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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 REPLY
IN SUPPORT OF MOTION TO
AMEND PRELIMINARY
INJUNCTION ORDER**

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INTRODUCTION

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2 Plaintiff Securities and Exchange Commission (the “SEC”) submits this reply in support
3 of its motion to amend the Court’s prior preliminary injunction and asset freeze order to include
4 the eight defendants added to the SEC’s Amended Complaint—Larry Jeffery, Jason Jenne, Seth
5 Johnson, Christopher Madsen, Richard Madsen, Mark Murphy, Cameron Rohner, and Warren
6 Rosegreen (together herein, the “New Defendants”). (Motion, Dkt. No. 119.) New Defendants
7 Christopher Madsen (“C. Madsen”) and Richard Madsen (“R. Madsen”) oppose the SEC’s
8 requested amendment as to them. (*See* Dkt. Nos. 159, 161). Defendant Jeffrey Judd (“Judd”),
9 whose interests are not affected by the motion, nevertheless filed an opposition to it, asking the
10 Court to reconsider the original preliminary injunction and asset freeze that was entered nearly
11 three months ago. (*See* Dkt. No. 163). No other Defendant has submitted an opposition.

12 None of the factual or legal arguments raised by C. Madsen or R. Madsen are sufficient
13 to rebut the SEC’s *prima facie* case to extend the Court’s preliminary injunction and asset freeze
14 to the New Defendants. C. Madsen declares he did not, “from [his] perspective,” solicit
15 investors; and both C. Madsen and R. Madsen assert they are somehow incapable of continuing
16 to violate the securities laws, and that because the SEC has alleged only strict liability offenses
17 as to them an asset freeze is inappropriate. None of these objections comports with the law, or
18 with the facts—which show the Madsens violated the securities laws, received millions of dollars
19 of ill-gotten gains for those violations, and have already dissipated assets.

20 Judd’s opposition, meanwhile—a procedurally improper motion for reconsideration—
21 rehashes the arguments Judge Mahan rejected in granting the original preliminary injunction and
22 asset freeze order nearly three months ago. The SEC submitted extensive evidence Judge Mahan
23 considered in granting the order, and Judd failed to submit anything more than legal argument.
24 Judd also failed to respond to any of the SEC’s expedited discovery requests and failed to submit
25 an accounting, instead invoking the Fifth. Judd’s current pleading provides no new facts or law
26 that would support his procedurally-flawed demand for this Court to unwind Judge Mahan’s
27 prior order or hold further hearings on Judd’s previously adjudicated arguments.

1 **I. THE SEC’S REQUESTED RELIEF IS APPROPRIATE AS TO NEW**
2 **DEFENDANTS CHRISTOPHER MADSEN AND RICHARD MADSEN.**

3 **A. C. Madsen Solicited Investors, And Offered And Sold Securities.**

4 C. Madsen argues the SEC has not set forth a *prima facie* case that he “offered or sold”
5 securities in violation of Sections 5(a) and 5(c) of the Securities Act [15 U.S.C. § 77e(a), (c)], or
6 acted as a broker in violation of Section 15(a)(1) of the Exchange Act [15 U.S.C. § 78o(a)(1)].

7 C. Madsen contends that because he—in his lawyer’s words—merely “acted as a connection or
8 conduit” between investors (his “family and friends”) and Judd, and did not independently
9 “solicit” investors, he cannot be liable for violations of the securities laws. (*See* Dkt. No. 159,
10 Opp. at 9.) This contention does not comport with C. Madsen’s own contemporaneous
11 descriptions of his conduct or his bank transactions. Nor is it at all supported by the sole
12 evidence C. Madsen submits on his behalf: a creatively worded, self-serving declaration.

