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

7
8 SECURITIES AND EXCHANGE
COMMISSION,

9 Plaintiff,

10 v.

11 MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
12 CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
13 Corporation; J&J CONSULTING SERVICES,
INC., a Nevada Corporation; J AND J
14 PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
15 SEYBERT; ROLAND TANNER; LARRY
JEFFERY; JASON A. JENNE; SETH
16 JOHNSON; CHRISTOPHER M. MADSEN;
RICHARD R. MADSEN; MARK A.
17 MURPHY; CAMERON ROHNER; AND
WARREN ROSEGREN;

18 Defendants; and

19 THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
20 STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2 INVESTMENTS,
21 LLC; ROCKING HORSE PROPERTIES,
LLC; TRIPLE THREAT BASKETBALL,
22 LLC; ACAC LLC; ANTHONY MICHAEL
ALBERTO, JR.; and MONTY CREW LLC;

23 Relief Defendants.
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Case No.: 2:22-cv-00612-CDS-EJY

Judge: Cristina D. Silva
Magistrate Judge: Elayna J. Youchah

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S,
DEFENDANT CHRISTOPHER
MADSEN'S, AND RECEIVER'S
STIPULATION CONCERNING
LIVING EXPENSES**

1 **WHEREAS**, on June 29, 2022, Plaintiff United States Securities and Exchange
2 Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Amended Complaint in this matter,
3 alleging violations of the registration and/or antifraud provisions of the federal securities laws by
4 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.
5 No. 118.)

6 **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Preliminary
7 Injunction Order to extend the existing preliminary injunctive relief and asset freeze to those
8 defendants added in the Commission’s Amended Complaint. (Dkt. No. 119.)

9 **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Receivership
10 Order to extend the existing receivership order to include those defendants added in the
11 Commission’s Amended Complaint. (Dkt. No. 120.)

12 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Preliminary
13 Injunction and Asset Freeze Order, which, *inter alia*, extended the asset freeze imposed by the
14 Court on April 13, 2022 to those defendants added in the Commission’s Amended Complaint.
15 (Dkt. No. 206.) The Court’s Order provided for “an allowance for necessary and reasonable
16 living expenses to be granted only upon good cause shown by application to the Court with
17 notice and an opportunity for the Commission to be heard.”

18 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Receivership Order,
19 which, *inter alia*, extended the receivership previously imposed by the Court to the assets of
20 those defendants added in the Commission’s Amended Complaint. (Dkt. No. 207.)

21 **WHEREAS**, at the hearing before the Court on July 25, 2022, the Court directed the
22 parties to discuss any exceptions to the asset freeze regarding living expenses and so as to ensure
23 the scope of the preliminary injunction was tied to the underlying Ponzi scheme.

24 **WHEREAS**, on August 4, 2022 the Court entered an order further amending the
25 Preliminary Injunction and Asset Freeze Order exempting certain assets of Defendant
26 Christopher Madsen from the order. (Dkt. No. 229.)
27

1 Dated: August 23, 2022

WILEY PETERSON

2 */s/ Jonathan D. Blum*

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16 *Attorneys for Defendant Christopher Madsen*

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1 Dated: August 23, 2022

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26 *Attorneys for Receiver Geoff Winkler*

27 IT IS SO ORDERED:

CRISTINA D. SILVA
UNITED STATES DISTRICT JUDGE

DATED: _____