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*Attorneys for Geoff Winkler Receiver*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY et al.

Defendants;

THE JUDD IRREVOCABLE TRUST et al.

Relief Defendants.

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

**RECEIVER'S MOTION FOR ORDER IN  
AID OF RECEIVERSHIP ALLOWING  
AND DISALLOWING CLAIMS BY  
CLIENTS OF HORIZON TRUST  
COMPANY**

In accordance with his prior representations to this Court, Geoff Winkler (the “Receiver”), the Court-appointed receiver for Defendants J&J Consulting Services, Inc., an Alaska corporation; J&J Consulting Services, Inc., a Nevada corporation; and J and J Purchasing LLC, as well as the Wells Fargo Interest on Lawyers’ Trust Account ending in 5598 in the name of defendant Beasley Law Group PC, and Relief Defendants the Judd Irrevocable Trust; PAJ Consulting Inc.; BJ Holdings LLC; Stirling Consulting LLC; CJ Investments, LLC; JL2 Investments, LLC; Rocking Horse Properties, LLC; Triple Threat Basketball, LLC; ACAC LLC; Monty Crew LLC, and the assets of Defendants and Relief Defendants Matthew Wade Beasley, Jeffrey J. Judd, Christopher R. Humphries, 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, Warren Rosegreen, and Anthony Michael Alberto, Jr. (collectively, the “Receivership Entities”),<sup>1</sup> moves this Court for an order approving the Receiver’s recommended treatment of claims against the Receivership Entities submitted by clients of Horizon Trust Company.

This Motion is based on the following memorandum of points and authorities, the attached exhibits, all papers on file, and any argument the Court may consider. A proposed order granting the Motion is attached as Exhibit 1.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. INTRODUCTION AND RELEVANT FACTUAL BACKGROUND.**

On May 11, 2026, the Receiver filed his *Motion for Order in Aid of Receivership Allowing and Disallowing Claims* (ECF No. 890, *et seq.*) (the “Claims Allowance Motion”) pursuant to which he reported to this Court that he and his staff had completed an exhaustive review and analysis of all claims for payment submitted against the estate of the Receivership Entities (the “Estate”), including a small number of claims received from investor claimants (each an “HTC Client”) who are clients of Horizon Trust Company (“HTC”), and invested in the alleged Ponzi

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<sup>1</sup> On July 29, 2022, this Court entered an order expanding the original order appointing the Receiver to apply to additional defendants. *See* ECF No. 207.

scheme at issue here via their HTC self-directed IRA accounts. At the time the Claims Allowance Motion was filed, the Receiver had information and document requests outstanding to HTC which made it impossible for him to arrive at a claims determination for the HTC Client claims at that time. (*See* ECF No. 890 at 4:11-20.) In the Claims Allowance Motion, the Receiver advised that, upon the receipt of the requested information and documentation, he would promptly complete an audit of the related claims, and file a separate motion as to his recommended treatment of those claims. (*Id.*)

The Receiver has since received the requested information and documentation, and completed the promised audit of the HTC Client claims. (*See* concurrently filed *Declaration of Geoff Winkler* “Winkler Decl.” ¶ 2.) Having considered the information presented in the claims, along with supporting documentation obtained independently, including from HTC, the Receiver recommends all of the HTC Client claims for allowance, in full or in part. (Winkler Decl. ¶ 3, Ex. A.) He further recommends that, assuming this Court accepts his recommended treatment of these claims and grants the instant Motion, that the claims be treated as identical to all other allowed investor claims, to be paid on a *pro rata* basis, provided the Court accepts the Receiver’s proposed distribution plan, as recommended in his pending *Motion for Order: (1) Approving Receiver’s Proposed Distribution Plan; and (2) Authorizing Receiver to Commence Making Distributions on Allowed Claims* (ECF No. 983, *et seq.*).

## II. ARGUMENT.

Federal courts presiding in equity over fiduciary estate res are vested with wide discretion to enter orders approving the claims process and the plan for disposition of those assets. “The power of a district court to impose a receivership ... derives from the inherent power of a court of equity to fashion effective relief.” *SEC v. Wencke*, 622 F.2d 1363, 1369 (9<sup>th</sup> Cir. 1980). “The primary purpose of equity receiverships is to promote orderly and efficient administration of the estate by the district court for the benefit of creditors.” *SEC v. Hardy*, 803 F.2d 1034, 1038 (9<sup>th</sup> Cir. 1986). “[T]he practice in administering an estate by a receiver must accord with the historical practice in federal courts or with a local rule.” Fed. R. Civ. P. 66.

