

1 PETER S. CHRISTIANSEN, ESQ. (#5254)  
 2 pete@christiansenlaw.com  
 3 KENDELEE L. WORKS, ESQ. (#9611)  
 4 kworks@christiansenlaw.com  
 5 KEELY P. CHIPPOLETTI, ESQ. (#13931)  
 6 keely@christiansenlaw.com  
 7 CHRISTIANSEN TRIAL LAWYERS  
 8 710 S. 7<sup>th</sup> Street, Suite B  
 9 Las Vegas, Nevada 89101  
 10 Telephone: (702) 240-7979  
 11 Facsimile: (866) 412-6992

12 *Attorneys for Defendant Christopher R. Humphries*  
 13 *and Relief Defendant CJ Investments, LLC*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SECURITIES AND EXCHANGE  
 17 COMMISSION,

18 Plaintiff,

19 v.

20 MATTHEW WADE BEASLEY; BEASLEY  
 21 LAW GROUP PC; JEFFREY J. JUDD;  
 22 CHRISTOPHER R. HUMPHRIES; J&J  
 23 CONSULTING SERVICES, INC., an Alaska  
 24 Corporation; J&J CONSULTING SERVICE,  
 25 INC., a Nevada Corporation; J AND J  
 26 PURCHASING, LLC; SHANE M. JAGER;  
 27 JASON M. JONEGARD; DENNY  
 28 SEYBERT; and RONALD TANNER,

Defendants,

THE JUDD IRREVOCABLE TRUST; PAJ  
 CONSULTING INC; BJ HOLDINGS LLC;  
 STIRLING CONSULTING, L.L.C.; CJ  
 INVESTMENTS, LLC; JL2  
 INVESTMENTS, LLC; ROCKING HORSE  
 PROPERTIES, LLC; TRIPLE THREAT  
 BASKETBALL, LLC; ACAC LLC;  
 ANTHONY MICHAEL ALBERTO, JR.; and  
 MONTY CREW LLC;

Relief Defendants

CASE NO.: 2:22-cv-00612

**RECEIVERSHIP DEFENDANT  
 CHRISTOPHER HUMPHRIES'  
 LIMITED OPPOSITION TO  
 PETITION FOR ORDER  
 APPROVING PROCEDURES FOR  
 SALES OF REAL PROPERTY OUT  
 OF RECEIVERSHIP [ECF 172]**

**CHRISTIANSEN**  
 TRIAL LAWYERS



1 Receivership Defendant Christopher R. Humphries, by and through Peter S. Christiansen,  
2 Esq., Kendelee L. Works, Esq. and Keely P. Chippoletti, Esq., of Christiansen Trial Lawyers, his  
3 Counsel of Record, hereby opposes the Receiver’s Petition for Order Approving Procedures for  
4 Sales of Real Property Out of Receivership [ECF 172] to the extent it seeks to include the  
5 Humphries’ family residence in Henderson, Nevada (the precise address is listed in the sealed  
6 assets list filed on April 20, 2022; ECF 37).

7 The parties are in the process of attempting to reach a resolution as to living arrangements,  
8 the sale of real properties, and living expenses for non-party Jessica Humphries, her husband and  
9 defendant Christopher Humphries, and their four minor children. The Humphries have agreed to  
10 the Receiver’s request to move out of their Huntington Beach house by August 15, 2022, in an  
11 effort to cooperate with the Receiver and SEC to facilitate the sale of the residence.<sup>1</sup> Mrs.  
12 Humphries and their four children will then move back to live full-time in the Henderson house,  
13 where Mr. Humphries currently resides.

14 The Henderson house is owned by the Humphries’ Living Trust and protected by a  
15 recorded homestead. Homesteads are protected by both the Nevada Constitution and the Nevada  
16 Revised Statutes. Nevada Constitution Article 4, Section 30 provides, in relevant part, that “[a]  
17 homestead as provided by law, shall be exempt from forced sale under any process of law.” NRS  
18 115.010(1) codifies the general rule exempting homesteads from any “forced sale on execution  
19 or any final process from any court,” while NRS 115.010(3) codifies the constitutional exceptions  
20 to the homestead exemption. The Nevada Supreme Court clarified the application of the  
21 homestead exemption in *In re Contrevo*, 153 P.3d 652, 654 (2007), unambiguously stating as  
22 follows:

23 . . . Nevada has a constitutional imperative that homestead property be exempt  
24 from legal process and placed outside the reach of creditors. . . To comply with

25 \_\_\_\_\_  
26 <sup>1</sup> The Humphries own a third property in Hurricane Utah (the precise address is listed in the  
27 sealed assets list filed on April 20, 2022; ECF 37). The Hurricane residence is a rental property  
28 with a current lease due to expire in February of 2023. The Humphries agree to cooperate with  
the Receiver and SEC to facilitate the sale of the Hurricane residence.



1 this constitutional mandate, the Nevada Legislature enacted NRS 21.090, which  
2 specifically exempts a homestead from execution.

3 *Id.*

4 The Receiver and the SEC have agreed to permit the Humphries to reside in their  
5 Henderson house for a minimum of six (6) months. Prior to the expiration of the six-month period,  
6 the parties will meet and confer about the Humphries continuing to reside in the Henderson house.

7 Based on the foregoing, Mr. Humphries respectfully requests that the Henderson house  
8 be exempt from the accelerated sale procedures proposed by the Receiver. Any attempted sale  
9 of the Humphries' Henderson residence should be properly noticed by motion with full  
10 opportunity for the Humphries to respond and be heard.

11 Dated this 1st day of August, 2022.

12 CHRISTIANSEN TRIAL LAWYERS

13 By  \_\_\_\_\_

14 PETER S. CHRISTIANSEN, ESQ.  
15 KENDELEE L. WORKS, ESQ.  
16 KEELY P. CHIPPOLETTI, ESQ.

17 *Attorneys for Defendant*  
18 *Christopher R. Humphries and Relief*  
19 *Defendant CJ Investments, LLC*

CHRISTIANSEN  
TRIAL LAWYERS



**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5 and LR-5.1, I certify that I am an employee of CHRISTIANSEN TRIAL LAWYERS, and that on this 1st day of August, 2022, I caused the foregoing document entitled **RECEIVERSHIP DEFENDANT CHRISTOPHER HUMPHRIES' LIMITED OPPOSITION TO PETITION FOR ORDER APPROVING PROCEDURES FOR SALES OF REAL PROPERTY OUT OF RECEIVERSHIP [ECF 172]** to be filed and served via the Court's CM/ECF electronic filing system upon all registered parties and their counsel.



\_\_\_\_\_  
An employee of Christiansen Trial Lawyers



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28