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

8 SECURITIES AND EXCHANGE  
9 COMMISSION,

10 Plaintiff,

v.

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

19 Defendants; and

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

24 Relief Defendants.

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

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S  
RESPONSE TO NON-PARTY  
KAMILLE DEAN'S MOTION FOR  
LEAVE TO FILE INTERPLEADER  
ACTION**

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1 Plaintiff Securities and Exchange Commission (the “SEC”) respectfully opposes non-  
2 party Kamille Dean’s (“Dean’s”) motion for leave of court to file an interpleader action under 28  
3 U.S.C. § 959(a). (Dkt. No. 259, herein, “Motion” or “Mot.”) Dean’s Motion should be denied  
4 for all the reasons provided in the Receiver’s omnibus response to Dean’s various motions to  
5 obstruct the Receiver’s attempts to marshal and preserve funds sent from Defendant Judd to  
6 Dean. (See Dkt. No. 275, the “Receiver’s Response.”) The SEC joins the arguments presented  
7 in the Receiver’s Response and incorporates them by reference here. In short, Dean’s Motion is  
8 nothing more than an attempt to end-run the Court’s prior ruling regarding the use of presumed  
9 investor funds by Judd for attorneys’ fees. (See Dkt. No. 235.)

10 As the Court ruled in denying Judd’s motion to unfreeze funds for attorneys’ fees, “once  
11 the SEC has met its preliminary showing that the assets in question can be traced to fraud, the  
12 burden of establishing whether the funds are tainted or untainted falls squarely on Judd.” (Dkt.  
13 No. 235, Order at 8.) Here, the only evidence presented—by the Receiver—indicates that the  
14 funds at issue originated from Judd, and were sent to Dean through an intermediary for the  
15 apparent purpose of paying Judd’s attorneys’ fees. (See Dkt. No. 275, Receiver’s Response at  
16 20–21 (summarizing evidence regarding the funds at issue).) Dean provides no evidence, and  
17 thus no basis, for any other conclusion. Because the SEC has already made a *prima facie*  
18 showing that Judd’s funds, as of the date they were sent to Dean, can be traced to fraud, it is  
19 Dean’s burden to make some showing that the funds are untainted. She makes no such showing,  
20 and thus there is no basis to release the funds from the freeze or the receivership order.

21 **CONCLUSION**

22 For these reasons, the SEC respectfully requests that the Court deny Dean’s Motion.

23 DATED this 29th day of August, 2022.

24 /s/ Casey R. Fronk \_\_\_\_\_  
25 Tracy S. Combs  
26 Casey R. Fronk  
27 Attorney for Plaintiff  
SECURITIES AND EXCHANGE COMMISSION

**CERTIFICATE OF SERVICE**

1 I hereby certify that on the 29th day of August, 2022, I caused the **PLAINTIFF**  
2  
3 **SECURITIES AND EXCHANGE COMMISSION’S RESPONSE TO NON-PARTY**  
4 **KAMILLE DEAN’S MOTION FOR LEAVE TO FILE INTERPLEADER ACTION** to be  
5 served to all parties entitled to service through the Court’s ECF system and to the following  
6 individuals by the means indicated below:  
7

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

9 BJ Holdings LLC  
10 c/o Beasley Law Group PC, c/o Matthew Wade Beasley  
11 Nevada Southern Detention Center  
12 2190 East Mesquite Avenue  
13 Pahrump, NV 89060

14 The Judd Irrevocable Trust  
15 c/o Trustee Matthew Wade Beasley  
16 Nevada Southern Detention Center  
17 2190 East Mesquite Avenue  
18 Pahrump, NV 89060

19 Jason M. Jongeward and JL2 Investments, LLC  
20 [REDACTED]  
21 Washington, UT [REDACTED]

22 PAJ Consulting, Inc  
23 [REDACTED]  
24 Huntington Beach CA [REDACTED]

25 Triple Threat Basketball, LLC  
26 c/o Warren Rosegreen  
27 [REDACTED]  
Henderson, NV [REDACTED]

The Judd Irrevocable Trust  
c/o Jeffrey Judd  
[REDACTED]  
Henderson, NV [REDACTED]

1 Jason A. Jenne  
[REDACTED]

2 Las Vegas, NV [REDACTED]

3 Warren Rosegreen  
[REDACTED]

4 Henderson, NV [REDACTED]

5  
6 ***By email to the following:***

7 Anthony Michael Alberto, Jr. and Monty Crew, LLC  
[REDACTED]

8  
9 Dyke Huish  
10 Huish Law Firm  
11 [huishlaw@mac.com](mailto:huishlaw@mac.com)

*Counsel for Roland Tanner*

12  
13 */s/ Casey R. Fronk*  
14 Casey R. Fronk  
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