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Services, Inc., J and J Purchasing LLC,
The Judd Irrevocable Trust, and BJ Holdings LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; et al.,

Defendants,

THE JUDD IRREVOCABLE TRUST, et al.,

Relief Defendants.

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CASE NO. 2:22-cv-00612-CDS-EJY

**RECEIVER'S MOTION TO APPROVE
NOTICE OF ADVERSE CLAIM
DETERMINATION**

Geoff Winkler (the "Receiver"), the Court-appointed receiver for Defendants J&J Consulting Services, Inc., an Alaska corporation; J&J Consulting Services, Inc., a Nevada corporation; and J and J Purchasing LLC, as well as the Wells Fargo Interest on 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. (collectively, the “Receivership Entities”)¹, moves this Court for an order approving the form of the Receiver’s final notice of adverse claim determination. This Motion is based on the below memorandum of points and authorities, the exhibits hereto, all papers on file, and any argument the Court may consider.

MEMORANDUM OF POINTS AND AUTHORITIES

On May 11, 2026, the Receiver filed a Motion for Order in Aid of Receivership Allowing and Disallowing Claims (the “Claims Approval Motion”) [ECF No. 890], which sought this Court’s approval of both the Receiver’s recommended treatment of claims against the Receivership Entities and the Receiver’s proposed procedure for claimants to object to the recommended adverse treatment.

On June 10, 2026, the Court held a status conference on, among other things, the Claims Approval Motion, during which the Court indicated that it would issue an order granting the Claims Approval Motion (among other motions recently filed by the Receiver). Pursuant to that ruling, and as outlined in the Claims Approval Motion, the Receiver has prepared a final notice to be mailed to all claimants for whom the Receiver recommends disallowance or only partial allowance (the “Notice of Adverse Claim Determination”), a copy of which is attached hereto as **Exhibit 1**. The Notice of Adverse Claim Determination notifies the claimants of the Receiver’s recommended adverse treatment and notifies the claimants of their opportunity to object by following the dispute procedure proposed in the Claims Approval Motion and approved by this

¹ On July 29, 2022, this Court entered an order expanding the original receivership order to apply to additional defendants (*see* ECF No. 207).

1 Court in its ruling granting the Claims Approval Motion and adopting the procedures it proposed.

2 Accordingly, for the reasons stated herein, the Receiver respectfully asks this Court for an
3 order approving the Notice of Adverse Claim Determination attached hereto as **Exhibit 1**. A
4 proposed order approving the Notice of Adverse Claim Determination is attached hereto as
5 **Exhibit 2**.

6 Respectfully submitted this 19th day of June 2026.

7 **GREENBERG TRAURIG, LLP**

8 By: /s/ Madeleine Coles

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27 *J&J Consulting Services, Inc., J&J*
28 *Consulting Services, Inc., J and J*
Purchasing LLC, The Judd Irrevocable
Trust, and BJ Holdings LLC

CERTIFICATE OF SERVICE

I hereby certify that on **June 19, 2026**, 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/ Madeleine Coles

An employee of GREENBERG TRAURIG, LLP

INDEX OF EXHIBITS

Exhibit	Description
1	NOTICE TO CLAIMANT OF ADVERSE CLAIM DETERMINATION AND OBJECTION PROCEDURE
2	[PROPOSED] ORDER GRANTING MOTION TO APPROVE NOTICE OF ADVERSE CLAIM DETERMINATION

EXHIBIT 1

EXHIBIT 1

NOTICE OF ADVERSE CLAIM DETERMINATION

American Fiduciary Services LLC
715 NW Hoyt Street #4364
Portland, Oregon 97208

**NOTICE TO CLAIMANT OF ADVERSE CLAIM DETERMINATION
AND OBJECTION PROCEDURE**

June __, 2026

Re: *Securities and Exchange Commission v. Matthew Wade Beasley, et al.* Case No. 2:22-cv-00612 (Dist. Nev.) (the “Receivership Court”)

Dear Claimant:

PLEASE TAKE NOTICE THAT:

On May 11, 2026, Geoff Winkler (the “Receiver”), the court-appointed Receiver for Defendants J&J Consulting Services, Inc., an Alaska corporation; J&J Consulting Services, Inc., a Nevada corporation; and J and J Purchasing LLC, as well as the Wells Fargo Interest on 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. (collectively, the “Receivership Entities”) filed a *Motion for Order in Aid of Receivership Allowing and Disallowing Claims* (the “Claims Approval Motion”). A copy of the Claims Approval Motion and its accompanying exhibits is enclosed with this Notice.

The Claims Approval Motion sought an order approving the Receiver’s recommended treatment of claims against the Receivership Entities. Specifically, the Receiver sought an order from the Receivership Court approving the Receiver’s decision to disallow certain claims and to partially allow claims in an amount determined by the Receiver, and further sought an order from the Receivership Court approving a procedure for claimants to object to the proposed treatment

of such claims.

