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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 SECURITIES AND EXCHANGE  
14 COMMISSION,

15 Plaintiff,

16 vs.

17 MATTHEW WADE BEASLEY *et al.*

18 Defendants,

19 THE JUDD IRREVOCABLE TRUST *et al.*

20 Relief Defendants.

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

**DEFENDANT LARRY JEFFERY’S**  
**ANSWER TO AMENDED**  
**COMPLAINT AND JURY DEMAND**

21 Defendant, Larry Jeffery (“Jeffery”), by and through undersigned counsel, submits this  
22 Answer to the Amended Complaint (Dkt. 118) filed by the Securities and Exchange Commission  
23 (the "Commission") and admits, denies, and alleges as follows:

24 **SUMMARY**

25 1. In responding to Paragraph 1 of the Amended Complaint, Jeffery denies acting as  
26 a promoter of any fraudulent scheme, affirmatively states he was deceived by Matthew Wade  
27 Beasley (“Beasley”, the Beasley Law Group, Jeffrey J. Judd (“Judd”), the J&J Entities, and others,  
28 is a victim in this matter, and lacks knowledge or information sufficient to form a belief about the  
truth of the remaining allegations and thus denies those allegations.

2. In responding to Paragraph 2 of the Amended Complaint, Jeffery denies the  
“purchase agreements” constituted securities under federal law, denies the conduct alleged with

1 respect to him, and lacks knowledge or information sufficient to form a belief about the remaining  
2 allegations and thus denies those allegations.

3 3. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
4 of the allegations contained within Paragraph 3 of the Amended Complaint and thus denies the  
5 remaining allegations.

6 4. In responding to Paragraph 4 of the Amended Complaint, Jeffery affirmatively  
7 states he was deceived by Beasley, the Beasley Law Group, Judd, the J&J Entities, and others, is  
8 a victim in this matter, and lacks knowledge or information sufficient to form a belief about the  
9 remaining allegations and thus denies those allegations.

10 5. In responding to Paragraph 5 of the Amended Complaint, Jeffery admits he  
11 transferred money as returns to investors and received transaction-based compensation for such  
12 investors, and that he was not a registered broker or dealer, nor associated with a broker or dealer,  
13 registered with the Commission, but denies that the returns were “fictitious” and that he was under  
14 any obligation to be a registered broker or dealer, or associated with a broker or dealer, registered  
15 with the Commission. As to the remaining allegations, Jeffery lacks knowledge or information  
16 sufficient to form a belief about the remaining allegations and thus denies those allegations.

17 6. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
18 of the allegations contained within Paragraph 6 of the Amended Complaint.

19 7. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
20 of the allegations as to the Commission’s intent in bringing this action and thus denies the  
21 allegations contained within Paragraph 7.

22 **JURISDICTION AND VENUE**

23 8. Jeffery denies the Commission may appropriately seek remedy from him and denies  
24 the remaining allegations contained in Paragraph 8 of the Amended Complaint.

25 9. Jeffery denies the allegations contained in Paragraph 9 of the Amended Complaint.

26 10. In answering Paragraph 10 of the Amended Complaint, Jeffery denies he transacted  
27 business in the District of Nevada and denies engaging in any acts or transactions constituting  
28 violations in the District of Nevada. As to the remaining allegations in the paragraph, Jeffery lacks

1 knowledge or information sufficient to form a belief about the truth of the allegations and thus  
2 denies those allegations.

3 11. Jeffery denies the allegations contained in Paragraph 11 of the Amended  
4 Complaint.

5 12. Jeffery admits he made use of mails or the means or instrumentalities of interstate  
6 commerce but lacks knowledge or information sufficient to form a belief about the truth of the  
7 allegations contained in Paragraph 12 of the Amended Complaint and thus denies those  
8 allegations.

9 **DEFENDANTS**

10 13. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegation contained in Paragraph 13 of the Amended Complaint and thus denies those  
12 allegations.

13 14. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
14 of the allegation contained in Paragraph 14 of the Amended Complaint and thus denies those  
15 allegations.

16 15. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
17 of the allegation contained in Paragraph 15 of the Amended Complaint and thus denies those  
18 allegations.

19 16. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
20 of the allegation contained in Paragraph 16 of the Amended Complaint and thus denies those  
21 allegations.

22 17. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
23 of the allegation contained in Paragraph 17 of the Amended Complaint and thus denies those  
24 allegations.

25 18. Jeffery lacks knowledge or information sufficient to form a belief about the truth  
26 of the allegation contained in Paragraph 18 of the Amended Complaint and thus denies those  
27 allegations.  
28

1           21.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegation contained in Paragraph 19 of the Amended Complaint and thus denies those  
3 allegations.

4           20.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegation contained in Paragraph 20 of the Amended Complaint and thus denies those  
6 allegations.

7           21.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegation contained in Paragraph 21 of the Amended Complaint and thus denies those  
9 allegations.

10          22.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegation contained in Paragraph 22 of the Amended Complaint and thus denies those  
12 allegations.

13          23.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
14 of the allegation contained in Paragraph 23 of the Amended Complaint and thus denies those  
15 allegations.

