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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; et. Al.

Defendants;

THE JUDD IRREVOCABLE TRUST; et. Al.

Relief Defendants.

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

**MOTION FOR ORDER IN AID OF
RECEIVERSHIP (1) SETTING A
CLAIMS BAR DATE, (2) APPROVING
PROPOSED CLAIM FORM, AND
(3) APPROVING SUMMARY CLAIM
PROCEDURES**

[HEARING REQUESTED]

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Geoff Winkler of American Fiduciary Services, LLC (the “Receiver”), the Court-appointed receiver for Defendants J&J Consulting Services, Inc., an Alaska corporation; defendant J&J Consulting Services, Inc., a Nevada corporation; and J and J Purchasing LLC; as well as the interest in the Wells Fargo Lawyers’ Trust Account ending in 5598 in the name of defendant Beasley Law Group PC, and Relief Defendants the Judd Irrevocable Trust; PAJ Consulting Inc.; BJ Holdings LLC; Stirling Consulting LLC; CJ Investments, LLC; JL2 Investments, LLC; Rocking Horse Properties, LLC; Triple Threat Basketball, LLC; ACAC LLC; Monty Crew LLC, and the assets of Defendants and Relief Defendants Matthew Wade Beasley, Jeffrey J. Judd, Christopher R. Humphries, Shane M. Jager, Jason M. Jongeward, Denny Seybert, Roland Tanner, Larry Jeffery, Jason A. Jenne, Seth Johnson, Christopher M. Madsen, Richard R. Madsen, Mark A. Murphy, Cameron Rohner, Warren Rosegreen, and Anthony Michael Alberto, Jr., moves this Court for an order providing the following relief: (1) setting a claims bar date; (2) approving the proposed claim form; and (3) approving summary claim procedures. The Receiver is informed that the Securities & Exchange Commission has no objection to the relief sought in this Motion.

This Motion is based on the below memorandum of points and authorities, the exhibits attached hereto, all papers on file, and any argument the Court may call and consider.

MEMORANDUM OF POINTS AND AUTHORITIES

I. RELEVANT BACKGROUND AND PROCEDURAL HISTORY

The Securities and Exchange Commission (“SEC” or “Commission”) initiated this action on April 12, 2022, alleging violations of the registration and/or antifraud provisions of the federal securities laws by Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (ECF No. 1) The complaint was subsequently amended on June 29, 2022, to add New Defendants.¹ (ECF No. 118).

On June 3, 2022, Geoff Winkler of American Fiduciary Services was appointed receiver
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¹ The “New Defendants” are Larry Jeffery, Jason Jenne, Seth Johnson, Christopher Madsen, Richard Madsen, Mark Murphy, Cameron Rohner, and Warren Rosegreen.

1 by order of this Court to serve as the receiver for the estates of the J&J Receivership Defendants²,
2 the interest in the Beasley IOLTA account, and the assets of the Individual Receivership
3 Defendants³ (collectively, the “Receivership Estate”) (ECF No. 88). The appointment order was
4 amended on July 28, 2022 (ECF No. 207) and the Receiver’s duties and obligations extended to
5 the personal assets of the New Defendants. (The June 3, 2022 order and the July 28, 2022 order
6 will be referred to collectively as the “Appointment Order”).

7 By and through the Appointment Order, this Court authorized, empowered, and directed
8 the Receiver to, among other things: (1) assume exclusive authority and control over the
9 Receivership Entities; (2) conduct such investigation and discovery as necessary to identify and
10 locate outstanding assets of the Receivership Defendants; (3) preserve and prevent the dissipation
11 of such assets; and (4) interface with investors and creditors.

12 As indicated in quarterly status reports, the Receiver has made substantial progress,
13 particularly in connection with assuming control over the Receivership Entities, identifying and
14 marshaling their assets for the benefit of the receivership estate and its creditors, including
15 investors in the alleged Ponzi investment scheme. Indeed, the Receiver has or is currently
16 working toward recovery of assets worth an estimated aggregate of over \$130 million, inclusive
17 of estimated litigation recovery. In addition to recovering estate assets, on March 31, 2025, the
18 Receiver’s forensic accountant filed his forensic accounting report to the Court (“Forensic
19 Accounting”). *See* ECF No. 792. The 116 page report was based on the reconstruction of the
20 J&J Enterprises financial records, which began in June 2022 and concluded in March 2025. In
21 order to complete the Forensic Accounting, the financial records of the J&J Enterprise were
22 reconstructed.⁴

24 ² The “J&J Receivership Defendants” consist of J&J Consulting Services, Inc., an Alaska corporation;
25 J&J Consulting Services, Inc., a Nevada corporation; J and J Purchasing LLC; The Judd Irrevocable Trust;
and BJ Holdings LLC.

26 ³ The “Individual Receivership Defendants” are Matthew Wade Beasley; Jeffrey J. Judd; Christopher R.
27 Humphries; Shane M. Jager; Jason M. Jongeward; Denny Seybert; and Roland Tanner (and together with
the J&J Receivership Defendants and the Beasley IOLTA, the “Receivership Defendants”).

28 ⁴ The financial records represented 179 bank accounts and over 164,000 transactions for the time period
October 14, 2016, through June 3, 2022. In total, the forensic accounting team reviewed over 700 personal
and business bank, brokerage and credit card accounts for relevance.

Although the Receiver's efforts to identify and recover additional outstanding assets continue, the Receiver believes he holds enough cash to warrant a claims process and that it is now appropriate to establish a formal claims procedure that will provide a mechanism for the Receiver to distribute assets of the Receivership Estate to investors and creditors. As detailed below, the Receiver proposes a 91 day claims period that starts on September 1, 2025 and closes on December 1, 2025.⁵

II. PROPOSED CLAIM PROCEDURES

To facilitate distributions, the Receiver proposes the following procedures for noticing, reviewing, and processing investor and non-investor creditor claims:

(1) Retention of Stretto⁶ to Receive and Maintain Claims. The Receiver seeks to retain Stretto to provide an electronic claims submission process and to maintain the register of claims. Stretto is a well-recognized national service provider with extensive experience in handling a large volume of claims in receiverships and bankruptcy proceedings. Stretto frequently partners with federal and state-appointed receivers and is experienced in navigating the claims reconciliation process in complex cases. Due to the Receiver's relation with Stretto, Stretto will not charge the estate for these services. Stretto will establish a web page to which investors and creditors will be directed to complete and submit the claim form electronically as well as manage any claims that are mailed in. Stretto will electronically log all of the claims and maintain a database of submitted claims. This process is expected to make it easier and more efficient for investors and creditors to submit their claims.

