UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, v. MATTHEW WADE BEASLEY *et al.*, Defendants	Case No. 2:22-cv-00612-CDS-EJY

NOTICE OF SETTLEMENT WITH WELLS FARGO BANK, N.A. AND RIGHT OF EXCLUSION FROM BAR ORDER

PLEASE TAKE NOTICE that a proposed settlement (the "Settlement") has been reached in an agreement by and among Geoff Winkler, not individually but solely in his capacity as the court-appointed Receiver (the "Receiver") of the Receivership Entities in this action (the "SEC Action"),[1] investors in the class action lawsuit captioned *In re J&J Investment Litigation*, Case No. 2:22-cv-00529-GMN-NJK (the "Class Action") in the District of Nevada, and Wells Fargo Bank, N.A. ("Wells Fargo"). The Settlement requires a $50 million payment from Wells Fargo, the net proceeds of which will be used by the Receiver to make payments to investors of J&J Consulting Services, Inc. and related entities who suffered a net, out-of-pocket loss on their investment, as alleged in the Class Action ("Class Members").

You are receiving this Notice because you have been identified as someone who may be a non-investor creditor of the Receivership Entities, a non-Class Member investor, and/or a person or entity who was affiliated with the Receivership Entities, and whose claim(s) against Wells Fargo may be barred or enjoined upon final approval of the Settlement, through the entry of a "Bar Order." A federal court authorized this Notice. This is not a solicitation from a lawyer.

The purpose of this Notice is to inform you of the Settlement and to inform you of your right to exclude yourself from the effect of the Bar Order or submit an objection to the Bar Order. If you do nothing and the Settlement is approved, the proceeds of the Settlement will be used to pay Class Members, thereby reducing the overall claims against the Receivership Entities. If you do not exclude yourself from the Bar Order, you will be enjoined from bringing any claims you may have against Wells Fargo arising out of the Receivership Entities' offering of investments in personal injury settlements (the "J&J Investment

[1] For purposes of the Settlement, "Receivership Entities" means J&J Consulting Services, Inc., an Alaska corporation; J&J Consulting Services, Inc., a Nevada Corporation; and J and J Purchasing LLC, a Florida limited liability company.

Scheme"). This Notice describes important rights you may have and the steps you must take if you wish to be excluded from the Bar Order. You should consider consulting with your attorney regarding the Settlement, the Bar Order, your choices, and this Notice. Your legal rights are affected whether you act or do not act. Please read this entire Notice carefully.

The Settlement: The following parties have reached an agreement memorializing the Settlement (the "Settlement Agreement"): (i) Geoff Winkler, not individually but solely in his capacity as the court-appointed Receiver of the Receivership Entities; (ii) Barrett Henzel, Allan Carso, Craig Rodney Michaelis, Joshua Luekenga, Gary Lundin, Bryce Kelly, and Clint and Dan McDaniel (the "Class Representatives"), as proposed class representatives in the Class Action; and (iii) Wells Fargo Bank, N.A. (the Receiver, the Class Representatives, and Wells Fargo may be referred to as the "Parties" or individually as a "Party.") The Settlement Agreement is subject to approval by (i) the Court overseeing the Receiver to make sure the Settlement is fair and reasonable as to the receivership estate, and (ii) the Court overseeing the Class Action to make sure the Settlement is fair and reasonable as to the Class Members.

Under the terms of the Settlement, Wells Fargo agrees to pay the total sum of fifty million dollars ($50,000,000.00) (the "Settlement Payment"). In exchange for the Settlement Payment, (a) the Receiver agrees to release all claims he and the Receivership Entities may have against Wells Fargo that arise from or relate to the J&J Investment Scheme, and (b) all claims of the Class Members against Wells Fargo that arise from or relate to the J&J Investment Scheme will be released and barred.[2] The Settlement also requires entry of the Bar Order in the SEC Action that will enjoin the following persons from bringing claims against Wells Fargo arising from the J&J Investment Scheme: (1) creditors, including without limitation any non-investor creditors, lenders, or factoring companies, (2) non-class member investors, including without limitation net winning investors, and (3) persons or entities affiliated with the Receivership Entities, as set forth in the "Bar Order Notice List."

If you received this Notice, you are on the Bar Order Notice List. You have the right to exclude yourself from (or opt out of) the provisions of the Settlement. By opting out of the Bar Order, you will be excluded from the provision of the Bar Order that enjoins claims against Wells Fargo arising from the J&J Investment Scheme. If too many persons from the Bar Order Notice List opt out of the Settlement or if the Bar Order is not entered, Wells Fargo may, at its option, terminate the Settlement. In addition, you have the right to object to entry of the Bar Order. The procedures to opt out and object to the Bar Order are set forth below.

