
Forensic Brief: Identity Backdating and the Concurrent Use of Multiple Legal Names as Predicate Conduct

Michael Allan Cane, then Kyleen Elisabeth Cane (a June 28, 2001 name-change date backdated over an actual November 25, 2003 court order), now Kyleen Elisabeth Castro: admission, the backdated name change, and audience-selected identity use, 1979–2023

This brief addresses two related questions and their legal significance. First, did the subject of the identity-backdating record represent a false, backdated date for her change of legal name from Michael Allan Cane (“Michael A. Cane”) to Kyleen Elisabeth Cane (“Kyleen E. Cane”), and was that backdated representation transmitted by interstate wire? Second, did the same subject thereafter use two legal names concurrently — Kyleen E. Cane and Kyleen Elisabeth Castro (“K. E. Castro”) — from one office, selecting between them by audience? The documentary record answers both questions in the affirmative. The conduct begins with the misrepresentation of when the Kyleen identity came into being, and continues through the contemporaneous deployment of the Cane and Castro identities across two government bodies.

I. Summary of Conclusions

The individual admitted to the California Bar in 1979 as Michael A. Cane has used, over four decades, three legal names: Michael A. Cane, Kyleen E. Cane, and K. E. Castro. Two features of that use are forensically significant and independently actionable.

First, the change from Michael A. Cane to Kyleen E. Cane was represented in Securities and Exchange Commission filings as effective June 28, 2001 — sixteen days after the June 12, 2001 reverse merger that founded the securities scheme. The change in fact occurred by order of the Eighth Judicial District Court, Clark County, Nevada, entered November 25, 2003 (*In re Michael Allan Cane*, Case No. D308221, Dept. E), and was corrected into the property records by quitclaim deeds recorded in 2004. The June 28, 2001 date was backdated by roughly two and a half years, and the backdated representation was transmitted to the public through EDGAR. That transmission is an independent wire-fraud predicate, separate from the wire frauds attending the securities scheme itself.

Second, from 2019 through at least 2023 the subject used the Cane and Castro names simultaneously, from the single office at 3273 East Warm Springs Road, Las Vegas, Nevada 89120, presenting to the Nevada Secretary of State as “K E Castro” while swearing to the Eighth Judicial District Court, under penalty of perjury, as “Kyleen E. Cane.” The selection of name tracked the forum.

II. The Identity Chronology

Each entry below is a public record — a state-bar registry, a recorded Clark County instrument, an SEC filing, a Nevada Secretary of State filing, or a court filing. The chronology is dispositive of both the backdating and the later concurrent use.

Date	Name Used / Represented	Matter
July 3, 1979	Michael A. Cane	Bar admission, No. 87106 ⁹
June 12, 2001	Michael A. Cane	Reverse merger ¹²
June 28, 2001	Kyleen E. Cane (<i>claimed</i>)	Backdated name-change date ¹¹
Aug. 25, 2003	Michael A. Cane	Home purchase, 15 Quail Hollow ¹⁰
Nov. 25, 2003	Michael Allan → Kyleen Elisabeth Cane	Name & gender change order ¹⁰
May 19, 2004	Michael A. → Kyleen E. Cane	Title correction, 15 Quail Hollow ¹⁰
July 22, 2004	Kyleen E. Cane	Form 5 (backdated date) ¹¹
Nov. 5, 2004	Kyleen E. Cane	Form 4, re-transmits backdated identity ¹³
Nov. 9, 2004	Michael A. nka Kyleen E. Cane	Title correction, 105 Quail Run ¹⁰
May 24, 2019	K E Castro	Annual List — Westward Law, LLC ¹
June 4, 2019	Kyleen Cane	Annual List — World Series of Golf, LLC ²
Apr. 16, 2020	Kyleen Cane	Email re online-content dispute
Aug. 16, 2021	K E Castro	Annual List — DKM Development, LLC ³
Apr. 10, 2023	Kyleen E. Cane	Sworn affidavit, <i>Cane v. Phillips</i> ⁴
Dec. 20, 2023	Kyleen Cane	Reinstatement + Annual List, WSOG ²

Source: State Bar of California; Clark County Recorder; SEC EDGAR; Nevada Secretary of State; Eighth Judicial District Court.