(2) Notice to Investors and Creditors of the Deadline to Submit the Claim Form and the Procedure For Doing So: Promptly upon entry of any order granting this Motion (the "Claims

⁵ Because the 90th day falls on a Sunday, the Receiver is proposing a 91 day claims period with the claims bar date falling on Monday, December 1, 2025.

⁶ Examples of receivership cases where Stretto has been retained include: *Commodity Futures Trading Commission v. Alexandre, et al.*, No. 1:2022-cv-03822 (S.D.N.Y.); *Securities and Exchange Commission v. StraightPath Venture Partners LLC, et al.*, Case No. 1:2022-cv-03897 (S.D.N.Y.); *Securities and Exchange Commission v. The Heartland Group Ventures, LLC, et al.*, Case No. 4-21-cv-1310-O-BP (N.D. Tx.); *In Re: Sajid Maqsood, Trustee of the Sajid Maqsood & Joan M. Maqsood Revocable Trust, et al. vs. Pride of Austin High Yield Fund, I, LLC; CCG Capital Group, LLC and Robert J. Buchanan*, Case No. D-1-GN-24-001018 (pending in the 201st Judicial District Court of Travis County, Texas).

1 Procedure Order”), the Receiver will mail a letter in a form substantially similar to **Exhibit 1** to
2 the last known mailing address on file for investors and a letter in a form substantially similar to
3 **Exhibit 2** to the last known mailing address on file for non-investor creditors. The letters will
4 notify them of the time period for submitting a claim, which the Receiver proposes be a 91 day
5 window running from September 1, 2025 through December 1, 2025. Alternatively, if an investor
6 or other claimant prefers a paper claim form, which would allow them to submit a claim by mail,
7 the letter will direct them to the Receiver’s office to obtain a claim form. The Receiver will also
8 convey this message to investors by email to the last known email address that he has for each
9 investor, if any. For non-investor creditors, the Receiver will only mail the letter.

10 In addition to the above service of the letters, the Receiver will publish notice of the
11 deadline to return claims at least twice in *USA Today*, the *Las Vegas Review-Journal* and the *Salt*
12 *Lake Tribune*. That publication notice will provide investors and creditors instructions on how to
13 obtain the claim form and the deadline by which they need to return it. Moreover, the Receiver
14 will also prominently provide information regarding the claims process and notice of the deadline
15 for the return of the claim form on the website that he set up for the receivership estate located at
16 <https://jjconsulting-receivership.com> The Receiver’s webpage will also provide information on
17 how to complete the claim form online via the Stretto webpage and provide a link for easy access
18 to the same.

19 Investors and creditors going to the Stretto website will see a claim form with boxes to
20 complete. A print-out of the claims form is attached hereto as **Exhibit 3**. The instructions appear
21 at the top of the claim form. The claim form contains all of the traditional boxes to complete, just
22 in electronic form. Once the claim form is complete and supporting documentation is uploaded,
23 the investor and/or creditor can submit the claim form. An investor or creditor can upload an
24 unlimited number of files up to 10 MB in size each, in support of their claim.

25 If an investor or creditor wishes to receive and submit the claim form by mail, then they
26 will be directed to contact the Receiver’s office. The Receiver’s office will then mail a claim
27 form to the investor or creditor. The investor or creditor can then complete a hard copy of the

28 ///

claim form and return it with supporting documentation by mail to Stretto⁷. Stretto will then scan the form in and store it electronically.

(3) Investor Determination Letters based on Forensic Accounting: The Receiver believes, based on the Forensic Accounting, that he has identified the identity of and dollar amount associated with most investor claims. Notably, the review of over 700 bank accounts and 164,000 transactions for the time period October 14, 2016, through June 3, 2022, required to complete the Forensic Accounting, enabled the Receiver to identify the net money-in/money-out (“MIMO”) by individual investor and/or account. This includes at least 948 investors and non-investor creditors who appear to have suffered net losses from their investments in, or contributions to the J&J Enterprise. Additionally, the Forensic Accounting identified 253 investors believed to have received funds back from the J&J Enterprise in excess of what they invested that have been identified as “false profits”. The Forensic Accounting also identified certain investors that broke even or in other words received back the money they invested into the J&J Enterprise.

Individuals and/or entities so identified, will receive a “Determination Letter” that provides a detailed breakdown of the Receiver’s forensic accounting analysis as it relates to the investments and/or payments the Receiver believes are attributed to each investor. To save resources, this information will be included in the same letter that advises the investors of the claims deadline as detailed in the bottom section of the notice letter attached as **Exhibit 1**.⁸ Upon receiving the Determination Letter, the investor will have the opportunity to review the relevant forensic accounting data and agree or disagree with the Receiver’s conclusions.

If the investor agrees with the numbers in the Determination Letter, no additional documentation will be required from the investor and the investor can simply confirm the

⁷ The mailing address for paper claims will be:
J&J Consulting Services Receivership
c/o Stretto
410 Exchange, Suite 100
Irvine, California 92602

⁸ If the Receiver has not made a determination regarding the amount of an investor’s claim, the notice letter will not include the “Claims Determination” section and will direct the investor to submit a claims form and provide back-up documentation to support their claim.

1 information provided and submit an attestation verifying the same via the Stretto website.

2 If an investor disagrees with the information in the Determination Letter, the investor will
3 be directed to complete the standardized claims form available through Stretto and provide the
4 Receiver the data requested therewith.

