victim of crimes. ②

WHY TO DISMISS COUNSEL

AMD LAW - Alexis M. Duecker

#1. I still have not been provided any transcripts to any of my cases. EJDC appointed her just to stall the process of my obtainment of freedom and justice. Never provided a PSI -

#2. Who is SMS CHARTERED? SOS CHARTERED
(warm springs address)

#3. Why Sahara address?

#4. Why was my mail returned from her Sahara Ave. address?

#5. Why surprised un-announced visit Nov. 10, 2022, causing rioting and my trip to the infirmary?

#6. Why 2nd surprise visit w/ DR BAILEY?

#7. I have not been provided any further records of A-22-853203-W, which is error because I'd requested STANDBY COUNSEL, not attorney of record. So where's Emily Strand? Where's my retired social security judge in Des Moines? Why have I still not been informed of who the mystery visitor was from November 10, 2022?

SEE ALSO Case No. 2:22-cv-01740-JAD-EJY Doc. 21, 04/24/2023 P. 117/278

(HAND-DRAWN COPY - SEE PREVIOUS MOTION AND

Case 2:22-cv-00031-RFB-DJA Document 10 Filed 01/24/23 P. 7 of 19

NAME: Matthew Travis Houston, #1210652

HIGH DESERT STATE PRISON
P.O. BOX 650
INDIAN SPRINGS, NEVADA 89018

DATE: January 20th, 2023

TO: ALEXIS M. DUECKER

SDS CHARTERED

AMO LAW, PLLC

340 East Warm Springs Road, Ste No. 110

Las Vegas, NV 89119

SUBJECT: TERMINATION OF COUNSEL/TRANSFER OF RECORDS

CASE NO.: A-22-853203-W

DEPT. NO.: 10 → 11 → 17

CASE NAME: Houston v. Johnson et al

Please be advised that from this date forward, your authority as Attorney of Record in the above-stated action is hereby terminated. All of the professional relations of Attorney and Client do hereby cease.

Please enter your withdrawal from this action with the Court immediately.

Pursuant to NRS 7.055, I respectfully request that you deliver to me, forthwith, all documents, papers, pleadings and tangible personal property that is in your possession that relates to the above-named action.

Your prompt attention to this request is genuinely appreciated.

Respectfully,

Matthew Travis Houston

REV. MATTHEW TRAVIS HOUSTON, CHTD

NDOC No. 1210652 @ HDSP

ABA No. 04662784

22010 Cold Creek Road

Po Box 650

Indian Springs, NV

89070-0650

1 POINTS AND AUTHORITIES

2 The Nevada Revised Statute 7.055(1), which deals with the duty of a discharged attorney, states:

3 "An attorney who has been discharged by his client shall, upon demand and payment of the fee due from
4 the client, immediately deliver to the client all papers, documents, pleadings and items of tangible property
which belong to or were prepared for that client."

5 As can be seen in this case, the defendant does not owe any fees, in fact, they, meaning counsel(s)
6 of record, were appointed by the Court to represent the defendant, who was an indigent, in Case
7 Number, A-22-853203-W, in Department No. 11, now Department 17.

8 N.R.S. 7.055(2) gives this Court the power to Order the Attorney(s) of record to produce and
9 deliver to the defendant in his/her possession, which states:

10 "A client who, after demand therefore and payment of the fee due from him, does not receive from his
11 discharged attorney all papers, documents, pleadings and items of tangible personal property may, by
12 a motion filed after at least 5 days' notice to the attorney, obtain an order for the production of his papers,
Documents, pleadings and other property."

13 In numerous cases throughout this great land, the courts have held attorneys to a high degree of
14 professional responsibility and integrity. This carried from the time of hiring to and through the
15 attorney's termination of employment.

16 Supreme Court Rule 173 states quite clear that a withdrawn attorney owes his former client a
17 prompt accounting of all his client's . . . property in his possession." This is echoed in Canon 2 of
18 the Code of Professional Responsibility of the American Bar Association, which states in pertinent
19 part EC 2-32: "A lawyer should protect the welfare of his client by . . . delivering to the client all
20 papers and property to which the client is entitled." Again in Disciplinary Rule 2-110(A)(2) of the
21 ABA, this is brought out that a withdrawn attorney must deliver to the client all papers and comply with
22 applicable laws on the subject.