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[2] "Releasees" is defined as "(1) Wells Fargo; (2) each of their past, present, or future subsidiaries, parent companies (including any and all of its subsidiaries and affiliates), divisions, affiliates, partners or any other organization units of any kind doing business under their names, or doing business under any other names, or any entity now or in the past controlled by, controlling, or under the common control with any of the foregoing and doing business under any other names, and each and all of their respective affiliates and subsidiaries, and each of their respective predecessors, successors, and assigns; and (3) each of the present and former officers, directors, partners, shareholders, agents, employees, attorneys (including any consultants hired by counsel), advisors, independent contractors, representatives, beneficial owners, insurers, accountants, heirs, executors, and administrators, and each of their respective predecessors, successors, and assigns of any person or entities in subparts (1) or (2) hereof. This definition specifically includes Wells Fargo and Company."

The Receiver has filed in the SEC Action a motion seeking preliminary approval of the Settlement, establishment of the procedure and requirements to notify persons who may be affected by the Settlement, and the scheduling of a hearing date for the Court to consider whether to approve the Settlement (the "SEC Final Approval Hearing"). The Class Representatives also have filed in the Class Action a motion seeking preliminary approval of the Settlement, establishment of the procedure and requirements to notify Class Members, and the scheduling of a hearing date for the Court to consider whether to approve the Settlement (the "Class Final Approval Hearing"). The Court in both cases has granted those requests and established the below dates and procedures.

Important Dates:

Event	Date
Deadline to Submit Request to Opt Out of the Bar Order	October 12, 2026
Deadline to Submit Written Objection to the Bar Order	October 12, 2026
Final Approval Hearing in SEC Action	November 12, 2026 at 1:30 p.m.
Final Approval Hearing in Class Action	November 12, 2026 at 1:30 p.m.

Your legal rights are affected whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	If you agree to the Settlement and entry of the Bar Order, you do not need to do anything. If you do nothing and the Court approves the Settlement, including the Bar Order, you will be barred by court order from pursuing your own claims or lawsuit against Wells Fargo arising from the J&J Investment Scheme. If the Settlement is approved and Wells Fargo makes the Settlement Payment, it will be used to pay Class Members, thereby reducing the total claims against the Receivership Entities.
EXCLUDE YOURSELF FROM THE BAR ORDER	If you opt out of the Bar Order, you will retain your right to pursue the claims you may have against Wells Fargo (if any) arising from the J&J Investment Scheme.

SUBMIT AN OBJECTION TO THE BAR ORDER	You may object to the Bar Order and request that the Court not enter the Bar Order. If you object to the Bar Order but do not exclude yourself from the Bar Order, and the Court overrules your objection, you will be barred by court order from pursuing your own claims or lawsuit against Wells Fargo arising from the J&J Investment Scheme.

The Court in the SEC Action must decide whether to approve the Settlement. The Court will consider whether the Settlement Agreement is adequate, fair, and reasonable. Distributions will only be made if the Court approves the Settlement and after objections, if any, are resolved.

COMMON QUESTIONS ABOUT THE SETTLEMENT AND BAR ORDER

1. What does the Settlement provide?

Wells Fargo has agreed to pay $50 million under the Settlement Agreement. The Settlement Payment, less attorneys' fees and costs and the cost of administration, will be used to make distributions to Class Members.

2. How will the Settlement Payment be allocated?

The net proceeds from the Settlement Payment will be allocated among Class Members based on their claims against the Receivership Entities. Class Members with approved claims in the SEC Action, as well as Class Members who submit claims in response to the Settlement notices, will be eligible for payment from the Settlement Payment. The Receiver will make a pro rata distribution to the Class Members based on their net investment (total investment less returns or distributions). These payments to Class Members will reduce the total amount of claims against the Receivership Entities.

3. How would the Bar Order affect me?

If you do not opt out of the Bar Order, you will be barred from pursuing any claims against Wells Fargo arising from the J&J Investment Scheme. The Settlement does not affect any potential or ongoing lawsuit you may have against Wells Fargo (if any) that does not relate to the J&J Investment Scheme.

4. What does it mean to opt out (*i.e.*, exclude myself)?

If you do not want the Bar Order to affect your claims, if any, against Wells Fargo arising from the J&J Investment Scheme, you must submit a request. This is called "excluding yourself" or "opting out." By opting out, you are excluding yourself from the applicability of the Bar Order. However, there is no guarantee that any claim you may file separately against Wells Fargo will prevail. If you opt out, you may not object to the Settlement or Bar Order.