Note: All 2019–2023 Nevada filings list the same record address, 3273 East Warm Springs Road, Las Vegas, Nevada 89120.

Two intervals carry the analysis. The gap between the claimed June 28, 2001 name change and the actual November 25, 2003 court order — with the August 2003 purchase still recorded in the Michael A. Cane name — establishes the backdating. The eleven days between the May 24, 2019 Castro filing and the June 4, 2019 Cane filing — at one address — establish the concurrency.

III. Example Statement of Facts (Model Allegations)

The following numbered paragraphs illustrate how the identity conduct may be pleaded as a statement of facts, tracing the subject from admission, through the name change and its backdating, through the audience-selected use of each identity, to the present Castro identity. They are offered as a drafting model; record citations are in the footnotes to Parts II and IV.

1. On July 3, 1979, the individual now known as Kyleen Elisabeth Castro was admitted to the practice of law in California as **Michael A. Cane** (State Bar of California No. 87106).
2. Through her law firm — later operating as Cane Clark LLP and as SEC filing agent under EDGAR filer identifier 0001255294 — **Michael A. Cane** served as counsel and filing agent for a series of reverse-merger shell issuers, including the June 12, 2001 Tele-Lawyer / Dynamic Associates / Legal Access Technologies transaction and the related shell-collateral arrangements later described in sworn bankruptcy proceedings.
3. In filings with the Securities and Exchange Commission, the subject represented that her legal name had changed from Michael A. Cane to **Kyleen E. Cane** effective **June 28, 2001** — sixteen days after the reverse merger.
4. That representation was false. The subject purchased 15 Quail Hollow Drive, Henderson, Nevada as "Michael A. Cane" on August 25, 2003 — more than two years after the claimed June 28, 2001 change. The legal name change in fact occurred by order of the Eighth Judicial District Court, Clark County, Nevada, entered **November 25, 2003**, in *In re Michael Allan Cane*, Case No. D308221, Dept. E — an Order for Change of Name and Gender changing Michael Allan Cane to Kyleen Elisabeth Cane and the gender from male to female, on which the subject appeared as her own counsel of record, "Michael A.

Cane, Esq., Nevada Bar No. 5900.” That order was thereafter recorded with the Clark County Recorder on November 9, 2004 as Doc. No. 20041109:001972, bundled with the quitclaim deed correcting title to 105 Quail Run Road (APN 178-06-411-005); the companion quitclaim correcting title to 15 Quail Hollow Drive had been recorded May 19, 2004 (Doc. No. 20040519:04721). The name change thus occurred on November 25, 2003 — not June 28, 2001.

5. The backdated June 28, 2001 date was transmitted to the public in the Form 5 for Legal Access Technologies, Inc. electronically filed with EDGAR on July 22, 2004 (Accession No. 0001255294-04-000216) — the first SEC filing under the Kyleen E. Cane name, filed through the subject’s own filing-agent identifier. The same backdated identity was transmitted to EDGAR a second time on November 5, 2004, in a Form 4 for the same issuer (Accession No. 0001255294-04-000300), signed “/s/ Kyleen Cane” on November 4, 2004 — four days before the November 25, 2003 order reached the public record on November 9, 2004.¹³ The subject knew the June 28, 2001 representation was false when she made it: she held the November 25, 2003 change-of-name order, and within months of the Form 5 she executed and recorded the very deeds that correct title from “Michael A. Cane” to “Kyleen E. Cane” — the May 19, 2004 quitclaim on 15 Quail Hollow Drive, and the November 8, 2004 quitclaim on 105 Quail Run Road (APN 178-06-411-005), recorded November 9, 2004 with the 2003 order attached. A person who is correcting her own title records from Michael to Kyleen in 2004 did not believe in good faith that the change had taken effect in 2001.
6. The subject used the Kyleen E. Cane identity for nearly two decades to litigate against and enforce a money judgment upon Mark Phillips, swearing the April 10, 2023 Affidavit and Renewal of Money Judgment as “Kyleen E. Cane, Esq., Nevada Bar No. 5900” in *Cane v. Phillips*, No. A-16-743194-C (Eighth Judicial District Court, Clark County), in the amount of \$4,888,924.78 — a sworn use of the Cane name made years after she had begun presenting to the Nevada Secretary of State under a third name, Kyleen Elisabeth Castro.
7. The subject adopted and used that third legal name, **Kyleen Elisabeth Castro**, in the Nevada Secretary of State records as early as **May 24, 2019** — the earliest Castro filing of record — filing annual lists as Manager “K E Castro” for Westward Law, LLC (May 24, 2019) and DKM Development, LLC (August 16, 2021), while continuing to file as “Kyleen Cane” for World Series of Golf, LLC (June 4, 2019; reaffirmed December 20, 2023) and to swear court pleadings as “Kyleen E. Cane” — all from the single office at 3273 East Warm Springs Road, Las Vegas, Nevada 89120.
8. The subject thus selected among three legal identities by audience and era: Michael A. Cane while conducting the foundational reverse-merger transactions; Kyleen E. Cane to litigate and to file under oath; and K E Castro to form and maintain Nevada entities — with the 2001 name-change date backdated to align the Kyleen identity with conduct in fact performed as Michael A. Cane.