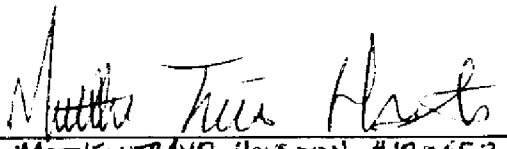
23 In the cases of In Re Yount, 93 Ariz. 322, 380 P.2d 780 (1963) and State v. Alvey, 215 Kan. 460,
24 524 P.2d 747 (1974), both of which dealt with a factual situation involving a withdrawn attorney
25 refusing to deliver to a former client his documents after being requested to do so by the client. The
26 court in Yount, supra, ordered the attorney disbarred while in Alvey, supra, the court had the attorney
27 censured.

1 While not the intention of the Defendant in this case to have the attorney disbarred, these cases do
2 show a pattern in the court in considering the refusal to deliver to a former client all his documents
3 and property after being requested to do so, a serious infraction of the law and of professional ethics.
4 See, In Re Sullivan, 212 Kan. 233, 510 P.2d 1199 (1973).

5 In summary, this court has jurisdiction through NRS 7.055 to Order the attorney(s) to produce and
6 deliver to the Defendant all documents and personal property in his/their possession belonging to him
7 or prepared for him. The Defendant has fulfilled his obligations in trying to obtain the papers. The
8 attorney(s) is in discord with Cannon 2 of the Code of Professional responsibility and the Nevada
9 Supreme Court Rules 173, 176 and 203.

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DATED: this 24 day of May, 2023.

BY: 
REV. MATTHEW TRAVIS HOUSTON #1210052
Defendant/In Propria Personam

1 **POINTS AND AUTHORITIES**

2 NRS 7.055 states in pertinent part:

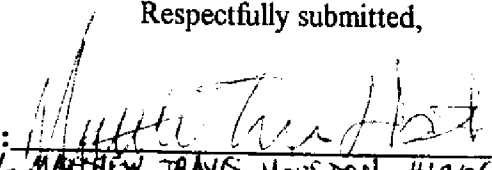
- 3 1. An attorney who has been discharged by his client shall upon demand and payment of the fee
4 due from the client, immediately deliver to the client all papers, documents, pleadings and items
5 of tangible personal property which belong to or were prepared for that client.
- 6 2. . . . If the court finds that an attorney has, without just cause, refused or neglected to obey its
7 order given under this section, the court may, after notice and fine or imprison him until the
8 contempt purged. If the court finds that the attorney has, without just cause, withheld the
9 client's papers, documents, pleadings, or other property, the attorney is liable for costs and
10 attorney's fees.

11 Counsel in the above-entitled case was court-appointed due to Defendant's indigence. Defendant
12 does not owe counsel any fees.

13 **WHEREFORE**, Defendant prays this Honorable Court, Grant his Motion to Withdraw Counsel
14 and that counsel deliver to Defendant all papers, documents, pleadings, discovery and any other
15 tangible property which belong to or were prepared for the Defendant to allow Defendant the proper
16 assistance that is needed to insure that justice is served.

17 **DATED:** this 24 day of May, 2023.

18 Respectfully submitted,

19 **BY:** 
20 REV. MATTHEW TRAVIS HOUSTON #124652
21 Defendant /In Propria Personam
22 Post Office Box 650 [HDSP]
23 Indian Springs, Nevada 89018
24
25
26
27
28

CERTIFICATE OF SERVICE BY MAILING

I, Matthew Travis Houston, hereby certify, pursuant to NRCP 5(b), that on this 24
day of May, 2023, I mailed a true and correct copy of the foregoing, "MOTION
TO WITHDRAW COUNSEL"

by depositing it in the High Desert State Prison, Legal Library, First-Class Postage, fully prepaid,
addressed as follows:

ESOC - Dept. 17
200 Lewis Ave.
Las Vegas, NV
89155

Alexis M. Duecker
SDS Chartered
340 East Warm Springs
Ste 110
Las Vegas, NV 89119

CC:FILE

DATED: this 24 day of May, 2023.

