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 5 Attorneys for the United States  
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 8 **UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
 10 Plaintiff,  
 11 v.  
 12 US \$353,900 and US \$20,081,  
 13 Defendants.

2:22-CV-612-CDS-EJY

**FILED UNDER SEAL**

**Stipulation to Dismiss the Civil Forfeiture  
 and to Turnover the \$353,900 and \$20,081  
 to the SEC Receiver as to Christopher  
 Humphries and Jessica Humphries, and  
 Order**

14 Christopher Humphries, his counsel, Peter S. Christiansen; and Jessica Humphries,  
 15 her counsel, Pamela L. Johnston, agree as follows:

16 1. The civil forfeiture involves the forfeiture of \$353,900 and \$20,081 (case).

17 2. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
 18 agree the government will dismiss the case with the purpose to turnover the \$353,900 and  
 19 \$20,081 to the Securities Exchange Commission (SEC) Receiver to be credited to  
 20 Christopher Humphries as payment toward any future disgorgement in *Securities Exchange  
 21 Commission vs. Beasley et al.*, Case No. 2:22-CV-00612-CDS-EJY.

22 3. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
 23 agree to waive their right to any administrative forfeiture, civil judicial forfeiture, or  
 24 criminal forfeiture proceedings (proceedings) concerning the forfeiture of \$353,900 and  
 25 \$20,081.

26 4. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
 27 agree to waive service of process of any documents filed in the case or any proceedings  
 28 concerning the \$353,900 and \$20,081 arising from the facts and circumstances of the case.

1           5. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
2 agree to waive any further notice to them, their agents, or their attorneys regarding the  
3 forfeiture, disposition, and turnover of the \$353,900 and \$20,081.

4           6. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
5 agree not to file any claim, answer, petition, or other documents in any proceedings  
6 concerning the \$353,900 and \$20,081.

7           7. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
8 agree not to contest, and agree not to assist any other person and entity to contest, the  
9 forfeiture in any proceedings concerning the \$353,900 and \$20,081.

10          8. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
11 agree to withdraw any claims, answers, counterclaims, petitions, or other documents they  
12 filed in any proceedings concerning the \$353,900 and \$20,081, including, but not limited  
13 to, the administrative forfeiture and the administrative claims.

14          9. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
15 agree to waive the statute of limitations, the CAFRA requirements, Supplemental Rules for  
16 Admiralty or Maritime Claims and Asset Forfeiture Actions A, C, E, and G, 18 U.S.C.  
17 § 983, any and all constitutional, statutory, legal, equitable rights, defenses, and claims  
18 regarding the property, including, but not limited to, double jeopardy and due process  
19 under the Fifth Amendment to the United States Constitution in any proceedings  
20 concerning the \$353,900 and \$20,081.

21          10. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
22 agree to waive all constitutional, statutory, legal, equitable rights, defenses, and claims  
23 regarding the property, including, but not limited to, a jury trial under the Sixth  
24 Amendment to the United States Constitution in any proceedings concerning the \$353,900  
25 and \$20,081.

26          11. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
27 agree to waive any and all constitutional, statutory, legal, equitable rights, defenses, and  
28 claims regarding the property, including, but not limited to, excessive fines and cruel and

1 unusual punishments under the Eighth Amendment to the United States Constitution in  
2 any proceedings concerning the \$353,900 and \$20,081.

3 12. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
4 agree to waive any and all constitutional, statutory, legal, equitable rights, defenses, and  
5 claims to the property under *Honeycutt v. United States*, 137 S. Ct. 1626 (2017) and *United*  
6 *States v. Thompson*, 990 F.3d 680 (9th Cir. 2021) in any proceedings concerning the  
7 \$353,900 and \$20,081.

8 13. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
9 agree to the entry of this Order to dismiss the case and to turnover the \$353,900 and  
10 \$20,081 to the SEC Receiver.

11 14. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
12 agree to waive the right to appeal any Order to dismiss the case and to turnover the  
13 \$353,900 and \$20,081 to the SEC Receiver.

14 15. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
15 agree to the conditions set forth in this Stipulation to Dismiss the Civil Forfeiture and to  
16 Turnover the \$353,900 and \$20,081 to the SEC Receiver as to Christopher Humphries and  
17 Jessica Humphries, and Order (Stipulation).

18 16. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
19 agree to hold harmless the United States, the United States Department of Justice, the  
20 United States Attorney's Office for the District of Nevada, the Federal Bureau of  
21 Investigation, the United States Marshals Service, the Department of the United States  
22 Treasury, the Internal Revenue Service, the Securities and Exchange Commission, their  
23 agencies, their agents, and their employees from any claim made by Christopher  
24 Humphries and Jessica Humphries or any third party arising out of the facts and  
25 circumstances of the case, its dismissal, and turnover of the \$353,900 and \$20,081 to the  
26 SEC Receiver.

