State Bar of Nevada – Attorney Complaint Form

Your Name: Blake Harris

Your Address: 201 S. Biscayne Blvd., 28th Floor, Miami, FL 33131

Your Telephone: (786) 559-1209

Your Email: blake@blakeharrislaw.com

Have you previously contacted the State Bar regarding this matter?: No.

Did you hire/retain the attorney about whom you are complaining?: No. I am an attorney licensed in Florida (Bar No. 86486) and Colorado (Bar No. 45942) and the founding attorney of Blake Harris Law, a firm whose practice concentrates on offshore asset protection trusts. Mr. Oshins and I practice in the same field. My connection to Mr. Oshins arises from public statements he made about offshore trust case law, my direct correspondence with him about those statements, and my firm's published review of the cases he cited.

Case Name: N/A

Case Number: N/A

Name of Court: N/A

Attorney Information

Attorney Name: Steven J. Oshins (Nevada Bar No. 5732)

Attorney Law Firm: Law Offices of Oshins & Associates, LLC

Address: 1645 Village Center Circle, Suite 170, Las Vegas, NV 89134

Telephone: (702) 341-6000, ext. 2

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Explanation of Grievance

I am filing this complaint because Mr. Oshins has repeatedly published and distributed to the public materially inaccurate descriptions of court decisions concerning offshore asset protection trusts, and because he continued to do so after receiving specific notice of the inaccuracies. He has cited, and is still citing, cases that do not involve an offshore trust at all as proof that offshore trusts fail. This complaint also concerns comparative advertising claims on his firm website sourced solely to anonymous, non-reproducible chatbot outputs. I believe this conduct implicates Rule 7.1 (false or misleading communications concerning a lawyer or the lawyer's services) and Rule 8.4(c) (conduct involving misrepresentation) of the Nevada Rules of Professional Conduct, though I understand the Office of Bar Counsel will make its own determination.

The chart. For many months, Mr. Oshins published and promoted a chart titled "45 FAPT Cases Gone Wrong," presenting forty-five court decisions to the legal profession and the general public as proof that foreign asset protection trusts fail. My firm reviewed the entries case by case and published the full analysis at 45FAPT.com, which resolves to blakeharrislaw.com/articles/case-law-cit. The review found the following. First, none of the cases we could locate shows a properly formed, timely funded offshore trust with an independent trustee losing on the merits; the courts in those cases were addressing fraud, concealment, retained control, or transfers made after a claim arose. Second, and most plainly, a number of the entries involve no offshore trust at all. In three of them the chart's own one-line description asserts an offshore trust or an offshore transfer that the decision does not contain. SEC v. Cook is described as the settlor losing control of his offshore trust assets, when the case concerned offshore bank accounts and entities the defendant controlled personally. In re Cyr is described as scrutiny of offshore trust transfers, when the trust at issue is a domestic Texas trust created by the debtor's in-laws. Fortney v. Kuipers is described as assets moved offshore, when the transfers at issue were domestic. In further entries the one-line description is unobjectionable on its face, but the case is presented, in a document titled "45 FAPT Cases Gone Wrong," as an instance of a foreign asset protection trust failing, when no such trust was involved. Chadwick v. Green concerned money moved to a Gibraltar company and to bank accounts in the debtor's own name. FTC v. Fortuna Alliance concerned a corporate offshore bank account. U.S. v. Plath concerned offshore credit card accounts. The Jerome Schneider matter concerned offshore banks and corporations. In re Omegas Group is a constructive-trust dispute arising from a commercial transaction. Whether a case involved an offshore trust is not a matter of opinion or of trust-design analysis. It is verifiable from the decision itself. Third, the count is inflated. Morris v. Wroble is the same Merry Morris action as Morris v. Morris, and In re Brooks duplicates Sattin v. Brooks. In re Steering Committee and In re Tinsley could not be located despite extensive research. Fourth, the chart conflates contempt orders against a settlor with a court reaching the trust; in numerous entries the debtor was sanctioned personally while the trust assets were never recovered. The complete case-by-case analysis is included as Exhibit 1a.

