

DOUGLAS M. MILLER (Cal. Bar No. 240398)

Email: millerdou@sec.gov

JASON BUSSEY (Cal. Bar. No. 227185)

Email: busseyja@sec.gov

PAT HUDDLESTON (Ga. Bar. No. 373984)

Email: huddlestonp@sec.gov

Attorneys for Plaintiff

Securities and Exchange Commission

44 Montgomery Street, Suite 700

San Francisco, CA 94104

Tel: (415) 705-2500

Fax: (415) 705-2501

KARA B. HENDRICKS

Nevada Bar No. 7743

Email: hendricksk@gtlaw.com

10845 Griffith Peak Drive

Suite 600

Las Vegas, NV 89135

Tel: (702) 792-3773

Attorneys for Receiver

DAVID C. CLUKEY

Email: dclukey@jacksonwhitelaw.com

Attorneys For Defendant Seth Johnson

40 N. Center Street

Suite 200

Mesa, AZ 80201

Tel: (480) 745-1776

**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;

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

Judge: Cristina D. Silva

Magistrate Judge: Elayna J. Youchah

**STIPULATION AND [PROPOSED]
ORDER CONCERNING RELEASE OF
CERTAIN FUNDS OF SETH
JOHNSON AND LIS PENDENS**

1 RICHARD R. MADSEN; MARK A.
2 MURPHY; CAMERON ROHNER; AND
3 WARREN ROSEGREEN;

4 Defendants; and

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

13 Relief Defendants.
14
15
16
17
18
19
20
21
22
23
24
25
26
27

1
2 **WHEREAS**, on April 12, 2022, Plaintiff United States Securities and Exchange
3 Commission (“SEC”, “Commission”, or “Plaintiff”) filed a Complaint in this matter, alleging
4 violations of the registration and/or antifraud provisions of the federal securities laws by
5 Defendants, and the receipt of ill-gotten proceeds of such violations by Relief Defendants. (Dkt.
6 No. 1.)

7
8 **WHEREAS**, on or about June 3, 2022, Geoff Winkler of American Fiduciary Services
9 was appointed as Receiver by order of this Court (Dkt. No. 88) (the “Receivership Order”).

10 **WHEREAS**, on June 29, 2022, the Commission filed its Amended Complaint in this
11 matter, which added Seth Johnson as a defendant (“Defendant”). (Dkt. No. 118.)

12 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Preliminary
13 Injunction and Asset Freeze Order, which extended the asset freeze previously imposed by the
14 Court to those defendants added in the Commission’s Amended Complaint, including Defendant.
(Dkt. No. 206.)

15 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Receivership Order,
16 which extended the receivership previously imposed by the Court to the assets of those
17 defendants added in the Commission’s Amended Complaint, including Defendant. (Dkt. No.
18 207.)

19 **WHEREAS**, on August 31, 2022, the Court granted a stipulation regarding Defendant’s
20 living expenses, including the right of the Receiver to record a *lis pendens* for certain real
21 property owned by Defendant. (Dkt. No. 280.)

22 **WHEREAS**, on September 16, 2024, the Court granted a stipulation between counsel for
23 the Commission, Defendant, and the Receiver regarding Defendant’s living expenses, including
24 releasing the *lis pendens* for certain real property owned by Defendant. (Dkt. No. 705.)

25 **WHEREAS**, the Receiver has received the total sum of \$353,993 (“Deposit”) from
26 Defendant.
27

1 **WHEREAS**, pursuant to a bifurcated settlement with the Commission, the Court entered
2 judgment against Defendant as to liability, reserving for later determination the amounts of
3 disgorgement, prejudgment interest, and civil penalties for which Defendant will be liable. (Dkt.
4 No. 746.)

5 **WHEREAS**, counsel for Defendant has maintained certain funds of Defendant in the
6 IOLTA trust account of Jackson White Law, PC, as disclosed to counsel for the Commission and
7 Receiver in Exhibit 1 to Dkt. No. 251.

8 **WHEREAS**, the Commission, and Defendant believe, based on available information,
9 that the total remaining disgorgement, prejudgment interest, and civil penalties that the
10 Commission will seek in this action from the Defendant may be within the amounts of the
11 Deposit and if over and above the Deposit likely will not exceed \$12,000.

12 **WHEREAS**, and the Commission, Defendant, and the Receiver further agree that
13 Defendant will maintain \$12,000 in the IOLTA trust account of Jackson White Law, PC until the
14 Court enters final judgment as to Defendant.

15 **WHEREAS**, counsel for the Commission, Defendant, and Receiver have reached an
16 agreement allowing the release of all funds held in the IOLTA trust account of Defendant's
17 counsel Jackson White Law, PC in excess of \$12,000, to be used for any lawful purpose.

18 **NOW THEREFORE**, counsel for the Commission, Receiver, and Defendant stipulate
19 and request that the Court allow the release of all but \$12,000 of the funds held in the IOLTA
20 trust account of Jackson White Law, PC, identified herein and owned by Defendant Seth
21 Johnson.

22 Dated: July 30, 2025

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

/s/ Pat Huddleston

PAT HUDDLESTON

*Attorneys for Plaintiff U.S. Securities and
Exchange Commission*

Dated: July 30, 2025

RECEIVER

/s/ Kara B. Hendricks

KARA B. HENDRICKS

Attorneys for Receiver

Dated: July 30, 2025

SETH JOHNSON

/s/ David C. Clukey

DAVID C. CLUKEY

Attorneys for Seth Johnson

1
2 **BASED ON THE FORGOING, IT IS HEREBY ORDERED** that:

3 a. \$12,000 of Defendant's funds shall remain in the IOLTA trust account of Jackson
4 White Law, PC, until final judgment is entered as to Defendant;

5 b. the remaining funds held on Defendant's behalf in the IOLTA trust account of
6 Jackson White Law, PC may be released and used for any lawful purpose.
7

8
9 Dated: _____

10 Hon. Cristina D. Silva
United States District Court
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I, Horace Austin, hereby certify that on the 30th day of July, I caused the foregoing **Stipulation and [Proposed] Order Concerning Release of Certain Funds of Seth Johnson and Lis Penders** to be served to all parties entitled to service through the Court's ECF system, and to the following individuals by the means indicated below:

By U.S. Mail, first class, postage prepaid, to:

Matthew Wade Beasley and
Beasley Law Group PC and
PAJ Consulting, Inc. (as Registered Agent)
Nevada Southern Detention Center
2190 East Mesquite Avenue
Pahrump, NV 89060

Jason M. Jongeward and
JL2 Investments, LLC
3084 Regal Court
Washington, UT 84780

Warren Rosegreen and
Triple Threat Basketball, LLC
2231 Sky Pointe Ridge Dr.
Henderson, NV 89052

Jason A. Jenne
6175 Cortney Ridge Ct.
Las Vegas, NV 89149-1237

Larry Jeffery
760 La Sierra Drive
Sacramento, CA 95864

By email to the following:

Anthony Michael Alberto, Jr. and Monty Crew, LLC
Stokes22288@sdicloud.com

Dyke Huish
Huish Law Firm
huishlaw@mac.com

Counsel for Roland Tanner

/s/ Horace Austin
Horace Austin