5. **How do I opt out (*i.e.*, exclude myself)?**

To opt out of the Settlement, you must send a written request (the "Request to Opt Out") by mail stating that you want to be excluded from the Bar Order. Your Request to Opt Out must include the following: (a) identification of the case name for the SEC Action; (b) your name, and address,; (c) your signature; and (d) a signed statement that indicates a desire to be excluded from the Bar Order, such as "I hereby request that I be excluded from the Bar Order in the SEC Action." The Request to Opt Out must be postmarked no later than October 12, 2026, and sent to:

J&J Bank Settlement
c/o Exclusion Requests
Stretto, Inc.
410 Exchange Ste. 100
Irvine, CA 92602

You cannot exclude yourself on the phone. You must submit the written exclusion request via mail as noted above. If you do not properly and timely submit a Request to Opt Out, it will be invalid and may be disregarded.

6. **If I do not opt out, can I sue Wells Fargo for the same claim later?**

No, because you will be bound by the Bar Order. If you have any pending claim or intend to assert a claim against Wells Fargo arising from the J&J Investment Scheme, you may want to consult a lawyer. Remember the deadline to submit a Request to Opt Out is October 12, 2026.

7. **How do I object to the Bar Order?**

If you would like to tell the Court in the SEC Action that you do not agree with entry of the Bar Order, you must submit an objection. If you wish to object to the Bar Order, you must (i) file a written objection with the Court in the SEC Action by mailing to [court address] and (ii) mail it (with the requisite postmark) to the Receiver's attorneys and Wells Fargo's attorneys at the addresses indicated in the response to Question 12 below.

All objections must be postmarked by October 12, 2026, and contain:

a. the case name and number of the SEC Action;
b. your name, address, and telephone number, and the same information as to your attorney, if you are represented by counsel;
c. the basis for the objection;
d. a statement of whether you intend to appear at the Final Approval Hearing in the SEC Action, either with or without counsel;
e. the identity of all counsel who represent or have represented you, including any attorney who may be entitled to compensation for any reason related to the objection to the Settlement, Bar Order, or the fee application; and

f. the identity of all counsel who will appear on your behalf at the Final Approval Hearing in the SEC Action.

Please note that if you do not submit an objection by the time and in the manner provided above, you will be deemed to have waived the right to object (including any right to appeal) to the Bar Order. You do not need to appear at the Final Approval Hearing or take any other action to indicate your objection or approval.

8. When and where will the Court decide whether to approve the Settlement and enter the Bar Order?

The Court in the SEC Action will hold a hearing to decide whether to approve the Settlement, enter the Final Approval Order, and enter the Bar Order. The Court will hold the Final Approval Hearing on the Settlement at 1:30 p.m., on November 12, 2026, in LV Courtroom 6B of the United States District Court for the District of Nevada, Las Vegas Division, 333 Las Vegas Boulevard South, Las Vegas, NV 89101. At the hearing, the Court will consider whether the Settlement is fair, adequate, and reasonable, as well as any objections to the Settlement, and consider whether the enter the Bar Order.

9. Do I need to go to the Final Approval Hearing?

No. If you submit an objection, you do not have to go to the Court to talk about it. As long as your written objection is received on time, the Court will consider it. If you timely and properly submit a Request to Opt Out, you do not need to confirm that with the Court either.

10. How can my counsel or I appear at the Final Approval Hearing in the SEC Action?

If you wish to make an appearance at the Final Approval Hearing, either on your own or through an attorney, you must make a request to do so, and it is subject to Court approval. To appear, you must file with the Clerk of the Court in the SEC Action a "Notice of Intention to Appear" and serve that notice on the Receiver's attorneys and Wells Fargo's attorneys at the addresses indicated in the response to Question 12 below. Your or your attorney's Notice of Intention to Appear must include copies of any papers, exhibits, or other evidence that you will present to the Court. Your Notice of Intention to Appear must also be filed and served by October 12, 2026.

11. How do I get more information about the Settlement and Bar Order?

This Notice does not provide all the details of the Settlement and the Bar Order. For further information, you can obtain copies of the Settlement Agreement, the proposed Bar Order, the motions seeking approval of the Settlement, and other supporting papers from the Receiver's website (https://jjconsulting-receivership.com/). Copies of these documents may also by requested by e-mail, by sending the request to contact@jjconsulting-receivership.com; or by telephone, by calling (702) 832-2299.

12. What is the contact information for the Receiver's Counsel and Wells Fargo's Counsel for purposes of the Settlement?

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