

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
3 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
4 **GREENBERG TRAUIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
Telephone: (702) 792-3773
6 Facsimile: (702) 792-9002

7 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
8 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
9 **SEMENZA KIRCHER RICKARD**
10161 Park Run Drive, Suite 150
11 Las Vegas, Nevada 89145
Telephone: (702) 835-6803
12 Facsimile: (702) 920-8669

13 *Attorneys for Geoff Winkler Receiver for*
J&J Consulting Services, Inc., J&J Consulting Services, Inc.,
14 *J and J Purchasing LLC, The Judd Irrevocable Trust,*
and BJ Holdings LLC

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 vs.

22 MATTHEW WADE BEASLEY *et al.*

23 Defendants,

24 THE JUDD IRREVOCABLE TRUST *et al.*

25 Relief Defendants.

Case No. 2:22-CV-00612-CDS-EJY

**STIPULATION AND ORDER
AUTHORIZING THE SALE OF
REAL PROPERTY HELD IN THE
NAME OF LARRY JEFFERY AND
CASSANDRA JEFFERY WITH
PROCEEDS FROM SALE TO BE
TRANSFERRED FROM ESCROW
DIRECTLY TO THE RECEIVER**

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**STIPULATION AND ORDER AUTHORIZING THE SALE OF REAL PROPERTY HELD
IN THE NAME OF LARRY JEFFERY WITH PROCEEDS FROM SALE TO BE
TRANSFERRED FROM ESCROW DIRECTLY TO THE RECEIVER**

The following Stipulation and [Proposed] Order regarding the sale of real property held in the name of Larry Jeffery and Cassandra Jeffery with proceeds from the sale to be transferred from escrow directly to the Receiver is made by and between Geoff Winkler, the Court-appointed receiver in the above-entitled action (the "Receiver"), the Plaintiff Securities and Exchange Commission (the "Commission") on the one hand, and Defendant Larry Jeffery and on-party Cassandra Jeffery on the other hand, by and through their respective representatives, and with respect to the following facts:

1. The Receiver was appointed on June 3, 2022 pursuant to this Court's Order Appointing Receiver [ECF No. 88] which was amended on July 28, 2022 [ECF 207] (collectively the "Appointment Order");

2. Among other things, the Appointment Order required the turnover of certain funds and assets to the Receiver, including real property owned by Mr. Jeffery which includes a home located at 755 Pearl St., Laguna Beach, California ("Pearl St. Property").

3. Mr. Jeffery has represented through counsel that he maintains sufficient assets to satisfy potential disgorgement and has advised that he received an offer for the purchase of the Pearl St. Property which has been on the market for sale since May of 2022.

4. The proposed buyer will pay the list price of \$4,199,000.000, pay 3% down (\$125,970.00) and sale will close within 30 days or less with the house being sold "As Is" (the "Offer"). It is understood the Offer represents fair market value for the Pearl St. Property and is the only offer received on the property despite two price reductions and it being listed for sale for nearly 70 days.

5. The Offer was received by Mr. Jeffery and his wife Cassandra Jeffery on August 2, 2022 and the Jefferys have an acceptance deadline of 3 calendars days after buyers' signatures or August 3, 2022 at 12:00 PM.

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1 6. There is currently a loan secured by the property in the approximate outstanding
2 amount of \$3,149,250,000 and it is estimated that after payment of the same, the net proceeds of
3 the sale of the Pearl St. Property will be close to \$1,000,000.

4 7. Mr. and Mrs. Jefferys are willing to provide all net proceeds from the sale of the
5 Pearl St. Property pursuant to the Offer to be wired directly to the Receiver from escrow.

6 8. Given the time the Pearl Street Property has been on the market and the nature of
7 the Offer, the Receiver and the Commission are agreeable to the sale moving forward and all
8 proceeds from the sale being provided directly to the Receiver.

9 9. Given the unique circumstances surrounding the Offer and proposed sale of the
10 Pearl Street Property, which is market appropriate, and concerns that failing to immediately move
11 forward will endanger the consummation of the sale which will have significant benefits to the
12 estate, the parties believe this stipulation is necessary, is in the best interest of all parties and the
13 receivership estate and therefore waive any requirements imposed by 28 U.S.C. § 2001, et. seq. to
14 the extent they are applicable to the Offer and proposed sale.

15 **ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED** by and between the
16 undersigned counsel that:

- 17 A. Mr. and Mrs. Jefferys may accept the Offer;
- 18 B. That any deposit received relating to the Offer be provided directly to the Receiver;
- 19 and

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C. Upon the consummation of the sale of the Pearl Street Property, including the payment of the current mortgage, that the net proceeds of the sale shall be wired directly from escrow to the Receiver.

DATED this 2nd day of August, 2022.

DATED this 2nd day of August, 2022.

GREENBERG TRAUERIG, LLP

SECURITIES & EXCHANGE
COMMISSION

/s/ Kara B. Hendricks

/s/ Casey R. Fronk

By: _____
KARA B. HENDRICKS, Bar No. 07743
JASON K. HICKS, Bar No. 13149
KYLE A. EWING, Bar No. 014051

By: _____
TRACY S. COMBS, ESQ.
(California Bar No. 298664)
CASEY R. FRONK, ESQ.
(Illinois Bar No. 6296535)
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101
Tel: (810) 524-5796
Fax: (810) 524-3558

JARROD L. RICKARD, Bar No. 10203
KATIE L. CANNATA, Bar No. 14848
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

DAVID R. ZARO*
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**admitted pro hac vice*
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816
Attorneys for Receiver Geoff Winkler

DATED this 2nd day of August, 2022.

GOODMAN LAW GROUP, PC

/s/ Ross C. Goodman

By: _____
ROSS C. GOODMAN, Bar No. 7722
520 S. Fourth Street, Second Floor
Las Vegas, NV 89101
*Counsel for Larry Jeffery and non-party
Cassandra Jeffery*

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
(702) 792-3773
(702) 792-9002 (fax)

1 **IT IS HEREBY ORDERED** that:

- 2 A. Mr. and Mrs. Jefferys may accept the Offer;
- 3 B. That any deposit received relating to the Offer be provided directly to the Receiver;
- 4 and
- 5 C. Upon the consummation of the sale of the Pearl Street Property including the payment
- 6 of the current mortgage, that the net proceeds be wired directly from escrow to the
- 7 Receiver.

8
9 Dated: August 3, 2022



 Hon. Cristina D. Silva
 Judge, United States District Court

Greenberg Traurig, LLP
 10845 Griffith Peak Drive, Suite 600
 Las Vegas, NV 89135
 (702) 792-3773
 (702) 792-9002 (fax)

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