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CASE NO: A-22-851472-C  
Department 4

8 *Self-Represented*

9 **EIGHTH JUDICIAL DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11	_____	)	Case No:
12	<b>T. MATTHEW PHILLIPS, Esq.</b>	)	Dept No:
13		)	
14	<i>Plaintiff,</i>	)	
15		)	COMPLAINT <i>for</i>
16	<b>vs.</b>	)	FRAUD UPON <i>the</i> COURT
17		)	[NRCF Rule 60(b)(3)]
18	<b>SHANNON R. WILSON, Esq.</b>	)	
19		)	
20	<i>Defendant.</i>	)	
21	_____	)	<i>Plaintiff Demands Trial by Jury</i>

1           **I.        JURISDICTION, PARTIES & VENUE—**

2 (1)    Jurisdiction: District Court Civil Division may hear this case because Plaintiff’s  
3 claims arise under state law.

4 (2)    Plaintiff: T. MATTHEW PHILLIPS, ESQ., (“PHILLIPS”), is a resident of Clark  
5 County, Nev. Plaintiff is a licensed California attorney, State Bar No. 165833, in “good  
6 standing” for thirty (30) consecutive years. Plaintiff is *not* licensed in Nevada.

7 (3)    Defendant: SHANNON R. WILSON, (“WILSON”), ESQ. is a licensed Nevada  
8 attorney, State Bar No. 9933, who practices family law in Clark County, Nev.

9 (4)    Venue: The Eighth Judicial District is the proper venue because all events took  
10 place in Clark County, Nev.

11 (5)    Trial by Jury: Plaintiff demands trial by jury, [Nev. Const., Art. 1, Sec. 3].  
12 Plaintiff sues for (i) “fraud upon the court,” and (ii) attempted “fraud upon the court,”  
13 [NRCF Rule 60(b)(3)].

14 (6)    Relief Sought: Plaintiff seeks a court order finding, (a) that SHANNON R. WILSON,  
15 perpetrated fraud upon the court; (b) that Plaintiff’s ex never learned that Plaintiff  
16 *threatened to shoot-up his son’s school*; (c) that WILSON violated Professional Rule 3.3  
17 and Rule 3.4; and (d) striking the custody order, (Dec. 19, 2020), in *Phillips vs. Phillips*.

18  
19           **II.        STATEMENT OF FACTS—FRAUD UPON THE COURT**

20 (7)    Defendant, SHANNON R. WILSON, Esq., is opposing counsel in PHILLIPS’ domestic  
21 case, [*Phillips vs. Phillips*]. WILSON works for two law firms, (i) *Hutchison-Steffen*, LLC,  
22 and, (ii) *Legal Aid Center of Southern Nevada*, Inc. (“LACSN”).

23 (8)    PHILLIPS could have filed the instant claim as a “motion” in his domestic case,  
24 under Rule 60(b)(3); however, PHILLIPS elects to file an independent cause-of-action  
25 in order to have a trial by jury, [*see Nev. Const., Art. 1, Sec. 3*].

26 (9)    PHILLIPS demands trial by jury—which is a fundamental right under Nevada law.  
27 Nevada Constitution declares the right to trial by jury, “shall remain inviolate forever,”  
28 [*see Nev. Const., Art. 1, Sec. 3; (1864)*].

1 (10) Defendant, SHANNON R. WILSON, perpetrated “fraud upon the court,” in his  
2 domestic case, [*Phillips vs. Phillips*]. WILSON misled the court to believe that PHILLIPS’  
3 ex had supposedly “learned” that he ***threatened to shoot-up his son’s school***. However,  
4 PHILLIPS’ ex “learned” no such thing.

5 (11) On Oct. 18, 2018, Defendant, SHANNON R. WILSON, in open court, intentionally  
6 misled the court, falsely arguing that PHILLIPS’ supposedly ***threatened to shoot-up his***  
7 ***son’s school***. According to WILSON, this purported act of terrorism occurred approx.  
8 three (3) weeks prior, on Sept. 26, 2018.

