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Geoff Winkler of American Fiduciary Services

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

**STIPULATION AND ORDER
REGARDING DOMAIN NAMES**

[ECF No. 33]

21 **STIPULATION**

22 Geoff Winkler, Receiver for Profit Connect Wealth Services, Inc. and its
23 subsidiaries and affiliates (together, “Profit Connect”), plaintiff Securities &
24 Exchange Commission (“SEC”), and defendants Joy I. Kovar, and Brent Carson
25 Kovar (together, the “Defendants”), by and through their respective counsel, stipulate
26 to give the Receiver explicit authority regarding the domain names used by Profit
27 Connect, pursuant to the following recitals:

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1 **RECITALS**

2 A. On August 6, 2021, the Court entered the Order: (A) Granting Parties'
3 Stipulation to Enter a Preliminary Injunction and Order for Related Relief (1)
4 Freezing Assets, (2) Prohibiting the Destruction of Documents, (3) Appointing a
5 Permanent Receiver, and (4) Permitting Joy Kovar to Open a Bank Account for
6 Certain Income; (B) Setting video status conference about the receivership; and (C)
7 Vacating Hearing on the SEC's Motions for a Preliminary and to Appoint a
8 Permanent Receiver (the "Order").

9 B. Pursuant to the Order, the Court appointed Geoff Winkler of American
10 Fiduciary Services LLC as the permanent receiver (the "Receiver").

11 C. Section X of the Order gives the Receiver authority over all assets owned
12 or controlled by Profit Connect. Based on this authority, the Receiver requested that
13 GoDaddy, which hosts the domain names used by Profit Connect to conduct
14 operations, give the Receiver access to the control of the domain names so that he can
15 have them redirected to the website established by the Receiver for the receivership
16 estate. Because the Order did not specifically reference the domain names or specify
17 the action GoDaddy is to take, GoDaddy declined to take any action and is awaiting
18 a Court order giving it direction.

19 D. The known domain names used by Profit Connect and hosted by
20 GoDaddy are the following: Profitconnect.com; Profitconnect-agnet.com;
21 Profitconnect-wealthservices.com; and Profitconnect.me (together with any other
22 domain names identified by the Receiver as having been used by Profit Connect to
23 conduct operations, the "Domain Names").

24 Therefore, the Receiver, the SEC, and the Defendants stipulate as follows:

25 1. GoDaddy is authorized to redirect the Domain Names to the website
26 established by the Receiver at www.profitconnect-receivership.com

2. Ownership of the Domain Names shall be transferred into the name of Profit Connect Wealth Services, Inc. and neither of the Defendants shall have any further access to or control of these Domain Names.

Dated: August 11, 2021

BALLARD SPAHR LLP

HAYES WAYAKAMA LLC

By: /s/ Maria A. Gall

By: /s/ Dale A. Hayes, Jr.

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SECURITIES & EXCHANGE COMMISSION

By: /s/ Kathryn C. Wanner

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Attorneys for Plaintiff, the SEC

ORDER

IT IS SO ORDERED:

U.S. District Judge Jennifer A. Dorsey

DATED: August 16, 2021

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