As the Ninth Circuit explained:

A district court's power to supervise an equity receivership and to determine the appropriate action to be taken in the administration of the receivership is extremely broad. The district court has broad powers and wide discretion to determine the appropriate relief in an equity receivership. The basis for this broad deference to the district court's supervisory role in equity receiverships arises out of the fact that most receiverships involve multiple parties and complex transactions.

*SEC v. Capital Consultants, LLC*, 397 F.3d 733, 738 (9th Cir. 2005) (citations omitted); *see also CFTC v. Topworth Int'l, Ltd.*, 205 F.3d 1107, 1115 (9th Cir. 1999) ("This court affords 'broad deference' to the court's supervisory role, and 'we generally uphold reasonable procedures instituted by the district court that serve th[e] purpose of orderly and efficient administration of the receivership for the benefit of creditors.'). With respect to administering claims against the receivership estate, it is well-settled that district courts supervising federal equity receiverships have broad discretion to adopt appropriate procedures to administer the assets of and claims against a receivership estate. *See Capital Consultants, LLC*, 397 F.3d at 738; *Hardy*, 803 F.2d at 1038.

This Court entered an order granting the Receiver's Claims Allowance Motion on July 30, 2026, as amended by subsequent filings (*see* ECF No. 976). In so doing, the Court accepted the Receiver's recommendation regarding the treatment of claims submitted by investors similarly situated to the claims of the HTC Clients; the only difference being that, at the time the Claims Allowance Motion was filed, the Receiver did not yet have enough information to make a recommendation regarding the proposed treatment of these latter, limited claims. *Cf. id.*

The Receiver has now completed a claims review of the HTC Client claims identical to that undertaken for all other investor claims, and arrived at decisions regarding the recommended treatment of each, just as he did for the claims already adjudicated in the Claims Allowance Motion. Specifically, of the 49 HTC Client claims received, the Receiver has recommended 44 for allowance in full – reflecting his conclusion that the documents obtained and reviewed by the Receiver and his staff confirmed the net loss claimed by each claimant – and 5 for partial allowance, where the documents reviewed by the Receiver and his staff confirmed a net loss lower than that reflected in the submitted claims. (Winkler Decl. ¶ 4.) In other words, all HTC Client

claims are recommended for allowance, with the vast majority recommended for allowance, in full. (*Id.*)

The Receiver submits that his recommended treatment of the HTC Client claims is consistent with both applicable law, and the standard already applied by this Court to substantively identical claims. For this reason, the Receiver respectfully requests that this Court enter an order accepting and adopting his recommended treatment of the HTC Client claims.

### III. CONCLUSION.

For the foregoing reasons, the Receiver respectfully requests that the Court approve the Receiver's recommended treatment of the 49 HTC Client claims, as reflected in Exhibit A to the concurrently filed Declaration of Geoff Winkler.

DATED this 28th day of September 2026.

#### GREENBERG TRAURIG, LLP

By: /s/ Kyle A. Ewing

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**CERTIFICATE OF SERVICE**

I hereby certify that on **September 28, 2026**, I caused the foregoing *Receiver's Motion For Order In Aid Of Receivership Allowing And Disallowing Claims By Clients Of Horizon Trust Company* to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service, and:

☒ via **ELECTRONIC MAIL**, by e-mailing a copy of the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Jason M. Jongeward: [Jason.jcd@gmail.com](mailto:Jason.jcd@gmail.com)

☒ via **FIRST CLASS MAIL**, by mailing a copy of the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

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An employee of GREENBERG TRAURIG, LLP

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# EXHIBIT 1

[PROPOSED] ORDER ON RECEIVER'S MOTION FOR ORDER IN AID OF RECEIVERSHIP  
ALLOWING AND DISALLOWING CLAIMS BY CLIENTS OF HORIZON TRUST COMPANY

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE  
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MATTHEW WADE BEASLEY et al.

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**[PROPOSED] ORDER ON RECEIVER'S  
MOTION FOR ORDER IN AID OF  
RECEIVERSHIP ALLOWING AND  
DISALLOWING CLAIMS BY CLIENTS  
OF HORIZON TRUST COMPANY**

[Motion for Order in Aid  
re: HTC Client Claims]

**ORDER**

The Motion (the "Motion") of Geoff Winkler, the Court-appointed receiver (the "Receiver") for Order in Aid of Receivership Allowing and Disallowing Claims by Clients of Horizon Trust Company having come for hearing before this Court, and good cause appearing therefor, this Court ORDERS as follows:

1. The Receiver's Motion is GRANTED, in its entirety; and
2. The Receiver's recommended treatment of claims against the receivership estate established in the above-entitled action, as reflected in Exhibit A to the Receiver's concurrently filed declaration in support of the Motion, is APPROVED.

SO ORDERED.

Dated: \_\_\_\_\_

Hon. Cristina D. Silva  
United States District Judge