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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 [PROPOSED]  
ORDER AUTHORIZING THE SALE  
OF REAL PROPERTY HELD IN THE  
NAME OF SHANE JAGER WITH  
PROCEEDS FROM SALE TO BE  
TRANSFERRED FROM ESCROW  
DIRECTLY TO THE RECEIVER**

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**STIPULATION AND [PROPOSED] ORDER AUTHORIZING THE SALE OF REAL PROPERTY HELD IN THE NAME OF SHANE JAGER 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 Shane Jager and Willow Jager, Trustees of the Jager Family Trust dated June 30, 2009 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 Shane Jager and nonparty Willow Jager individually and as trustees of the Jager Family Trust dated June 30, 2009 ("Jager Parties") 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. Jager which includes a home located at 305 Calle Francesca, San Clemente, CA ("Calle Francesca Property") which is owned by the Jager Parties.

3. The Calle Francesca Property was purchased by the Jager Parties on February 8, 2022, for \$7,499,999 and the Jager Parties have received a cash offer to sale the same for \$8,200,000. The Buyer has agreed to pay an initial deposit of 2.9% or \$235,000 and intends to close escrow in 20 days (the "Offer"). It is understood the Offer represents fair market value for the Calle Francesca Property.

4. There is currently a loan secured by the property in the approximate outstanding amount of \$3,936,248.56 and it is estimated that after payment of the same, and fees associated with the sale, the net proceeds of the sale of the Calle Francesca Property will be between \$3,900,000 to \$4,000,000.

5. The net proceeds from the sale of the Calle Francesca Property will be wired directly to the Receiver from escrow.

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1 6. Given nature of the Offer, including the sale price, the cash nature of the same and  
2 the ability for the sale to close quickly, the Receiver and the Commission are agreeable to the sale  
3 moving forward on an expedited basis with all proceeds from the sale being provided directly to  
4 the Receiver.

5 7. The parties agree that the Offer is market appropriate and have concerns that failing  
6 to immediately move forward will endanger the consummation of the sale which will have  
7 significant benefits to the estate, and therefore believe this stipulation is necessary, is in the best  
8 interest of all parties and the receivership estate and therefore waive any requirements imposed by  
9 28 U.S.C. § 2001, et. seq. to the extent they are applicable to the Offer and proposed sale.

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

- 12 A. The Jager Parties may accept the Offer;
- 13 B. That any deposit received relating to the Offer be provided directly to the Receiver;
- 14 and
- 15 C. Upon the consummation of the sale of the Calle Francesca Property, including the  
16 payment of the current mortgage, that the net proceeds of the sale shall be wired directly  
17 from escrow to the Receiver.

18 DATED this 8<sup>th</sup> day of August, 2022.

DATED this 8<sup>th</sup> day of August, 2022.

19 GREENBERG TRAUIG, LLP

SECURITIES & EXCHANGE  
COMMISSION

21 */s/ Kara B. Hendricks*

*/s/ Casey R. Fronk*

22 By: \_\_\_\_\_  
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12 *Attorneys for Receiver Geoff Winkler*

13 DATED this 8<sup>th</sup> day of August, 2022.

14 PALAZZO LAW FIRM

15 /s/ T. Louis Palazzo

16 By: \_\_\_\_\_  
17 T. Louis Palazzo, Bar No. 4128  
18 520 S. Fourth Street  
19 Las Vegas, NV 89101  
20 *Counsel for Defendant Shane Jager, Non*  
21 *Party Willow Jager individually and as*  
22 *Trustees of the Jager Family Trust dated*  
23 *June 30, 2009*

24 **IT IS HEREBY ORDERED** that:

- 25 A. The Jager Parties may accept the Offer;
- 26 B. That any deposit received relating to the Offer be provided directly to the Receiver;
- 27 and
- 28 C. Upon the consummation of the sale of the Pearl Street Property including the payment of the current mortgage, that the net proceeds be wired directly from escrow to the Receiver.

Dated: \_\_\_\_\_

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

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