

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: <u> </u>	<u>MAN</u> DEPUTY

GEOFF WINKLER, as court-appointed Receiver
for J&J CONSULTING SERVICES INC., ET AL.,

Plaintiff,

v.

Warren Rosegreen, et al.
Defendant.

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

**Motion To Compel Identification of
Every Entity Claiming a Property
Interest, Standing, Custodial
Authority, Or Beneficial Ownership**

I. Introduction

COMES NOW Defendant, appearing **in propria persona** and **sui juris**, and respectfully moves this Court for an Order compelling Plaintiff Securities and Exchange Commission ("SEC") to identify every natural person, legal entity, governmental entity, nominee, trustee, custodian, intermediary, clearing agency, broker, transfer agent, depository, secured creditor, or other person claiming any legal, equitable, beneficial, fiduciary, custodial, or possessory interest in the assets, securities, funds, accounts, or property alleged to be involved in this action.

This Motion is based upon the threshold constitutional and procedural requirements of Article III standing, Federal Rule of Civil Procedure 17(a) (Real Party in Interest), Rules 26, 34, and 37 of the Federal Rules of Civil Procedure, the Due Process Clause of the Fifth Amendment, and the Court's inherent obligation to determine its jurisdiction before proceeding to adjudicate the merits.

1 Because Plaintiff seeks relief affecting Defendant's property, liberty, and financial interests,
2 Defendant is entitled to know the complete chain of ownership, custody, legal title, beneficial
3 title, and authority upon which Plaintiff relies. Without disclosure of these foundational facts,
4 Defendant cannot meaningfully evaluate standing, jurisdiction, ownership, or the identity of the
5 real party in interest.
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8 **II. Statement of Grounds**

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10 Standing is not presumed. Plaintiff bears the burden of demonstrating that the claims asserted are
11 brought by or on behalf of a party possessing a legally cognizable interest and that the Court
12 possesses jurisdiction over the controversy presented.

13 Where securities, financial accounts, custodial arrangements, nominee ownership, trusts, clearing
14 agencies, intermediaries, or other third parties may possess or claim legal or equitable interests in
15 the property at issue, Defendant is entitled to discover the complete ownership chain before
16 being compelled to defend against allegations affecting those interests.
17

18 Plaintiff cannot rely upon generalized assertions of regulatory authority while withholding the
19 identities of the persons or entities claiming ownership, custody, or legally protected interests in
20 the property underlying this action. Transparency concerning ownership and authority is
21 fundamental to due process and the orderly administration of justice.
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1 **III. Motion to Compel Production**

2 Defendant respectfully requests that Plaintiff be ordered to produce, within fourteen (14) days or
3 such other period as the Court deems appropriate, the following:
4

5 Plaintiff shall produce all documents identifying or maintained by the **Depository Trust**
6 **Company (DTC), Depository Trust & Clearing Corporation (DTCC), Cede & Co., any**
7 **affiliated clearing agency, any central securities depository, any clearing member, or any**
8 **other entity participating in the custody, clearance, settlement, transfer, or administration**
9 **of the securities or assets alleged to be involved in this action.**
10

11 Plaintiff shall produce all brokerage account records, custodian agreements, clearing agreements,
12 omnibus account records, introducing broker agreements, carrying broker agreements, custodial
13 account statements, and all agreements governing custody, possession, settlement,
14 administration, or transfer of the property or securities at issue.

15 Plaintiff shall produce all transfer-agent records, shareholder registers, stock ledgers, issuer
16 ownership records, transfer histories, registration histories, and every document identifying the
17 chain of title, registration, ownership, or transfer of the securities, accounts, or assets alleged in
18 the Complaint.
19

20 Plaintiff shall identify and produce documents establishing every registered owner, legal owner,
21 beneficial owner, nominee owner, equitable owner, record owner, custodial owner, trustee, agent,
22 bailee, pledgee, secured creditor, or other person or entity claiming any present or contingent
23 interest in the property.
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1 Plaintiff shall produce all trust agreements, declarations of trust, custodial trust agreements,
2 nominee agreements, fiduciary appointment documents, powers of attorney, agency agreements,
3 servicing agreements, and every other document establishing any fiduciary, custodial,
4 representative, or agency relationship affecting the property.

5
6 Plaintiff shall produce all securities-lending agreements, stock-loan agreements, borrowing
7 agreements, rehypothecation agreements, collateral agreements, pledge agreements, margin
8 agreements, prime brokerage agreements, collateral schedules, collateral substitution records,
9 and any agreements authorizing the lending, pledging, encumbering, or rehypothecation of the
10 property or securities.

11
12 Plaintiff shall identify every lien, security interest, pledge, assignment, hypothecation,
13 rehypothecation, charge, encumbrance, beneficial claim, equitable claim, trust claim, or other
14 asserted interest affecting the property together with all supporting documentation.

15 For every entity identified above, Plaintiff shall produce documents establishing the legal basis
16 for the claimed property interest, the source of that interest, the date acquired, whether the
17 interest is legal or equitable, direct or derivative, present or contingent, and the constitutional,
18 statutory, contractual, or regulatory authority supporting that claim.

19
20 Finally, Plaintiff shall produce all documents demonstrating Article III standing, including
21 evidence supporting injury in fact, causation, redressability, any assignment of claims, any
22 authorization permitting one entity to prosecute claims belonging to another, and every document
23 identifying the real party in interest.

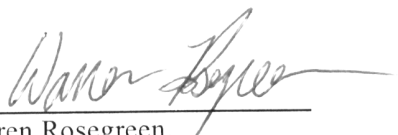
1 **IV. Request for Relief**

2 WHEREFORE, Defendant respectfully requests that this Court:

- 3
- 4 1. Grant this Motion in its entirety;
- 5 2. Compel Plaintiff to produce all requested documents within a time certain;
- 6
- 7 3. Stay further proceedings, if appropriate, until production is complete;
- 8 4. Award such additional relief as the Court deems just and proper.

