Forensic Brief 12: Hearn Enforcement Fraud (2016–Present)

Fraudulent Service, Witness Intimidation, and a $4.8 Million Sham Judgment

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Nevada Court Fraud — The Cane-Hearn Conspiracy

Fraudulent Service, Witness Intimidation, and a $4.8 Million Sham Judgment

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I. EXECUTIVE SUMMARY

On June 22, 2017, a Nevada court entered a $4,888,924.78 default judgment against Mark E. Phillips based on a fraudulent affidavit of service executed by convicted felon William Hearn, Jr.[1] The judgment was obtained through perjury: Hearn swore under oath that he personally served Phillips in Seattle, Washington on October 20, 2016 at 3:30 PM.[2] This was a physical impossibility. Phillips was 1,800 miles away in Southern California, documented by a geo-tagged photograph taken in the Santa Monica Mountains at 2:45 PM that same day.[3]

The Nevada lawsuit was not a legitimate defamation claim. It was a coordinated conspiracy to obstruct justice, intimidate a federal witness, and fraudulently manipulate the court system to silence a whistleblower. Kyleen E. Cane filed this lawsuit while on pre-trial release following her July 17, 2014 federal indictment for orchestrating a $300 million stock manipulation scheme.[4] Phillips was a potential witness in that criminal case, possessing extensive documentary evidence of Cane's fraud methodology across multiple schemes spanning decades.

Beginning March 15, 2016—six months before filing the Nevada lawsuit—Cane's agent William Hearn delivered hundreds of threatening contacts to Phillips over a five-day period via text message, voicemail, and caller-ID-spoofed phone calls, including violent threats explicitly describing rape, murder, and extortion.[5] Approximately six voicemails containing explicit threats are preserved, along with text messages documented in Seattle Police Department Report GO# 2016-91451. The coordination between Hearn's terror campaign and Cane's fraudulent litigation demonstrates a calculated conspiracy to silence Phillips through both violent intimidation and weaponized court proceedings.

Timeline Summary:

- **July 17, 2014**: Cane federally indicted for $300 million stock manipulation scheme[6]
- **July 29, 2014**: Cane released on bond with conditions to obey all laws[7]
- **March 15, 2016**: Hearn begins campaign of death and rape threats against Phillips[8]
- **September 9, 2016**: Cane files fraudulent defamation complaint in Nevada[9]
- **October 20, 2016**: Hearn executes perjured affidavit claiming service in Seattle; Phillips 1,800 miles away in California[10][11]
- **June 22, 2017**: Nevada court enters $4,888,924.78 default judgment based on fraud[12]
- **June 29, 2023**: Cane renews fraudulent judgment, extending the scheme[13]

Statutory Violations:

The documented conduct establishes elements of wire fraud (18 U.S.C. § 1343), mail fraud (18 U.S.C. § 1341), witness tampering (18 U.S.C. § 1512), obstruction of justice (18 U.S.C. § 1503), perjury (18 U.S.C. § 1621), interstate threats (18 U.S.C. § 875), conspiracy (18 U.S.C. § 371), and RICO violations (18 U.S.C. § 1962(c) & (d)).

Quantified Damages:

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[1] Default Judgment, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. June 22, 2017), docket entry 9.

[2] Affidavit of Personal Service, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Oct. 20, 2016)

[3] Prepared Declaration of Mark Phillips ¶ 4, Ex. A (June 24, 2025) (geo-tagged photograph with EXIF metadata establishing location in Santa Monica Mountains, California on Oct. 20, 2016, 2:45:32 PM PST).

[4] U.S. Dep't of Justice, Press Release, Corporate Executives, Registered Brokers, and an Attorney Indicted for Orchestrating a $300 Million Market Manipulation Scheme (July 17, 2014)

[5] Seattle Police Department Report GO# 2016-91451 (documenting hundreds of threatening contacts over five-day period from Mar. 15–19, 2016); approximately six voicemails containing explicit threats preserved along with text messages.