Private correspondence. On November 18, 2025 at 7:57 AM, months before any public dispute, I emailed Mr. Oshins privately (Exhibit 2). I raised concerns that his repeated public assertions that foreign asset protection trusts are fundamentally weak misrepresent the effectiveness of properly structured offshore trusts. I explained that the failures he cites, including cases such as FTC v. Affordable Media, In re Lawrence, and SEC v. Bilzerian, reflect settlor misconduct, retained control, or untimely transfers rather than a flaw in the structure itself, and I invited him to clarify and correct his statements. He responded the same day at 12:00 PM (Exhibit 3). He defended his public statements, wrote that he did not believe anything he says or writes is misleading, stated that he was "not misrepresenting anything by listing the cases where FAPTs didn't work," and declined to make any correction.

Public notice. I subsequently raised the inaccuracies in the chart publicly on more than one occasion, including in comments on Mr. Oshins's LinkedIn post and in posts tagging him. Mr. Oshins has since deleted the LinkedIn post on which my initial comments appeared, so those comments are no longer retrievable from that thread. His own August 10, 2026 post, however, confirms the public notice: he wrote that he had "not posted that chart since you brought to my attention (by tagging me on LinkedIn posts) that some of the cases do not belong" (Exhibit 7). The chart remained available in his past postings until August 10, 2026, by his own account.

Final notice. On Friday, August 7, 2026, I posted a final request: if Mr. Oshins removed the "45 FAPT Cases Gone Wrong" list from wherever he had posted it before the end of Monday, August 10, 2026, we would not act on the matter; if he refused, we would report him to the Bar (Exhibit 6).

His written acknowledgment. In written comments during the ensuing public exchange, Mr. Oshins acknowledged the defects in his own chart. On or about August 8, 2026, he wrote: “Those 45 cases came from multiple sources. I agree that some of them aren’t actual trust cases. I haven’t read them all.” In the same comment, he directed readers to a third-party website listing twenty of the forty-five cases (Exhibit 5a). On or about August 9, 2026, he confirmed the statement in a further comment, writing that my concern “is based on me typing that I haven’t read all the cases,” and directing readers to what he described as twenty-one cases (Exhibit 5b). He thus acknowledged in writing that he compiled the chart from other sources, that he had not read all of the cases, and that some entries are not trust cases at all, while continuing to direct the public to third-party lists. These were not his first statements to that effect. In the post of on or about March 2026 he wrote that he agreed with foreign trust proponents that most of the cases are, in his words, bad facts cases, while continuing to present them as failures and to rely on their number, which inflates the count of failed foreign asset protection trusts on his list (Exhibit 15b).

Removal, coupled with redirection to the same inaccuracies. On Monday, August 10, 2026, Mr. Oshins posted that he had removed the chart. In the same post, he directed readers to three third-party articles, each presenting a list of over two dozen court cases as defeating offshore trusts, and argued that the exact number of failed cases does not matter because “there are several, not zero” (Exhibit 7). In other words, on the same day he removed the chart, he redirected the public to third-party lists containing the same categories of misrepresentation. In an update he added to the same post on August 11, 2026, Mr. Oshins characterized the issue as my threatening to report him “for providing links to three other people’s websites with information he doesn’t believe is accurate,” referring to me. The inaccuracies documented at 45FAPT.com are matters of verifiable record, not belief.

The three articles. I reviewed every case discussed in those three articles. They repeat the same inaccuracies documented in the original chart, including cases involving no failure of an offshore trust on the merits and conflation of personal contempt sanctions with recovery of trust assets, and they overlap heavily with the forty-five cases already analyzed. One of the three articles states categorically that “[t]here are no cases to the contrary.” I marked the inaccurate statements line by line and published the marked copies at 45FAPT.com (Exhibit 9). The exact number of cases matters: whether the public is told there are two failed cases or forty-five materially affects whether families pursue offshore planning at all, and a legal proposition cannot be established by counting entries on a list; the decisions must be read and their holdings determined. All three articles remained publicly posted as of August 13, 2026 (Exhibit 8).