9 Respectfully submitted,

10

11 **By:** 
Warren Rosegreen,
12 In Propria Persona, Sui Juris,
13 All Rights Reserved Without Prejudice

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Certificate Of Service

I hereby certify that on this 15 day of July, 2026, I caused a true and correct copy of the foregoing:

Motion To Compel Identification of Every Entity Claiming a Property Interest, Standing, Custodial Authority, Or Beneficial Ownership

together with all supporting exhibits and attachments, to be served upon all parties entitled to notice by the following method(s):

- ☐ Electronic Filing through the Court's CM/ECF System, which will provide electronic notice to all registered counsel of record.
- ☐ United States Mail, first-class postage prepaid.
- ☐ Certified United States Mail.
- ☐ Personal Delivery.
- ☒ Electronic Mail.

Service was made upon the following:

Counsel for Plaintiff

Greenberg Taurig, LLP
10845 GRIFFITH PEAK DRIVE
SUITE 600A
LAS VEGAS, NEVADA 89135

Plaintiff / Receiver

Geoff Winkler, Court-Appointed Receiver
10845 GRIFFITH PEAK DRIVE
SUITE 200A
LAS VEGAS, NEVADA 89135

Any additional counsel or parties of record were served in accordance with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the District of Nevada, and any applicable Orders of this Court and by electronic filing on the case and its subsequent notifications and options.

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

Executed this 15 day of July, 2026.

Respectfully submitted by LDPLasVegas@gmail.com

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GEOFF WINKLER, as court-appointed
Receiver for J&J CONSULTING SERVICES
INC., ET AL.,

Plaintiff,

v.

Warren Rosegreen, et al.
Defendant.

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

**Order Granting Defendant's Motion to
Compel Identification of Every Entity
Claiming A Property Interest, Standing,
Custodial Authority, Or Beneficial
Ownership**

This matter comes before the Court on Defendant Warren Rosegreen's **Motion to Compel Identification of Every Entity Claiming a Property Interest, Standing, Custodial Authority, or Beneficial Ownership**. Upon review of the motion and supporting materials, the Court finds that the information and documents requested are relevant, material, and necessary for the determination of issues regarding standing, jurisdiction, and the real parties in interest in this case.

The Court further finds that transparency concerning ownership, custodial arrangements, and beneficial interests in the property or assets at issue is essential to ensuring due process and the orderly administration of justice under Article III of the United States Constitution and applicable procedural rules.

Accordingly, **IT IS HEREBY ORDERED THAT:**

1. **Motion to Compel Granted:** Defendant's Motion to Compel is GRANTED in its entirety.
2. **Plaintiff's Obligation to Identify and Produce:** Plaintiff, the court-appointed Receiver, and any affiliated third parties are hereby ORDERED to identify and produce the following within **fourteen (14) days** from the date of this Order:
 - a. All documents identifying or maintained by the **Depository Trust Company (DTC), Depository Trust & Clearing Corporation (DTCC), Cede & Co.**, any affiliated clearing agency, central securities depository, clearing member, or any other entity participating

in the custody, clearance, settlement, transfer, or administration of the securities or assets alleged to be involved in this action.

b. All brokerage account records, custodian agreements, clearing agreements, omnibus account records, introducing broker agreements, carrying broker agreements, custodial account statements, and all agreements governing custody, possession, settlement, administration, or transfer of the property or securities.

c. All transfer-agent records, shareholder registers, stock ledgers, issuer ownership records, transfer histories, registration histories, and every document identifying the chain of title, registration, ownership, or transfer of the securities, accounts, or assets alleged in the complaint.

d. All relevant trust agreements, declarations of trust, custodial trust agreements, nominee agreements, fiduciary appointment documents, powers of attorney, agency agreements, servicing agreements, and every other document establishing fiduciary, custodial, representative, or agency relationships affecting the property.

e. All securities-lending agreements, stock-loan agreements, borrowing agreements, rehypothecation agreements, collateral agreements, pledge agreements, margin agreements, prime brokerage agreements, collateral schedules, and any other agreements authorizing the lending, pledging, encumbering, or rehypothecation of the property or securities.

f. Documentation identifying every lien, security interest, pledge, assignment, hypothecation, rehypothecation, charge, encumbrance, beneficial claim, equitable claim, trust claim, or other asserted interest affecting the property.

g. For every entity identified above, Plaintiff shall produce all documents establishing the legal basis for the claimed property interest, including:

- i. The source of the interest;
- ii. The date acquired;
- iii. Whether the interest is legal or equitable, direct or derivative, present or contingent;
- iv. The constitutional, statutory, contractual, or regulatory authority supporting such claims.

h. All documents evidencing Article III standing, including but not limited to:

- i. Evidence of injury in fact, causation, and redressability;
- ii. Records of any assignment of claims or authority permitting one entity to prosecute claims belonging to another;
- iii. Identification of the real party in interest as required under **Federal Rule of Civil Procedure 17(a)**.

3. **Stay of Proceedings:** If Plaintiff fails to comply with this Order within the time specified, Defendant may file a motion to stay further proceedings until compliance is completed.

4. **Sanctions for Noncompliance:** Failure to comply with this Order within the time specified may result in the imposition of sanctions, including but not limited to adverse inferences, suppression of related claims, or monetary penalties.
5. **Certification of Compliance:** Plaintiff shall file a written certification with the Court confirming full compliance with the terms of this Order within **twenty-one (21) days** from the date of this Order.

IT IS SO ORDERED.

DATED: _____, 2026

By: _____

Honorable _____
United States District Court
District of Nevada