5 (4) Non-Investor Determination Letters: The Receiver has requested and received
6 information and documentation from a number of non-investors that are believed to have potential
7 creditor claims. The Receiver will complete initial claims calculations for those non-investor
8 creditors who have already submitted what amount to anticipatory “claims”, and transmit a
9 Determination Letter to them in a similar manner as he will for investors identified in Section 2,
10 above, and in a form substantially similar to **Exhibit 2**.⁹ All other non-investors known or
11 suspected to have claims will receive notice and be afforded an opportunity to submit a claim via
12 the same process outlined for investors.

13 (5) Deadline for the Return of the Claim Forms: The Receiver proposes that the
14 claims period be ninety-one (91) days and proposes the claims period run from September 1, 2025
15 through December 1, 2025. December 1, 2025 is the proposed “Claims Bar Date”. The Claims
16 Bar Date is the last day a claim will be deemed timely submitted. Any investor or creditor who
17 fails to submit a claim form online or to return one by mail to Stretto by December 1, 2025, the
18 Claims Bar Date, shall be forever barred and enjoined from asserting a claim against the
19 Receivership Defendants, the Receiver, and the Receivership Estate.

20 For the avoidance of any doubt, claims shall not be filed with the Court, but rather, shall
21 be submitted electronically through the claims website or by mail to Stretto. If an investor or
22 creditor submits a claim electronically, they will receive email confirmation of the receipt of their
23 claim and a claim number. If an investor or creditor elects to submit the claim form by mail, they
24 will receive an email confirmation after it is received by Stretto.

25 (6) Claims Review Process and the Use of Summary Proceedings to Resolve
26

27 _____
28 ⁹ If the Receiver has not made a determination regarding the amount of a creditor’s claim, the notice letter will not include the “Claims Determination” section and will direct the investor to submit a claims form and provide back-up documentation to support their claim.

1 Objections: The Receiver will evaluate all claim forms and supporting documentation that are
 2 received by the Claims Bar Date and compare them to the records and findings of the Forensic
 3 Accounting. The Receiver will then make a determination of the recommended treatment of each
 4 claim.

5 Where the Receiver disputes all or a portion of a claim, he will provide written notice of
 6 the objection to the claimant by email and attempt to resolve the dispute informally.¹⁰ If the
 7 dispute cannot be resolved informally and warrants judicial resolution, then the Receiver will
 8 submit the dispute to the Court for resolution. If there are multiple objections on similar grounds,
 9 the Receiver will likely file an omnibus motion addressing similar issues with different claims.
 10 For more complex objections, the Receiver will file a separate motion objecting to the claim. In
 11 either case, the Receiver will identify the portion of the claim that he believes is objectionable,
 12 the proposed allowed amount, if any, and the factual and legal basis for the Receiver's objection.
 13 The motion will be served by mail on the claimant at the address on the proof of claim. The
 14 claimant may file an opposition in accordance with the Local Rules of this Court and the Receiver
 15 will file a reply. As necessary, the Receiver and the claimant may seek Court permission for a
 16 settlement conference, a briefing schedule, or other procedures the Court deems appropriate.

17 The Receiver believes that these procedures will minimize delay and expense while still
 18 affording investors and creditors a full and fair opportunity to present their claims and have any
 19 disputes resolved by the Court.

20 **III. LEGAL ARGUMENT**

21 **A. The Court Has Broad Discretion to Approve Procedures for the Submission** 22 **and Administration of Claims**

23 “The power of a district court to impose a receivership . . . derives from the inherent power
 24 of a court of equity to fashion effective relief.”¹¹ “The primary purpose of equity receiverships
 25 is to promote orderly and efficient administration of the Receivership Estate by the district court
 26

27 ¹⁰ If no response to an email is received within 14 days, a letter will be sent to the last known address of the
 28 claimant.

¹¹ *SEC v. Wencke*, 622 F.2d 1363, 1369 (9th Cir. 1980).

1 for the benefit of creditors.”¹² “[T]he practice in administering an estate by a receiver . . . must
2 accord with the historical practice in federal courts or with a local rule.”¹³

3 As the Ninth Circuit explained:

4 A district court’s power to supervise an equity receivership and to determine
5 the appropriate action to be taken in the administration of the receivership
6 is extremely broad. The district court has broad powers and wide discretion
7 to determine the appropriate relief in an equity receivership. The basis for
8 this broad deference to the district court’s supervisory role in equity
receiverships arises out of the fact that most receiverships involve multiple
parties and complex transactions.¹⁴

9 With respect to administering claims against the receivership estate, it is well-settled that
10 district courts supervising federal equity receiverships have broad discretion to adopt appropriate
11 procedures to administer the assets of and claims against a receivership estate.¹⁵

12 **B. The Claim Submission Process Is Appropriate**

13 Although historically, the Receiver has utilized a process that requires claims to be
14 submitted by mail, this mode of submitting claims is becoming technologically outdated and
15 burdensome. The Receiver stores the claims electronically, so claims submitted by mail must be
16 logged and scanned in and the original paper copy maintained. Permitting the submission of
17 claims electronically is more efficient, cheaper, and easier for the majority of claimants. This is
18 particularly true in a receivership like this, where a number of the Defendants communicated with
19 investors almost entirely by electronic mail and many investments were received electronically.

20 Investors will be directed to the claims website by letter, email, posting on the receivership
21 website, and legal notices in three newspapers. The claims website will contain instructions on
22 how to complete various sections of the claim form, with a phone number to call if they have any
23

24 _____
¹² *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986).

25 ¹³ Fed. R. Civ. P. 66.

26 ¹⁴ *SEC v. Capital Consultants, LLC*, 397 F.3d 733, 738 (9th Cir. 2005) (citations omitted); *see also CFTC*
27 *v. Topworth Int’l, Ltd.*, 205 F.3d 1107, 1115 (9th Cir. 1999) (“This court affords ‘broad deference’ to the
28 court’s supervisory role, and ‘we generally uphold reasonable procedures instituted by the district court
that serve th[e] purpose of orderly and efficient administration of the receivership for the benefit of
creditors.’”).

¹⁵ *See Capital Consultants, LLC*, 397 F.3d at 738; *Hardy*, 803 F.2d at 1038.