IV. The Backdated Name-Change Representation as an Independent Wire-Fraud Predicate

The wire-fraud statute, 18 U.S.C. § 1343, reaches any transmission by wire in interstate commerce of a communication for the purpose of executing a scheme to defraud.⁸ An EDGAR submission is such a transmission: the filer uploads the document over interstate facilities to the Commission’s systems, where it is published.

The Form 5 for Legal Access Technologies, Inc., electronically filed July 22, 2004,¹¹ is the first public instrument bearing the Kyleen E. Cane name and the vehicle by which the backdated June 28, 2001 identity date entered the federal record. Because the name change did not occur until the November 25, 2003 court order, the representation that the Kyleen identity existed in June 2001 was false when transmitted, and it served a purpose: to place the new identity at the moment of the foundational reverse merger and thereby obscure that the foundational conduct had been performed as Michael A. Cane. The backdated identity was transmitted not once but twice: the same EDGAR filer uploaded a Form 4 for the issuer on November 5, 2004 (Accession No. 0001255294-04-000300), signed “/s/ Kyleen Cane” the prior day and transmitted four days

before the November 25, 2003 order was recorded — a second interstate wire carrying the Kyleen identity tied to the false June 2001 date.¹³ That transmission supports a wire-fraud predicate that is *independent* of — and additional to — the wire communications that carried the underlying securities fraud. The securities-fraud wires concern *what* was sold and to whom; this wire concerns *who* the seller represented herself to be and *when* that person came into existence. Each is separately chargeable conduct under section 1343.

V. The 2023 Affidavit and the Concurrent Secretary-of-State Filings

On April 10, 2023, while operating Westward Law, LLC and DKM Development, LLC under the Castro name, the subject executed and electronically filed an Affidavit and Renewal of Money Judgment in the Eighth Judicial District Court.⁴ The affidavit is signed “Kyleen E. Cane, Esq.,” gives Nevada Bar No. 5900, lists the firm address as 3273 East Warm Springs Road, and recites the email kcane@canec Clark.com. It renews, under NRS 17.214,⁵ a June 22, 2017 judgment against Phillips, stating an exact amount due of \$4,888,924.78 plus interest, and was served by certified mail and transmitted electronically to the court.

The affidavit fixes the Cane identity in a sworn instrument at the precise moment the Castro identity was in active use at the Secretary of State. The two Nevada Secretary of State records reproduced as **Exhibit A** and **Exhibit B** make the concurrency visible on the face of the state’s own database: World Series of Golf, LLC carries Manager “KYLEEN CANE” (Ex. A), while Westward Law, LLC — same office, same period — carries Manager “K E CASTRO” (Ex. B). The subject presented to the District Court as Cane and to the Secretary of State as both Cane and Castro, contemporaneously, from one office.

VI. Identity Use and the Nevada False-Personation and Identity-Theft Statutes

A person may lawfully change her name, and may lawfully use a former name in different contexts; the Castro and Cane names may each, standing alone, be names the subject is entitled to use. The forensic concern is the concurrent, audience-selected deployment of two identities to obtain advantage, and the backdating of the first change. NRS 205.450 makes it an offense to falsely personate another or to assume a false identity to obtain a benefit or to subject another to liability;⁶ NRS 205.463 addresses obtaining and using personal identifying information to harm or to gain a benefit.⁷ Whether the conduct reaches the elements of either statute turns on facts not yet fully developed — in particular, the procurement of the Clark County name-change records and whether any identity was used to misrepresent the subject to a person entitled to know it. The record assembled here establishes the predicate facts — the backdating and the contemporaneous dual use — on which any such analysis depends.

