

1 TRACY S. COMBS (California Bar No. 298664)  
2 Email: combst@sec.gov  
3 CASEY R. FRONK (Illinois Bar No. 6296535)  
4 Email: fronkc@sec.gov  
5 SECURITIES AND EXCHANGE COMMISSION  
6 351 South West Temple, Suite 6.100  
7 Salt Lake City, Utah 84101  
8 Tel: (801) 524-5796  
9 Fax: (801) 524-3558

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

7  
8 SECURITIES AND EXCHANGE  
9 COMMISSION,

9 Plaintiff,

10 v.

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

18 Defendants; and

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

24 Relief Defendants.

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  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

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*

3 \_\_\_\_\_  
4 Jonathan D. Blum, Esq.  
5 Nevada Bar No. 9515  
6 1050 Indigo Drive, Suite 200B  
7 Las Vegas, Nevada 89145  
8 Telephone: (702) 910-3329  
9 Facsimile: (702) 533-3467  
10 jblum@wileypetersonlaw.com

**PRYOR CASHMAN, LLP**

11 */s/ John Giardino*  
12 John Giardino, Esq., *pro hac*  
13 7 Times Square  
14 New York, New York 10036-6569  
15 jgiardino@pryorcashman.com

16 *Attorneys for Defendant Christopher Madsen*

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
(continued on following page)

Dated: August 23, 2022

**GREENBERG TRAUERIG, LLP**

/s/ Kara B. Hendricks  
KARA B. HENDRICKS, Bar No. 07743  
JASON K. HICKS, Bar No. 13149  
KYLE A. EWING, Bar No. 014051  
10845 Griffith Peak Dr., Ste. 600  
Las Vegas, NV 89135

JARROD L. RICKARD, Bar No. 10203  
KATIE L. CANNATA, Bar No. 14848  
**SEMENZA KIRCHER RICKARD**  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803  
Facsimile: (702) 920-8669

DAVID R. ZARO\*  
JOSHUA A. del CASTILLO\*  
MATTHEW D. PHAM\*  
*\*admitted pro hac vice*  
**ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP**  
865 South Figueroa Street  
Suite 2800  
Los Angeles, California 90017-2543  
Telephone: (213) 622-5555  
Facsimile: (213) 620-8816

*Attorneys for Receiver Geoff Winkler*

IT IS SO ORDERED:

  
\_\_\_\_\_  
CRISTINA D. SILVA  
UNITED STATES DISTRICT JUDGE

DATED: August 23, 2022

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27