16          24.     Jeffery admits he is 49 years old, resides in Laguna Beach, California, and assisted  
17 individuals who approached him about obtaining “purchase agreements” through FD Consulting  
18 Corp. and Capital Core Financial, Inc. As to the remaining allegations in the paragraph 24 of the  
19 Amended Complaint, Jeffery denies those allegations.

20          25.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
21 of the allegation contained in Paragraph 25 of the Amended Complaint and thus denies those  
22 allegations.

23          26.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
24 of the allegation contained in Paragraph 26 of the Amended Complaint and thus denies those  
25 allegations.

26          27.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
27 of the allegation contained in Paragraph 27 of the Amended Complaint and thus denies those  
28 allegations.



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37. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 37 of the Amended Complaint and thus denies those allegations.

38. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 38 of the Amended Complaint and thus denies those allegations.

39. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 39 of the Amended Complaint and thus denies those allegations.

40. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 40 of the Amended Complaint and thus denies those allegations.

41. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 41 of the Amended Complaint and thus denies those allegations.

42. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 42 of the Amended Complaint and thus denies those allegations.

**FACTS**

43. Jeffery admits he assisted individuals who approached him about obtaining personal injury settlement contracts but lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 43 of the Amended Complaint.

44. Jeffery lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 44 of the Amended Complaint and thus denies those allegations.

1            45.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegations contained in Paragraph 45 of the Amended Complaint and thus denies those  
3 allegations.

4            46.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegations contained in Paragraph 46 of the Amended Complaint and thus denies those  
6 allegations.

7            47.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegations contained in Paragraph 47 of the Amended Complaint and thus denies those  
9 allegations.

10           48.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegations contained in Paragraph 48 of the Amended Complaint and thus denies those  
12 allegations.

13           49.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
14 of the allegations contained in Paragraph 49 of the Amended Complaint and thus denies those  
15 allegations.

16           50.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
17 of the allegations contained in Paragraph 50 of the Amended Complaint and thus denies those  
18 allegations.

19           51.     Jeffery lacks information sufficient to admit or deny the allegations contained  
20 within Paragraph 51 of the Amended Complaint.

21           52.     Jeffery lacks information sufficient to admit or deny the allegations contained  
22 within Paragraph 52 of the Amended Complaint.

23           53.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
24 of the allegations contained in Paragraph 53 of the Amended Complaint and thus denies those  
25 allegations.

26           54.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
27 of the allegations contained in Paragraph 54 of the Amended Complaint and thus denies those  
28 allegations.

1           55.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegations contained in Paragraph 55 of the Amended Complaint and thus denies those  
3 allegations.

4           56.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegations contained in Paragraph 56 of the Amended Complaint and thus denies those  
6 allegations.

7           57.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegations contained in Paragraph 57 of the Amended Complaint and thus denies those  
9 allegations.

10          58.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegations contained in Paragraph 58 of the Amended Complaint and thus denies those  
12 allegations except Jeffery admits that a document titled “Exhibit B: Example of Investor  
13 Agreement” and a document titled “Exhibit C: Example of Buyer Agreement” were attached to  
14 the Amended Complaint.

15          59.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
16 of the allegations contained in Paragraph 59 of the Amended Complaint and thus denies those  
17 allegations except Jeffery admits that a document titled “Exhibit D: Confidential Private Placement  
18 Memorandum (‘PPM’)” was attached to the Amended Complaint.

19          60.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
20 of the allegations contained in Paragraph 60 of the Amended Complaint and thus denies those  
21 allegations.

22          61.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
23 of the allegations contained in Paragraph 61 of the Amended Complaint and thus denies those  
24 allegations.

25          62.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
26 of the allegations contained in Paragraph 62 of the Amended Complaint and thus denies those  
27 allegations.

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1           63.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegations contained in Paragraph 63 of the Amended Complaint and thus denies those  
3 allegations.

4           64.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegations contained in Paragraph 64 of the Amended Complaint and thus denies those  
6 allegations.

7           65.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegations contained in Paragraph 65 of the Amended Complaint and thus denies those  
9 allegations.

10          66.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegations contained in Paragraph 66 of the Amended Complaint and thus denies those  
12 allegations.

13          67.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
14 of the allegations contained in Paragraph 67 of the Amended Complaint and thus denies those  
15 allegations.

16          68.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
17 of the allegations contained in Paragraph 68 of the Amended Complaint and thus denies those  
18 allegations.

19          69.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
20 of the allegations contained in Paragraph 69 of the Amended Complaint and thus denies those  
21 allegations.

22          70.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
23 of the allegations contained in Paragraph 70 of the Amended Complaint and thus denies those  
24 allegations.

25          71.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
26 of the allegations contained in Paragraph 71 of the Amended Complaint and thus denies those  
27 allegations.

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1           72.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegations contained in Paragraph 72 of the Amended Complaint and thus denies those  
3 allegations.

4           73.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegations contained in Paragraph 73 of the Amended Complaint and thus denies those  
6 allegations.