13 **First**, C. Madsen himself—in multiple text messages with Judd during the course of the
14 investment scheme—described what he was doing as “**selling**” investors on the scheme and
15 “**put[ting] pressure on**” those potential investors to invest. (*See, e.g.*, Ex. A, Supplemental
16 Declaration of J. Ostler ¶¶ 7, 11, 12 (emphasis added).) While these text messages indicate that
17 on at least one occasion C. Madsen worked as a team with Judd to solicit an investor, even then
18 C. Madsen was, in his own words, doing solicitation work—including “talk[ing] to [the investor]
19 for hours” to “prepare” the investor to talk with Judd. (*Id.* ¶ 14.) C. Madsen’s text messages
20 also indicate he was actively promoting the investment scheme: for example, C. Madsen texted
21 Judd that he was going to “**put the word out** and start to get [Judd] more money,” and that he
22 would “**get us** a few more guys [i.e., investors].” (*Id.* ¶¶ 8, 13 (emphasis added).)

23 Notably, and in contrast to his lawyer’s argument in his briefing, C. Madsen does not
24 directly deny, under oath, that he solicited people to invest in the scheme; nor does he assert that
25 he **only** discussed the investment scheme with his “friends and family members.” (*See* Dkt. No.
26 159-1, C. Madsen Decl. ¶¶ 8–9.) Instead, his declaration is creatively worded to suggest—but
27 not directly support—these propositions. While C. Madsen states in his declaration that he

1 “responded to inquiries from friends and family members,” he says nothing about his interactions
2 with other investors who were not “friends and family.” (*See id.* ¶ 8.) And his assertion that he
3 “did not solicit, or approach anyone suggesting they invest in the Beasley opportunity” is heavily
4 qualified by the preamble, “[f]rom my perspective,” making the denial nearly meaningless. (*See*
5 *id.* (emphasis added).) It is also notable that C. Madsen’s brother, R. Madsen—who worked with
6 and for C. Madsen in the scheme—submits no similar declaration and does not otherwise
7 provide evidence against the SEC’s *prima facie* case for R. Madsen’s liability for the same strict
8 liability offenses.¹ (*See generally* Dkt. No. 161)

9 **Second**, the sheer amount of investment funds C. Madsen solicited belies any claim that
10 his efforts were limited to passively fielding inquiries from family and friends. Relief Defendant
11 ACAC, LLC, which C. Madsen admits he controls (*see* Dkt. No. 159-1, C. Madsen Decl. ¶ 3),
12 deposited at least \$18,239,000 into the Beasley Law Group IOLTA, received distributions of at
13 least \$11,684,000 from the Beasley IOLTA, and received payments of at least \$13,537,776 from
14 Judd’s J & J Consulting Services, Inc. account at U.S. Bank. (*See* Dkt. No. 119-2, Ostler Decl.
15 ¶ 56.) The bank records of ACAC, LLC, meanwhile, show that the over \$18 million in
16 presumed investments were obtained, at a minimum, from at least 100 different individual
17 investors. (Ex. B, Supplemental Declaration of Amir Salimi ¶¶ 10, 13.)

18
19 ¹ C. Madsen also quibbles with the SEC’s use of the word “retained,” claiming that there is no
20 proof C. Madsen was “retained” by Judd to promote the scheme; and that in any event he “did
21 not follow” Judd’s instructions. (*See* Dkt. 159-1, Madsen Decl. ¶ 10.) In fact, and contrary to
22 these representations, when Judd instructed the promoters to update paperwork for each investor
23 solicited into the scheme, C. Madsen responded: “100% I’m on it;” sent Judd the spreadsheet of
24 the investors C. Madsen had solicited as Judd requested; and otherwise acted as if—like Judd
25 perhaps jokingly threatened—Judd could “fire” him at any time. (*See* Ex. A, Ostler Supp. Decl.
26 ¶¶ 20–23.) Further, C. Madsen cannot deny that he earned substantial compensation for getting
27 others to invest, as discussed below.