Notice that the three articles are inaccurate. After Mr. Oshins directed the public to those three articles, I put him on notice that they contain the same misrepresentations as the chart. In a public comment on or about August 11, 2026, I stated that each of the three articles he cited misrepresents offshore case law and directed him and any reader to the line-by-line marked copies published at 45FAPT.com (Exhibit 13). I also identified publicly four decisions on those lists in which no offshore trust was involved at all: FTC v. Direct Benefits Group, in which no offshore trust, foreign trustee, or foreign asset appears in the record and the repatriation language relied on is boilerplate in a standard freeze order; Chadwick v. Green, in which the funds were moved to a Gibraltar company and to offshore bank accounts in the debtor’s own name; FTC v. Fortuna Alliance, in which the funds were held in a corporate offshore bank account; and U.S. v. Plath, which concerned offshore credit card accounts. Each of the four is presented on those lists as a court defeating an offshore trust, and all three lists remain posted, so he is still citing cases that involve no offshore trust. The marked copies at 45FAPT.com document each one (Exhibit 9), and my public statement identifying them is Exhibit 14. All three articles remained posted after that notice.

The sequence of the removal. Mr. Oshins acknowledged the defects in the chart in writing on or about August 8, 2026. By his own account in his August 10, 2026 post, the chart nonetheless remained available in his past postings until August 10, 2026, the deadline stated in my final-notice post (Exhibit 7). He removed it on that date and, in the same post, directed the public to the three articles described above. The chart itself is no longer posted, but his own posts citing and characterizing the forty-five case list remain publicly available on his LinkedIn profile. Three of them were still posted when captured on August 13, 2026, each marked as edited (Exhibits 15a through 15c). In a post from on or about January 2026 he referred readers to his post citing forty-five published FAPT cases that he said had not worked out well for the defendant (Exhibit 15a). In a post from on or about March 2026 he wrote that he had identified at least forty-five published FAPT cases in which the debtor either lost or had to sit in jail, and attached an infographic titled to the effect that offshore trusts will not keep a debtor out of jail, which presents eleven decisions as its legal precedents and which he described in the post as showing eleven debtors who chose jail (Exhibit 15b). Two defects in that infographic are verifiable from the document itself. First, one of the eleven decisions, Chadwick v. Green, involved no offshore trust. Second, the infographic's own caption for Eulich v. U.S. states that the debtor was threatened with jail until assets were repatriated, not that he was jailed, which does not match the description of eleven debtors who chose jail. The infographic is his own work published under his own name rather than a list compiled by someone else, so these defects appear in material he authored.

Advertising claims sourced to anonymous chatbot outputs. Separately, Mr. Oshins publishes banners on his firm's public website homepage stating: Steven J. Oshins Named "Most Influential [Asset Protection Attorney] Overall Today" and Steven J. Oshins Named "Most Influential Estate Planning Attorney in Nevada" (Exhibit 10). The banners appear alongside recognitions from established third-party organizations such as Best Lawyers in America, presented in the same "Named" format. Each banner links, as the sole source of the claim, to a PDF captioned as "a copy of a conversation between ChatGPT & Anonymous" (Exhibit 11). Outputs of this kind are generated for an unidentified user, are not reproducible, and cannot be verified or audited by any consumer or third party. As to the first banner, the chatbot's initial answer was a hedged response naming multiple attorneys and stating there is no single universally agreed answer; the superlative phrasing emerged only after a follow-up prompt requesting a ranking, and the banner title inserts bracketed text that the chatbot did not generate (Exhibit 12, side-by-side comparison). A comparative superlative presented to consumers as a named recognition, sourced only to an anonymous, self-procured, non-reproducible chatbot conversation, is a misleading communication about a lawyer's services.