9 (12) Apparently, someone did phone 911, (on Sept. 26, 2018), and falsely report that  
10 PHILLIPS had ***threatened to shoot-up his son’s school***, [Exhibit No. “1”]. But nobody  
11 knows where the allegation originated; (and, curiously, neither WILSON nor the family  
12 court judge had any interest in learning the truth). But still, the question remains, did  
13 PHILLIPS’ ex learn that he ***threatened to shoot-up his son’s school?***

14 (13) The true and correct facts are these—PHILLIPS never ***threatened to shoot-up***  
15 ***his son’s school***, [*see* Exhibit Nos. “1” and “2”]. It was all a ruse!—a con-job!—an  
16 inflammatory interspousal accusation gone awry! Defendant, SHANNON R. WILSON’S  
17 hysterical hyperbole is mired in a maelstrom of melodrama from Eighth Judicial District  
18 Court, Family Division.

19 (14) PHILLIPS’ ex-wife perpetrated the school-shooting myth and SHANNON R. WILSON  
20 brought the mythology to the courtroom—urging the judge to believe it—*and believe it,*  
21 *he did*. [*See*, Exhibit No. “3,” *Decision and Order*, (Dec. 19, 2020), p. 43, line 23].  
22 But WILSON’S scandalous arguments are empirically false. WILSON intended to defraud  
23 the court—as part of an underhanded scheme to redirect, and ultimately derail, the  
24 “machineries of justice,” and rack-up attorney’s fees. WILSON succeeded.

25 (15) On Sept. 26, 2018, pursuant to a 911 call, Las Vegas Metro Police Dept. arrived  
26 at the school that PHILLIPS’ son then-attended. Metro Police Officers determined the  
27 911 call was a false alarm. Metro Police found NO threats from PHILLIPS. Metro Police  
28 closed their investigation that same day, [*see* Exhibit No. “1”].

1 (16) Despite being accused of a crime of extreme moral turpitude—*i.e.*, ***threatening***  
2 ***to shoot several hundred school children***—Metro Police investigators never even  
3 bothered to contact PHILLIPS. This is significant. Metro Police never contacted PHILLIPS  
4 regarding the incident of Sept. 26, 2018—precisely because it was a *non*-incident.

5 (17) Back on Sept. 26, 2018, PHILLIPS had no idea that he was (momentarily) a suspect  
6 in a school-shooting investigation (which police opened and closed the same day).  
7 PHILLIPS first heard of these crazy terrorist allegations in open court, on Oct. 18, 2018,  
8 more than three (3) weeks after the fact.

9 (18) PHILLIPS emphasizes the timeline; on Sept. 26, 2018, Metro Police opened (and  
10 closed) the school-shooting investigation; twenty-two (22) days later, (Oct. 18, 2018),  
11 in open court, SHANNON R. WILSON presented her scandalous arguments, urging the  
12 court to believe that PHILLIPS supposedly ***threatened to shoot-up his son’s school***.

13 (19) Twenty-two (22) days is sufficient time to undertake a diligent investigation of  
14 the facts—as Rule 11 requires. Had SHANNON R. WILSON undertaken a reasonable  
15 investigation, she would have learned there is no “evidentiary support” to argue that  
16 PHILLIPS ***threatened to shoot-up his son’s school***, [see Rule 11(b)(3)]. But WILSON has  
17 no inclination to investigate; (she already knows it’s a hoax!).