1 There can also be no doubt that C. Madsen was paid substantial commissions on the
2 investments he solicited. C. Madsen repeatedly references those commissions—what C. Madsen
3 termed “*making mine*”—in his contemporaneous communications with Judd. (*See, e.g.*, Ex. A,
4 Ostler Supp. Decl. ¶ 18.) From these communications, it appears C. Madsen made at least
5 \$3,000 per quarter for each \$100,000 investment he solicited (*see id.* ¶ 18), and that he often
6 made more, depending on what investment returns he chose to pay out to his investors. (*See,*
7 *e.g., id.* ¶¶ 17, 18.) C. Madsen also made commissions off of investors (or as C. Madsen called
8 them, “clients”) R. Madsen brought into the scheme—leading to a situation where C. Madsen
9 negotiated with Judd to keep R. Madsen’s “clients” “running through [C. Madsen]” so that C.
10 Madsen could continue to collect commissions on those investors. (*See id.* ¶ 19.)

11 ***Third***, C. Madsen’s own communications demonstrate that he alone controlled the
12 investments of the hundred or more investors he solicited. For one, C. Madsen—not Judd—was
13 the person actively selecting the rate of return for investors who invested through him. For
14 example, in April 2019, C. Madsen told Judd that he was “only giving [an investor] \$12k on his
15 100k only because he’s a pain in my ass and I really shouldn’t have let him in [to the investment
16 scheme].” (Ex. A, Ostler Supp. Decl. ¶ 17.) C. Madsen also refused to allow at least one
17 investor to invest separately through Beasley—insisting that Beasley “text [the investor] and tell
18 him you have to deal with Chris only or no more loans.” (*Id.* ¶ 15.) And C. Madsen’s texts
19 show he had the power to prevent “his” investors from continuing with their investments: in
20 August 2021, C. Madsen texted Judd: “Hey man . . . I have one of the investors out of Calley
21 Jacob Enterprises and his small group I’m going to wire them their money back next week . . .
22 ***I’m done with them . . . They keep asking too many damn questions.*** I personally don’t know
23 a single one of them except for the main guy.” (*Id.* ¶ 16 (emphasis added).)

24 In short, the evidence shows that C. Madsen was selling and pushing investments, that he
25 obtained at least \$18 million in investments from a minimum of 100 different individual
26 investors, that he was paid a commission of no less than \$3,000 quarterly on each investment he
27 brought to the scheme, that he had control over the rate of return and term of the investments he

1 solicited, and that he actively sought to prevent “his” investors and his brother’s investors from
2 dealing directly with Beasley or Judd. This is more than sufficient to present a *prima facie* case
3 that C. Madsen “offered and sold” securities in violation of Section 5(a) and worked as an
4 unregistered broker in violation of Section 15(a)(1).²

5 **B. The SEC’s Evidence Supports Preliminary Injunctive Relief.**

6 There is also no merit to the contention, advanced by both C. Madsen and R. Madsen,
7 that the SEC is precluded from obtaining injunctive relief as to them because the Ponzi scheme
8 collapsed upon Beasley’s arrest.³ (*See* Dkt. No. 159, Opp. at 11–12; Dkt. No. 161, Opp. at 4–5.)
9 As the Ninth Circuit has made clear, “[t]he fact that illegal conduct has ceased does not foreclose
10 injunctive relief,” *SEC v. Koracorp Indus., Inc.*, 575 F.2d 692, 698 (9th Cir. 1978), and “[a]n
11 inference arises from illegal past conduct that future violations may occur.” *Id.* The scheme at
12 issue here, and C. Madsen’s and R. Madsen’s involvement, was expansive and extensive; C.

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15 ² C. Madsen’s contention that he was not acting as a “broker” because he only sold investments
16 in this single investment scheme (*see* Dkt. No. 159, Opp. at 9–10) omits that courts have
17 routinely found violations on less volume of solicitation than C. Madsen’s. *See, e.g., SEC v.*
18 *Mogler*, No. CV-15-01814, 2020 WL 1065865, at *9 (D. Ariz. Mar. 5, 2020) (finding regularity
19 of participation where defendant received approximately \$400,000 in transaction-based
20 compensation); *SEC v. Forester*, No. CV 20-9813, 2021 WL 4803475, *2–3 (C.D. Cal. Sept. 17,
21 2021) (finding violations of Section 15(a)(1) where defendant earned only a little more than
22 \$29,000 in alleged commissions).

