

# What happens here **only** happens here...

## But should it?



*A Vegas Voice  
Investigative Report*  
by Judy Polumbaum

### PART ONE

## FROM THE LAND OF PREPOSTEROUS STORIES

### 1. The precipitating incident

It was mid-July, 2019. The hottest period of the hottest month in Las Vegas. Swarms of grasshoppers, migrations triggered by wet weather earlier in the summer, were starting to descend on the Vegas valley.

That's when a deputy constable showed up at a house inhabited by three generations of an Armenian-American family to usher Arkadi Zakaryan, his three teenaged children, and his elderly mother and uncle out of their own home.

At the behest of a stranger named Thomas Moore, the baffled

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family was being “removed” under court order. The two seniors were not allowed back inside to fetch needed medications. The locks were changed and a no-trespass notice posted on the door.

The family had bought the house six years earlier. Just a month after that, Zakaryan's vibrant young wife had died suddenly of an aneurysm, mere weeks before her 31st birthday. More shock and grief were exactly what they didn't need.

They spent the next ten days sleeping on the floor at their family business, a Mediterranean restaurant and bakery in a strip mall.

Meanwhile, Compass Realty listed their house as being for sale.

Only after a friend put Zakaryan in touch with a lawyer, who made some outraged phone calls, was the family able to move back into their house, get the real estate listing removed, and begin to sort out what the heck was going on.

### 2. How could such a thing happen?

The lawyer, Michael R. McNerny, UNLV law school class of 2012, was determined to get to the bottom of this. Especially when Wells Fargo moved to foreclose on the house, even after the family was back in.

Zakaryan had experienced some financial challenges and was discussing those with the bank before all this transpired. Perhaps, McNerny surmised, the family had fallen behind on homeowner association payments and the HOA had initiated foreclosure.

Nope, that wasn't it.

## probate noun

### Definition of *probate*

- a : the action or process of proving before a competent judicial authority that a document offered for official recognition and registration as the last will and testament of a deceased person is genuine
- b : the judicial determination of the validity of a will
- 2 : the officially authenticated copy of a **probated** will
- 3 a : a court with jurisdiction over determination of the validity of wills and administration of estates and sometimes matters involving minors or adults judged incompetent: **PROBATE COURT**

The explanation was much stranger.

For years, this person named Thomas Moore had been petitioning Clark County Probate Court to be named “independent administrator” of dead people's estates. From his first few filings in 2014 and 2015, the venture escalated to scores in 2016 and 2017 and hundreds more in 2018 and 2019. More often than not, his petitions to open and oversee probate –



– the legal process by which a person’s assets pass to heirs and/or creditors after death – went uncontested, and the court appointed him the estate administrator.

Among more than one hundred petitions Moore filed in 2019 alone was his request, soon granted, to administer the estate of Zakaryan’s late wife. The title to the house where the family continued to lawfully live was in her name.



*Arkadi's late wife Tsoghik*

Alleging the house was vacant, Moore then obtained an order from the Las Vegas Justice Court, which handles evictions, to remove what he claimed in an affidavit were “unlawful/unauthorized” occupants.

Court records show that the \$71 payment to file and serve the removal order came from the “Estate of Tsoghik Khachatryan,” the woman still mourned by her bereaved family.

### 3. An accumulation of conundrums

McNerny was not the only one in the legal community perturbed by Thomas Moore’s activities. Robert Telles, recently elected Clark County public administrator, already was looking into probate cases that Moore had initiated and sought to manage.

Telles, a 2014 graduate of UNLV law school (where he overlapped with McNerny) defeated two other contenders for the post in the 2018 general election, with 53 percent of the vote. He took office in January 2019. Within a few months, he was noticing Moore’s activities.

The public administrator handles matters surrounding deaths referred from the county coroner. Duties include making sure that any residence and belongings of the deceased are secured, and getting property released to family members. The office also is charged with managing deceased persons’ estates through the probate system when an individual dies without a will and no suitable relative or other overseer is available.

This may entail locating and assisting heirs, ensuring that real estate is sold at fair market value and that lenders and creditors are paid off, enlisting additional legal expertise, and submitting required reports to the court.