Matthew Travis Houston
REV. MATTHEW TRAVIS HOUSTON, CTD #1210652
Defendant /In Propria Personam
Post Office box 650 [HDSP]
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:
ABA No. 04662784

REV. MATTHEW TRAVIS HOBSTON, CATH

NDOC No. 1210652

HOSP

Pa Box 650

Indian Springs, NV 89070-0650

LAS VEGAS, NV 890

26 MAY 2023 PM 3 L



4/17

EIGHTH JUDICIAL DISTRICT COURT
CHAMBERS OF THE HON. JENNIFER SCHWARTZ
FWD: Department 17 Law Clerk
200 Lewis Avenue
Las Vegas, NV

C-21-357927-1

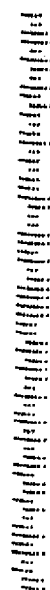
89155

Case No.

#METCO

ABA No. 04662784

89101-530000





**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

June 30, 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: Notice Of Motion And Motion For Modification Of Sentence

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 # 27
Deputy Clerk of the Court

1 REV. MATTHEW TRAVIS HOUSTON ID NO. 1210652

2 HIGH DESERT STATE PRISON

3 22010 COLD CREEK RD

4 P.O. BOX 650

5 INDIAN SPRINGS, NV. 89070

6 ABA No. 04662784

7 IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE
8 STATE OF NEVADA FOR THE COUNTY OF CLARK

9 State of Nevada dba STATE BAR OF NEVADA,

10 Plaintiff,

11 vs.

12 Matthew Travis Houston,

13 Defendant
14 (Plaintiff -in- Error)

Case No.: A-22-862155-C

Dept. No.: 27

Case No. C-21-357927-1

Dept. No. 17

Case No. C-17-323614-1

Dept. No. 19

15 NOTICE OF MOTION

16 MOTIONS FOR MODIFICATION OF SENTENCE

17 Comes now, Defendant, Matthew Houston, pro per, and respectfully moves this Honorable
18 Court for a Modification of Sentence.

19 This motion is made and based pursuant to the supporting Points and Authorities attached hereto,
20 NRS 176.555, as well as all papers, pleadings, and documents on file herein.

21 POINTS AND AUTHORITIES

22 I. STANDARD OF REVIEW

23 The Nevada Supreme Court has long recognized that Court's have the power and jurisdiction to
24 Modify a sentence, see, Staley v. State, 787 P2d 396, 106 Nev. 75 (1990):

25 ... "that if a sentencing court pronounces sentence within statutory limits, the court will have
26 jurisdiction to MODIFY, suspend or other wise correct that sentence if it is based upon materially
27 untrue assumptions or mistakes which work to the extreme detriment of the defendant".
28

1 Defendant believes that this court has, based upon Staley, the jurisdiction to MODIFY his
2 sentence, due to that sentence being pronounced based upon a Pre-Sentence Investigation Report which
3 did have several material facts in error, which will be discussed below in the statement of facts.

4 Respondent may argue that laches apply due to the fact that thee [3] years have passed since
5 sentence was pronounced. However, the Nevada Supreme Court held that such time requirement does not
6 apply to a request for Modification of Sentence, see, Passanisi v. State, 831 P2d 1371, 108 Nev. 318
7 (1995):
8

9 ... "we note that the trial court has inherent authority to correct a sentence at any time if such
10 sentence based on mistake of material fact that worked to the extreme detriment of the defendant.
11 (Citations Omitted). If the trial court has inherent authority to correct a sentence, a Fortiori, if has
12 the power to entertain a motion requesting it to exercise that inherent authority.... Thus, the time
13 limits and other restrictions with respect to a post-conviction relief do not apply to a Motion to
14 Modify a Sentence based on a claim that the sentence was illegal or was based on an untrue
15 assumption of the fact that amounted to denial of due process (Emphasis added) Id. 831 P2d at
16 1372n. 1. See also, Edwards v. State, 918 P2d 321, 324, 112 Nev. 704 (1996).

17 Defendant, as stated above, is alleging that his sentence by this Court was based upon
18 assumptions founded upon his Pre-Sentence Investigation Report (PSI) that had several factors in error,
19 and as such, his constitutional right to due process was violated. See, State v. District Court, 677 P2d
20 1044, 100 Nev. 90 (1984):

21 The district court's inherent authority to correct a judgment or sentence founded on mistake is in
22 accord with the constitutional considerations underlying the sentencing process. The United
23 States Supreme Court has expressly held that where a defendant is sentenced on the basis of
24 materially untrue assumptions concerning his criminal record, "(the) result whether caused by
25 carelessness or design, is inconsistent with due process of law". Townsend v. Burke, 736, 741,
26 68 S. Ct. 12552, 1255, 92 L. Ed. 1690 (1948). Further, the cases clearly established that
27 constitutionally Violate "materially untrue assumptions" concerning a criminal record may arise
28 either as a result of a sentencing judge's correct perception of misapprehension. (Emphasis in
29 original). Id. 677 P2d at 1048 n. 3.

