

BALLARD SPAHR LLP
1980 FESTIVAL PLAZA DRIVE, SUITE 900
LAS VEGAS, NEVADA 89135
(702) 471-7000 FAX (702) 471-7070

1 Maria A. Gall, Esq.
Nevada Bar No. 14200
2 BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
3 Las Vegas, NV 89135
Tel: (702) 471-7000
4 Fax: (702) 471-7070
gallm@ballardspahr.com

5
6 Kyra E. Andrassy, Esq.
(admitted pro hac vice)
SMILEY WANG-EKVALL, LLP
7 3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
8 Tel: (714) 445-1000
Fax: (714) 445-1002
9 kandrassy@swelawfirm.com

10 *Attorneys for Receiver*
11 *Geoff Winkler of American Fiduciary Services*

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE
COMMISSION;

15 Plaintiff,

16 v.

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

19 Defendants.
20
21

CASE NO. 2:21-cv-01298-JAD-BNW

**NOTICE OF RELATED CASES
AND REQUEST TO REASSIGN
CASE NO. 2:21-cv-02000-JCM-EJY**

22 Geoff Winkler, as Receiver for Profit Connect Wealth Services, Inc. and any of
23 its subsidiaries and affiliates, files this notice and request pursuant to LR 42-1: (1) to
24 advise that the action styled *Geoff Winkler, as Receiver for Profit Connect Wealth*
25 *Services, Inc. v. William Roshak, et al.*, Case No. 2:21-cv-02000-JCM-EJY (the
26 “Roshak Action”) is related to this action, and (2) to ask that the Roshak Action be
27 reassigned to the district judge and magistrate judge presiding over this action. As
28 set forth below, the Roshak Action is substantially related to this action because both

1 cases involve the same series of events and transactions and, as such, both cases
2 involve similar questions of fact. Indeed, the Receiver filed the Roshak Action under
3 authority of this court's order that he pursue assets belonging to the receivership
4 estate (*see* ECF No. 26). In such instances, LR 42-1(a) contemplates assignment to
5 the same district judge and magistrate judge.

6 More specifically, this action concerns a Ponzi-scheme perpetrated by Brent
7 and Joy Kovar, where the Kovars raised investor funds through a company called
8 Profit Connect. The Kovars assured investors that their money would be invested in
9 securities trading and cryptocurrencies based on recommendations made by an
10 "artificial intelligence supercomputer." The Kovars told investors that they had the
11 opportunity to invest by opening a "Wealth Builder" account and purchasing a
12 supercomputer "seat" that represented "cycle time on our supercomputer system,"
13 and that such accounts "are not affected by the current market volatility" because
14 "the supercomputer system guides the use of Profit Connect internal funds to be
15 focused on long and short position in foreign currency, stocks, block-chain
16 calculations, venture capital services and real estate opportunities." Needless to say,
17 there was no supercomputer and such representations proved untrue.

18 The Kovars relied on agents, i.e., promoters, to tout Profit Connect, and from
19 May 2018 through April 12, 2021, these agents were paid over \$3 million, or
20 approximately 26% of the funds from investors. William Roshak—the principal
21 defendant to the Roshak Action—was one such promoter and agent, as well as a
22 Profit Connect employee. The Roshak Action seeks to unwind over \$500,000 in
23 fraudulent transfers of investor funds made by the Kovars to William Roshak and his
24 current wife, Tetiana Luzhanska.

25 As alleged in the complaint in the Roshak Action, William and Tetiana took
26 such transfers in bad faith and without providing reasonably equivalent value, all
27 the while participating in perpetration of the Profit Connect scheme. To make
28 matters worse, they structured a significant portion of the fraudulent transfers to go

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1 directly to Tetiana so that William could avoid his child support obligations to his
2 two eldest children from his first marriage to Melissa Roshak.

3 Profit Connect was harmed by this unauthorized course of conduct, which was
4 effectuated by the Kovars, William, and Tetiana in furtherance of their schemes;
5 their conduct dissipated Profit Connect’s assets. To allow William and Tetiana to
6 keep monies they received from Profit Connect would be inequitable and unjust,
7 including to Profit Connect investors. The Receiver seeks to recover such amounts in
8 the Roshak Action.

9 Given the overlapping events and transactions between the Roshak Action and
10 this action, their assignment to the same district judge and magistrate judge is likely
11 to effect a substantial savings of judicial effort. By proceeding before the same
12 district judge and magistrate judge already familiar with this underlying action, the
13 Receiver seeks to avoid a duplication of labor by both the litigants and the court.
14 Accordingly, the Receiver asks that the court reassign this case to district judge and
15 magistrate judge presiding over this action.

16 Dated: December 1, 2021

17 BALLARD SPAHR LLP

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19 By: /s/ Maria A. Gall
20 Maria A. Gall, Esq.
21 Nevada Bar No. 14200
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135

22 -and-

23 Kyra E. Andrassy, Esq.
24 (admitted pro hac vice)
SMILEY WANG-EKVALL, LLP
25 3200 Park Center Drive, Suite 250
Costa Mesa, California 92626

26 *Attorneys for Receiver*

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CERTIFICATE OF SERVICE

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On December 1, 2021, I served the foregoing **NOTICE OF RELATED CASES AND REQUEST TO REASSIGN CASE NO. 2:21-cv-02000-JCM-EJY** on plaintiff Securities and Exchange Commission by electronic service and Brent and Joy Kovar by first class mail to their last known address listed below:

Plaintiff Securities and Exchange Commission:

Kathryn C. Wanner, Esq.
Teri M. Melson, Esq.
Securities and Exchange Commission
444 S. Flower Street, Suite 900
Los Angeles, California 90071
wannerk@sec.gov
melsont@sec.gov

***Pro Se* Defendants Joy I. Kovar and Brent Carson Kovar:**

Brent Kovar
Joy Kovar
8545 W. Warm Springs Rd., Ste A-4-179
Las Vegas, Nevada 89113

/s/ Adam Crawford
An Employee of Ballard Spahr LLP

BALLARD SPAHR LLP
1980 FESTIVAL PLAZA DRIVE, SUITE 900
LAS VEGAS, NEVADA 89135
(702) 471-7000 FAX (702) 471-7070