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11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

17 PROFIT CONNECT WEALTH
18 SERVICES, INC., JOY I. KOVAR, and
19 BRENT CARSON KOVAR,

20 Defendants.

Case No. 2:21-cv-01298-JAD-BNW

21 **STIPULATION AND ORDER**
22 **MODIFYING ORDER (ECF NO. 26):**

23 **(A) GRANTING PARTIES'**
24 **STIPULATION TO ENTER A**
25 **PRELIMINARY INJUNCTION AND**
26 **ORDER FOR RELATED RELIEF (1)**
27 **FREEZING ASSETS, (2)**
28 **PROHIBITING THE DESTRUCTION**
OF DOCUMENTS, (3) APPOINTING A
PERMANENT RECEIVER, AND (4)
PERMITTING JOY KOVAR TO OPEN
A BANK ACCOUNT FOR CERTAIN
INCOME;

(B) SETTING VIDEO STATUS
CONFERENCE ABOUT THE
RECEIVERSHIP; AND

(C) VACATING HEARING ON THE
SEC'S MOTIONS FOR A
PRELIMINARY AND TO APPOINT A
PERMANENT RECEIVER

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1 that authorization, the Receiver has instructed the financial institutions to close
2 Profit Connect's accounts and to turnover the funds on deposit so that the Receiver
3 can deposit them into accounts that he has established for the receivership. However,
4 at least one financial institution has expressed concern that the Order may limit the
5 turnover to only the amount necessary to make payroll, pay operating expenses or to
6 meet any other payment obligations.

7 E. The intention of the Order and the stipulation that it approved was for
8 the Receiver to have authority to take control and possession of all assets of defendant
9 Profit Connect and its subsidiaries and affiliates, including bank accounts in the
10 name of these entities, and to establish accounts for the Profit Connect receivership
11 estate. This stipulation clarifies that intention.

12 Therefore, the SEC and the Defendants stipulate as follows:

13 1. Section V of the Order is amended to replace the language at page 7:4-
14 12 with the following:

15 Except as otherwise ordered by the Court or as directed by the Receiver, any
16 bank, financial institution or brokerage firm, or third-party payment processor
17 holding such monies and assets described above shall hold and retain within their
18 control and prohibit the withdrawal, removal, transfer or other disposal of any such
19 funds or other assets.

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2. Except for the foregoing, the remainder of the provisions of the Order remain in full force and effect.

Dated: August 9, 2021

BALLARD SPAHR LLP

SECURITIES & EXCHANGE COMMISSION

By: /s/ Maria A. Gall

By: /s/ Kathryn C. Wanner

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ORDER

IT IS SO ORDERED:

U.S. DISTRICT COURT JUDGE

DATED: _____