30 Defendant would asks that this Court not perceive this request to be pointing the finger at the
31 Court and saying 'you were wrong' as that is not the case. Defendant is merely requesting that the Court
32 reconsider the sentence that was pronounced based upon mistakes of fact in the PSI report and at
33 sentencing.

STATEMENT OF FACTS: Kidnapped from his home in

1
2. **Iowa**, On July 14, 2021, MATTHEW TRAVIS HOUSTON (hereinafter ^{"Plaintiff-in-Error/..."} "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 Benard 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 #1248384A + #C1237802A; with the first being by J. Wood
19 in the EIGHTH JUDICIAL DISTRICT COURT 21-CR-019840 + 21-CR-033713. 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 wilful 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.

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CONCLUSION

WHEREFORE, all of the above stated reasons, Defendant respectfully requests this Honorable Court to Modify his/her Sentence in accordance with this Court's fair and just consideration of the facts of the case. Pursuant to Assembly Bill 271, the wrongfully convicted Defendant, now Plaintiff-in-Error, Matthew Travis Houston, should be credited a total of 292 days (40%) against the 2-5 years (24-60 month) of extensive incarceration.

Dated this 13~~14~~ day of May, 2023.

By: Matthew Travis Houston

REV. MATTHEW TRAVIS HOUSTON # ^{CMTD} 1210652
High Desert State Prison
22010 Cold Creek Rd.
P.O. Box 650
Indian Springs, NV. 89070
ABA No. 04662784

1 I, Matthew Travis Houston, certify that the foregoing "Motion For
2 Modification of Sentence", was served upon the Respondent pursuant to NRCP 5 (b), by placing same in
3 the United States Postal Service, postage being fully pre-paid, and addressed as follows:
4

5 PO Box 551601
6 EJDC Clerk of Courts, Dept. 17
7 19 and 27
8 200 Lewis Avenue
9 Las Vegas, NV 89155-
10 1601

PO Box 552212
District Attorney's Office
200 Lewis Avenue
Las Vegas, NV 89155-2212

11
12
13
14 Dated this 13 day of May, 2023.

15
16
17 By: [Signature]
18 REV. MATTHEW TRAVIS HOUSTON, #1210652
19 High Desert State Prison
20 22010 Cold Creek Rd.
21 P.O. Box 650
22 Indian Springs, NV. 89070
23 ABA No. 04662784
24 Defendant, In Proper Person
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REV. MATTHEW TRAVIS HOUSTON, CHTD

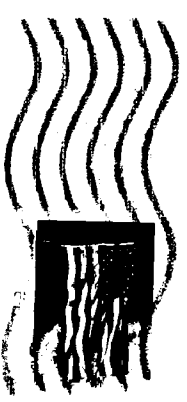
NOOC No. 1210652

Po Box 650

Indian Springs, NV 89070-0650

LAS VEGAS NV 890

15 MAY 2023 PM 3:1



Po Box 551601

EIGHTH JUDICIAL DISTRICT COURT
CHAMBERS OF THE HON. NANCY ALF
FWD. Department 27 Law Clerk

200 Lewis Avenue

Las Vegas, NV

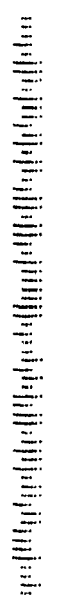
89155-1601

Case No. A-22-862155-C

#MET00

ABA No. 04662784

89101-630000



1 MOT

2 Petitioner/In Propria Persona, REV. MATTHEW TRAVIS HOUSTON, CHTD
3 Post Office Box 200, 6000 PO BOX 650, HDSP
Indian Springs, Nevada 89070
4 American Bar Association Member ID No. 04662784

5 IN THE EIGHTH JUDICIAL DISTRICT COURT OF
6 THE STATE OF NEVADA IN AND FOR THE
7 COUNTY OF CLARK

8 THE STATE OF NEVADA, }

9 Plaintiff,

10 vs.