On _____, 2026, the Receivership Court issued an order granting the Claims Approval Motion, adopting the claim determination objection procedure described below for claimants—like you—for whom the Receiver recommends disallowance or only partial allowance of the claim, and approving the form of this Notice.

YOU ARE RECEIVING THIS NOTICE BECAUSE THE RECEIVER HAS IDENTIFIED YOU AS A CLAIMANT FOR WHOM THE RECEIVER RECOMMENDS DISALLOWANCE OR ONLY PARTIAL ALLOWANCE. You have already been advised that the Receiver will recommend disallowance or partial allowance of your claim. However, this formal Notice provides you with a final opportunity to object to the Receiver’s recommended adverse treatment of your claim before such treatment is approved by the Receivership Court.

PLEASE TAKE NOTICE THAT objections, if any, to the Receivership Court’s approval of the adverse treatment of your claim (a “Final Claim Objection”) must: (i) be in writing and state with specificity the legal and factual bases for the objection and your proposed alternative treatment of your claim, (ii) include appropriate affidavits and documentation in support thereof, and (iii) be mailed to the Receiver at the following address so as to be actually received no later than 30 days after the date of this Notice:

**American Fiduciary Services LLC
700 NE MULTNOMAH STREET, SUITE 1550
PORTLAND, OREGON 97232**

PLEASE TAKE FURTHER NOTICE THAT upon receipt of a timely Final Claim Objection, the Receiver will review the material submitted in support of your objection and, based on that review, attempt to resolve the objection with you directly. If the Receiver is unable to do so, the Receiver shall file an omnibus motion with the Receivership Court that presents each unresolved Final Claim Objection and includes an explanation detailing the factual and legal bases for the Receiver’s proposed treatment thereof (the “Unresolved Claims Motion”). The Receiver will file the Unresolved Claims Motion with the Receivership Court and serve it on all claimants whose Final Claim Objections are included in the motion.

PLEASE TAKE FURTHER NOTICE THAT any response to the Unresolved Claims

Motion must be filed with the Receivership Court no later than 21 days after the Unresolved Claims Motion was filed. Further, any response to the Unresolved Claims Motion must not be more than 10 pages.

PLEASE TAKE FURTHER NOTICE THAT if you file a timely response to the Unresolved Claims Motion, the Receiver may file a reply brief of not more than 10 pages no later than 21 days after your response is filed.

PLEASE TAKE FURTHER NOTICE THAT the Unresolved Claims Motion will be resolved by the Receivership Court, and the Receivership Court's determination of the claim shall be final and binding.

CONSEQUENCES OF FAILING TO TIMELY ASSERT FINAL CLAIM OBJECTION

IF YOU FAIL TO TIMELY MAIL A FINAL CLAIM OBJECTION BEFORE THE FINAL CLAIM OBJECTION DEADLINE AS SET FORTH HEREIN, THE RECEIVER'S PROPOSED ADVERSE TREATMENT OF YOUR CLAIM, WHICH MAY INCLUDE DISALLOWANCE OF YOUR CLAIM IN ITS ENTIRETY OR PARTIAL ALLOWANCE IN AN AMOUNT SET BY THE RECEIVER, WILL BE APPROVED BY THE RECEIVERSHIP COURT, AND YOU WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING ANY CLAIM AGAINST THE RECEIVERSHIP ENTITIES INCONSISTENT WITH THE TREATMENT RECOMMENDED BY THE RECEIVER AND APPROVED BY THE COURT.

Best Regards,

Geoff Winkler, JD, MBA, CFE, CIRA
Receiver

EXHIBIT 2

EXHIBIT 2

[PROPOSED] ORDER

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**IN THE UNITED STATES DISTRICT COURT
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SECURITIES AND EXCHANGE
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Plaintiff,

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MATTHEW WADE BEASLEY, et al.,

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THE JUDD IRREVOCABLE TRUST, et al.,

Relief Defendants.

CASE NO. 2:22-cv-00612-CDS-EJY

**ORDER GRANTING MOTION TO
APPROVE NOTICE OF ADVERSE
CLAIM DETERMINATION**

1 The Court having reviewed the Receiver's Motion to Approve Notice of Adverse Claim
2 Determination (the "Motion") [ECF No. 935], and there being no opposition to the Motion and
3 good cause appearing, hereby orders:

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

5 (2) The Notice of Adverse Claim Determination attached to the Motion as **Exhibit 1**
6 is approved;

7 (3) The Receiver shall mail the Notice of Adverse Claim Determination to all
8 claimants for whose claims the Receiver has recommended partial or full disallowance;

9 (4) For the avoidance of any doubt, the Receiver's Motion for Order in Aid of
10 Receivership Allowing and Disallowing Claims (the "Claims Approval Motion") [ECF No. 890]
11 is therefore **GRANTED** in its entirety, including for the reasons set forth on the record during the
12 June 10, 2026, hearing and consistent with the Court's June 12, 2026, minute order [ECF No.
13 931].

14 **IT IS SO ORDERED.**

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17 _____
UNITED STATES DISTRICT COURT JUDGE

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19 DATE: _____
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