18 (20) SHANNON R. WILSON acted with *specific intent* to deceive—and *deceive, she did*.  
19 WILSON perpetrated fraud—and it appears in PHILLIPS’ custody order, (Dec. 19, 2020),  
20 which is thus tainted and must be overturned. This custody order shows that WILSON  
21 did indeed affect the “machineries of justice.” The judge found that, “***Phillips’ ex-wife***  
22 ***learned that Phillips made phone calls to the child’s school and threatened to shoot***  
23 ***up the school***,” [Exhibit No. “3,” *Decision and Order*, (Dec. 19, 2020), p. 43, line 23].  
24 But this finding is demonstrably false!—the ex-wife “learned” no such thing! This  
25 finding proves that SHANNON R. WILSON did pull-off her scheme to defraud the court.  
26 The judge actually “bought” WILSON’S false arguments.

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### 1           **III.    STATEMENT OF FACTS—*ATTEMPTED FRAUD UPON THE COURT***

2 (21) Defendant SHANNON R. WILSON’s holy grail quest for attorney’s fees provides  
3 motive for her to perpetrate “fraud upon the court.” Way back in 1931, Nevada became a  
4 “no-fault” divorce state, which means there’s no basis for attorney fees in divorce cases.  
5 However, where cunning and unscrupulous attorneys (such as WILSON) are able to show  
6 the other spouse is “at-fault,” attorney fees suddenly become a reality.

7 (22) In the PHILLIPS divorce, SHANNON R. WILSON’S only goal was to prove “fault”;  
8 if she proves PHILLIPS is “at-fault,” then she receives a handsome attorney fee award;  
9 if not, she goes home empty-handed. WILSON is a *de facto* contingency fee lawyer, *i.e.*,  
10 no attorney’s fees until she wins; (spoiler alert: the win is guaranteed).

11 (23) In the PHILLIPS divorce, Defendant SHANNON R. WILSON tried to prove that  
12 PHILLIPS was “at-fault”—by alleging he made “threats.” However, these so-called  
13 *threats* were in fact “litigation threats”—*not* “criminal threats.” PHILLIPS, a licensed  
14 attorney, often issues “litigation threats”; (after all, that’s his job).

15 (24) In PHILLIPS’ divorce, SHANNON R. WILSON sought to influence the judge, by  
16 repeatedly intoning—*over and over*—the word, “threat,” refusing to distinguish between  
17 “litigation threat” and “criminal threat.” Full of hysterical hyperbole, WILSON, in open  
18 court, would cry-out, “*threat!*”—hoping the judge would hear, “*criminal threat!*”

19 (25) And then, one day, SHANNON R. WILSON went too far; on Dec. 17, 2018, in open  
20 court, WILSON falsely accused PHILLIPS of having threatened *her!* PHILLIPS was  
21 shocked. He demanded to know the details of the supposed “threat” to WILSON’S life.

22 (26) And then, remarkably, WILSON doubled-down on her LIE!—she claimed to have  
23 proof that PHILLIPS threatened her life—in an email! And yet, despite the fact that an  
24 officer-of-the-court (WILSON) claimed that a “convicted” domestic violence perp  
25 (PHILLIPS) had threatened her life, the family court showed zero interest in seeing the  
26 smoking-gun email that (supposedly) threatened her. A textbook example of family court  
27 corruption, two family court judges, (Marquis and Ochoa), would bend over backwards  
28 to ensure that WILSON would NOT have to produce the smoking-gun email.

1 (27) When WILSON falsely accused PHILLIPS, she violated the certification requirement  
2 of Rule 11. Her false representations lack “evidentiary support,” [Rule 11(b)(3)].

3 PHILLIPS thus brought a sanctions motion under Rule 11. To defend herself, WILSON  
4 would have to actually produce the smoking-gun email—but, remarkably, she never did!  
5 The family court “system” went out of its way to protect SHANNON R. WILSON.

6 (28) When discovery opens, PHILLIPS will make a demand to see the phantom email  
7 that supposedly contains “threats” to WILSON’S life; and, when she fails to produce,  
8 this court will know—with total certainty—SHANNON R. WILSON is a fraudster.