11 MATTHEW TRAVIS HOUSTON, }

12 Defendant, aka,
"Plaintiff-in-Error". }

Case No. C-21-357927-1

Dept. No. 17

13 EMERGENCY MOTION TO COMPEL AN ANSWER FROM SDS CHARTERED AND
14 EMERGENCY MOTION TO WITHDRAW COUNSEL UNDER NRAP 27 E
15 AND 9TH.CIA.RULE.27-3 "HEARING REQUESTED"

Date of Hearing: _____

Time of Hearing: _____

17 'ORAL ARGUMENT REQUESTED, (Yes) X No _____"

18 COMES NOW, Defendant, Matthew Travis Houston, proceeding in proper
19 person, moves this Honorable Court for an ORDER Granting him permission to withdraw his
20 present counsel of record in the proceeding action, namely,

21 ALEXIS M. DVECKER, ESQ D/B/A AMD LAW, PLLC

22 This Motion is made and based on all papers and pleadings on file with the Clerk of the Court
23 which are hereby incorporated by this reference, the Points and Authorities herein, and attached
24 Declaration(s)
Affidavit of Defendant.

25 DATED: this 28 day of June, 2023.

26 BY: [Signature] True Host
27 REV. MATTHEW TRAVIS HOUSTON #1210652
28 Defendant/In Propria Personam @NDOC

[illegible]

"An attorney who has been discharged by his client shall, upon demand and payment of the fee due from the client, immediately deliver to the client all papers, documents, pleadings and items of tangible property which belong to or were prepared for that client."

N.R.S. 7.055(2) gives this Court the power to Order the Attorney(s) of record to produce and deliver to the defendant in his/her possession, which states:

“A client who, after demand therefore and payment of the fee due from him, does not receive from his discharged attorney all papers, documents, pleadings and items of tangible personal property may, by a motion filed after at least 5 days’ notice to the attorney, obtain an order for the production of his papers, Documents, pleadings and other property.”

In numerous cases throughout this great land, the courts have held attorneys to a high degree of professional responsibility and integrity. This carried from the time of hiring to and through the attorney's termination of employment.

Supreme Court Rule 173 states quite clear that a withdrawn attorney owes his former client a prompt accounting of all his client's . . . property in his possession." This is echoed in Canon 2 of the Code of Professional Responsibility of the American Bar Association, which states in pertinent part EC 2-32: "A lawyer should protect the welfare of his client by . . . delivering to the client all papers and property to which the client is entitled." Again in Disciplinary Rule 2-110(A)(2) of the Rules of Professional Conduct, this is brought out that a withdrawn attorney must deliver to the client all papers and comply with applicable laws on the subject.

in the cases of In Re Yount, 93 Ariz. 322, 380 P.2d 780 (1963) and State v. Alvey, 215 Kan. 460, P.2d 747 (1974), both of which dealt with a factual situation involving a withdrawn attorney refusing to deliver to a former client his documents after being requested to do so by the client. The court in Yount, supra, ordered the attorney disbarred while in Alvey, supra, the court had the attorney censured.

1 While not the intention of the Defendant in this case to have the attorney disbarred, these cases do
2 show a pattern in the court in considering the refusal to deliver to a former client all his documents
3 and property after being requested to do so, a serious infraction of the law and of professional ethics.
4 See, In Re Sullivan, 212 Kan. 233, 510 P.2d 1199 (1973).

5 In summary, this court has jurisdiction through NRS 7.055 to Order the attorney(s) to produce and
6 deliver to the Defendant all documents and personal property in his/their possession belonging to him
7 or prepared for him. The Defendant has fulfilled his obligations in trying to obtain the papers. The
8 attorney(s) is in discord with Cannon 2 of the Code of Professional responsibility and the Nevada
9 Supreme Court Rules 173, 176 and 203.

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11 DATED: this 26 day of June, 2023.

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BY: Matthew Travis Houston
REV. MATTHEW TRAVIS HOUSTON - NDOC# 1210652
Defendant/In Propria Personam

~~REV~~ ORDER

Petitioner/In Propria Persona, REV. MATTHEW TRAVIS HOUSTON, CHTD
~~Post Office Box 208, SDOG~~ PO Box 650, HDSP
Indian Springs, Nevada 89070
ABA No. 04662784

IN THE EIGHTH JUDICIAL DISTRICT COURT OF
THE STATE OF NEVADA IN AND FOR THE
COUNTY OF CLARK

THE STATE OF NEVADA,)

Plaintiff,)

vs.)