1 questions. They will also have the option of submitting a claim by mail by contacting the
2 Receiver's office and requesting that a claim form be mailed to them or printing the form from
3 the Receiver's website. They may then complete the claim form by hand and mail it to the address
4 on the claim form for Stretto so that it is received by the Claims Bar Date.

5 This proposed claims process gives investors and creditors the option of submitting their
6 claim electronically or by mail, but relieves the Receiver of the need to scan and maintain all of
7 the claims electronically. Stretto has agreed not to charge the estate for its services as a courtesy
8 to the Receiver, who utilizes Stretto in other unrelated matters.

9 **C. The Claims Bar Date Is Necessary and Appropriate**

10 In order to make distributions, the Receiver must have certainty about the possible
11 magnitude of allowed claims. The Receiver believes that he has identified a significant number
12 of the J&J Enterprise investors and creditors by analyzing the funds transferred to and from
13 various accounts identified in the Forensic Accounting. However, because the J&J Entities and
14 the Individual Defendants did not maintain a definitive register of investors and creditors, nor
15 accurate books and records of the J&J Enterprise's operations and financial transactions, there is
16 a significant likelihood that there are investors and creditors who have not yet been identified.

17 Setting a bar date will provide a mechanism for providing notice and a deadline after
18 which the Receiver can be confident that the universe and magnitude of investor and creditor
19 claims is known and can be reserved for while the allowed amount of disputed claims is
20 determined by the Court. *See Hardy*, 803 F.2d at 1038-39 (affirming a district court's decision to
21 establish deadlines for the filing of claims because the rights of creditors must be balanced against
22 the need for the expeditious administration of the receivership).

23 Accordingly, the Receiver requests that the Court enter an order setting a 91 day window
24 for the submittal of claims with the Claims Bar Date as December 1, 2025 and the claims period
25 starting on September 1, 2025. For both investors and creditors, the Receiver proposes to send
26 the notice of Claims Bar Date and instructions on how to submit a claim form in the letter by mail
27 (to those for whom he has mailing addresses), and by publishing notice of the Claims Bar Date
28 on the website he set up for this case, and in *USA Today*, the *Las Vegas Review-Journal* and the

1 *Salt Lake Tribune*. The Receivership website will also prominently give notice of the Claims Bar
2 Date.

3 **D. The Summary Claim Procedures Are Appropriate**

4 As set forth above, the Court has wide discretion to establish procedures in connection
5 with the administration of a receivership. The Court has the general power to use summary
6 proceedings in allowing, disallowing, and subordinating claims of creditors.¹⁶

7 The Receiver believes that the proposed procedures for resolution of disputes will provide
8 an efficient and expeditious method to resolve any disputes that require judicial intervention while
9 still ensuring that claimants have due process. Therefore, he requests that they be approved.

10 **IV. CONCLUSION**

11 Based on the foregoing, the Receiver requests entry of an order in the form attached hereto
12 as **Exhibit 4**:

13 (1) Granting the Motion in its entirety;

14 (2) Approving the Notice of Claims Bar Date attached hereto as **Exhibits 1**
15 and **2**;

16 (3) Approving the proposed claim form attached hereto as **Exhibit 3**;

17 (4) Approving the retention of Stretto;

18 (5) Authorizing and approving the Receiver's proposed means of noticing
19 investors and creditors, including via mail, email, the Receiver's website, the Stretto webpage,
20 and by publication of notice of the claims process in *USA Today*, the *Las Vegas Review-Journal*,
21 and the *Salt Lake Tribune*;

22 (6) Authorizing and approving the Receiver's proposed means for the
23 submission of claims through a website established by Stretto or, where applicable, by mail to
24 Stretto;

25 (7) Approving and authorizing the use of summary proceedings for the
26 determination of claims against the J&J Entities and Defendants, as detailed in the Motion;

27
28 ¹⁶ See *U.S. v. Arizona Fuels*, 739 F.2d 455, 458 (9th Cir. 1984); *Hardy*, 803 F.2d at 1040; *SEC v. Elliot*, 953 F.2d 1560, 1571 (11th Cir. 1992).

1 (8) Approving a 91 day claims period for submittal of claims that begins on
2 September 1, 2025 and ends on December 1, 2025;

3 (9) Setting December 1, 2025 as the Claims Bar Date and any investor or
4 creditor who fails to submit a claim form online or to return one by mail to Stretto by December 1,
5 2025, shall be forever barred and enjoined from asserting a claim against the Receivership
6 Defendants, the Receiver, and the Receivership Estate; and

7 (10) Granting any other relief the Court deems appropriate.

8 DATED this 14th day of July, 2025

9 **GREENBERG TRAURIG, LLP**

10 */s/ Kara B. Hendricks*

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19 JOSHUA A. del CASTILLO*
20 MATTHEW D. PHAM*

21 **admitted pro hac vice*

22 *Attorneys for Receiver Geoff Winkler*

CERTIFICATE OF SERVICE

I hereby certify that on **July 14, 2025**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAURIG, LLP

INDEX OF EXHIBITS

EXHIBIT	DESCRIPTION
1	NOTICE OF CLAIMS BAR DATE TO INVESTORS
2	NOTICE OF CLAIMS BAR DATE TO CREDITORS
3	PROPOSED CLAIM FORM
4	PROPOSED ORDER

EXHIBIT 1

EXHIBIT 1

NOTICE OF CLAIMS BAR DATE TO INVESTORS

American Fiduciary Services
715 NW Hoyt St. #4364
Portland, OR 97208



[Date]

[Name]

[Address]

[Address]

Re: *Securities and Exchange Commission v. Matthew Wade Beasley, J&J Consulting Services, Inc., et al. ---*
Case Number 2:22-cv-00612-CDS-EJY ("J&J Receivership Action")
NOTICE OF CLAIMS PROCEDURE & CLAIMS BAR DATE

Dear [Investor Name],

This correspondence will serve as your notice of the claims procedure and claims bar date in the J&J Receivership Action and the Receiver's determination of your claim amount. Please review carefully and respond as indicated herein.