9 (29) From all outward appearances, SHANNON R. WILSON is a respectable attorney.  
10 She’s a partner in a prominent Vegas law firm. She speaks in slow, measured tones.  
11 She wears pearls. For some judges, it may be difficult to see this woman as a fraudster.  
12 But, make no mistake—this woman is a wretched deceiver, a common street finagler.  
13 She possesses a malignant heart—totally devoid of human emotion—not one ounce of  
14 empathy or compassion for the parents (and children) whose lives she destroys.

15 (30) WILSON advocates the *Silver Bullet Playbook*, a litigation manual with foolproof  
16 legal strategies based on false allegations of domestic violence. Here’s how it works—  
17 a desperate mother and her unscrupulous lawyer phony-up D.V. allegations against a  
18 *pro se* father. It’s foolproof because there’s enormous pressure on the judge to believe  
19 the (supposed) victim—and enormous pressure to award fees to the “faux bono” attorney.  
20 Truth is, the *Silver Bullet Playbook* is an affront to genuine D.V. victims.

21 (31) Hungry for attorney’s fees, WILSON tore a page from the *Silver Bullet Playbook*—  
22 the tried ‘n true “**school shooting**” hoax! SHANNON R. WILSON perpetrated fraud upon  
23 the court—and PHILLIPS will prove it to a jury—with clear and convincing evidence—  
24 just as surely as ten dimes will buy a dollar. And, it’s easy enough to prove because  
25 WILSON’S fraudulent argument is memorialized in the judge’s order dated Dec. 19, 2020.

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1           **IV. T. MATTHEW PHILLIPS, ESQ. VS. JENNIFER ABRAMS, ESQ.**

2 (32) PHILLIPS is now suing, WILSON’S colleague, Jennifer Abrams, Esq. another  
3 unscrupulous family law attorney. Jennifer Abrams hired two paralegals who run a  
4 Facebook hater group, (of which PHILLIPS’ ex-wife is a member). PHILLIPS is now suing  
5 Abrams and her paralegals for defamation. Abrams and her crew seek to silence parents,  
6 such as PHILLIPS, who publicly decry the family court “system.”

7 (33) When parents go online and complain about the family court “system,” the  
8 Abrams crew publishes that parent’s divorce case online—to humiliate, denigrate, and  
9 belittle the parent—in order to silence them. The last thing the family court “system”  
10 wants is uppity parents publicly demanding reform.

11 (34) This Facebook hater group targets PHILLIPS—an outspoken advocate for family  
12 court reform. PHILLIPS is a high-value target for the family court “system.” Looking to  
13 find “dirt” on PHILLIPS, Jennifer Abrams’ crew happened upon WILSON’S false  
14 argument—*about allegations that PHILLIPS may shoot-up his son’s school*. And now,  
15 WILSON’S salacious railings are published all over the internet—in violation of L.R.  
16 5.301—sitting in “plain view”—for PHILLIPS’ son to see, [*see* EDCR, Rule 5.301;  
17 (“MINOR CHILDREN; EXPOSURE TO COURT PROCEEDINGS”)]. The Abrams crew still posts  
18 the PHILLIPS divorce case online—and WILSON and the ex have actual knowledge—  
19 but they allow it to continue—in furtherance of WILSON’S fraudulent scheme.

20 (35) PHILLIPS is now suing Jennifer Abrams’ crew for having broadcast WILSON’S  
21 fraudulent argument—*about allegations that PHILLIPS may shoot-up his son’s school*.  
22 Make no mistake; SHANNON R. WILSON’S fraudulent arguments are a cause-in-fact of the  
23 defamatory P.R. campaign against PHILLIPS, which serves only to prove the old adage,  
24 “A lie can travel around the world and back—while the truth is still lacing-up its boots,”  
25 [Mark Twain; (1835–1910)].

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1 (40) WILSON Defrauds Machineries of Justice: “Fraud upon the court” occurs where,  
2 as here, an officer-of-the-court perpetrates a fraud that affects the machineries of justice.