MATTHEW TRAVIS HOUSTON,)

Defendant, aka)
"Plaintiff-in-Error".)

Case No. C-21-357927-1

Dept. No. 17

ORDER

Upon reading the motion of defendant, Matthew Travis Houston, requesting
withdrawal of counsel, Alexis M. Duecker, Esq., of the Clark county Public
Defender's Office, and Good Cause Appearing,

IT IS HEREBY ORDERED that defendant's Motion for Withdrawal of Counsel is
GRANTED.

IT IS HEREBY FURTHER ORDERED that Counsel deliver to defendant at his address,
all documents, papers, pleadings, discovery and any other tangible property in the above-entitled
case.

DATED and DONE this ____ day of _____, 20__.

DISTRICT COURT JUDGE, THE HON.
JENNIFER L.S. SCHWARTZ

3-A

CERTIFICATE OF SERVICE BY MAILING

I, Matthew Travis Houston, hereby certify, pursuant to NRCP 5(b), that on this 28
day of June, 2023, I mailed a true and correct copy of the foregoing, "EMERGENCY
MOTION TO COMPEL AN ANSWER FROM SDS CHARTERED AND
EMERGENCY MOTION TO WITHDRAW COUNSEL UNDER
NRAP 27-E AND 9TH CIR. RULE 27-3
by placing document in a sealed pre-postage paid envelope and deposited said envelope in the
United State Mail addressed to the following:

LAW CLERK OF DEPT. 17
CHAMBERS OF THE HON.
JENNIFER M.S. SCHWARTZ
EDDC
200 Lewis Ave
Las Vegas, NV
89155

STATE BAR OF NEVADA
3100 W. Charleston Blvd
Suite 110
Las Vegas, NV
89102

Alexis M. Duecker, Esq
SDS CHARTERED
D/B/A SOFOS
340 E. Warm Springs Rd
Suite 110
Las Vegas, NV 89119

American Bar Association
1050 Connecticut Ave. NW
Suite 400
Washington, DC
20036

CC:FILE

DATED: this 28 day of June, 2023.

Matthew Travis Houston
REV. MATTHEW TRAVIS HOUSTON-NDC #1210652
Plaintiff-in-error/In Propria Personam
Post Office Box 208, S.D.C.C. P.O. Box 650, HDSP
Indian Springs, Nevada 89018 89070
IN FORMA PAUPERIS



**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

September 13, 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: **Motion To Withdraw Plea**

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

1 0203

2 Matthew Travis Houston, pro se
#1210652 & Hosp

3 American Bar Association [REDACTED] Member # [REDACTED]
PO Box 650

4 Indian Springs, NV 89070-0650

04662784

5 IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF

6 NEVADA IN AND FOR THE COUNTY OF CLARK

7 MATTHEW TRAVIS HOUSTON,
8 Plaintiff-in-Error,

v.

9 CALVIN JOHNSON ET AL,
10 defendant(s),

11 THE STATE OF NEVADA,
12 Plaintiff

v.

13 MATTHEW TRAVIS HOUSTON,
14 Defendant,

~~Petitioner-appellant and Plaintiff-in-Error.~~

CASE No. A-22-B53203-W

DEPARTMENT NO. 17

CASE NO. C-21-357927-1

DEPT. NO. XI

"RESET DE NOVO HEARING
FROM: June 15, 2022 "
8:00 AM

15 EMERGENCY [REDACTED] MOTION TO WITHDRAW PLEA UNDER NRCP 59 AND
16 NRCP 60 "HEARING REQUESTED"

COMES NOW, Defendant, Matthew Travis Houston, proceeding in proper

17 person, and moves this Honorable Court for an Order granting him permission to withdrawal 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 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 DEPT

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, Respectfully submitted,
24 he was too worried about the Matthew Travis Houston Defendant in Proper Person

25 guilty thief who stole my
26 identity in the court of the "SUBSTITUTE JUDGE",
27

30 whom has been identified as THE HON. NANCY BECKER.

