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14 UNITED STATES DISTRICT COURT  
15 DISTRICT OF NEVADA

17 SECURITIES AND EXCHANGE  
18 COMMISSION,

18 Plaintiff,

19 vs.

20 MATTHEW WADE BEASLEY, *et al.*,

21 Defendants

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

23 Relief Defendants  
24

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

**STIPULATION AND 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 7, 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
2		
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	<del>5317 Schoofey Street, Las Vegas, NV 89108</del>	<del>126-36-618-028</del>
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 MB [initials]  
 also the SEC  
 KBT*

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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

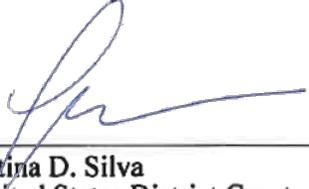
By:   
MATTHEW WADE BEASLEY

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 <sup>6</sup>7, 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.

8

9 Dated: January 26, 2023

  
\_\_\_\_\_  
Hon. Cristina D. Silva  
Judge, United States District Court

**SECURITIES & EXCHANGE COMMISSION v. MATTHEW WADE BEASLEY,**  
**USDC CASE NO. 2:22-CV-00612-CDS-EJY**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
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

# EXHIBIT 1

# EXHIBIT 1

5475 Ruffian Road Property  
Legal Description

**EXHIBIT 1**  
**5475 Ruffian Road**

**LEGAL DESCRIPTION**

PARCEL ONE (1):

That portion of the Northeast Quarter (NE  $\frac{1}{4}$ ) of the Northeast Quarter (NE  $\frac{1}{4}$ ) of Section 36, Township 19 South, Range 59 East, M.D.B. &M., described as follows:

Lot Two (2) as shown by map thereof in File 107 of Parcel Maps, Page 22, in the Office of the County Recorder of Clark County, Nevada.

PARCEL TWO (2):

An Easement for ingress and egress over those portions of Lots One (1), Three (3) and Four (4), lying within the Private Drive as shown by said map.

# EXHIBIT 2

# EXHIBIT 2

2143 Via Regina Coeli Street Property  
Legal Description

**EXHIBIT 2**  
**2143 Via Regina Coeli Street**

**LEGAL DESCRIPTION**

LOT FOUR (4) IN BLOCK FIVE (5) OF CAMP LADY OF THE SNOWS SUBDIVISION AS SHOWN BY MAP THEREOF ON FILE IN BOOK 5, OF PLATS, PAGE 45, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA.

# EXHIBIT 3

# EXHIBIT 3

5485 Ruffian Road and 0.64 Acres SWC Ruffian Road and W. Stephen Avenue Legal Description

**EXHIBIT 3**

**5485 Ruffian Road -AND- 0.64 Acres – SWC Ruffian Road and W. Stephen Ave.**

**LEGAL DESCRIPTION**

**PARCEL ONE (1):**

That portion of the Northeast Quarter (NE ¼) of the Northeast Quarter (NE ¼) of Section 36, Township 19 South, Range 59 East, M.D.B &M., described as follows:

Lots Three (3) and Four (4) as shown by the map thereof in File 107 of Parcel Maps, Page 22, in the Office of the County Recorder of Clark County, Nevada.

Together with that land vacated by that Order of Vacation recorded October 30, 2019 in book 20191030 as Document No. 03413 and re-recorded October 31, 2019 in Book 20191031 as Document No. 00661, Official Records, Clark County, Nevada.

**PARCEL TWO (2):**

An Easement for ingress and egress over those portions of Lots One (1) and Two (2), lying within the Private Drive as shown by said map.

# EXHIBIT 4

# EXHIBIT 4

5485 Ruffian Road AND 0.64 Acres - SWC Ruffian Road and W. Stephen Avenue Legal Description

**Exhibit 4**

**5485 Ruffian Road -AND- 0.64 Acres – SWC Ruffian Road and W. Stephen Ave.**

**[INTENTIONALLY LEFT BLANK:  
LEGAL DESCRIPTION COMBINED WITH AND NOW CONTAINED IN EXHIBIT 3]**

# EXHIBIT 5

# EXHIBIT 5

2.5 Acres - NWC Ruffian Road & W. Hammer Lane  
Property Legal Description

**EXHIBIT 5**

**2.5 Acres – NWC Ruffian Road and W. Hammer Lane**

**LEGAL DESCRIPTION**

The Southeast Quarter (SE 1/4) of the Southwest Quarter (SW 1/4) of the Northeast Quarter (NE 1/4) of the Northeast Quarter (NE1/4) of [Section 36](#), Township 19 South, Range 59 East, M.D.M.

# **EXHIBIT 6**

# **EXHIBIT 6**

548 Lucerne Way Property Legal Description

**EXHIBIT 6**  
**548 Lucerne Way**

**LEGAL DESCRIPTION**

The land referred to is situated in the County of El Dorado, City of South Lake Tahoe, State of California, and is described as follows:

Lot 18, as shown on the Map entitled "Tahoe Keys Unit No. 2", filed October 13, 1965 in the Office of the El Dorado County Recorder, California, in Book D, of Maps at Page 51, El Dorado County Records.

APN: 022-111-013-000