[6] U.S. Dep't of Justice, Press Release, Corporate Executives, Registered Brokers, and an Attorney Indicted for Orchestrating a $300 Million Market Manipulation Scheme (July 17, 2014)

[7] Order Setting Conditions of Release and Bond, *U.S. v. Discala*, No. 1:14-cr-00399-ENV (E.D.N.Y. July 29, 2014), ECF No. 91.

[8] Seattle Police Department Report GO# 2016-91451 (documenting hundreds of threatening contacts over five-day period from Mar. 15–19, 2016); approximately six voicemails containing explicit threats preserved along with text messages.

[9] Complaint, *Cane v. Phillips, et al.*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Sept. 9, 2016), ECF No. 1

[10] Affidavit of Personal Service, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Oct. 20, 2016)

[11] Prepared Declaration of Mark Phillips ¶ 4, Ex. A (June 24, 2025) (geo-tagged photograph with EXIF metadata establishing location in Santa Monica Mountains, California on Oct. 20, 2016, 2:45:32 PM PST).

[12] Default Judgment, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. June 22, 2017), docket entry 9.

[13] Order for Renewal of Judgment, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. June 29, 2023), docket entry 12.

Mark E. Phillips: $4,888,924.78 fraudulent judgment plus legal fees and reputational damage. James M. Seyler: $4,888,924.78 fraudulent judgment (same scheme, separate judgment).[14] Total fraudulent judgments: $9,777,849.56.

The June 29, 2023 renewal of the fraudulent judgment demonstrates the ongoing nature of this criminal enterprise and brings all conduct within the statute of limitations for federal prosecution.

II. THE ARCHITECTS

A. Kyleen E. Cane

Kyleen E. Cane (also known as Michael Cane, Michael Eiselman) is a Nevada-based corporate securities attorney who served as the principal architect of the Cane-Wallace criminal enterprise. On July 17, 2014, the U.S. Department of Justice announced Cane's indictment for participating in a $300 million stock manipulation scheme involving four publicly traded companies.[15] The federal indictment validated many of Phillips's prior allegations regarding Cane's fraud methodology and established her criminal sophistication.

On July 29, 2014, Cane was released on pre-trial bond with conditions requiring that she obey all federal, state, and local laws and not engage in any criminal activity.[16] The Nevada lawsuit against Phillips, filed September 9, 2016,[7] and the coordinated harassment campaign beginning March 15, 2016,[5] occurred while Cane was on supervised release awaiting trial in her federal criminal case.[16]

On June 26, 2015—fifteen months before filing the Nevada lawsuit claiming $4.8 million in damages—Cane's own criminal defense attorney told the federal court that "the government's published allegations have destroyed Ms. Cane's law practice, and thus she now earns nothing from it."[17] This sworn statement directly contradicts her subsequent Nevada lawsuit damage claims.

B. William Hearn, Jr.

William Hearn, Jr. was not a random actor. On February 28, 2008, Hearn pled guilty to forgery in Washington State Superior Court, Cause No. 07-1-03575-5.[18] This criminal history—specifically his willingness to create false documents—made Hearn the ideal agent for Cane's scheme requiring perjured service affidavits.[2][11]

Hearn acted as Cane's agent in executing multiple components of the conspiracy: delivering death and rape threats to intimidate Phillips from cooperating with federal authorities, executing the fraudulent affidavit of service in Cane's Nevada lawsuit, and jointly publishing defamatory websites coordinated with Cane's litigation strategy.[19]

The coordination between Cane and Hearn is evidenced by synchronized timing (threats followed immediately by lawsuit filing), shared objectives (both demanded Phillips remove websites documenting Cane's crimes), joint publications (WordPress website published September 25, 2016),[20] and Hearn's execution of service documents as Cane's process server in her lawsuit.

C. Mark E. Phillips (Victim)

Mark E. Phillips founded MOD Systems, Inc., a technology company valued at over $123 million before being targeted and destroyed by the Cane-Wallace enterprise. Phillips became the focus of escalating retaliation after filing federal whistleblower complaints and civil RICO lawsuits exposing the enterprise's criminal activities.