Why, Telles wondered, was an independent administrator with no public mandate and no prior relationship with all these deceased people and their families handling so many estates? Especially when Telles’ office was empowered with relevant oversight and capabilities, and specifically designed to manage the

aftermath when individuals died without wills or immediately apparent heirs.

In numerous cases, family members seeking to open probate or sell a home after a loved one died were finding that Thomas Moore, someone they’d never heard of, had “beat them to the courthouse door,” as one observer puts it. Their legal counsel or a realtor then would help the families reclaim their rights.

In such instances, Moore, through his attorneys, would quickly relinquish his interest.

But many more of his cases proceeded uninterrupted.

How did Moore find out about the demise of people who might have left property behind and whose relatives or attorneys had not yet filed for probate? And on what basis did he claim that potential heirs had gone missing and that estates were mired in insolvency?

Telles explored the mystery, and discovered a chain of events that seemed to lead from Moore’s voluminous probate court filings into nebulous recesses of the real estate market. Toward the end of last year, Telles began to file challenges to some of Moore’s petitions.

Moore himself offers a very different picture of his probate activities.

Reached by email, Moore said his goal is to rid neighborhoods of abandoned homes that attract drug dealers and violent criminals. He said he has settled estates when heirs are distant or disinterested, assisted aged and disabled heirs relocate, and rescued neglected pets; and has achieved “extremely positive results” in a wide variety of situations that leave neighbors, the city, and mortgage servicers happy and relieved.

In Moore’s view, the public administrator and other “3rd parties,” which he did not name, are engaged in a vendetta against him, creating “an uproar” over rare instances when something has gone awry.



Robert Telles,  
Clark County public administrator

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## 4. Fraud allegations

About ten days after the displaced Zakaryan family returned home, Moore ostensibly washed his hands of the matter, notifying the probate court of his resignation from the administrator role. A month later, the court appointed Arkadi Zakaryan administrator of his wife's estate. By then, Zakaryan had worked things out with the bank.

But attorney McNerny wasn't done. His office dug into court files and property records and discovered an ongoing pattern: Moore somehow was cross-referencing obituaries or other death records with notices of default or other documents indicating troubles with house payments. Moore would petition for, and usually gain, authority over the properties, then get them sold at prices that seemed suspiciously low – often to the same people or dummy corporations, typically investors in distressed housing.

McNerny is not in the habit of suing people; he mainly handles

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***“Moore would petition for, and usually gain, authority over the properties, then get them sold at prices that seemed suspiciously low ... ”,***

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straightforward administrative matters related to business or real estate. He made an exception here, filing a lawsuit on behalf of the Zakaryan family against the parties involved in throwing those six individuals out on the street – namely, Thomas Moore; attorney Taylor L. Waite and his law firm, Clear Counsel Law Group; and Vegas Valley Evictions LLC, hired to take care of inconvenient human beings in a house. Evidently, nobody had bothered to simply knock on the door and find out who lived there.

The civil suit, filed in Clark County District Court in early January 2020, alleges fraud against the family members and the courts, wrongful assertion of control over property, misrepresentation in legal documents, wrongful eviction, abuse of the legal process, infliction of emotional distress, and elder abuse. The suit requests a jury trial and unspecified damages “in excess of \$50,000.”

Waite and Clear Counsel countered with a motion to dismiss the lawsuit. Moore and the eviction company soon joined the motion. Arguments were aired before a District Court judge via teleconference in mid-March. As of mid-May, court records showed these filings were “under advisement,” with the court yet to rule on the dismissal efforts.

Again, Moore's account differs from that of his critics. His email described “One situation [in which] an occupant would not identify himself after a minimum of 10+ attempts by multiple parties,” an evident reference to Zakaryan. “The day after an eviction,” Moore continued, “he identified himself, and was able to re-enter the house. There was a trustee sale scheduled on the house and my real estate team was able to postpone the trustee sale. The mortgage servicer said they postponed the trustee sale

due to my efforts. I look at that as helping save a property from trustee sale for the heirs.”

Moore also alluded to complexities surrounding the estate of a man named Eddie Lamont Washington, saying, “Recently, some heirs came forward on a case and stated that the heir I was working with lied. My heir said she was the only heir. My counsel believed her and she lied big time. We are working to get this resolved for the other heirs.” Attorneys representing those other heirs allege that Moore easily could have found them, and chose not to look.

(See sidebar “A tale of five siblings.”)