CLERK OF THE COURT

SEP 11 2023

RECEIVED

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 wrongful conviction, including C-17-323674-1, A-17-758861-C, 21CR019840, 21CR033713, 21PD1275 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 addresses constitutes an additional 2 miscarriages of manifest injustice and 3 separate dereliction of duties after the double jeopardies of both C1248384A AND C1237802A.
So the question for "our bdy 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
oppose 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" and eleven GROUNDS OF MERITORIOUS INTERVENTION:

GROUND NUMBER ONE

23(a). ^{ONE} Ground ~~ONE~~: Ineffective aid of counsel due to the fact that
 Petitioner was forced to file his own DIRECT APPEAL
 after being hindered by numerous procedural errors and
 conflicts of interest as result of being provided misinformation.

Supporting FACTS (Tell your story briefly without citing cases or law.): See attached copy
 of 'DIRECT APPEAL' filed pro se, pages 1 - 12 specifically
 page No. 1 showing filing dates of February 17th and 18th of
 2022. Page 2 showing events of July 14th, July 15th and
 December 6th, 2021. Page No. 7 showing the events of December
 10th, 2021. Page No. 11 showing some of the results of
 Petitioner's rights being violated intentionally by law enforcement,
 the courts AND the prosecution. Upon the allegation by a
 defendant of insufficient performance by assigned counsel, the
 trial court has an obligation to hold a hearing on the record to
 establish if a true conflict exists. See *Young v. State*, 120 Nev. 963 (2004).
 Petitioner's now withdrawn attorney Benard Little was ineffective for
 knowing his client alleged a conflict of interest and failing to notify
 the court when he was mistakenly re-appointed to represent the
 Petitioner on December 6th, 2021. Nevada Rule of Professional Conduct 2.1
 "Advisor" reads: "In representing a client, a lawyer shall exercise independent
 professional judgement and render candid advice. In rendering advice, a
 lawyer may refer not only to law but to other considerations such as moral,
 economic, social and political factors that may be relevant to the
 client's situation." Both the Petitioner and Benard Little requested that
 counsel withdraw, alleging conflicts of interest. See *Young vs. State*, "the Court
 must conduct an inquiry into the alleged conflict(s), although the attorney -
 client privilege should not be invaded unless absolutely necessary."
 Petitioner was not granted a "YOUNG HEARING" thus violating his (Now See
 Page 6a)

1 Fourteenth Amendment right to due process of law and his Sixth
2 Amendment right to effective assistance of counsel.

8 Failure to execute motions: Florida Bar v. Martinez, 717
4 P.2d 1121 (NM 1986) violating ABA rule 4.3(c)(2) "for an attorney
5 to suppress motions where the circumstances indicated such
6 motions should be filed and executed constitutes ineffective
7 assistance of counsel." Benard Little neglected his duty in
8 representing the Petitioner when the original "EMERGENCY
9 MOTION TO OPPOSE REMAND AND DISMISS CASE IN ITS
10 ENTIRETY" was forwarded from Clerk's office to Clark County
11 Public Defenders office than a copy was mailed after the initial
12 pro se filing in October, 2021 not until four months later in
13 February, 2022 was the copy received by Petitioner after he had
14 already been wrongfully convicted and moved to High Desert
15 State Prison was Petitioner finally able to file a renewed
16 'MOTION TO DISMISS'. See People v. Rotenberg, 635 P.2d 220
17 (Colo 1981); Strickland v. Washington, 104 S. CT 2052 (1984).
18 By failing to keep both the court and his client informed
19 after repeated attempts by the Petitioner requesting information
20 and by requesting his own withdraw as counsel, Benard Little
21 violated Petitioner's Sixth and Fourteenth Amendment rights to
22 effective assistance of counsel and right to due process of
23 law. United States v. Stonberg, 805 F.2d 1391, 1394 (9th Cir. 1986).

BLIND / VISUALLY IMPAIRED

DECEMBER 17th, 2021

MDC
Name: MATTHEW TRAVIS HOUSTON CCDC
Address: 435 S. Linn St. #927
City/State/Zip: JOWA CITY, IA 52240
Phone: ask house counsel @ CCDC
D: PRO SE

FILED

JAN 03 2022

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

January 24, 2022
8:30 AM

indigent

MATTHEW HOUSTON, et al

Plaintiff, in error

vs.