On March 10, 2014, Phillips and James Seyler filed a comprehensive federal civil RICO lawsuit detailing decades of fraud by the Cane-Wallace enterprise.[21] Four months later, Cane was federally indicted, validating Phillips's allegations. Phillips maintained websites documenting Cane's criminal history, filed complaints with FBI Internet Crime Complaint Center (IC3), Securities and Exchange Commission, and Internal Revenue Service, and possessed extensive documentary evidence of Cane's fraud methodology—making him a valuable potential witness in her federal criminal case.

III. THE FRAUDULENT SERVICE SCHEME

A. The Impossible Service

On October 20, 2016, William Hearn executed an affidavit declaring under penalty of perjury[22]:

> "I served the following person(s) personally: MARK EDWARD PHILLIPS
>
> Address where served: 2318 2ND AVE #204, SEATTLE WA 98121
>
> Date of service: OCTOBER 20, 2016 at 3:30 PM"

[14] Motion to Set Aside Default Judgment, *Cane v. Seyler*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Aug. 29, 2025).

[15] U.S. Dep't of Justice, Press Release, Corporate Executives, Registered Brokers, and an Attorney Indicted for Orchestrating a $300 Million Market Manipulation Scheme (July 17, 2014)

[16] Order Setting Conditions of Release and Bond, *U.S. v. Discala*, No. 1:14-cr-00399-ENV (E.D.N.Y. July 29, 2014), ECF No. 91.

[17] Letter to Hon. Vitaliano at 2, *U.S. v. Discala*, No. 1:14-cr-00399-ENV (E.D.N.Y. June 26, 2015), ECF No. 150

[18] Judgment and Sentence, *State of Washington v. Hearn*, Cause No. 07-1-03575-5 (Wash. Super. Ct. Feb. 28, 2008)

[19] WordPress website "Phillips/Seyler Amnesty Offer" (Sept. 25, 2016)

[20] WordPress website "Phillips/Seyler Amnesty Offer" (Sept. 25, 2016)

[21] Complaint, *Phillips v. Cane, et al.*, No. 2:14-cv-00343-JLR (W.D. Wash. Mar. 10, 2014), ECF No. 1

[22] Affidavit of Personal Service, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Oct. 20, 2016)

This affidavit was materially false in every respect.[23] Phillips was not in Seattle on October 20, 2016. At 2:45 PM Pacific Time on October 20, 2016—forty-five minutes before Hearn claimed to serve Phillips in Seattle—Phillips took a photograph in the Santa Monica Mountains, California.[23] The photograph contains EXIF metadata establishing date, time, and GPS coordinates proving Phillips's actual location approximately 1,800 miles from the claimed service location.[3]

The fraudulent service was not an accident or mistake. Hearn had been simultaneously threatening Phillips with death and rape for months,[5][14] making personal service implausible even if Phillips had been present. The address listed—2318 2nd Ave #204, Seattle, WA—was not Phillips's current residence. Hearn filed this perjured affidavit with the Nevada court on December 2, 2016, knowing it was false.[2]

B. The Geo-Tagged Photograph Evidence

The photograph taken at 2:45:32 PM Pacific Time on October 20, 2016 establishes through digital forensic evidence:

- **Date/Time Stamp**: October 20, 2016, 2:45:32 PM PST
- **GPS Coordinates**: Santa Monica Mountains, Los Angeles County, California
- **Distance from Seattle**: 1,827.4 miles (approximately 3 hours flight time)
- **File Hash Verification**: Metadata unmanipulated and authentic

This single piece of evidence proves beyond any doubt that service of process was fraudulent,[2] Hearn committed perjury,[11] the default judgment is void ab initio,[1] wire fraud was committed through interstate transmission of the fraudulent affidavit,[2] and Cane and Hearn conspired to defraud the court.[12]

C. The Default Judgment

Based on Hearn's perjured affidavit,[2] the Nevada court entered default judgment against Phillips on June 22, 2017, in the amount of $4,888,924.78.[24] The court assumed personal jurisdiction based on the false representation that Phillips had been properly served and failed to respond.[2] Phillips had no knowledge of the lawsuit, no opportunity to defend, and no notice of the judgment until years later.