As you may be aware, Geoff Winkler (the "Receiver"), was appointed by the Court as the permanent receiver for J&J Consulting Services, Inc., and its subsidiaries and affiliates (together, "J&J Consulting") in the above referenced J&J Receivership Action pending in the United States District Court for the District of Nevada (the "Court").

To facilitate an orderly claims process, the Receiver filed a Motion with the Court seeking and order: (1) setting a claims bar date; (2) approving a proposed claim from; and (3) approving summary claim procedures (ECF No. ____) ("Claims Motion"). On _____, the Court entered its Order granting the Claims Motion (the "Claims Order") (ECF No. ____) a copy of which can be found at jjconsulting-receivership.com. **IMPORTANTLY, THE COURT HAS SET DECEMBER 1, 2025 AS THE CLAIMS BAR DATE IN THIS MATTER. ACCORDINGLY, IF YOU INTEND TO SUBMIT A CLAIM, IT MUST BE SUBMITTED BY DECEMBER 1, 2025.**

Claims Determination

As you may be aware, the Receiver has also completed an accounting of the financial activities of J&J Consulting and in so doing has made an initial determination of the amount owed to you based on a net money-in/money-out ("MIMO") accounting of financial transactions. As a result of the Receiver's investigation, the funds you invested and/or received relating to the alleged Ponzi Scheme are detailed in the attachment hereto. Notably, the attached document identifies your

715 NW Hoyt Street #4364
Portland, Oregon 97208
www.americanfiduciaryservices.com

American Fiduciary Services
715 NW Hoyt St. #4364
Portland, OR 97208



Claim Amount.¹ The Claim Amount represents the Receiver's MIMO calculation of your aggregate claim for reimbursement against J&J Consulting, i.e., your aggregate MIMO net loss from your investment(s) in and/or contribution(s), as reflected in the Receiver's records.² **We ask that you closely review the attachment which may be utilized by you to submit a claim with the Receiver.** If you agree with the Claim Amount you can accept the amount and submit an attestation relating to the same at stretto.com. If you disagree with the Claim Amount you may submit a Claim Form for the amount you believe you are entitled to and file a Claim Form with the Receiver by following the instructions at stretto.com. If you would prefer to complete a hard copy of the claim form, visit www.jjconsulting-receivership.com. or contact AFS at contact@jjconsultingreceivership.com.

Claims submitted electronically or mailed, must be received by **December 1, 2025**. Claims that are received late will not receive a distribution from the Receiver or the receivership estate. **To be clear, if you do not return a completed Claim Form to the Receiver on or before the Claims Bar Date, you will not have a claim and will be forever barred.**

Please do not hesitate to contact the Receiver should you have any questions.

Sincerely,

J&J Consulting Receivership Claims Team

contact@jjconsulting-receivership.com

¹ The Claim Amount will be utilized by the Receiver to evaluate and propose a plan of for distribution. The Claim Amount identified on the attachment does not guaranty you will receive a payment in that amount. After the Claims Bar Date, the Receiver will file a motion with the Court to get approval to make a distribution which will likely be a percentage of the Claim Amount for approved claims.

² In accordance with the Claims Order, the Claim Amount does not, and shall not, include accrued interest, late fees, contract or other damages, attorneys' fees, or similar contingent, consequential, or unliquidated damages.

EXHIBIT 2

EXHIBIT 2

NOTICE OF CLAIMS BAR DATE TO CREDITORS

American Fiduciary Services
715 NW Hoyt St. #4364
Portland, OR 97208



[Date]

[Name]

[Address]

[Address]

Re: *Securities and Exchange Commission v. Matthew Wade Beasley, J&J Consulting Services, Inc., et al. ---*
Case Number 2:22-cv-00612-CDS-EJY ("J&J Receivership Action")
NOTICE OF CLAIMS PROCEDURE & CLAIMS BAR DATE

Dear [Creditor Name],

This correspondence will serve as your notice of the claims procedure and claims bar date in the J&J Receivership Action and the Receiver's determination of your claim amount. Please review carefully and respond as indicated herein.

As you may be aware, Geoff Winkler (the "Receiver"), was appointed by the Court as the permanent receiver for J&J Consulting Services, Inc., and its subsidiaries and affiliates (together, "J&J Consulting") in the above referenced J&J Receivership Action pending in the United States District Court for the District of Nevada (the "Court").

To facilitate an orderly claims process, the Receiver filed a Motion with the Court seeking and order: (1) setting a claims bar date; (2) approving a proposed claim form; and (3) approving summary claim procedures (ECF No. ____) ("Claims Motion"). On _____, the Court entered its Order granting the Claims Motion (the "Claims Order") (ECF No. ____) a copy of which can be found at jjconsulting-receivership.com. **IMPORTANTLY, THE COURT HAS SET DECEMBER 1, 2025 AS THE CLAIMS BAR DATE IN THIS MATTER. ACCORDINGLY, IF YOU INTEND TO SUBMIT A CLAIM, IT MUST BE SUBMITTED BY DECEMBER 1, 2025.**

Claims Determination

As you may be aware, the Receiver has requested and received information and documentation from you relating to your potential creditor claim. The attached document identifies what the

715 NW Hoyt Street #4364
Portland, Oregon 97208
www.americanfiduciaryservices.com

American Fiduciary Services
715 NW Hoyt St. #4364
Portland, OR 97208



Receiver understands your Claim Amount¹ to be.² **We ask that you closely review the attachment which may be utilized by you to submit a claim with the Receiver.** If you agree with the Claim Amount you can accept the amount and submit an attestation relating to the same at stretto.com. If you disagree with the Claim Amount you may submit a Claim Form for the amount you believe you are entitled to and file a Claim Form with the Receiver by following the instructions at stretto.com. If you would prefer to complete a hard copy of the claim form, visit www.jjconsulting-receivership.com, or contact AFS at contact@jjconsultingreceivership.com.

Claims submitted electronically or mailed, must be received by **December 1, 2025**. Claims that are received late will not receive a distribution from the Receiver or the receivership estate. **To be clear, if you do not return a completed Claim Form to the Receiver on or before the Claims Bar Date, you will not have a claim and will be forever barred.**

Please do not hesitate to contact the Receiver should you have any questions.