Mandalay Bay +

Defendant & LVMPD

State of Nevada

REQUESTING ORDER SETTING HEARING

MOTION TO DISMISS COUNSEL

Plaintiff in Error + Plaintiff

COMES NOW, the Matthew Houston and moving

Honorable Court to dismiss Defendant's counsel, Bernard Little, and ensure

SELF (This Motion is based upon all papers, pleadings, and documents on file) recuse

herself permanently, as she is a blatant
racist, and POINTS AND AUTHORITIES took \$ in bribes

It is respectfully requested of this court to grant this Motion to Dismiss Counsel and

Appoint Alternate Counsel for the reasons listed below: From SEGBWICK

workers compensation insurance, as did
most likely Magistrate De La Garza as did
Michaels P. Villani from Janies Schwartz
Karen Schwartz too many other criminals...

CLERK OF THE COURT

DEC 21 2021

DECEMBER 17th - 2021

I. PROCEDURAL BACKGROUND AND FACTUAL SUMMARY

Since September 30th 2016 @ Mandulay Bay

Convention Center, where HOUSTON fell 45' while working as an entertainment rigging high-steel climber and crew manager of elite technician units deployed from International Alliance of Theatrical Stage Employees #720 and other parties still unknown but not limited to the following witnesses/employees, employers, etc:

"RUSSIAN" coworker

*please take notice of Go Fund Me initiated shortly thereafter, about 2 years of my ruined, ONE OCTOBER pandemic, illegal incarceration in NOOD, the primary issue is that Houston (me myself and Irene pro se) out of fear for the SEDGWICK having me killed by LVMPD or who knows who. I was forced to sign the void / ILLEGAL CONTRACT for \$ so I wouldn't kill myself from too many debts from legal fees, etc. Clark County Public Defenders and this whole state wants me to kill myself, why? What the F is wrong with you people? Traumatic Brain Injury is worse than all of you... just ask my good bro Dr. Elmer.

topdanghouston

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DETENTION SERVICES DIVISION

MEDICAL/DENTAL/MENTAL HEALTH SERVICES REQUEST

Name: LAST Matthew FIRST ID:
Housing: 1A-70 Date of Birth: 7/11/11 Date:

**IF YOU ARE CURRENTLY EXPERIENCING A MEDICAL EMERGENCY OR MENTAL HEALTH CRISIS,
NOTIFY A UNIFORMED OFFICER IMMEDIATELY**

Description of Illness or Injury:
WADNLINE - my friend's brother
has been in the hospital for 11 days

Date/Time Triage: Category 1 ☐ 2 ☐ 3 ☐ RN

S:

O: TEMP: PULSE: RESP: BP:

A:

B:

Refer to: ☐ Sick Call Doctor ☐ Nurse ☐ Psychiatrist ☐ Dentist ☐ DON ☐ Other:

Fee Charge: ☐ \$8.00 Medical Access Fee ☐ \$5.00 Medication Fee ☐ \$3.00 Medication Renewal Fee
☐ \$200.00 or actual cost (whichever is higher) ☐ No Charge

I understand that pursuant to NRS 211.140, I may be responsible for payment for medical care (see back of this form).

I understand that the medical access fee and/or medication fee noted above will be deducted from my inmate account.

I understand that fees may be collected at a later date if funds are not currently available in my inmate account. If I do not have sufficient funds to pay, and money is deposited into my inmate account at a later time, the amount I owe for these services will be deducted before any funds are made available to me.

No inmate will be refused in-house medical services based on an inability to pay at the time the healthcare is provided.

Inmate Signature: Date: 11/11/23

Staff Signature: Date:

INMATE NAME (PLEASE PRINT)		ID#	HOUSING
<u>Matthew</u>		<u> </u>	<u>1A-70</u>

DISTRIBUTION: WHITE - Medical Records YELLOW - Inmate

DSD 82 (REV. 4/2021)

1 CERTIFICATE OF SERVICE

2 BY MAIL

3 (pursuant to N.R.S., per
4 declaration Sworn under penalty
5 of perjury, etc.)

6
7 prisoner is indigent

8
9 X
10 #1210652 @ N.O.D.C.

11 #7035901 @ CCDC

12
13 Matthew Travis Houston

14
15
16 12/21/2021 @

17
18 H. D. S. P.

19 P.O. Box 650

20 Indian Springs, NV

21 9070-0650

**PLEADING
CONTINUES
IN NEXT
VOLUME**