Why this matters. These publications are communications by a lawyer to the public about the effectiveness of competing legal services in his field of practice and about his own standing in that field. Consumers and referring professionals rely on them in deciding whether to pursue offshore planning at all and in selecting counsel. A lawyer who publishes case citations to the public is responsible for their accuracy whether he authored the underlying analysis or borrowed it, and carelessness does not make an inaccurate representation acceptable. That an author has not read the decisions he cites does not make the resulting descriptions accurate, and neither does the fact that the descriptions originated with someone else. A lawyer is responsible for the accuracy of what he disseminates to the public, whether he wrote it himself or is directing readers to another person's work, and whether or not he has read the underlying decisions. Mr. Oshins received private notice and public notice, acknowledged in his own words that he had not read all of the cases and that some were not trust cases, and on the day he removed the chart he redirected the public to three other lists repeating the same inaccuracies. The clearest of these representations require no assessment of trust design at all. A case either involved an offshore trust or it did not, and a number of the cases he has cited, and still cites, did not.

To be clear about what I am not alleging: I am not asking the Bar to referee a professional disagreement about the merits of foreign asset protection trusts. Criticism of offshore planning is fair game. This complaint concerns the accuracy of specific representations about what identified court decisions held, which is verifiable against the decisions themselves, and the substantiation of comparative advertising claims, which is verifiable against the sources Mr. Oshins himself cites. For every representation I identify as inaccurate, both the source and my firm's explanation are included here, so that no assertion in this complaint has to be taken on my word. The chart as Mr. Oshins compiled and circulated it is Exhibit 1b, and my firm's case-by-case analysis of each of its forty-five entries is Exhibit 1a. The three articles as published by their sources are Exhibit 8, and the line-by-line marked copies identifying each inaccurate statement are Exhibit 9.

Context. Mr. Oshins's practice includes domestic asset protection planning. The publications at issue compare that planning favorably against foreign asset protection trusts, which are the structures my firm's practice concentrates on, and they are addressed to the same prospective clients and referring professionals. The representations are therefore competitive statements about a rival category of legal services. They are also not a single instance. The chart circulated for months and was promoted repeatedly; the same categories of misrepresentation appear in the three articles he cited on the day he removed it; and the representations continued after both private notice in November 2025 and public notice in 2026. His own posts state the comparison directly. In the three posts described above he promotes the Hybrid Domestic Asset Protection Trust, which he states he created, and the Special Power of Appointment Trust as the alternatives to foreign trusts, writing that there are only two possible best asset protection techniques and that Hybrid DAPTs are undefeated (Exhibit 15).

Mr. Oshins's characterization of my notice. In his August 10, 2026 post Mr. Oshins wrote that he had been "threatened," and in his August 11, 2026 update he described me as threatening to report him for linking to three other people's websites. Neither characterization is accurate. On August 7, 2026 I gave notice of the step I would take if the inaccurate material was not removed, together with a commitment not to act if it was removed. That is notice of an intended step in an ordinary regulatory process, given as a professional courtesy so that the matter could be resolved without a filing. On or about August 11, 2026, after he removed the chart but directed the public to the three articles, I informed him that I would be reporting the matter (Exhibit 13). That was a statement of the action I was taking, not a demand or a condition.

Attempt to resolve directly. I attempted to resolve this matter directly with Mr. Oshins before involving the State Bar. My private email of November 18, 2025 raised the inaccuracies in his public statements and the cases he cites and invited correction; he declined the same day. I raised the matter publicly; he acknowledged not having read all of the cases but did not remove the chart. My August 7, 2026 post gave final notice, and while he removed the chart by the August 10 deadline, his removal post simultaneously directed the public to three other lists containing the same categories of misrepresentation, which remain posted. I ask the Office of Bar Counsel to investigate.

Exhibits

Exhibit 1a. Case-by-case analysis of the “45 FAPT Cases Gone Wrong” chart, as published at 45FAPT.com (resolving to blakeharrislaw.com/articles/case-law-cit), printed August 13, 2026, together with the full case-by-case review PDF (blakeharrislaw.com/docs/45-fapt-rebuttal.pdf).

Exhibit 1b. The original “45 FAPT Cases Gone Wrong” chart as compiled and circulated by Mr. Oshins (preserved copy at blakeharrislaw.com/docs/45-fapt-cases-gone-wrong.pdf).