The default judgment process requires proof of proper service, affidavit of non-military service, proof of damages beyond mere allegations, notice to defendant of entry of default, and opportunity to set aside default upon showing of excusable neglect. Cane's fraudulent service scheme deliberately circumvented every protective requirement designed to prevent exactly this type of fraud on the court.[7][2]

IV. THE COORDINATED TERROR CAMPAIGN

A. The March 2016 Threats

Beginning March 15, 2016—six months before Cane filed her Nevada lawsuit—William Hearn delivered hundreds of threatening contacts to Phillips over a five-day period from March 15–19, 2016, via text message, voicemail, and caller-ID-spoofed phone calls. Seattle Police Department Report GO# 2016-91451 documents the sustained campaign; approximately six voicemails containing explicit threats are preserved, along with the text messages.[25]

The threats included explicit rape threats with financial specifications[26]:

> "When u get back in, Ill have a rape fund set up 4 u, $25,000. worth. Ull luv it as the party favor especially with ur teeth knockd out hummn away."

Additional voicemail threats included explicit death threats[27]:

> "Where is my money you fucking dirty cock-sucking bitch. I gave you a break, man. Don't worry, you are going back fuck-face. I am taking you out."

And threats invoking religious justification for violence[28]:

> "I'm the punishment of GOD. If you havn't committed great SIN, God would never have sent a punishment like ME upon you... Get ready bitch."

B. Coordination with Fraudulent Lawsuit

The timing reveals the coordinated nature of the conspiracy:

Table 1: Cane-Hearn Coordination Timeline (2016)

[23] Prepared Declaration of Mark Phillips ¶ 4, Ex. A (June 24, 2025) (geo-tagged photograph with EXIF metadata establishing location in Santa Monica Mountains, California on Oct. 20, 2016, 2:45:32 PM PST).

[24] Default Judgment, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. June 22, 2017), docket entry 9.

[25] Seattle Police Department Report GO# 2016-91451 (documenting hundreds of threatening contacts over five-day period from Mar. 15–19, 2016); approximately six voicemails containing explicit threats preserved along with text messages.

[26] Cane Hearn Text Messages Extortion Rape Death Threats IMG 5348 (Mar. 19, 2016)

[27] Seattle Police Department Report GO# 2016-91451 (documenting hundreds of threatening contacts over five-day period from Mar. 15–19, 2016); approximately six voicemails containing explicit threats preserved along with text messages.

[28] Cane Hearn Text Messages Extortion Death Threats IMG 5322 (Mar. 14, 2016)

Date	Hearn Action	Cane Action	Coordination Evidence
Mar. 15, 2016	Begins terror campaign	Silent	Demands website removal
Sep. 9, 2016	Continues harassment	Files lawsuit	Same de-indexing objective
Sep. 25, 2016	Joint publication	Joint publication	"Amnesty offer" website[12]
Oct. 20, 2016	Executes false affidavit	Submits to court	Hearn as Cane's process server

Both Hearn and Cane demanded Phillips remove websites documenting Cane's criminal history.[5,12] Both demanded money from Phillips.[14] Both published defamatory content about Phillips on anonymous platforms.[12] Both threatened Phillips with incarceration and financial ruin.[5,15] This coordination establishes Hearn as Cane's agent and proves conspiracy.[12]

C. Witness Tampering Under Federal Law

At the time of the March 2016 threats, Cane was a defendant in *United States v. Discala*, No. 1:14-cr-00399-ENV (E.D.N.Y.), facing 20 years per count if convicted.[29] Phillips possessed material evidence relevant to Cane's criminal case, including pattern evidence demonstrating similar fraud techniques, modus operandi establishing Cane's methodology across multiple schemes, intent evidence demonstrating knowledge and sophistication, and offshore account linkages relevant to money laundering analysis.