## 5. But how can a stranger take over estates?

Investigation into the world of probate reveals that the Zakaryan family's ordeal is just one outcropping of a larger drama. The story emerges in part from insufficient institutional support for public services like the overburdened courts. It's a partial legacy of the subprime mortgage crisis and housing collapse of 2008-09, when for a time Nevada led the country in foreclosure rates and the sort of financial adversity that energized speculation in distressed housing. Most obviously, it reflects unique peculiarities of Nevada law.

Remarkably, the process enabling Moore to assume control of other people's property is made possible by provisions in Nevada's probate law – specifically, a lengthy section, known as the Independent Administration of Estates Act (NRS: Chapter 143), which was added to the state code by the 2011 session of the state legislature.

Legal scholars and practitioners across the country interviewed for this report expressed astonishment at what the Nevada law allows, and even facilitates. Some experts said they have never come across anything comparable in half a century or more of legal study or practice. While other states (including California, Illinois, Missouri and Texas) have independent administration add-ons to probate law, none insulate administrators from conventional expectations of openness and proof the ways Nevada's law and practices seem to.

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***“The part that's wrong is the independent administrator – they get to do it all in secret.”***

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Some Las Vegas-based probate attorneys say they avoid independent administration entirely, or use the measure rarely, because the process lacks transparency.

Nevada's probate law works well except for one part, remarked one lawyer: “The part that's wrong is the independent administrator – they get to do it all in secret.”

This lawyer admitted to “breaking my own rule slightly” during the Covid-19 slowdown in the courts, since independent



*Clark County's Regional Justice Center (in downtown Las Vegas)*

administration can speed the closing of a home sale and get proceeds to heirs quickly. “But I must have the whole family on board” in such cases, the lawyer said.

Under the Nevada law, if an estate is valued under \$300,000, courts may authorize an independent administrator to arrange for real estate sales with no court supervision. This departs from the more usual probate process in which real estate contracts are shared in open court, giving others the opportunity to offer higher bids.

The independent administrator need not have any relationship

to the decedent:

Anyone at least 18 years old without a felony record can seek the appointment. This contrasts with usual expectations that personal representatives for an estate, if not heirs or relatives themselves, have a preexisting advocacy role or trusted contractual relationship with the deceased or the family.

In Nevada, at least in Clark County, standards of evidence required for anyone seeking appointment as an independent administrator seem minimal.

The applicant provides a death certificate – available from the Vital Records department of the Southern Nevada Health District even to non-relatives if it serves to “facilitate legal process.”

The applicant can simply assert the estimated value of an estate, perhaps with a Zillow printout for the address in question. The applicant can speak to the deceased owner’s equity in a home, or lack thereof, without supplying evidence such as mortgage documents. A formal appraisal of the property need not be produced in court either before or after a sale.

The applicant can say no heirs have appeared, or that likely heirs failed to reply to notification, without proof that

essential information has been appropriately delivered, published, received or understood.

The applicant affirms eligibility to administer the estate because he or she is of age and not a felon, and sometimes because someone identified as an heir has signed over that authority.

The claims are followed by a “verification” document, swearing to all the above under penalty of perjury. According to “knowledge” and “belief,” the applicant vows with a signature, everything herein is the truth.

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## 6. The making of an independent administrator

“Thomas Moore states the following under penalty of perjury under the law of the State of Nevada,” declare his petitions to probate court: “That he is the Petitioner herein; that he has read the foregoing Petition and knows the contents thereof, and that the contents are true of his own knowledge, except for those matters stated on information and belief, and as to those matters, he believes them to be true.” Above his signature is the statement: “I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct to the best of my knowledge.”

So who is Thomas Moore?

Although his is a common name, Thomas Garland Moore Jr. seldom uses his middle initial. He is in his late 30s. His Las Vegas residence is a house owned by a couple in San Diego. In September 2018, he registered the company Estate Administration Services LLC with the Nevada Secretary of State, listing himself as registered agent and managing member. Other than dated blog posts about an online real estate technology platform he developed in 2009, eBrokerHouse.com, he seems to have no social media presence.

In response to emailed questions, Moore said his background “consists of working with distressed/foreclosure properties” as well as software programming. During the 2008 mortgage crisis, he trained listing agents for so-called REO (real estate owned) properties that remain in the hands of banks or other lenders after failing to sell at foreclosure auctions.

