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

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY  
LAW GROUP PC; JEFFREY J. JUDD;  
CHRISTOPHER R. HUMPHRIES; J&J  
CONSULTING SERVICES, INC., an Alaska  
Corporation; J&J CONSULTING SERVICES,  
INC., a Nevada Corporation; J AND J  
PURCHASING LLC; SHANE M. JAGER;  
JASON M. JONGEWARD; DENNY  
SEYBERT; ROLAND TANNER; LARRY  
JEFFERY; JASON A. JENNE; SETH  
JOHNSON; CHRISTOPHER M. MADSEN;  
RICHARD R. MADSEN; MARK A.  
MURPHY; CAMERON ROHNER; AND  
WARREN ROSEGREEN;

Defendants; and

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

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 AND  
DEFENDANT MARK MURPHY'S  
STIPULATION REGARDING  
PLAINTIFF'S MOTIONS FOR ASSET  
FREEZE AND RECEIVERSHIP**

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1 Plaintiff United States Securities and Exchange Commission (“SEC”, “Commission”, or  
2 “Plaintiff”), the Court’s appointed Receiver, Geoff Winkler of American Fiduciary Services LLC  
3 (the “Receiver”), defendant Mark Murphy (“Mr. Murphy” or “Defendant”), hereby stipulate as  
4 follows:

5 **WHEREAS**, on June 29, 2022, Plaintiff United States Securities and Exchange  
6 Commission (“SEC”, “Commission”, or “Plaintiff”) filed its Amended Complaint in this matter,  
7 alleging violations of the registration and/or antifraud provisions of the federal securities laws by  
8 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.  
9 No. 118.)

10 **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Preliminary  
11 Injunction Order to extend the existing preliminary injunctive relief and asset freeze to those  
12 defendants added in the Commission’s Amended Complaint. (Dkt. No. 119.)

13 **WHEREAS**, on June 29, 2022, the Commission filed a Motion to Amend Receivership  
14 Order to extend the existing receivership order to include those defendants added in the  
15 Commission’s Amended Complaint. (Dkt. No. 120.)

16 **WHEREAS**, on January 16, 2023, the Court held oral argument on Plaintiff’s Motions as  
17 to Defendant Mark Murphy (“herein, Defendant”), and thereafter ordered the parties to meet and  
18 confer within 21 days as to a proposed stipulation regarding certain accounts held by Murphy.

19 **WHEREAS**, Defendant and the Commission have reached the following agreement as to  
20 the Commission’s Motions, and jointly provide this proposed agreement for approval by the  
21 Court.

22 1. The Court’s July 29, 2022 Order Amending Preliminary Injunction and Asset  
23 Freeze Order, which, *inter alia*, extended the asset freeze imposed by the Court on April 13,  
24 2022 to those defendants added in the Commission’s Amended Complaint (Dkt. No. 206), is  
25 hereby applicable to Defendant, and Defendant is defined as a “New Defendant” pursuant to and  
26 subject to that Order.

27 2. The Court’s July 29, 2022 Order Amending Receivership Order, which, *inter alia*,  
extended the receivership previously imposed by the Court to the assets of those defendants

1 added in the Commission’s Amended Complaint (Dkt. No. 207), is hereby applicable to  
2 Defendant, and the personal assets of Defendant are hereby included as “Receivership Property”  
3 and “Receivership Estate;” with the exception of the property specified in paragraph 7 of this  
4 Order. Defendant is hereby included as an “Individual Receivership Defendant” and  
5 “Receivership Defendant” as defined and ordered in the June 3, 2022 Receivership Order (Dkt.  
6 No. 88); and Defendant shall have the same obligations and duties as the Individual Receivership  
7 Defendants in the June 3, 2022 Receivership Order, except that the deadlines in Section II,  
8 paragraphs 9, 10, and 11 of the June 3, 2022 Order shall begin to run for Defendant upon the date  
9 of entry of this stipulated Order.

10 3. The assets subject to this freeze order and injunction shall be frozen but will not  
11 be transferred or otherwise sold without further Court order or agreement.

12 4. The Silver State Schools Federal Credit Union account ending in 5818 (the  
13 “Silver State Business Account”) held in the name of Mark Murphy Ltd. shall be unfrozen to  
14 allow Defendant to hold going-forward, earned income unconnected to the conduct alleged in the  
15 Complaint.

16 5. The Silver State Schools Federal Credit Union account ending in 4900 (the  
17 “Silver State Personal Account”) held in the name of Mark Murphy shall be unfrozen to allow  
18 Defendant to hold going-forward, earned income unconnected to the conduct alleged in the  
19 Complaint.

20 6. Defendant must continue to provide to counsel to the Commission and to the  
21 Receiver, without further request or subpoena, monthly account statements of all active bank and  
22 financial accounts owned and controlled by Defendant, for review and inspection, by no later  
23 than the 5<sup>th</sup> of each month. These account statements shall be provided to counsel to the  
24 Commission by email to Casey R. Fronk (fronkc@sec.gov) and Michael E. Welsh  
25 (welshmit@sec.gov); and to the Receiver by email to Kara Hendricks (hendricks@gtlaw.com) as  
26 counsel for the Receiver and to Geoff Winkler (geoff@americanfiduciaryservices.com).

27 7. To the extent Defendant earns additional, going-forward income that he  
demonstrates, to the satisfaction of counsel for the Commission, is unconnected to the conduct

1 alleged in the Complaint, such income may be used for the payment of necessary and reasonable  
2 living expenses and payment of attorney’s fees and defense costs.

3 8. The Steel Dust Properties, LLC operated by the Non Profit Hope Ranch located at  
4 453 County Road 295, Gainesville Texas, 76240 (the “Hope Ranch Property”) will remain under  
5 the control of Defendant but shall not be transferred without further Court order. Defendant shall  
6 provide documentation regarding the Hope Ranch Property’s non-profit status and financial  
7 disclosures to counsel to the Commission by email to Casey R. Fronk (fronkc@sec.gov) and  
8 Michael E. Welsh (welshmit@sec.gov); and to the Receiver by email to Kara Hendricks  
9 (hendricks@gtlaw.com) as counsel for the Receiver and to Geoff Winkler  
10 (geoff@americanfiduciaryservices.com), on the 5th of each month detailing any expenses  
11 associated with the Hope Ranch Property in the preceding month.

12 Dated: February 14, 2023

**U.S. SECURITIES AND EXCHANGE  
COMMISSION**

13  
14 /s/ Casey R. Fronk  
15 CASEY R. FRONK  
16 MICHAEL E. WELSH  
*Attorneys for Petitioner U.S. Securities and  
Exchange Commission*

**GREENBERG TRAUIG, LLP**

17  
18 By: /s/ Kara B. Hendricks  
19 KARA B. HENDRICKS  
20 JASON K. HICKS  
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22 *Attorneys for Receiver Geoff Winkler*

**MARC COOK**

/s/ Marc P. Cook  
MARC P. COOK, ESQ.  
COOK & KELESIS, LTD.  
517 S. NINTH STREET  
LAS VEGAS, NEVADA 89101  
*Attorney for Defendant Mark Murphy*

IT IS SO ORDERED:

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CRISTINA D. SILVA  
UNITED STATES DISTRICT JUDGE

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

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