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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

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13 **SECURITIES AND EXCHANGE**
14 **COMMISSION,**

15 Plaintiff,

16 vs.

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

19 Defendants.
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Case No.

**[PROPOSED] ORDER RE
PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S *EX*
PARTE MOTION TO FILE
COMPLAINT AND APPLICATION
FOR A TEMPORARY
RESTRAINING ORDER UNDER
SEAL PURSUANT TO LOCAL RULE
10-5(a)**

(Filed Under Seal)

1 Plaintiff Securities and Exchange Commission (“SEC”) having moved for an
2 order directing that all pleadings and other documents filed with the Court in the
3 above-captioned case be filed under seal, and good cause appearing therefore,

4 **IT IS HEREBY ORDERED** that the entire file and the docket in this action
5 be sealed, and that all documents submitted to the Court in this action, including:

- 6 • this Application and the proposed Sealing Order;
- 7 • the SEC’s Complaint;
- 8 • Civil Cover Sheet;
- 9 • Summons;
- 10 • the SEC’s Ex Parte Application for a Temporary Restraining Order and
11 Orders (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting
12 Destruction of Documents; (4) Granting Expedited Discovery; (5)
13 Appointing a Temporary Receiver; and (6) To Show Cause Re
14 Preliminary Injunction and Appointment of a Permanent Receiver;
- 15 • the SEC’s Memorandum of Points and Authorities in Support of its Ex
16 Parte Application for a Temporary Restraining Order and Orders (1)
17 Freezing Assets; (2) Requiring Accountings; (3) Prohibiting Destruction
18 of Documents; (4) Granting Expedited Discovery; (5) Appointing a
19 Temporary Receiver; and (6) To Show Cause Re Preliminary Injunction
20 and Appointment of a Permanent Receiver;
- 21 • the Declaration of Teri M. Melson;
- 22 • the Declaration of Dora Zaldivar;
- 23 • the Declaration of Elizabeth Blaylock;
- 24 • the [Proposed] Temporary Restraining Order and Orders: (1) Freezing
25 Assets; (2) Requiring Accountings; (3) Prohibiting Destruction of
26 Documents; (4) Granting Expedited Discovery; (5) Appointing a
27 Temporary Receiver; and (6) To Show Cause Re Preliminary Injunction
28 and Appointment of a Permanent Receiver;

- 1 • Recommendation Concerning Appointment of a Receiver;
- 2 • the SEC’s Motion to Permit Appearance of Government Attorney Teri
- 3 M. Melson; and
- 4 • the SEC’s Motion to Permit Appearance of Government Attorney
- 5 Kathryn C. Wanner;

6 (collectively, the “TRO Application”), be filed under seal, and that the file
7 remain sealed: (a) for 48 hours after the Court issues its ruling on the TRO
8 Application, or (b) upon application by the SEC to unseal which shall be granted
9 upon filing with the Clerk of the Court. No further order of the Court shall be
10 necessary for the Clerk of the Court to unseal the file.

11 **IT IS HEREBY FURTHER ORDERED** that this Order shall not be
12 construed to prohibit the SEC or its attorneys or agents from disclosing the existence
13 of this action or the TRO Application to the process servers and other third parties to
14 the extent the SEC deems necessary, and that the SEC and its attorneys may disclose
15 and serve any Order on the *Ex Parte* Application for a Temporary Restraining Order
16 and Orders (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting
17 Destruction of Documents; (4) Granting Expedited Discovery; (5) Appointing a
18 Temporary Receiver; and (6) To Show Cause Re Preliminary Injunction and
19 Appointment of a Permanent Receiver, upon the depository institutions identified in
20 the proposed order.

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22 IT IS SO ORDERED.

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24 Dated: _____, 2021

25 UNITED STATES DISTRICT JUDGE

26 Presented by:
27 Kathryn Wanner
28 Teri M. Melson
Attorneys for Plaintiff
Securities and Exchange Commission