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13
14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA
16

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

**STIPULATION AND [PROPOSED] ORDER
AUTHORIZING DEFENDANT MATTHEW
WADE BEASLEY TO TRANSFER
OWNERSHIP OF REAL PROPERTIES TO
RECEIVERSHIP ENTITY J&J
CONSULTING SERVICES, INC., A
NEVADA CORPORATION**

1 The following Stipulation and [Proposed] Order Authorizing Defendant Matthew Wade
 2 Beasley to Transfer Ownership of Real Properties to Receivership Entity J&J Consulting Services,
 3 Inc., a Nevada Corporation (the "Stipulation") is entered into by and between Geoff Winkler (the
 4 "Receiver"), the Court-appointed receiver in the above-entitled action, and the plaintiff Securities
 5 and Exchange Commission (the "Commission"), and defendant Matthew Wade Beasley
 6 ("Mr. Beasley") by and through their respective representatives and with reference to the
 7 following facts:

8 1. On motion of the Commission, the Receiver was appointed on June 3, 2022
 9 pursuant to this Court's Order Appointing Receiver [ECF No. 88], as amended by its July 28, 2022
 10 Order Amending Receivership Order [ECF 207] (collectively the "Appointment Order");

11 2. Among other things, the Appointment Order required the defendants in the above-
 12 entitled action to turn over to the Receiver certain real and personal property assets, and further
 13 authorized the Receiver to market such assets for sale;

14 3. On August 8, 2022, this Court entered its Order Granting Petition of Receiver,
 15 Geoff Winkler, for Order Approving Procedures for Sale of Real Property Out of Receivership
 16 (the "Real Property Sales Procedures Order") [ECF No. 224] which, among other things approved
 17 the Receiver's recommendations for the marketing and sale of those real property assets subject to
 18 the turnover provisions of the Appointment Order, including the transfer of record ownership of
 19 such real property to the receivership estate;

20 4. The Receiver has identified the following real properties (collectively, the
 21 "Properties") owned in whole or in part by Mr. Beasley, or an entity or trust owned or controlled
 22 by him (collectively "Beasley"), and bearing the legal descriptions appended hereto as Exhibits 1
 23 through ⁶7, as real properties subject to the turnover provisions of the Appointment Order and the
 24 sales procedures established by the Real Property Sales Procedures Order:

<u>Address / Property Description</u>	<u>Assessor's Parcel Number</u>
5475 Ruffian Road, Las Vegas, NV 89149	126-36-501-029
2143 Via Regina Coeli Street, Las Vegas, NV 89124	129-02-410-074

1	±0.64 Acres - SWC Ruffian Rd and W Stephen Ave, Las Vegas, NV 89149	126-36-501-031
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3	5485 Ruffian Road, Las Vegas NV 89149-1269	126-36-501-030
4	±2.5 Acres - NWC Ruffian Rd and W Hammer Ln, Located in Section 36, Township 19 South, Range 59 East, Las Vegas, NV 89149	126-36-501-017
5		
6	5317 Schoofey Street, Las Vegas, NV 89108	126-36-618-028
7	548 Lucerne Way, South Lake Tahoe, CA 96150	022-111-013-000
8		

9 5. Beasley acknowledges that the Properties are subject to the turnover Provisions of
10 the Appointment Order;

11 6. The Receiver has determined, in his reasonable business judgment, that it is
12 necessary and appropriate for Beasley's ownership interest in the Properties to be assigned to one
13 of the entities placed into receivership pursuant to the Appointment Order and under the
14 Receiver's exclusive authority and control, J&J Consulting Services, Inc., a Nevada corporation
15 ("J&J Consulting"), or such other entity in receivership that the Receiver may designate, in order
16 for the Receiver to successfully market, sell, and convey clear title to prospective purchasers of the
17 Properties; and

18 7. The Receiver, the Commission, and Mr. Beasley agree that it is necessary and
19 appropriate, and consistent with the turnover provisions of the Appointment Order, for Beasley to
20 transfer or assign his ownership interest in the Properties to J&J Consulting, or such other entity in
21 receivership that the Receiver may designate, in order to facilitate the Receiver's marketing and
22 sale of the Properties for the benefit of the receivership estate established by the Appointment
23 Order.

24 **ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED** by and between the
25 undersigned counsel that:

26 A. Beasley is authorized to transfer or assign his ownership interest in the Properties,
27 bearing the legal descriptions appended hereto as Exhibits 1 through 7, to J&J

to NB
also the SEC
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Consulting, or such other entity in receivership and under the Receiver's exclusive authority and control as designated by the Receiver.

B. The forgoing transfers may be accomplished by grant deed, quit claim deed or other form of real property transfer in the sole and absolute discretion of the Receiver.

DATED this 24th day of January, 2023.

DATED this 24th day of January, 2023.

GREENBERG TRAURIG, LLP

SECURITIES & EXCHANGE COMMISSION

By: /s/ Kara B. Hendricks

By: /s/ Casey Fronk

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Attorneys for Receiver Geoff Winkler
DATED this ___ day of January, 2023.

DEFENDANT MATTHEW WADE BEASLEY

By: 
MATTHEW WADE BEASLEY

1 **IT IS HEREBY ORDERED** that:

2 A. The Stipulation is approved, in its entirety; and

3 B. As provided for in the Stipulation, Defendant Matthew Wade Beasley is ordered
4 and authorized to transfer or assign his ownership interest in the Properties, bearing
5 the legal descriptions appended hereto as Exhibits 1 through ⁶7, to J&J Consulting,
6 or such other entity in receivership and under the Receiver's exclusive authority and
7 control as designated by the Receiver.

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9 Dated: _____

10 Hon. Cristina D. Silva
11 Judge, United States District Court
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SECURITIES & EXCHANGE COMMISSION v. MATTHEW WADE BEASLEY,
USDC CASE NO. 2:22-CV-00612-CDS-EJY

EXHIBIT	DESCRIPTION
Exhibit 1	5475 Ruffian Road Property Legal Description
Exhibit 2	2143 Via Regina Coeli Street Property Legal Description
Exhibit 3	5485 Ruffian Road and .64 Acres SWC Ruffian Road and W. Stephen Avenue Property Legal Description
Exhibit 4	5485 Ruffian Road and .64 Acres SWC Ruffian Road and W. Stephen Avenue Property Legal Description
Exhibit 5	2.5 Acres – NWC Ruffian Road and W. Hammer Lane Property Legal Description
Exhibit 6	548 Lucerne Way Property Legal Description