27 17. Christopher Humphries and Jessica Humphries knowingly and voluntarily  
28 release and forever discharge the United States, the United States Department of Justice,

1 the United States Attorney's Office for the District of Nevada, the Federal Bureau of  
2 Investigation, the United States Marshals Service, the Department of the United States  
3 Treasury, the Internal Revenue Service, the Securities and Exchange Commission, their  
4 agencies, their agents, and their employees from any and all claims, rights, or causes of  
5 action of any kind that Christopher Humphries and Jessica Humphries now have or may  
6 hereafter have on account of, or in any way growing out of, the seizures, the dismissal of  
7 the case, and the turnover of the \$353,900 and \$20,081 to the SEC Receiver.

8 18. Within a practicable time for the United States, the government agrees to  
9 turnover the \$353,900 and \$20,081 to the SEC Receiver.

10 19. Each party acknowledges and warrants that their execution of this Stipulation  
11 is free and is voluntary.

12 20. This Stipulation contains the entire agreement between Christopher  
13 Humphries, Jessica Humphries, and the government in this case.

14 21. Except as expressly stated in this Stipulation, no party, officer, agent,  
15 employee, representative, or attorney has made any statement or representation to any  
16 other party, person, or entity regarding any fact relied upon in entering into this  
17 Stipulation, and no party, officer, agent, employee, representative, or attorney relies on  
18 such statement or representation in executing this Stipulation.

19 22. The persons signing this Stipulation warrant and represent that they have full  
20 authority to execute this Stipulation and to bind the persons, on whose behalf they are  
21 signing, to the terms of this Stipulation.

22 23. This Stipulation shall be construed and interpreted according to federal  
23 forfeiture law and federal common law. The jurisdiction and the venue for any dispute  
24 related to, and/or arising from, this Stipulation is the unofficial Southern Division of the  
25 United States District Court for the District of Nevada, located in Las Vegas, Nevada.

26 24. Each party shall bear their own attorneys' fees, expenses, costs, and interest.

27 25. This Stipulation shall not be construed more strictly against one party than  
28 against the other merely by virtue of the fact that it may have been prepared primarily by

1 counsel for one of the parties; it being recognized that both parties have contributed  
2 substantially and materially to the preparation of this Stipulation.

3 IT IS HEREBY CERTIFIED, pursuant to 28 U.S.C. § 2465(a)(2), that there was  
4 reasonable cause for the seizure and forfeiture of the \$353,900 and \$20,081.

5 Dated: \_\_\_\_\_

6 Christiansen Trial Lawyers  
7 Counsel for Christopher Humphries

Dated: \_\_\_\_\_

JASON M. FRIERSON  
United States Attorney

8  
9 \_\_\_\_\_  
PETER S. CHRISTIANSEN

\_\_\_\_\_ DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

10 Dated: \_\_\_\_\_

11  
12 \_\_\_\_\_  
CHRISTOPHER HUMPHRIES

13  
14 Dated: 11-9-22

15 Foley & Lardner, LLP  
16 Counsel for Jessica Humphries

17   
18 \_\_\_\_\_  
PAMELA L. JOHNSTON

19 Dated: \_\_\_\_\_

20  
21 \_\_\_\_\_  
JESSICA HUMPHRIES

22  
23 IT IS SO ORDERED:

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25 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

26  
27 DATED: \_\_\_\_\_



1 counsel for one of the parties; it being recognized that both parties have contributed  
2 substantially and materially to the preparation of this Stipulation.

3 IT IS HEREBY CERTIFIED, pursuant to 28 U.S.C. § 2465(a)(2), that there was  
4 reasonable cause for the seizure and forfeiture of the \$353,900 and \$20,081.

5 Dated: November 10, 2022

Dated: 11/10/22

6 Christiansen Trial Lawyers  
7 Counsel for Christopher Humphries

JASON M. FRIERSON  
United States Attorney

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PETER S. CHRISTIANSEN

\_\_\_\_\_   
DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

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12 \_\_\_\_\_  
CHRISTOPHER HUMPHRIES

13 Dated: 11/9/22

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15 Foley & Lardner, LLP  
16 Counsel for Jessica Humphries

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PAMELA L. JOHNSTON

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JESSICA HUMPHRIES

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UNITED STATES DISTRICT JUDGE

27 DATED: \_\_\_\_\_  
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4 reasonable cause for the seizure and forfeiture of the \$353,900 and \$20,081.

5 Dated: \_\_\_\_\_

Dated: 11/10/2022

6 Christiansen Trial Lawyers  
7 Counsel for Christopher Humphries

JASON M. FRIERSON  
United States Attorney

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9 \_\_\_\_\_  
PETER S. CHRISTIANSEN

/s/ Daniel D. Hollingsworth  
DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

10 Dated: \_\_\_\_\_

11  
12 \_\_\_\_\_  
13 CHRISTOPHER HUMPHRIES

14 Dated: \_\_\_\_\_

15 Foley & Lardner, LLP  
16 Counsel for Jessica Humphries

17  
18 \_\_\_\_\_  
PAMELA L. JOHNSTON

19 Dated: \_\_\_\_\_

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21 \_\_\_\_\_  
JESSICA HUMPHRIES

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23 IT IS SO ORDERED:

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UNITED STATES DISTRICT JUDGE

27 DATED: \_\_\_\_\_