“I began working on probates when a real estate broker was telling me he was unable to sell a listing because the neighboring house was boarded up and a gang hang out,” Moore wrote. A daughter of the deceased homeowner wanted nothing to do with the matter. “She was very thankful that someone was going to help solve the situation. The mortgage servicer ended up doing a short sale on this property and was very eager to do so as the foreclosure process on this particular loan was quite lengthy. In addition, the neighbors, who had two adorable little daughters, kept me in the loop on gang activity/

police presence. They were very excited when the house sold and was finally going to be stabilized.”

Las Vegas Justice Court records show that Moore, in the role of administrator of various estates, instigated actions against “unauthorized occupant” on at least 13 occasions in 2019, including the episode that left the Zakaryan family temporarily homeless. These records also show that earlier, during 2018 and 2019, he brought actions for “unauthorized occupant” or “summary eviction” at least 14 times in the role of “owner” or “landlord,” indicating that he may have been a property owner or manager before focusing attention on estate administration.

Moore seldom needs to go to court in person; lawyers submit filings online and appear on his behalf. Until recently, Taylor L. Waite of Clear Counsel Law Group of Henderson handled most of Moore’s dealings in probate court. Since late last year, Taylor L. Randolph of Randolph Law Firm is his main representative on probate matters. To counter the Zakaryan civil suit, Moore has enlisted defense attorney Patrick N. Chapin, an adjunct professor of law at UNLV.

In response to an email inquiry, Chapin said Moore was referred to him based on his experience “litigating cases in the commercial, employment and complex areas for the past 27 years,” but that he cannot comment further due to “attorney-client privilege and canons of professional ethics.”

Waite’s law firm similarly declined to discuss a specific client. A letter emailed by Clear Counsel managing partner Jonathan W. Barlow on behalf of the firm said: “We scrupulously refrain from any outside discussions that could potentially violate any attorney-client or work-product privileges.” Speaking generally, the letter added, “we strive to fully advise our clients about all aspects of probate law,” and that the firm “has been responsive to the courts in adhering to every aspect of the law for our probate clients.”

By email, Randolph’s office said he was “unable” to field questions because, “We have very limited resources and attorney time due to the Covid-19 pandemic.”

## 7. The Las Vegas playbook

Moore said he has worked on more than 300 probate cases, and “every situation is different.” Yet commonalities are apparent.

The estates he seeks to administer invariably are worth, according to his court filings, under \$300,000 – in fact, he usually asserts a belief that the estate is worth zero dollars. He requests, and usually is granted, “summary administration,” which has a shorter timeline, lower filing fees, fewer court appearances and reduced reporting obligations than “general administration.”

Moore’s petitions almost always say the deceased individual left behind a house or condominium that is underwater – “encumbered for more than its value,” i.e., with more owed on a mortgage than the property is worth.

Frequently, his petitions say efforts to locate heirs have been unsuccessful. Some say no heirs have surfaced even if the appended death certificate lists an “informant” with the same surname and address as the deceased. Sometimes he provides

names and addresses of heirs in Nevada and/or in other states said to be unreachable or unresponsive to notices about the estate.

Usually, the deceased person has died “intestate,” meaning without a will. Sometimes, someone identified as a relative has signed a release to let Moore administer the estate. Once in a while, the document includes a will naming heirs, and one has signed over authority to Moore. If multiple heirs are identified and only one signs off, that evidently is sufficient.

In the case of the Zakaryan family, Moore followed his usual path: According to him, the estate was worthless, and efforts to contact heirs were fruitless.

If indeed Moore sent required notifications, they didn’t reach or register with the family: neither the notice of probate actions, nor the complaint about their supposedly unlawful occupancy, nor the removal notice.

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## BACKGROUND

### A tale of five siblings

Eddie Lamont Washington taught math at the Las Vegas Arts Institute. He hailed from Chicago and had a PhD from the University of Illinois. His students called him Dr. Washington.

On February 20, 2015, Washington passed away in Sunrise Hospital, just two miles east of the Vegas Strip. He was 63. His death certificate lists cardio-respiratory failure and pneumonia as the causes.