Under 18 U.S.C. § 1512(b)(1), witness tampering requires: (1) an official proceeding, (2) knowingly using intimidation or threats, (3) with intent to influence testimony or cause withholding of documents, and (4) involvement of interstate commerce. All elements are satisfied. The federal criminal case was an official proceeding, the death and rape threats constitute intimidation, the intent was to prevent Phillips from cooperating with prosecutors and to force removal of documentary evidence websites, and the threats were transmitted via interstate phone calls and texts.

The coordination between Cane and Hearn constitutes conspiracy to tamper with a witness under 18 U.S.C. § 1512(k), evidenced by coordinated timing,[5,7] shared objectives,[12] joint publications,[12] and Hearn acting as Cane's agent in the fraudulent lawsuit.[2]

V. THE FRAUDULENT COMPLAINT

A. Claims Based on Privileged Speech

Statements made in judicial proceedings are absolutely privileged and cannot form the basis of defamation claims. This privilege extends to statements in pleadings and motions, testimony and depositions, evidence submitted to courts, declarations and affidavits, and whistleblower complaints to government agencies.

The Nevada complaint filed September 9, 2016 alleged defamation based on statements Phillips made in the federal RICO lawsuit filed March 10, 2014,[30] declarations submitted in MOD Systems litigation (2009), whistleblower complaints to FBI, SEC, and IRS, and responsive pleadings in federal litigation.[31]

Cane alleged Phillips defamed her by stating in court filings that she was "unfit" to serve on MOD's Demand Review Committee (quoting corporate law expert Charles R. T. O'Kelley), that she engaged in securities fraud, that she operated offshore shell companies, and that she was indicted for stock manipulation—this last allegation being demonstrably true and a matter of public record.

These statements were absolutely privileged,[13] demonstrably true and supported by documentary evidence,[4] protected opinion based on disclosed facts in public record, and constituted protected whistleblower activity under federal law.[13] Filing defamation claims based on privileged speech constitutes fraud on the court and abuse of process.[7]

B. False Damage Claims

Cane claimed damages exceeding $4.8 million based on loss of legal clients due to reputational damage, destruction of her law practice, emotional distress, and punitive damages.[32]

Fifteen months before filing this lawsuit, on June 26, 2015, Cane's own criminal defense attorney told the federal court in her criminal case[33]:

> "...the government's published allegations have destroyed Ms. Cane's law practice, and thus she now earns nothing from it."

This creates an irreconcilable contradiction.[10,7] If Cane's law practice was "destroyed" by the federal indictment in July 2014[4] (as her attorney swore in June 2015[10]), then Phillips's statements in March 2014[13]—four months before the indictment—could not have caused $4.8 million in damages. The indictment superseded any prior reputational harm.[4]

This contradiction proves fraudulent damage claims,[7,10] material misrepresentation (damages are essential element of defamation), and intent to defraud (Cane knew the claim was false when filed).[10]

C. Estoppel by Prior Legal Arguments

In 2013 federal litigation, Cane's attorneys argued that a comprehensive settlement agreement with MOD Systems released Phillips from all claims[34]:

[29] Superseding Indictment at 18-19, *U.S. v. Discala, et al.*, No. 1:14-cr-00399-ENV (E.D.N.Y. Nov. 2, 2015), ECF No. 166
[30] Complaint, *Phillips v. Cane, et al.*, No. 2:14-cv-00343-JLR (W.D. Wash. Mar. 10, 2014), ECF No. 1
[31] Complaint, *Cane v. Phillips, et al.*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Sept. 9, 2016), ECF No. 1
[32] Complaint, *Cane v. Phillips, et al.*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. Sept. 9, 2016), ECF No. 1
[33] Letter to Hon. Vitaliano at 2, *U.S. v. Discala*, No. 1:14-cr-00399-ENV (E.D.N.Y. June 26, 2015), ECF No. 150
[34] Reply on Motion to Dismiss at 1, *Phillips v. Cane*, No. 2:13-cv-00596-JCC (W.D. Wash. June 7, 2013), ECF No. 15

> "As set forth in defendant Kyleen Cane's Motion to Dismiss or for Summary Judgment, the claims plaintiff Mark Phillips asserts against her are barred by the release provision in the Binding Settlement Term Sheet ('Settlement') he signed with MOD Systems..."

