

UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS, AUSTIN DIVISION

In re Shan’a Wallace

Case No. 26-10649-cgb (Bankr. W.D. Tex. June 23, 2026) · No. Case No. 26-10649-cgb · Decided June 23, 2026

SUMMARY

This order directs attorney Brian West to show cause why he should not be sanctioned or referred to the District Discipline Committee for alleged deficiencies in bankruptcy filings, disclosure of confidential client information, and related professional-conduct concerns. The court also raises concerns about his practices in other bankruptcy cases and potential violations of duties applicable to debt relief agencies. A written response is due July 14, 2026, and an in-person show-cause hearing is scheduled for July 21, 2026.

CASE DETAILS

COURT	United States Bankruptcy Court for the Western District of Texas, Austin Division
WRITING FOR THE COURT	Christopher G. Bradley
JURISDICTION	United States Bankruptcy Court for the Western District of Texas, Austin Division
DECIDED	June 23, 2026
DOCKET	Case No. 26-10649-cgb
DISPOSITION	other
PROCEDURAL POSTURE	The bankruptcy court issued an order directing debtor’s attorney, Brian West, to show cause why he should not be sanctioned or referred to the District Discipline Committee based on alleged professional misconduct in the chapter 13 case and other cases.
PRECEDENTIAL VALUE	Unknown; show-cause order with no reported citation or final sanctions disposition.

TOPICS

- sanctions
- chapter 13
- bankruptcy disclosure requirements
- bankruptcy
- civil procedure

PRACTICE AREAS

- Bankruptcy
- Professional responsibility
- Attorney discipline
- Attorney-client privilege
- Chapter 13

QUESTIONS PRESENTED

1. Whether the bankruptcy court has authority to discipline an attorney appearing before it.
2. Whether the attorney's filings and public responses appear to violate duties concerning former-client confidentiality, protection of a client's interests, and supervision of nonlawyer assistants.
3. Whether the attorney should be required to show cause why sanctions, including possible penalties under 11 U.S.C. § 526(c)(5)(B), or referral to the District Discipline Committee should not be imposed.

HOLDINGS

1. A bankruptcy court has inherent authority, supplemented by 11 U.S.C. § 105(a) and applicable local attorney rules, to conduct disciplinary proceedings and discipline attorneys who practice before it.
2. An attorney practicing before the court is subject to the Texas Disciplinary Rules of Professional Conduct as adopted by the Western District of Texas; for matters not covered by those rules, the ABA Model Rules may be consulted.
3. An attorney may not use confidential information of a former client to the former client's disadvantage after the representation ends, absent applicable consent or another recognized exception; defending against allegations concerning the attorney's representation may permit limited disclosure, but that exception did not plainly apply where the debtor's motion was not brought against the attorney.
4. An attorney may be subject to discipline for the conduct and work product of nonlawyer assistants and must provide appropriate instruction and supervision concerning ethical obligations, including confidentiality.

KEY QUOTATIONS

"This Court has the "inherent authority to discipline an attorney" who appears before it."

"Even upon terminating representation, Mr. West still had a duty to "take steps to the extent reasonably practicable to protect [his] client's interests," which in no way included advocating against the Debtor."

"The Court believes that the governing ethics rules provide that it is unacceptable for an attorney to publicly disclose such information or make such allegations as a response to a Google review."

FACTUAL BACKGROUND

West represented Wallace in a chapter 13 case in which required schedules, statements, and a plan were never filed. The court identified inaccurate dates and debtor information, a nonexistent citation to "FRBP 10013(c)," and other deficiencies in West's filings. West later filed a response opposing Wallace's motion to vacate and exhibits containing communications and information obtained during the representation, and his firm allegedly posted client-specific information in response to an unfavorable Google review. The court also reviewed West's record in other bankruptcy cases and found widespread filing noncompliance warranting further inquiry into possible sanctions.

PROCEDURAL HISTORY

Brian West filed the chapter 13 case for Shan'a Wallace on April 10, 2026. The debtor's emergency motion to extend the deadline for required documents was dismissed for noncompliance with local rules, and no schedules, statements, or chapter 13 plan were filed. The case was dismissed on May 19, 2026, for failure to timely file a plan or schedules; the debtor's pro se motion to vacate the dismissal was later denied. After reviewing West's filings, alleged disclosures of client information, online-review response, and record in other cases, the court ordered West to file a written response and appear at a show-cause hearing.

DISPOSITION

other

CASES CITED

- Steinberg v. Alvarado (In re Alvarado), No. Civ.SA-03-CA-0295-RF, 2003 WL 22097092, at *5 (W.D. Tex. July 29, 2003)
- In re Luna, Nos. 03-50956, 02-54849, 2004 WL 1618824, at *3 (W.D. Tex. July 19, 2004)
- Cunningham v. Ayers (In re Johnson), 921 F.2d 585, 586–87 (5th Cir. 1991)
- Resolution Trust Corp. v. Bright, 6 F.3d 336, 341 (5th Cir. 1993)
- In re Royce Homes, LP, 449 B.R. 709, 723 (Bankr. S.D. Tex. 2011)
- United States v. Robinson, 121 F.3d 971, 974 (5th Cir. 1997)
- United States v. Pipkins, 528 F.2d 559, 562 (5th Cir. 1976)
- Alpert v. Riley, 267 F.R.D. 202, 208 (S.D. Tex. 2010)
- In re Sergio Lucio et al., Case No. 26-30103, Order for Brian Steven West to Appear and Show Cause as to Why He Should Not Be Sanctioned Under 11 U.S.C. § 526(c)(5)(B), ECF No. 34 (Bankr. S.D. Tex. Apr. 22, 2026)
- Milavetz, Gallop & Milavetz, P.A. v. United States, 559 U.S. 229, 236 (2010)