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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

17 SECURITIES AND EXCHANGE  
18 COMMISSION,

19 Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY, *et al.*,

22 Defendants,

23 THE JUDD IRREVOCABLE TRUST, *et al.*,

24 Relief Defendants.

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

Judge Hon. Cristina D. Silva

**DECLARATION OF RECEIVER, GEOFF  
WINKLER, IN SUPPORT OF OPPOSITION  
TO MOTION TO INTERVENE**

[Opposition to Motion submitted concurrently  
herewith]

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**DECLARATION OF GEOFF WINKLER**

I, Geoff Winkler, declare as follows:

1. I am the Court-appointed receiver in the above-entitled matter. I make this Declaration in support of my concurrently filed Opposition to Motion to Intervene. I have personal knowledge of the facts presented in this Declaration. If called as a witness in this matter, could and would competently testify thereto.

2. As of the date of the filing of my August 2, 2022 First Quarterly Report and Petition for Instructions (ECF No. 223), I had recovered millions of dollars' worth of personal and real property for the benefit of the receivership estate, and sought and secured Court approval of my proposed procedures for selling these assets out of receivership.

3. Since then, I have recovered additional assets. I presently estimate that I have marshaled assets worth approximately \$55 million, including a private aircraft for which I recently accepted a purchase offer with a net value to the receivership estate of over \$5 million.

4. I was not contacted by movants K. Young and O. Shahabe prior to the filing of their Motion to Intervene.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2022, at Portland, Oregon.



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Geoff Winkler

**CERTIFICATE OF SERVICE**

I am employed by the law firm of Semenza Kircher Rickard. in Clark County. I am over the age of 18 and not a party to this action. The business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

On the 12th day of September, 2022, I served the document(s), described as:

**DECLARATION OF RECEIVER, GEOFF WINKLER, IN SUPPORT OF OPPOSITION TO MOTION TO INTERVENE**

by serving the  original  a true copy of the above and foregoing via:

a. **CM/ECF System** to the following registered e-mail addresses:

Garrett T Ogata, court@gtogata.com

Gregory E Garman, ggarman@gtg.legal, bknotices@gtg.legal

Kevin N. Anderson, kanderson@fabianvancott.com, amontoya@fabianvancott.com, mdonohoo@fabianvancott.com, sburdash@fabianvancott.com

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4 blschroeder@hollandhart.com

5 Joni Ostler, ostlerj@sec.gov

6 Daniel D. Hill, ddh@scmlaw.com

7  b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The  
8 envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with  
9 Semenza Kircher Rickard's practice of collection and processing correspondence for  
10 mailing. Under that practice, documents are deposited with the U.S. Postal Service on the  
11 same day which is stated in the proof of service, with postage fully prepaid at Las Vegas,  
12 Nevada in the ordinary course of business. I am aware that on motion of party served,  
13 service is presumed invalid if the postal cancellation date or postage meter date is more than  
14 one day after the date stated in this proof of service.

12  c. **BY PERSONAL SERVICE.**

13  d. **BY DIRECT EMAIL.**

14  e. **BY FACSIMILE TRANSMISSION.**

15 I declare under penalty of perjury that the foregoing is true and correct.  
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*/s/ Olivia A. Kelly*

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An Employee of Semenza Kircher Rickard

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