23 ³ The Madsens also suggest that the SEC has proposed an incorrect standard for establishing the
24 appropriateness of a preliminary injunction. (*See* Dkt. No. 159, Opp. at 8 n.2; Dkt. No. 161,
25 Opp. at 5.) In fact, the “two-part” standard has been applied by numerous courts in this Circuit,
26 *see SEC v. Sripetch*, No. 20-cv-01864, 2020 WL 6396927, *3 (S.D. Cal. Nov. 2, 2020) (citing
27 cases), including in one of the primary cases on which Defendants rely, *see SEC v. Schooler*, 902
F. Supp. 2d 1341, 1344 (S.D. Cal. 2012).

1 Madsen and R. Madsen solicited tens of millions of dollars of investor funds for at least four and
2 a half years; C. Madsen continues to insist—through creatively-worded declarations—that he has
3 done nothing wrong; neither makes any assurances that they will cease their unregistered broker
4 activities; and it would be difficult to believe such assurances in any event, as it appears (from
5 the enormous volume of investor funds passing through ACAC, LLC and R. Madsen’s entities)
6 that both C. Madsen and R. Madsen derived most of their livelihood over the past four or more
7 years from their violations of the securities laws.

8 Moreover, the only reason the illegal conduct at issue has purportedly ceased was the
9 arrest of one of the main perpetrators, and “courts should be wary of a defendant’s termination of
10 illegal conduct when a defendant voluntarily ceases unlawful conduct in anticipation of a formal
11 investigation.” *FTC v. Electronic Payment Solutions of Am. Inc.*, No. CV-17-02535, 2019 WL
12 4287298, *9 (D. Ariz. Aug. 28, 2019); *see also Koracorp*, 575 F.2d at 698 (“[C]ourts must be
13 particularly skeptical about attaching any significance to contrition under protest.”); *Polo*
14 *Fashions, Inc. v. Dick Bruhn, Inc.*, 793 F.2d 1132, 1135 (9th Cir. 1986) (“[T]he reform of the
15 defendant must be irrefutably demonstrated and total.”). Indeed, as described further below, C.
16 Madsen continued to engage in the scheme up until at least the day of Beasley’s standoff with
17 the FBI—the same day that he was texting Beasley about the FBI raids. (*See Ex. A, Ostler Supp.*
18 *Decl.* ¶ 24 & *Ex. 78.*) In addition, R. Madsen was soliciting investors not only for the J&J
19 scheme, but for various other investments as well, indicating that although the J&J scheme may
20 have ended, he is likely still acting as an unregistered broker in promoting other investments.
21 (*See Dkt. No. 119-2, Ostler Decl.* at ¶ 71 & *Ex. 53.*) Thus, there is ample need for injunctive
22 relief which would preclude C. Madsen and R. Madsen from continuing future violations of
23 Section 5 and Section 15(a)(1).

24 C. The SEC’s Evidence Supports An Asset Freeze.

25 Finally, the SEC’s evidence, which shows that both C. Madsen and R. Madsen received
26 tens of millions of dollars in investor funds, and have dissipated funds since Beasley’s arrest, is
27 sufficient to obtain an asset freeze over their remaining assets.

1 The Madsens both argue, erroneously, that the SEC must make a showing that each of
2 them engaged in fraud to support an asset freeze. (See Dkt. No. 159, Opp. at 12; Dkt. No. 161,
3 Opp. at 5–6.) That is not the standard. Indeed, the SEC routinely obtains asset freezes over
4 relief defendants, who are not alleged to have violated any law but who nonetheless received ill-
5 gotten funds from one or more of the violators. See, e.g., *Smith v. SEC*, 653 F.3d 121, 128 (2d
6 Cir. 2011). “Federal courts may order equitable relief against a person who is not accused of
7 wrongdoing in a securities enforcement action where that person (1) has received ill-gotten
8 funds; and (2) does not have a legitimate claim to those funds.” *Id.*, quoting *SEC v. Cavanaugh*,
9 155 F.3d 129, 136 (2d Cir. 1998). Here, there is no debate that, at a minimum, both C. Madsen
10 and R. Madsen received millions of dollars in ill-gotten funds, and have used those funds for,
11 among other things, personal expenses. Thus, an asset freeze is appropriate regardless whether
12 the Madsens intentionally defrauded the investors they illegally solicited into the Ponzi scheme.⁴