VII. The Conduct as RICO Predicate Acts

Under 18 U.S.C. § 1961(1), racketeering activity includes mail fraud (§ 1341) and wire fraud (§ 1343).⁸ The identity record supplies predicate conduct at two points. First, the July 22, 2004 EDGAR transmission of the backdated identity date — and its November 5, 2004 re-transmission in a Form 4 — is a discrete wire-fraud act, as set out in Part IV. Second, the April 2023 affidavit was both mailed by certified mail and transmitted electronically to the court; if the judgment it advances or the representations it contains are shown to be part of a scheme to defraud, the mailing and the wire are themselves predicate acts under sections 1341 and 1343. The concurrent maintenance of the Castro identity, and the earlier backdating of the Cane identity, are probative of the intent, the means, and the continuity that a pattern of racketeering activity requires. This brief does not contend that the existence of multiple names is, without more, a RICO violation; it contends that the backdated identity representation and the audience-selected use of two identities are admissible, material, and — as to the discrete wire and mail transmissions identified — separately chargeable conduct.

VIII. Conclusion

The record establishes that Michael A. Cane, Kyleen E. Cane, and K E Castro are one person; that the 2001 date for the first name change was backdated over an actual November 25, 2003 court order and transmitted to EDGAR; and that the Cane and Castro identities were used at the same time, from one office, chosen by forum. These facts should be (a) pleaded as evidence of identity, intent, and concealment in the civil

RICO and related claims; (b) the basis for discovery of the remaining Nevada entity-formation files; and (c) the foundation for charging the July 2004 EDGAR transmission and the April 2023 affidavit as discrete wire- and mail-fraud predicates. The certified Clark County Order for Change of Name and Gender (Case No. D308221, Dept. E, entered November 25, 2003; recorded Nov. 9, 2004 as Doc. No. 20041109:001972) is now in hand; the remaining evidentiary step is to authenticate the filed annual-list images bearing the Castro and Cane signatures (the snapshots of which appear as Exs. A and B), converting the inferences above into authenticated exhibits.

¹Nevada Secretary of State entity record, Westward Law, LLC (Entity E0259632015-7 / Business ID NV20151329122), Annual List filed May 24, 2019, Manager K E Castro, 3273 East Warm Springs Road, Las Vegas. A separate commercial-registered-agent registration for the same name exists at Business ID NV20151732942. Retrieved from the Nevada Secretary of State SilverFlume business search (lookup endpoint in the Appendix of Online Sources). Reproduced as Exhibit B. The same individual, under the Castro name, authored Kyleen Elisabeth Castro, *Inhibition of Cyclin Dependent Kinase 9 Is Synthetically Lethal with the Loss of Von Hippel Lindau Tumor Suppressor in Clear Cell Renal Cell Carcinoma* (Ph.D. dissertation, Univ. of Cal., Irvine 2024), at 1–2 (title page and author's name, "Kyleen Elisabeth Castro"), 4 (dedication, "To my children, Joshua and Stephen"), 11–12 (curriculum vita, reciting the identical 1975 U.C. Irvine B.A. and 1978 USC J.D. with Order of the Coif); printed copy at <https://escholarship.org/content/qt2bm435jc/qt2bm435jc.pdf>.

²Nevada Secretary of State entity record, World Series of Golf, LLC (Entity E0068082014-8 / Business ID NV20141089620), Annual List filed June 4, 2019, Manager Kyleen Cane; reinstated and re-filed Dec. 20, 2023 (Certificate of Reinstatement 20233706469; Annual List 20233706505), same address. Reproduced as Exhibit A.

³Nevada Secretary of State entity record, DKM Development, LLC (Entity E0527452005-8), Annual List filed Aug. 16, 2021, Manager K E Castro, same address. The K E Castro name on this annual list is the same individual who authored the 2024 U.C. Irvine doctoral dissertation cited *supra* note 1.