3 Distinguishable from “garden-variety” fraud, “fraud upon the court” refers to—

4 “that species of fraud which does or attempts to defile the court itself ...

5 so that the judicial machinery can not perform in the usual manner its

6 impartial task of adjudging cases,” [*Martina Theatre Corp. v. Schine*

7 *Chain Theatres*, 278 F.2d 798, 801 (2d Cir. 1960); underscore added].

8 (41) WILSON’S Fraud Scheme—Successful: SHANNON R. WILSON’S false arguments  
9 resonated with the court, and the custody order, (Dec. 19, 2020), memorializes these false  
10 arguments. The custody order indicates that, “[*Phillips’ ex-wife*] **learned that [*Phillips*]**  
11 ***made phone calls to the child’s school and threatened to shoot-up the school,***” [see,  
12 *Decision and Order*, at p. 43, line 23; (Dec. 19, 2020). No!—the ex-wife never “learned”  
13 any such thing! As a result of WILSON’S false advocacy, PHILLIPS’ order now contains  
14 demonstrably false facts, [see Exhibit Nos. “1” and “2”].

15 (42) Prima Facie Case: PHILLIPS makes a *prima facie* case for “fraud upon the court.”  
16 At first blush, the finding that, “[*Phillips’ ex-wife*] **learned that [*Phillips*]** ***made phone***  
17 ***calls to the child’s school and threatened to shoot-up the school,***” with nothing more,  
18 is persuasive evidence that WILSON defrauded the judge.

19 (43) WILSON Stands Liable: By urging the judge to believe that PHILLIPS ***threatened***  
20 ***to shoot up his son’s school***—SHANNON R. WILSON defrauded the “judicial machinery”  
21 itself. Again, the custody order, (Dec. 19, 2020), proves that WILSON’S fraudulent  
22 scheme was successful. SHANNON R. WILSON, officer-of-the-court, now stands liable  
23 for “fraud upon the court.”

24 (44) Fraud Upon the Court—Relevant Inquiry: The relevant inquiry is not whether the  
25 fraudulent conduct “prejudiced the opposing party” but whether the conduct “harmed the  
26 integrity of the judicial process,” [*Estate of Stonehill*, 660 F.3d 415, 444, (9th Cir. 2011)].  
27 Here, WILSON’S conduct harms the “integrity of the judicial process” because the custody  
28 order, (Dec. 19, 2020), now contains demonstrably false facts.

1 (45) This Court Sits in Equity: PHILLIPS seeks no money damages; *therefore*, WILSON  
2 has no immunity defense. Here, it's the "integrity of the judicial process" that receives  
3 injury, [*Stonehill, supra*]. The judge relied upon WILSON'S ignominious arguments—  
4 and the "judicial process" itself sustained resulting injury.

5 (46) Parental Rights—Terminated: The custody order, (Dec. 19, 2020), corrupted with  
6 the stain of WILSON'S false arguments, is the very instrument that terminated Plaintiff's  
7 parental rights to his son. Owing to WILSON'S false advocacy, Plaintiff has not seen,  
8 nor heard, from his son in **1,313 days**, (*i.e.*, 3 years, 7 months, 5 days, and counting...).

9 (47) Specific Intent: Defendant, SHANNON R. WILSON is a most persuasive advocate.  
10 Her clever artifice and cunning were sufficient to persuade the judge. Acting with  
11 *specific intent*, WILSON aimed to defraud the court, and *boy howdy*, she hit the bullseye.  
12 And now, the court ceases to be impartial vis-à-vis Plaintiff, [*see, Martina Theatre Corp.*  
13 *v. Schine Chain Theatres, Inc.*, 278 F.2d 798, 801 (2d Cir. 1960)].

14 (48) The Judge—Not Impartial: The family court was *not* impartial—the court got  
15 boonswoggled by SHANNON R. WILSON'S contrived "***school shooting***" hoax. To her  
16 credit, as a capable advocate, SHANNON R. WILSON persuaded the judge to fall for her  
17 song 'n dance routine.