Sincerely,

J&J Consulting Receivership Claims Team

contact@jjconsulting-receivership.com

¹ The Claim Amount will be utilized by the Receiver to evaluate and propose a plan of for distribution. The Claim Amount identified on the attachment does not guaranty you will receive a payment in that amount. After the Claims Bar Date, the Receiver will file a motion with the Court to get approval to make a distribution which will likely be a percentage of the Claim Amount for approved claims.

² In accordance with the Claims Order, the Claim Amount does not, and shall not, include accrued interest, late fees, contract or other damages, attorneys' fees, or similar contingent, consequential, or unliquidated damages.

EXHIBIT 3

EXHIBIT 3

PROPOSED CLAIM FORM

INSTRUCTIONS FOR PROOF OF CLAIM FORM

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SECURITIES AND EXCHANGE COMMISSION, Plaintiff

v.

MATTHEW WADE BEASLEY; ET. AL., Defendants;

THE JUDD IRREVOCABLE TRUST; ET.AL., Relief Defendants.

Case Number 2:22-cv-00612-CDS-EJY

GENERAL INFORMATION

On April 12, 2022, the Securities and Exchange Commission ("SEC") filed its initial complaint in Case Number 2:22-cv-00612-CDS-EJY which was amended on June 29, 2022 (the "SEC Action"). The SEC complaint as amended alleges that, beginning in at least January 1, 2017, and continuing until March 2022, a number of individuals and entities promoted and offered investments in "purchase agreements", while investor money was instead spent making Ponzi-type payments to earlier investors and promoters, and supporting Defendants' lavish lifestyles. The Defendants in the SEC Action are: Matthew Wade Beasley ("Beasley"), Beasley Law Group PC, J&J Consulting Services, Inc., an Alaska corporation; defendant J&J Consulting Services, Inc., a Nevada corporation; and J and J Purchasing LLC ("the J&J Receivership Defendants"), Jeffrey Judd ("Judd"), Christopher R. Humphries ("Humphries"), Shane M. Jager ("Jager"), Jason M. Jongeward ("Jongeward"), Denny Seybert ("Seybert"), Roland Tanner ("Tanner"), Larry Jeffery ("Jeffery"), Jason A. Jenne ("Jenne"), Seth Johnson ("Johnson"), Christopher Madsen ("C. Madsen"), Richard Madsen ("R. Madsen"), Mark Murphy ("Murphy"), Cameron Rohner ("Rohner"), and Warren Rosegreen ("Rosegreen") (collectively "Defendants"). The Relief Defendants are: The Judd Irrevocable Trust, PAJ Consulting Inc., BJ Holdings LLC, Stirling Consulting LLC, CJ Investments, LLC, JL2 Investments LLC, Rocking Horse Properties LLC, Triple Threat Basketball LLC, ACAC LLC; Anthony Michael Alberto, Jr, and Monty Crew LLC (collectively "Relief Defendants") The SEC filed a Motion to Appoint Receiver on May 3, 2022 (ECF 67), which was granted by the Court on June 3, 2022 and Geoff Winkler of American Fiduciary Services was appointed as Receiver (ECF 88). The June 3, 2022 appointment order was amended by the Court on July 29, 2022 (ECF No. 207) and the two appointment orders will be referred to collectively herein as the "Appointment Order". By and through the Appointment Order the Court took exclusive jurisdiction and possession of the assets of the J&J Receivership Defendants, the assets of Beasley Law Group except for the Beasley IOLTA, and the personal assets of Beasley, Judd, Humphries, Jager, Jongeward, Seybert, and Tanner, (collectively "the Receivership Defendants"). The Receiver was authorized, empowered, and directed to, among other things: (1) take exclusive authority and control over the J&J Receivership Entities; (2) conduct such investigation and discovery as necessary to identify and locate assets of the Receivership Defendants; and (3) preserve and prevent the dissipation of such assets.

The Receiver is holding sufficient funds to make a partial distribution to investors and creditors. The Receiver expects to make at least two distributions and does not yet know what the ultimate amount to be distributed will be. However, the Receiver does not expect that investors and creditors will be paid in full. The Receiver has sought approval from the Court in the SEC Action to make an initial distribution. To facilitate distribution investors and creditors request a distribution are required to file this proof of claim form. **If your proof of claim form is not received before December 1, 2025 at 5:00 PDT, you will lose your right to receive any distributions from the Receiver or the receivership estate and your claim will be barred.**

1. **WHO MUST FILE A PROOF OF CLAIM FORM?** You must file a Proof of Claim form if you: Believe that you are owed money by any Defendant in the SEC Action. arising out of or based upon: (a) any investment with, through, or in the J&J Receivership Entities; (b) any interest in the J&J Receivership Entities or any of its assets or any claim against the J&J Receivership Entities or any entity under its control based on primary, secondary, direct, indirect, secured, unsecured, or contingent liabilities; or (c) any claim of any sort against the J&J Receivership Entities or any entity under its control whether such claim is based upon contract, tort, contribution, indemnity, reimbursement, subrogation theories or other legal or equitable theory.
2. **ONLY ONE PROOF OF CLAIM TO BE FILED BY INDIVIDUAL OR ENTITY.**
If you are both an investor and creditor, or are an investor with or through more than one of the Companies, you must file a single Proof of Claim form for all claim(s) or interest(s) you allege to have against the Companies, collectively and individually. **Note that a failure to submit a signed Proof of Claim form and supporting documentation, will result in the denial of your claim.**
3. **CONSENT TO JURISDICTION OF THE COURT AND THE CONSEQUENCES THEREOF.** If you submit a Proof of Claim form in this case, you consent to the jurisdiction of United States District Court for the District of Nevada ("District Court") for all purposes, agree to be bound by its decisions, including a determination, among other things, as to the validity and amount of your claim against the J&J Receivership Entities, or other persons or entities as identified in paragraph 1, above. In submitting a Proof of Claim, you agree to be bound by the actions of the District Court, including the District's Court approval of limiting or denying your claim, if any. By submitting a Proof of Claim, you further agree that your participation in any distribution of the receivership estate may exclude or prevent you from pursuing any other remedies.