Three years on, represented by Taylor Waite of Clear Counsel Law Group, Thomas Moore opened probate for Washington’s estate using his customary template. No will was found. One heir was identified, a sister in Chicago named Vivian Best. The decedent had left behind a house, valued by Zillow at \$211,000. Moore calculated that only \$8,555 would remain after paying off debts.

Curiously, the house was not at the address listed on Washington’s death certificate as his residence. Rather, it corresponded with the mailing address for the “informant” supplying information about the death – Vivian Best.

In April 2018, the court granted Moore authority over the estate. In July, Moore arranged for the sale of the house to one of his frequent buyers, GMW LLC (corporate label for one Gary M. Wilson), for \$167,300. In August, Moore filed a final report to the court. After subtracting the mortgage payoff, closing costs and other expenses, exactly \$5,000 remained – to be paid to the law firm. The result: “there are no assets left in the estate.” The case was closed.

Eight months later, in April 2019, GMW resold the house for \$236,500 to an individual buyer.



*Dr. Eddie Washington, 1951-2015*

Another month passed. In May 2019, Moore’s attorney was back, asking the court to reopen the estate of Eddie Lamont Washington. The sister, Vivian Best, had alerted Moore to the existence of a second house. She’d signed a waiver granting Moore authority to take care of that property, too. In sworn statements, she and Moore both declared that Best was “the sole heir,” entitled to any remaining assets in the estate.

This second house did bear the address identified as Washington’s residence on his death certificate. According to Zillow, it was worth some \$244,600.

The title was transferred from the estate to Vivian Best.

The case was reopened and then, for the second time, closed.

In November, Best sold the property for \$235,000 to an individual buyer.

Then Thomas Moore’s disposition of the estate of Eddie Lamont Washington hit an unfamiliar hitch:

#### ***Four other siblings materialized!***

Three days before Nevada Governor Steve Sisolak issued the first of a series of shutdown decrees to cope with the coronavirus, Washington’s estate found new life in probate court. On March 13, 2020, on behalf of three additional sisters (two of them living in or near Chicago, one in California) and a brother (also in Chicago), Las Vegas attorneys Kennedy E. Lee and Daniel P. Keifer petitioned the court to reopen the estate yet again.

The petition alleges that Vivian Best was fully aware of her four living siblings and their rights; that she and Moore fraudulently represented Best as Washington’s only heir; and that Moore “breached his fiduciary duty by failing to perform any due diligence” to identify the other siblings. It calls on the court to correct the situation by recovering and redistributing the proceeds from Washington’s estate. Further, it asks the court to impose punitive damages on Best, and to assess damages for breach of fiduciary duty by Moore.

As a first step, the attorneys asked the court to freeze Best’s personal bank accounts. The court granted the request with a restraining order, effective into early August, “which shall freeze all accounts of Vivian Best held at any financial institution.”



## 8. *Peeling away layers*

Robert Telles, Clark County's public administrator, finds more questions than answers in Moore's record of estate administration.

Telles reviewed scores of closed cases for which Moore was appointed estate administrator, arranged for the sale of property, and reported back to the court with a final accounting that supposedly wrapped everything up.

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***“Strangely, Moore never asks for administrative fees for himself..”***

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Most of the final reports conclude that the deceased had no equity in the property and no other assets; the house or condo has been sold, the lender repaid, and nothing is left. Rarely, the estate is said to include a life insurance payoff or a bank account. Sometimes, some money remains, from which lawyers' fees, creditors' claims and other expenses are deducted to leave a balance (from a few hundred dollars to amounts in the thousands) for the court to distribute to any heirs who are known or might be located.

Strangely, Moore never asks for administrative fees for himself, which an estate administrator would be entitled to request. Nor, when a case comes up empty, is there any indication of how the lawyers who handled all this paperwork will get paid the \$5,000 to \$10,000 or so typically charged for such estate work.

So why is Moore so eager to manage these estates? What is he getting out of it all?

In his email, Moore emphasized the emotional rewards of his work, but did not address specific questions about financial rewards for either himself or his attorneys.

Lawyers who might help clarify these questions say attorney-client confidentiality prevents them from doing so. “Regarding compensation for any individual probate case, that would often be a matter of public record and reviewed by the courts,” the letter from Clear Counsel says. That does not appear to be the case here.