7           74.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegations contained in Paragraph 74 of the Amended Complaint and thus denies those  
9 allegations.

10          75.     Jeffery admits he assisted individuals who approached him about obtaining  
11 "purchase agreements," and denies the remaining allegations in this paragraph 75 of the Amended  
12 Complaint with respect to him. Jeffery lacks knowledge or information sufficient to form a belief  
13 about the truth of the remaining allegations and thus denies those allegations.

14          76.     Jeffery admits he assisted individuals who approached him about obtaining  
15 "purchase agreements," and that he received transaction-based compensation in return. Jeffery  
16 lacks knowledge or information sufficient to form a belief about the truth of the remaining  
17 allegations in paragraph 76 of the Amended Complaint and thus denies those allegations.

18          77.     Jeffery denies the allegations in this paragraph with respect to him, except he admits  
19 to transferring cash through wire transfers and using email and telephone to communicate with  
20 individuals who approached him about obtaining "purchase agreements." Jeffery lacks knowledge  
21 or information sufficient to form a belief about the truth of the remaining allegations and thus  
22 denies those allegations.

23          78.     Jeffery admits that with respect to him, investor funds flowed into Beasley Law  
24 Group's IOLTA account, but denies that the funds "typically" flowed into that account. Jeffery  
25 admits he distributed returns to investors and that sometimes investors wired their money to  
26 accounts he controlled. Jeffery lacks knowledge or information sufficient to form a belief about  
27 the truth of the remaining allegations in this paragraph and thus denies those allegations.  
28

1           79.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegations contained in Paragraph 79 of the Amended Complaint and thus denies those  
3 allegations.

4           80.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegations contained in Paragraph 80 of the Amended Complaint and thus denies those  
6 allegations.

7           81.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegations contained in Paragraph 81 of the Amended Complaint and thus denies those  
9 allegations.

10          82.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegations contained in Paragraph 82 of the Amended Complaint and thus denies those  
12 allegations.

13          83.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
14 of the allegations contained in Paragraph 83 of the Amended Complaint and thus denies those  
15 allegations.

16          84.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
17 of the allegations contained in Paragraph 84 of the Amended Complaint and thus denies those  
18 allegations.

19          85.     In responding to Paragraph 85 of the Amended Complaint, Jeffery admits that  
20 investors wired money to and were paid through these accounts, but denies the returns were  
21 “fictitious.”

22          86.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
23 of the allegations contained in Paragraph 86 of the Amended Complaint and thus denies those  
24 allegations.

25          87.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
26 of the allegations contained in Paragraph 87 of the Amended Complaint and thus denies those  
27 allegations.  
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1            88.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
2 of the allegations contained in Paragraph 88 of the Amended Complaint and thus denies those  
3 allegations.

4            89.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
5 of the allegations contained in Paragraph 89 of the Amended Complaint and thus denies those  
6 allegations.

7            90.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
8 of the allegations contained in Paragraph 90 of the Amended Complaint and thus denies those  
9 allegations.

10           91.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
11 of the allegations contained in Paragraph 91 of the Amended Complaint and thus denies those  
12 allegations.

13           92.     Jeffery admits he transferred money as returns to investors and received  
14 transaction-based compensation for such investors but denies soliciting those investments. Jeffery  
15 lacks knowledge or information sufficient to form a belief about the truth of the remaining  
16 allegations in this paragraph and thus denies those allegations.

17           93.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
18 of the allegations contained in Paragraph 93 of the Amended Complaint and thus denies those  
19 allegations.

20           94.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
21 of the allegations contained in Paragraph 94 of the Amended Complaint and thus denies those  
22 allegations.

23           95.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
24 of the allegations contained in Paragraph 95 of the Amended Complaint and thus denies those  
25 allegations.

26           96.     Jeffery lacks knowledge or information sufficient to form a belief about the truth  
27 of the allegations contained in Paragraph 96 of the Amended Complaint and thus denies those  
28 allegations.









**SIXTH DEFENSE: FAILURE TO STATE A CLAIM**

The Amended Complaint fails to state a claim upon which relief can be granted.

**RULE 8 STATEMENT**

Because the Commission’s Amended Complaint is phrased in conclusory terms, Jeffery cannot fully anticipate all affirmative defenses that may be applicable to this action. Jeffery reserves the right to amend this Answer to assert any matter constituting an avoidance or affirmative defense, including those matters set forth in Fed. R. Civ. P. 8 and 12, as may be justified by the facts determined during discovery

**WHEREFORE**, Jeffery prays for judgment in his favor and against Plaintiff and for such other and further relief as this Court deems fair and just.

**JURY DEMAND**

Larry Jeffery demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

DATED this 9<sup>th</sup> day of August 2022

**GOODMAN LAW GROUP, P.C.**

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**CERTIFICATE OF SERVICE**

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I hereby certify that on August 9, 2022, I electronically filed **DEFENDANT LARRY JEFFERY'S ANSWER TO AMENDED COMPLAINT AND JURY DEMAND** with the Court using the CM/ECF system.

/s/ Ross C. Goodman, Esq.  
ROSS C. GOODMAN, Esq.