4. **WHERE MUST THE PROOF OF CLAIM FORM BE SENT?** The completed Proof of Claim form, along with all supporting documentation, must either be (1) completed electronically at the website located at [Website TBD] ; or (2) mailed to the address below. Do not do both or it will result in duplicate claims. Claims submitted by mail can be mailed to:

J&J Consulting Services Receivership
c/o Stretto
410 Exchange Ste. 100
Irvine, CA 92602

5. **WHAT IS THE DEADLINE TO FILE THIS PROOF OF CLAIM FORM?** The Proof of Claim form must be received by the Receiver on or before **December 1, 2025**. Please note that any late filed claim will be objected to and denied in its entirety.

6. **AM I AN INVESTOR OR CREDITOR?** If you believe you have or allege you have invested money for purchase agreements or otherwise invested with, through, or in the J&J Receivership Entities, you are an investor. If you have performed services for the J&J Receivership Entities, sold merchandise, loaned money, or were an employee of the J&J Receivership Entities, you are a creditor. All other Claimants to whom the J&J Receivership Entities may owe a debt, which debts are not based on the investment into the purchase agreements in J&J Consulting are also creditors. Based on your categorization as either an investor or creditor, fill in the appropriate section of the attached Proof of Claim form. If you believe that you are both an investor and a creditor, you need to fill out only one (1) Proof of Claim form. If unsure of the classification of being an investor or creditor, then select both boxes in line 2. In either case, you must sign the Proof of Claim form at line 8.

7. **SUPPORTING DOCUMENTS.** You must attach to the Proof of Claim form copies of all documents that show that the J&J Receivership Entities owes the debts or amounts claimed. If supporting documents are not available, you must attach an explanation of why they are not available. Failure to provide such documents may result in the denial of your claim.

8. **ADDITIONAL INFORMATION.** Note that additional information regarding filing the Proof of Claim form, along with additional blank forms, can be obtained at www.jjconsulting-receivership.com or you may write to the Receiver at the following address:

Geoff Winkler, Receiver
c/o J&J Consulting Services, Inc., Claims
PO Box 4364
Portland, OR 97208-4364

INFORMATION ON COMPLETING THE PROOF OF CLAIM FORM

1. **1a. Information about Claimant.** Complete this section giving the name, address and telephone number of the Claimant to whom the J&J Receivership Entities allegedly owes money or property.

1b. Aliases may include, but are not limited to: Maiden name, corporation name, nickname used in transactions, etc.
2. **Claimant Type.** Indicate in this box whether you are an investor or creditor (as defined in the General Information section above). If you are both an investor and a creditor, please file a single Proof of Claim form for all claim(s). If unsure, then select both investor and creditor. Upon completing this box, if you have marked investor, please proceed to box 3; if you have marked creditor, please proceed to box 4. If you have marked investor and creditor, please complete boxes 3 and 4.
3. **FOR INVESTORS.**
 - 3a. **Claim Amount.** State the amount you invested or sent to the J&J Receivership Entities as of June 3, 2022. If said claim amount includes amounts over principal invested, such as interest, attorneys' fees, damages, claims or late fees, please mark the appropriate box below the claim amount and provide a detailed break-down of the claim. Also attach all documentation supporting said claim amount and the calculation of said claim. Also, if you allege that your claim is subject to a security interest, mark the appropriate box in this section and provide all supporting documentation evidencing the secured status of your claim.
 - 3b. **Date and Amount of Funds Invested.** Indicate in this section each time you made an investment with the applicable J&J Receivership Entities by indicating the investment date and the investment amount. Attach additional sheets as necessary to reflect all investments.
 - 3c. **Date and Amount of any Distributions or Withdrawals.** Indicate the date of any distributions or withdrawals from the applicable J&J Receivership Entities by indicating the date and amount of each said distribution or withdrawal. Attach additional sheets as necessary to reflect the date and amount of all transfers of money out of the applicable J&J Receivership Entities. (Investors go to Section 5 of the Proof of Claim and complete Sections 5 – 8.)
 - 3d. Attach to your Proof of Claim copies of all Agreements, Certificates, and any other documents you contend reflect the terms of your agreement or investment with the J&J Receivership Entities.
4. **FOR CREDITORS.**
 - 4a. Indicate the basis of your claim in this section.
 - 4b. **Name or Entity of Creditor.** Indicate the creditor name or entity. **Date the Claim was Incurred.** Indicate the date on which the amount you allege to be owed arose.
 - 4c. **Total Claim Amount as of June 3, 2022.** State your claim amount as of June 3, 2022. Also, mark the applicable box if you contend your claim is subject to a security interest, and attach copies of all security agreements and other documents that evidence the claim of secured status. Mark the applicable box if your claim amount includes interest or other charges, such as attorneys' fees, lost profits, or late fees in addition to the principal amount of your claim, and attach an itemized statement of all such additional charges.
5. **Supporting Documentation.** Note that in addition to filling out the Proof of Claim form, you must provide supporting documentation evidencing your claim. Supporting documentation may include, but need not be limited to, documents such as canceled checks, bank statements, account ledgers, promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, or evidence of perfection of liens. Furthermore, feel free to provide any additional pages of explanation or narrative discussing your claim and claim amount.
6. **Acknowledgement of Filing.** To receive an acknowledgment of the filing of your Proof of Claim form, ensure that your email address is correct on your form as of filing. You will receive an acknowledgment of filing via email.
7. **Date.** Insert the date on which you completed and signed the Proof of Claim form.
8. **Signature.** Sign the Proof of Claim form and indicate your title, if applicable.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PROOF OF CLAIM

SECURITIES AND EXCHANGE COMMISSION, Plaintiff

v.

MATTHEW WADE BEASLEY; ET. AL., Defendants;

THE JUDD IRREVOCABLE TRUST; ET.AL., Relief Defendants.