⁴Affidavit and Renewal of Money Judgment and Order to Remove and De-Index Harmful Online Materials, *Cane v. Phillips*, No. A-16-743194-C, Dep't XXIX (8th Jud. Dist. Ct., Clark County, Nev.), executed Apr. 10, 2023, electronically filed Apr. 13, 2023, 10:29 a.m. (Steven D. Grierson, Clerk), signed "Kyleen E. Cane, Esq., Nevada Bar No. 5900"; exact amount due \$4,888,924.78 plus interest from June 22, 2017.

⁵Nev. Rev. Stat. § 17.214 (renewal of judgment by affidavit).

⁶Nev. Rev. Stat. § 205.450 (personation generally).

⁷Nev. Rev. Stat. § 205.463 (obtaining and using personal identifying information of another).

⁸18 U.S.C. § 1961(1) (defining racketeering activity); 18 U.S.C. § 1341 (mail fraud); 18 U.S.C. § 1343 (wire fraud).

⁹State Bar of California No. 87106, admitted July 3, 1979; the 1979 admittee was "Michael A. Cane," the name now reading "Kyleen Elisabeth Cane" on the same record.

¹⁰Order for Change of Name and Gender, *In re Michael Allan Cane*, No. D308221, Dept. E (Nev. 8th Jud. Dist. Ct. Nov. 25, 2003) (changing Michael Allan Cane to Kyleen Elisabeth Cane and gender male to female), on which the subject appeared as her own counsel, "Michael A. Cane, Esq., Nevada Bar No. 5900," Cane & Associates, LLP; recorded, Clark County Recorder, Nov. 9, 2004, Doc. No. 20041109:001972, with quitclaim deed correcting title to 105 Quail Run Rd. (APN 178-06-411-005). Companion quitclaim correcting 15 Quail Hollow Dr. (APN 178-06-412-010) recorded May 19, 2004, Doc. No. 20040519:04721. Grant Deed, Doc. No. 0825-2863 (Clark Cnty. Aug. 25, 2003) (purchase by "Michael A. Cane," 15 Quail Hollow Dr., \$575,000) post-dates the claimed June 28, 2001 change and pre-dates the actual Nov. 25, 2003 order.

¹¹Form 5, Legal Access Technologies, Inc., filed by Kyleen E. Cane (July 22, 2004), Accession No. 0001255294-04-000216 — the first SEC filing under the Kyleen E. Cane name, transmitted to EDGAR through filer identifier 0001255294 (Cane Clark).

¹²Tele-Lawyer / Dynamic Associates / Legal Access Technologies reverse merger, June 12, 2001, as described in the sworn bankruptcy record, *In re Wallace*, Memorandum (Bankr. No. 15-1319, Oct. 14, 2016).

¹³Form 4, Legal Access Technologies, Inc. (f/k/a Dynamic Associates, Inc.), filed by Kyleen E. Cane (Nov. 5, 2004), Accession No. 0001255294-04-000300, signed "/s/ Kyleen Cane" Nov. 4, 2004 — a second EDGAR transmission of the Kyleen identity through filer identifier 0001255294 (Cane Clark), uploaded four days before the Nov. 25, 2003 name-change order was recorded (Nov. 9, 2004). Per EDGAR, the issuer was renamed from Dynamic Associates, Inc. to Legal Access Technologies, Inc. effective May 15, 2001.

Exhibit A

World Series of Golf, LLC — Nevada Secretary of State Entity Record (Entity E0068082014-8 / Business ID NV20141089620)
*Annual List filed June 4, 2019: Officer / Manager **KYLEEN CANE**, 3273 E Warm Springs Road, Las Vegas, NV 89120*

Filing History

Entity Information

Entity Name: WORLD SERIES OF GOLF LLC

Entity Number: E0068082014-8

Entity Type: Domestic Limited-Liability Company (86)

Entity Status: Revoked

Formation Date: 02/07/2014

NV Business ID: NV20141089620

Termination Date:

Annual Report Due Date: 2/28/2025

Compliance Hold:

Series LLC: ☐ Restricted LLC: ☐

Filing History Details

File Date	Effective Date	Filing Number	Document Type	Amendment Type	Source	# of Pages	View
12/20/2023	12/20/2023	20233706505	Annual List		External	2	View
12/20/2023	12/20/2023	20233706469	Certificate of Reinstatement		External	3	View
06/03/2019	06/03/2019	20190241744-04	Certificate of Reinstatement		Internal	1	View
06/03/2019	06/03/2019	20190241747-37	Annual List		Internal	1	View
06/03/2019	06/03/2019	20190241745-15	Certificate of Acceptance by Registered ...		Internal	1	View
02/06/2017	02/06/2017	20170057225-71	Resignation of Registered Agent		Internal	1	View
05/24/2016	05/24/2016	20160233163-47	Annual List		External	1	View
12/02/2014	12/02/2014	20140789674-58	Annual List		External	1	View
02/07/2014	02/07/2014	20140096322-19	Initial List		External	1	
02/07/2014	02/07/2014	20140096319-65	Articles of Organization		External	5	

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Filing Date SnapShot As Of: 12/20/2023

Business Details

Name Changes

Principal Office

Registered Agent

Officer Information

Shares

Date	Title	Name	Attention	Address1/Address2/City/State/Zip/Country
06/04/2019	Manager	KYLEEN CANE		3273 E WARM SPRINGS ROAD, LAS VEGAS, NV, 89120, USA

Exhibit B

Westward Law, LLC — Nevada Secretary of State Entity Record (Entity E0259632015-7 / Business ID NV20151329122)
Annual List filed May 24, 2019: Officer / Manager **K E CASTRO**, 3273 E Warm Springs Rd, Las Vegas, NV 89120

Filing History

Entity Information

Entity Name: WESTWARD LAW LLC

Entity Number: E0259632015-7

Entity Type: Domestic Limited-Liability Company (86)

Entity Status: Default

Formation Date: 05/26/2015

NV Business ID: NV20151329122

Termination Date:

Annual Report Due Date: 5/31/2026

Compliance Hold:

Series LLC: ☐ Restricted LLC: ☐

Filing History Details

File Date	Effective Date	Filing Number	Document Type	Amendment Type	Source	# of Pages	View
05/02/2025	05/02/2025	20254870995	Annual List		External	2	View
05/13/2024	05/13/2024	20244056037	Annual List		External	2	View
03/20/2023	03/20/2023	20233036084	Annual List		External	2	View
05/31/2022	05/31/2022	20222355879	Annual List		External	2	View
05/27/2021	05/27/2021	20211487426	Annual List		External	2	View
05/29/2020	05/29/2020	20200691044	Annual List		External	2	View
01/25/2020	01/25/2020	20200438259	Amended List		External	2	View
05/24/2019	05/24/2019	20190225435-23	Annual List		External	1	View
05/25/2018	05/25/2018	20180238340-31	Annual List		External	1	View
05/30/2017	05/30/2017	20170232714-19	Annual List		External	1	View
06/02/2016	06/02/2016	20160249978-28	Annual List		External	1	View
12/31/2015	12/31/2015	20150572261-91	Merge In		Internal	6	View
05/26/2015	05/26/2015	20150236029-50	Initial List		External	1	
05/26/2015	05/26/2015	20150236027-38	Articles of Organization		External	6	

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Filing Date SnapShot As Of: 05/02/2025

Business Details

Name Changes

Principal Office

Registered Agent

Officer Information

Shares

Date	Title	Name	Attention	Address1/Address2/City/State/Zip/Country
05/24/2019	Manager	K E CASTRO		3273 E WARM SPRINGS RD, LAS VEGAS, NV, 89120, USA

Appendix of Online Sources

The following lookup endpoints are reproduced for verification. Entity records are retrieved by name or business-identification number at the Nevada Secretary of State business search; statutes at the cited reporters; the SEC filing at EDGAR.

- Nevada Secretary of State, SilverFlume Business Search: <https://esos.nv.gov/EntitySearch/OnlineEntitySearch>
- Nevada Revised Statutes, Chapter 17 (Judgments): <https://www.leg.state.nv.us/nrs/nrs-017.html>
- Nevada Revised Statutes, Chapter 205 (Crimes Against Property): <https://www.leg.state.nv.us/nrs/nrs-205.html>
- 18 U.S.C. § 1961, § 1341, § 1343 (Cornell LII): <https://www.law.cornell.edu/uscode/text/18/1961>
- SEC EDGAR, Form 5, Legal Access Technologies, Inc. (Accession 0001255294-04-000216): <https://www.sec.gov/Archives/edgar/data/878146/000125529404000216/>