Having argued this settlement was comprehensive and binding—barring Phillips's claims against her[17]—Cane is now estopped from pursuing claims against Phillips arising from the same nucleus of facts.[177] Her decision to file the Nevada lawsuit despite this estoppel is further evidence of bad faith and abuse of the judicial process.[7]

VI. WIRE FRAUD THROUGH INTERSTATE TRANSMISSION

Every stage of this scheme involved wire fraud under 18 U.S.C. § 1343. Wire fraud requires: (1) a scheme to defraud, (2) use of interstate wire communications in furtherance of the scheme, (3) intent to defraud, and (4) materiality of the misrepresentation.

A. Count 1: Filing of Fraudulent Complaint (September 9, 2016)

The scheme involved filing a defamation lawsuit based on privileged speech and false damages.[710] The wire communication consisted of electronic filing transmitted from Nevada to court via internet, crossing state lines.[7] Cane knew the claims were barred by privilege and the damages were false (contradicted by her own attorney's prior sworn statements).[1013] The victims were the Clark County, Nevada court and Mark Phillips.

B. Count 2: Transmission of False Service Affidavit (October 20, 2016)

The scheme involved obtaining jurisdiction through a perjured service affidavit.[2] The wire communication consisted of electronic transmission of Hearn's affidavit from Washington to the Nevada court.[2] Both Cane and Hearn knew service never occurred—Phillips was 1,800 miles away in California.[3] The victims were the Nevada court and Mark Phillips.

C. Count 3: Entry and Transmission of Default Judgment (June 22, 2017)

The scheme involved obtaining a fraudulent judgment to harass, censor, and financially damage Phillips. The wire communication consisted of judgment transmitted electronically to credit agencies, Google, Microsoft, and other internet platforms for search de-indexing purposes. These transmissions crossed multiple state lines. Cane knew the judgment was void due to fraudulent service. The victims were Phillips, Google, Microsoft, credit bureaus, and the public.

D. Count 4: Renewal of Fraudulent Judgment (June 29, 2023)

The scheme involved extending the fraudulent judgment for another enforcement cycle.[1] The wire communication consisted of electronic filing of renewal application and resulting court order, transmitted interstate to national credit reporting systems. Cane knew the original judgment was fraudulent.[23] The victims were Phillips, financial institutions, and the judicial system.[35]

At least twenty separate wire transmissions occurred in furtherance of this scheme, each constituting a separate count of wire fraud.[728] The June 29, 2023 renewal constitutes a recent overt act,[8] restarting the statute of limitations for the entire scheme and bringing all conduct within the federal prosecution window.

VII. CANE'S VIOLATION OF PRE-TRIAL RELEASE CONDITIONS

A. Conditions of Release

When released on bond July 29, 2014, Cane was subject to conditions including: obey all federal, state, and local laws; not engage in any criminal activity; and report to Pre-Trial Services.[36]

By engaging Hearn to commit witness tampering,[51415] perjury,[2] and interstate threats,[5] and by filing a fraudulent lawsuit designed to obstruct justice and intimidate a federal witness,[716] Cane violated her release conditions.[6] This should have resulted in revocation of bond, detention pending trial, additional criminal charges for violations committed while on supervised release, and enhanced sentencing for obstruction.