18 (49) Rules of Professional Conduct: *Nevada Rules of Professional Conduct*, ("NRPC"),  
19 provide that lawyers have a duty of "candor toward the tribunal," [NRPC, Rule 3.3(a)(1)],  
20 as well as a duty of "fairness to opposing party," [NRPC, Rule 3.4(b)]. Once the court  
21 concludes that WILSON violated Rules 3.3 and 3.4, judicial canons require this court to  
22 refer the matter to *Nevada State Bar*, [NCJC, Rule 2.15(B)].

23 (50) The Custody Order (Dec. 19, 2020) Must be Stricken: Where, as here, there is  
24 fraud upon the court, orders may be attacked and overturned, [*see, In re Tri-Cran, Inc.*,  
25 98 B.R. 609, 616 (Bankr. D. Mass. 1989); *see also, [H.K. Porter Co. v. Goodyear Tire &*  
26 *Rubber Co.*, 536 F.2d 1115, 1119 (6th Cir. 1976)]. Bearing the unsightly stain of  
27 "fraud," Plaintiff attacks the custody order, dated Dec. 19, 2020. This order is tainted;  
28 *therefore*, it must be overturned immediately.

1            **SECOND CAUSE of ACTION—ATTEMPTED FRAUD UPON the COURT**

2 (51) Second Cause-of-Action—Attempted Fraud Upon the Court: PHILLIPS sues  
3 Defendant, SHANNON R. WILSON, for *attempted* “fraud upon the court,” perpetrated by  
4 an officer-of-the-court. Plaintiff incorporates, by reference, all numbered paragraphs.

5 (52) Fraudulent Misrepresentations: In PHILLIPS’ domestic case, Defendant, SHANNON  
6 R. WILSON, attempted to persuade the court to believe that Plaintiff had *threatened*  
7 *WILSON in an email*. At all times, WILSON had actual knowledge that no such emails  
8 existed. WILSON had *specific intent* to defraud the court—in order that her client might  
9 be adjudged the prevailing party—in order that WILSON might receive a handsome  
10 attorney’s fees award—from an easy mark. But the court never did adjudicate whether  
11 Plaintiff had *threatened WILSON in an email*; but still, WILSON accrues liability for  
12 the *attempt*. “Fraud upon the court” includes “attempts”—

13            *“that species of fraud which does or attempts to defile the court itself ...*

14            so that the judicial machinery can not perform in the usual manner its  
15            impartial task of adjudging cases,” [see, *Martina Theatre Corp. v. Schine*  
16            *Chain Theatres, Inc.*, 278 F.2d 798, 801 (2d Cir. 1960); emphases added].

17 (53) Specific Intent: Acting with *specific intent*, WILSON attempted to defraud the  
18 court; however, by sheer luck, the court did not take seriously her false charges, *i.e.*,  
19 that PHILLIPS supposedly threatened her life. But still, where attorneys *attempt* to  
20 commit “fraud upon the court,” it’s every bit as odious as having gotten away with it.

21 (54) Liability is Established: By falsely urging the court to believe that PHILLIPS  
22 threatened her life, SHANNON R. WILSON “attempted” to defraud the court—and liability  
23 thus attaches.

24 (55) Fraud Upon the Court—Relevant Inquiry: The relevant inquiry is not so much  
25 whether the fraudulent conduct “prejudiced the opposing party” but whether the conduct  
26 “harmed the integrity of the judicial process.” [*Estate of Stonehill*, 660 F.3d 415, 444,  
27 (9th Cir. 2011)]. Here, by fabricating allegations that PHILLIPS supposedly threatened  
28 her life, SHANNON R. WILSON harms the integrity of the judicial process.