After reviewing the closed files, Telles went further, using property records to identify who had bought property, and for how much, from estates supervised by Moore, then tracing subsequent transactions for these properties. It became clear that the same buyers were acquiring many of the houses and condos sold under Moore's administration, evidently for investment purposes and/or resale; and that post-probate resales looked profitable.

The most frequent buyers were Precision Assets and GMW LLC, companies registered with the state of Nevada.

Precision Assets, whose principals are Avi Segal and Eyal Karban, buys, rehabs, and sells property. The company is known to other investors from open-bid probate sales.

Gary M. Wilson, a former realtor, signed a settlement with Nevada's State Real Estate Commission in May 2017 agreeing to surrender his license to sell real estate and not reapply for at least three years. In the agreement, he acknowledged having "knowingly" submitted "fabricated and/or altered" bank statements regarding five properties in dealings with Wells Fargo. Meanwhile, he has bought and resold homes from Moore-administered estates through his GMW LLC.

In his objections to Moore's activities, Telles expresses "serious concerns" about what he regards as large discrepancies between prices for real estate sales that Moore brought to completion during the probate process and subsequent – sometimes significantly higher – resale prices for those same properties.

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***“That’s a cumulative increase in value of nearly \$6 million, or more than 40 percent appreciation”***

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Specifically, in his review of 62 short-sales concluded under Moore's auspices between July 2016 and May 2018 (with more than 40 of these properties sold to Precision Assets or GMW), Telles found that sales as reported to the Clark County Recorder totaled approximately \$8.5 million, whereas resales of those properties to subsequent buyers added up to nearly \$14.5 million.

That's a cumulative increase in value of nearly \$6 million, or more than 40 percent appreciation. Telles supplies the details in a spreadsheet appended to his objections.

Telles questions Moore's near-universal assertion that homes

in estates are encumbered for more than their value. He suggests that properties may be getting sold for less than fair market value, thus boosting prospects for lucrative resale. And while he concedes that buyers incur expenses leading up to resale, he does not believe that accounts for the gap between estate sale and resale prices.

Telles also is concerned about the interests of Nevada's Medicaid recovery program, run by the state Department of Health and Human Services.

If an elderly person of modest means dies without a surviving spouse, minor children or other dependents, the state may seek repayment of some of the Medicaid benefits expended for the person's late-life care. In addition to notifying heirs, therefore, Moore must notify Health and Human Services when he takes on an estate.

But Medicaid cannot hope to recover anything if the deceased has no assets or home equity and proceeds of property sales go to pay off lenders, which is most of the time with Moore's cases.

In response to some of Telles' challenges, Moore has simply withdrawn. But he has endeavored to retain cases in which he claims authority signed over from an heir, citing probate law standards for "priority" of estate administration that rank heirs above the public administrator, and the right of heirs to designate others to represent them.

Moore also asserts that Telles' spreadsheet evidence is incomplete, misleading and erroneous. Filings by attorney Taylor Randolph say Telles' calculations fail to incorporate costs of readying property for resale, which may be substantial in the case of damaged and dilapidated homes; and also fail to reflect a healthy increase in home prices during the period under consideration.

So far, Telles has contested at least 36 cases Moore sought to add to his portfolio. The court granted the public administrator authority over about half, and allowed Moore to keep more than a dozen cases with a family member's nomination – even instances in which more than one potential heir was identified but only one individual signed off.

## 9. Why it matters

Some might deem probate court doings immaterial in the coronavirus era, and independent administration insignificant amidst threats to public health and safety. Actually, these matters are more relevant than ever.

Clark County's probate court continues to process a large caseload even under pandemic restrictions, relying on virtual methods over in-person interactions. And the ambiguities of independent administration revolve around some of the very problems accentuated by the pandemic: issues of financial insecurity, housing instability, and the aftermath of death.

Analysts remind us that, when the worst of the medical crisis has passed, the economic repercussions will continue. Unemployment and other programs will run out; rent and

mortgage deferments will expire; moratoriums on evictions and foreclosures will end. Down the road, people who die of coronavirus without a will or other preparations, and without relatives at hand or advocates to attend to their homes and belongings, could well enter the system as posthumous subjects of independent administration.

Stay tuned for PART TWO:

**FURTHER TRAVELS IN A LOONY LEGAL LANDSCAPE**