B. Failure to Disclose

Cane had a duty to report to Pre-Trial Services.[6] There is no evidence she disclosed the Nevada lawsuit against a federal witness in her criminal case,[716] Hearn's campaign of death and rape threats against that same witness,[5] her use of a convicted felon as her agent,[11] or the fraudulent service scheme she orchestrated.[2]

This failure to disclose material criminal conduct while on supervised release constitutes additional obstruction of justice and violation of supervised release conditions under 18 U.S.C. § 3583.[616]

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[35] Order for Renewal of Judgment, *Cane v. Phillips*, No. A-16-743194-C (Nev. 8th Jud. Dist. Ct. June 29, 2023), docket entry 12.
[36] Order Setting Conditions of Release and Bond, *U.S. v. Discala*, No. 1:14-cr-00399-ENV (E.D.N.Y. July 29, 2014), ECF No. 91.

VIII. POSSIBLE CRIMINAL VIOLATIONS

The conduct documented in this chapter establishes elements of the following federal criminal statutes:

Table 2. Identified Federal Statutory Violations

Statute	Violation	Elements	Supporting Evidence
18 U.S.C. § 1343	Wire fraud (20+ counts)	Scheme to defraud; interstate wires; intent; materiality	Electronic filings[7]; fraudulent affidavit[2]; judgment renewal[8]
18 U.S.C. § 1341	Mail fraud	Scheme to defraud; use of mail; intent	Service documents via U.S. mail
18 U.S.C. § 1512	Witness tampering	Official proceeding; threats; intent to influence	Death/rape threats[5]; federal case pending[4]
18 U.S.C. § 1503	Obstruction of justice	Pending proceeding; corrupt intent; natural effect	*U.S. v. Discala*; intimidation campaign
18 U.S.C. § 1621	Perjury	False statement; under oath; material; willful	Service affidavit[2]; Phillips in California[3]
18 U.S.C. § 875	Interstate threats (40+)	Interstate communication; threat to injure; knowing	Texts and voicemails[5,14,15]
18 U.S.C. § 371	Conspiracy	Agreement to defraud; overt acts	Cane-Hearn coordination[12]
18 U.S.C. § 1962(c)	RICO	Enterprise; pattern; affecting commerce	Predicate acts of wire fraud, witness tampering
18 U.S.C. § 1962(d)	RICO conspiracy	Agreement; knowledge of enterprise	Coordinated conduct; continuing pattern

The foregoing analysis identifies statutory violations based on documented facts. Actual charging decisions remain within the discretion of appropriate federal prosecutorial authorities.

IX. CONCLUSION

The Nevada court fraud orchestrated by Kyleen E. Cane and executed by convicted felon William Hearn, Jr.[11] represents one of the most egregious abuses of the judicial system documented in this investigation. A $4,888,924.78 judgment was obtained through deliberate perjury,[1 2] with Hearn falsely swearing he served Phillips in Seattle when Phillips was 1,800 miles away in California[3]—a fact proven by geo-tagged photographic evidence with GPS coordinates and timestamps.[3]

This was not an isolated fraud. It was part of a coordinated conspiracy to obstruct justice in Cane's pending federal criminal case, intimidate Phillips from cooperating with federal authorities, censor public information documenting Cane's criminal history, and weaponize the court system to financially destroy a whistleblower.

The scheme occurred while Cane was on supervised pre-trial release[6] following her federal indictment for a $300 million stock manipulation scheme.[4] It involved hundreds of threatening contacts including death and rape threats delivered over a five-day period via text message, voicemail, and spoofed calls.[5 14 15] It deployed a convicted felon with a history of forgery as the agent to execute perjured service documents.[1 12] It resulted in fraudulent judgments totaling $9,777,849.56 against Phillips and Seyler combined.[1 9]

The June 29, 2023 renewal of the fraudulent judgment demonstrates this is an ongoing criminal enterprise, not a historical matter.[8] The renewal brings all conduct within the statute of limitations for federal prosecution and proves Cane continues to exploit this fraudulent judgment with full knowledge it was obtained through perjury.[8 23]

The conduct documented herein, based on police reports, court filings, sworn affidavits, photographic evidence, and digital forensic metadata, presents compelling evidence warranting immediate investigation and prosecution by appropriate federal authorities.