Case Number 2:22-cv-00612-CDS-EJY

1a. NAME AND ADDRESS OF CLAIMANT:

Name

Name of Co-Filer

Address

City / State / Zip Code

Telephone No. of Claimant: _____

Email: _____

Tax I.D. No. or SSN: _____

Tax I.D. No. or SSN of Co-Filer: _____

1b. KNOWN ALIASES OF CLAIMANT

If Claimant has known aliases that may be allocated to transactions, list below:

Aliases:

**2. CLAIMANT IS A(N): ☐ INVESTOR
☐ CREDITOR**

If Claimant is both an Investor and a Creditor, please file a single Proof of Claim form for all claim(s) and complete the form, per the instructions herein. If unsure, then check both boxes.

3a. Total Amount of Claim*: \$ _____

*This number is calculated by taking the total amount you invested minus the total amount of payments you received from the investment.

3b. Date and Amount of Funds Sent or Entrusted to the J&J Entities as of June 3, 2022 (if you have more than two transactions sent then add additional transactions on page 3):

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

3c. Date and Amount of Funds Received from the J&J Entities as of June 3, 2022 (if you have more than two payments received then add additional transactions on page 3):

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

3d. Attach Supporting Documentation:

Attach supporting documentation per the instructions in Section 5 below.

***You Must Date and Sign the Claim at Sections 7 and 8 Below for This Claim to be Valid.**

SECURITIES AND EXCHANGE COMMISSION, Plaintiff
v.
MATTHEW WADE BEASLEY; ET. AL., Defendants;
THE JUDD IRREVOCABLE TRUST; ET.AL., Relief
Defendants.

Case Number 2:22-cv-00612-CDS-EJY

4. CREDITORS

4a. Basis of Claim:

- ☐ Goods Sold
☐ Services Performed
☐ Money Loaned
☐ Taxes
☐ Wages, salaries or compensation (fill out below)
Unpaid compensation for services performed

from _____ to _____
(dates)

- ☐ Benefits (provide a detailed explanation on attached sheet)
☐ Other (provide a detailed explanation on attached sheet)

4b. Creditor information:

Entity/Person: _____

Date Claim was Incurred: _____

4c. Total Amount of Claim as of June 3, 2022: \$ _____

5. Supporting Documents: Please attach copies of supporting documents, such as cancelled checks (front and back), account ledgers, bank statements, promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, evidence of lien perfection, etc. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, please explain through attaching a narration to this claim form.

6. Acknowledgement of Filing: To receive an acknowledgment of the filing of your Proof of Claim form, ensure that your email address is correct on your form as of filing. You will receive an acknowledgment of filing via email.

7. Date

8. Sign and print the name and title, if any, of all Claimants or other persons authorized to file this claim (attach copy of power of attorney, death certificate, or other document as needed if co-owner is unable to sign). **By signing your name below, you certify that the information contained in this Claim Form and any back-up documentation provided is true and correct.**

Signature: _____ Name: _____ Title (if any): _____

Signature: _____ Name: _____ Title (if any): _____

DO NOT WRITE, STAMP OR SIGN IN THIS BOX. IT IS RESERVED FOR AMERICAN FIDUCIARY SERVICES LLC USE.

v.

MATTHEW WADE BEASLEY; ET. AL., Defendants;
THE JUDD IRREVOCABLE TRUST; ET.AL., Relief Defendants.

Case Number 2:22-cv-00612-CDS-EJY

3d. (cont.) Date and Amount of Funds Sent or Entrusted as of June 3, 2022:

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

3e. (cont.) Date and Amount of Any Payments Received from the J&J Entities as of June 3, 2022:

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

Date: _____ Amount: \$ _____

EXHIBIT 4

EXHIBIT 4

PROPOSED ORDER

1 KARA B. HENDRICKS, Bar No. 07743
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J and J Purchasing LLC, The Judd Irrevocable Trust,
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15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 v.

22 MATTHEW WADE BEASLEY; et. al.,

23 Defendants,

24 THE JUDD IRREVOCABLE TRUST; et. al.,

25 Relief Defendants.
26

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

**ORDER GRANTING MOTION FOR
ORDER IN AID OF RECEIVERSHIP
(1) SETTING A CLAIMS BAR DATE,
(2) APPROVING PROPOSED CLAIM
FORM, AND (3) APPROVING
SUMMARY CLAIM PROCEDURES**

27 ///

28 ///

1 The Court having reviewed the Motion for Order in Aid of Receivership (1) Setting a
 2 Claims Bar Date, (2) Approving Proposed Claim Form, and (3) Approving Summary Claim
 3 Procedures (the “Motion”)(ECF No. ____), and there being no opposition to the Motion and good
 4 cause appearing, and the Court having conducted a hearing on _____, hereby orders:

5 (1) The Motion is granted in its entirety;

6 (2) The Notices of Claims Bar Date attached to the Motion as **Exhibits 1** and **2** are
 7 approved;

8 (3) The Receiver’s proposed claim form attached to the Motion as **Exhibit 3** is
 9 approved;

10 (4) The Receiver’s proposed retention of Stretto is approved;

11 (5) The Receiver’s proposed means of noticing investors and creditors, including via
 12 mail, email, the Receiver’s website, the Stretto webpage, and by publication of notice of the
 13 claims process in *USA Today*, the *Las Vegas Review-Journal*, and the *Salt Lake Tribune* is
 14 authorized and approved;

15 (6) The Receiver’s proposed means for the submission of claims through a website
 16 established by Stretto or, where applicable, by mail to Stretto is authorized and approved;

17 (7) The use of summary proceedings for the determination of claims against the J&J
 18 Entities and Defendants, as detailed in the Motion, is approved;

19 (8) There will be a 91-day claims period for submittal of claims that begins on
 20 September 1, 2025 and ends on December 1, 2025; and

21 (9) December 1, 2025 is the Claims Bar Date and any investor or creditor who fails to
 22 submit a claim form online or to return one by mail to Stretto by December 1, 2025, shall be
 23 forever barred and enjoined from asserting a claim against the Receivership Defendants, the
 24 Receiver, and the Receivership Estate.

25 **IT IS SO ORDERED**

26 _____
 27 UNITED STATES DISTRICT JUDGE

28 Dated: _____