1 (56) This Court Sits in Equity: PHILLIPS seeks no money damages; *therefore*, WILSON  
2 has no immunity defense. Here, it's the "integrity of the judicial process" that received  
3 injuries, [*Stonehill, supra*]. The judge relied upon WILSON'S ignominious arguments—  
4 and the "judicial process" itself sustained resulting harm.

5 (57) Rules of Professional Conduct: *Nevada Rules of Professional Conduct*, ("NRPC"),  
6 provide that lawyers have a duty of "candor toward the tribunal," [NRPC, Rule 3.3(a)(1)],  
7 as well as a duty of "fairness to opposing party," [NRPC, Rule 3.4(b)]. Once the court  
8 concludes that WILSON violated Rules 3.3 and 3.4, judicial canons require this court to  
9 refer the matter to *Nevada State Bar*, [NCJC, Rule 2.15(B)].

10 (58) The Court Order (Dec. 19, 2020) Must be Stricken: Where, as here, there is fraud  
11 upon the court, orders may be attacked and overturned, [*see, In re Tri-Cran, Inc.*, 98 B.R.  
12 609, 616 (Bankr. D. Mass. 1989); *see also, [H.K. Porter Co. v. Goodyear Tire & Rubber*  
13 *Co.*, 536 F.2d 1115, 1119 (6th Cir. 1976)]. Bearing the unsightly stain of attempted  
14 "fraud," Plaintiff attacks the custody order, dated Dec. 19, 2020. This order is  
15 necessarily tainted; *therefore*, it must be overturned immediately.

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**PRAYER for RELIEF**

(59) WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, in the following manner:

- (a) that the court adjudge Plaintiff the prevailing party;
- (b) that the court award judgment to Plaintiff on the *first* cause of action, (“fraud upon the court”);
- (c) that the court award judgment to Plaintiff on the *second* cause of action; (“attempted fraud upon the court”);
- (d) Plaintiff seeks a court order finding, (a) that SHANNON R. WILSON, perpetrated fraud upon the court; (b) that Plaintiff’s ex never learned that Plaintiff threatened to shoot-up his son’s school; (c) that she violated Professional Rule 3.3 and Rule 3.4; and (d) striking the custody order, (Dec. 19, 2020), in Plaintiff’s domestic case, [*Phillips vs. Phillips*].
- (e) that, upon a finding that Defendant attorney violated Professional Rule 3.3 and or Rule 3.4, the court communicate its findings and conclusions to the State Bar, as NCJC, Rule 2.15(B) affirmatively requires;
- (f) that the Court award costs and expenses of this lawsuit; and,
- (g) for such other and further relief as the Court deems just and proper.

Dated: **April 21, 2022**

RESPECTFULLY SUBMITTED,



T. Matthew Phillips, Esq.  
*Self-Represented Plaintiff*

\* \* \*

VERIFICATION of T. MATTHEW PHILLIPS, ESQ.

My name is T. MATTHEW PHILLIPS. I authored the instant complaint. The within allegations are true and correct of my own personal knowledge. As to those matters alleged on information and belief, I reasonably believe them to be true. If called upon to testify, I could and would give competent and truthful evidence.

1. Attached as Exhibit No. "1" is a true and correct copy of a police report, dated Sept. 26, 2018, from Las Vegas Metro Police Dept, ("LVMPD"). This police report contains several "blackouts," *i.e.*, privacy redactions, made by LVMPD.

2. Attached as Exhibit No. "2" is a true and correct copy of a letter from *Howard & Howard* law firm, dated Sept. 26, 2021.

3. Attached as Exhibit No. "3" is a true and correct copy of page 43, from the *Decision and Order*, dated Dec. 19, 2020, in my Clark County domestic case.

4. As a direct and proximate result of Defendant's false advocacy, I have not seen, nor heard, from my son **1,313 days**, (*i.e.*, 3 years, 7 months, 5 days, and counting).

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

Dated: **April 21, 2022**

  
\_\_\_\_\_  
T. Matthew Phillips, Esq.  
*Declarant.*

\* \* \*