Exhibit 2. Email from Blake Harris to Steven Oshins, November 18, 2025, 7:57 AM, “Request for Clarification Regarding Claims of Offshore Trust Ineffectiveness.”

Exhibit 3. Email response from Steven Oshins, November 18, 2025, 12:00 PM.

Exhibit 4. Public notice of the inaccuracies prior to August 7, 2026. My initial comments appeared on a LinkedIn post Mr. Oshins has since deleted and are no longer retrievable from that thread; the public notice is corroborated by Mr. Oshins’s own statement in Exhibit 7.

Exhibit 5a. Written comment by Steven Oshins on LinkedIn, on or about August 8, 2026 (marked edited), containing the acknowledgment quoted above and a link to the twenty-case third-party list.

Exhibit 5b. Written comment by Steven Oshins on LinkedIn, on or about August 9, 2026, confirming the statement and citing twenty-one cases.

Exhibit 6. Public post by Blake Harris, August 7, 2026, giving final notice with an August 10, 2026 deadline and stating the conditional commitment not to act upon removal (URL: linkedin.com/posts/blake-harris-08a106b_fapt-assetprotection-blakeharrislaw-activity-7491583147822788608).

Exhibit 7. Post by Steven Oshins, August 10, 2026 (updated August 11, 2026), announcing removal of the chart, citing the three articles, and containing the August 11 update quoted above (full-browser screenshot captured August 13, 2026 with URL and system date visible; URL: linkedin.com/feed/update/urn:li:activity:7492591845793759232).

Exhibit 8. The three articles as published by their sources, unaltered: (a) mlutah.com/court-cases-defeating-offshore-trusts (McCullough Law); (b) htj.tax, “Thinking of Cook Islands, Nevis and Belize? List of Court Cases Defeating Offshore Trusts” (Derren Joseph, July 26, 2025); (c) suddenwealthprotectionlaw.com/cases-defeating-offshore-trusts (Paul E. Deloughery, December 25, 2022). (Full browser print-to-PDF captures dated August 13, 2026, with URLs and print dates visible.)

Exhibit 9. Line-by-line marked copies of the three articles, as published at 45FAPT.com (printed copies).

Exhibit 10. Screenshots of the two "Most Influential" banners on the oshins.com homepage, captured August 13, 2026.

Exhibit 11. The two PDF chatbot-conversation documents linked from the banners, each captioned as a conversation between ChatGPT and Anonymous.

Exhibit 12. Side-by-side comparison of the asset protection banner title and the underlying chatbot output, showing the hedged initial multi-attorney response, the follow-up ranking prompt, and the bracketed insertion in the banner text.

Exhibit 13. Public comment by Blake Harris, on or about August 11, 2026, stating that the three articles Mr. Oshins cited misrepresent offshore case law, directing readers to the marked copies at 45FAPT.com, and informing him that the matter would be reported.

Exhibit 14. Public statement by Blake Harris identifying the four decisions on the three lists in which no offshore trust was involved (FTC v. Direct Benefits Group, Chadwick v. Green, FTC v. Fortuna Alliance, U.S. v. Plath).

Exhibit 15a. Post by Steven Oshins, on or about January 2026, marked edited, referring readers to his post citing forty-five published FAPT cases and promoting the Hybrid Domestic Asset Protection Trust. Two screenshots, captured August 13, 2026.

Exhibit 15b. Post by Steven Oshins, on or about March 2026, marked edited, stating that he had identified at least forty-five published FAPT cases in which the debtor lost or was jailed, containing his statement that most of the cases are bad facts cases, and attaching an infographic presenting eleven decisions as offshore trust precedents. Two screenshots, captured August 13, 2026.

Exhibit 15c. Post by Steven Oshins, on or about May 2026, marked edited, stating that he had identified forty-five such cases and that regular DAPTs and FAPTs both have inherent flaws. Two screenshots, captured August 13, 2026.

Date: ___________________________

Printed Name: Blake Harris

Signature: ___________________________