

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135
(702) 792-3773 (702) 792-9002 (fax)

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
3 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
4 **GREENBERG TRAUIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
6 Telephone: (702) 792-3773
Facsimile: (702) 792-9002

7 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
8 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
9 **SEMENZA KIRCHER RICKARD**
10 10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
11 Telephone: (702) 835-6803
12 Facsimile: (702) 920-8669

13 *Attorneys for Geoff Winkler Receiver for*
14 *J&J Consulting Services, Inc., J&J Consulting Services, Inc.,*
J and J Purchasing LLC, The Judd Irrevocable Trust,
15 *and BJ Holdings LLC*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE
19 COMMISSION,
20
21 Plaintiff,
22
23 vs.
24 MATTHEW WADE BEASLEY *et al.*
25
26 Defendants;
27
28 THE JUDD IRREVOCABLE TRUST *et al.*
Relief Defendants.

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

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

**NOTICE OF STATUS OF
COMPLIANCE WITH THIS COURT’S
AUGUST 25, 2023 HEARING
DIRECTIVES RELATING TO THE
RECEIVER’S MOTION FOR
ORDER TO SHOW CAUSE WHY
PAULA BEASLEY AND AARON
GRIGSBY SHOULD NOT BE HELD
IN CONTEMPT FOR FAILURE TO
COMPLY WITH THIS COURT’S
ORDERS AND ALTERNATIVE
MOTION FOR TURNOVER**

Geoff Winkler, the Court-appointed Receiver (the “Receiver”), by and through his counsel of record, the law firm of Greenberg Traurig, LLP, hereby submits the following Notice relating

1 to compliance with this Court’s directives at the August 25, 2023 hearing, in relation to the
2 Receiver’s Motion for Order to Show Cause Why Paula Beasley and Aaron Grigsby Should not
3 be Held in Contempt for Failure to Comply With This Court’s Orders and Alternative Motion for
4 Turnover (the “Motion to Show Cause”) (ECF Nos. 498, 499). A timeline of relevant events
5 relating to what has transpired since the August 25th hearing is set forth below.

6 1. Counsel for the Receiver reached out to Mr. Grigsby on August 29, 2023 and
7 requested a meeting to discuss compliance with the Court’s directives. At Mr. Grigsby’s request,
8 the meeting was scheduled for September 22, 2023.

9 2. On September 18, 2023, Mr. Grigsby filed an Emergency Motion to withdraw as
10 counsel for Paula Beasley (ECF No. 573) which was granted on September 19, 2023 (ECF
11 No. 574).

12 3. On September 20, 2023, attorney Dean Kajioka contacted counsel for the Receiver
13 and indicated that he would be representing Mr. Grigsby on issues relating to the Motion to Show
14 Cause and requested the planned meeting be rescheduled. The Receiver thus adjusted travel plans
15 and made arrangements to attend a meeting with Mr. Kajioka on September 25, 2023.

16 4. The morning of September 25, 2023, Mr. Kajioka informed counsel for the
17 Receiver that he had tested positive for COVID and would not be able to attend the scheduled
18 meeting. A Zoom meeting was then suggested so the parties could discuss a potential resolution
19 of the issues identified. Neither Mr. Kajioka or Mr. Grigsby appeared for the Zoom meeting.

20 5. The afternoon of September 29, 2023, that the Receiver received correspondence
21 from Mr. Kajioka with limited documents and a settlement proposal that the Receiver believes is
22 wholly insufficient.

23 6. Mrs. Beasley contacted the Receiver on September 27, 2023, and indicated she is
24 earnestly looking for new counsel and expressed concerns regarding Mr. Grigsby’s prior
25 representation of her and stated that she believed he misrepresented what occurred in Court filings
26 and in his communication with the Receiver. A declaration from Mrs. Beasley is attached hereto
27 as **Exhibit A**.

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CERTIFICATE OF SERVICE

I hereby certify that, on the 2nd day of October, 2023, a true and correct copy of the foregoing was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties by operation of the Court’s CM/ECF system, and parties may access this filing through the Court’s CM./ECF system, and by serving via email by United States first class mail, postage pre-paid on the parties listed below:

Dean Kajioka, Esq.
attorneys@kajiokalaw.com
KAJIOKA & ASSOCIATE
8350 W. Sahara Avenue
Suite 110
Las Vegas, Nevada 89117
Attorneys for Aaron Grigsby

Paula Beasley
5317 Schoofey Street
Las Vegas, Nevada 89166
Telephone: (702) 515-9660

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAUIG, LLP

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135
(702) 792-3773 (702) 792-9002 (fax)

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INDEX OF EXHIBITS

EXHIBIT	DESCRIPTION
A	Declaration of Paula Beasley

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10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135
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EXHIBIT A

EXHIBIT A

Declaration of Paula Beaseley

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

CASE NO. 2:22-cv-00612-CDS-EJY

MATTHEW WADE BEASLEY, *et al.*,

Defendants,

THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

I, Paula Beasley, hereby declare as follows:

1. I am in the process of and actively seeking legal counsel to represent my interests in the above captioned matter and specifically in relation to the Motions to Compel or Alternative Motions for Order to Show Cause why I should not be held in contempt of Court.


2. I was previously represented by attorney Aaron Grigsby.

3. I do not believe Mr. Grigsby had my best interest in mind and believe he misrepresented what occurred in filings with the Court and in his communications with the Receiver.

4. I have spoken with the Receiver, Geoff Winkler, and requested an additional 30 days to provide the information the Court ordered me to produce by September 29, 2023 and to try and negotiate a resolution.

I declare under penalty of perjury under the laws of the United States of America and the State of Nevada that the foregoing is true and correct.

Executed on September 28, 2023.



Paula Beasley






Paula Beasley Declaration

Final Audit Report

2023-09-28

Created:	2023-09-28
By:	Geoff Winkler (geoff@americanfiduciaryservices.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAApYgzn8HnVUmNFC6sT11BG5c2WUIHvWpL

"Paula Beasley Declaration" History

-  Document created by Geoff Winkler (geoff@americanfiduciaryservices.com)
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-  Document emailed to Paula Beasley (paulacbeasley5@gmail.com) for signature
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-  Document e-signed by Paula Beasley (paulacbeasley5@gmail.com)
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