13 Likewise, the Madsens’ claims that they have not already dissipated investor assets rings
14 hollow, given the circumstances. For example, C. Madsen takes issue with the SEC’s evidence
15 showing his dissipation of assets shortly after Beasley’s arrest, suggesting in his opposition that
16 he was somehow unaware of the “Ponzi scheme” until it was “made public . . . later.” (Dkt. No.
17 159, Opp. at 6.) In fact, C. Madsen’s own text messages show ***he was in direct communication***
18 ***with Beasley while the FBI raided Judd’s house***, and that ***C. Madsen notified Beasley that the***
19 ***FBI had raided Humphries’ house***. (Ex. A, Ostler Supp. Decl. ¶ 24 & Ex. 78.) Any suggestion

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21 ⁴ To the extent the Madsens believe their current assets are sufficient to satisfy a likely
22 disgorgement judgment, the SEC is willing to work with them to allow for appropriate living
23 expenses and to prevent any diminution in value of any legitimate business—just as it has
24 successfully worked with the original Defendants to reach stipulated agreements on those issues.
25 Such objection is no reason to deny the asset freeze in its entirety; especially here, where neither
26 C. Madsen nor R. Madsen provides any assurance that they have secured all illegally-obtained
27 investor funds, or that they have sufficient funds on hand to satisfy a likely disgorgement award.

1 that C. Madsen was somehow unaware of the FBI’s activities until the “public” was informed
2 that Beasley was running a Ponzi scheme—and thus could not seek to dissipate assets before
3 then—should be understood in this context.

4 C. Madsen’s suggestion that he has not dissipated investor assets because he also made
5 deposits into the ACAC, LLC bank account omits that, from March 3, 2022 (the day of
6 Beasley’s standoff with the FBI) to March 31, 2022, the ACAC, LLC bank account has had net
7 withdrawals (i.e., withdrawals in excess of deposits) of at least \$450,000. (Ex. B, Salimi Supp.
8 Decl. ¶ 12.) Likewise, that R. Madsen declares he arranged a \$77,000 transfer out of ACAC,
9 LLC “the day before Beasley’s arrest” is meaningless when, from March 3, 2022 until April 30,
10 2022, the bank accounts in R. Madsen’s control had net withdrawals of over \$75,000. (*Id.* ¶ 11.)
11 These sort of net withdrawals, over a matter of months, are not consistent with regular business
12 activity, and strongly suggest that both C. Madsen and R. Madsen are dissipating assets. But
13 regardless of the Madsens’ intentions, these withdrawals diminish the funds available to repay
14 the numerous investors who were defrauded by Defendants’ Ponzi scheme, and thus support the
15 SEC’s requested asset freeze. *See Johnson v. Couturier*, 572 F.3d 1067 (9th Cir. 2009) (“A party
16 seeking an asset freeze must show a likelihood of dissipation of the claimed assets, or other
17 inability to recover monetary damages, if relief is not granted.”).

18 II. JUDD’S DISGUISED RECONSIDERATION MOTION SHOULD BE DENIED.

19 A. Judd’s “Opposition” Is Procedurally Improper.

20 Defendant Judd does not oppose any of the relief requested by the SEC as to the New
21 Defendants. Instead, Judd requests the Court revisit—and overrule—Judge Mahan’s prior order
22 “as to Judd,” that the Court amend the prior order to allow Judd to pay attorneys’ fees, and that
23 the Court order an “evidentiary hearing” as to Judge Mahan’s prior order. (*See* Dkt. No. 163,
24 Opp. at 19.) Judd attempts to justify this disguised motion for reconsideration by claiming the
25 Court should “take the opportunity to clarify the preliminary injunction,” but the ultimate relief
26 he requests is not “clarification,” but an untimely request for the Court to vacate an order entered
27 nearly three months ago. (*See id.*)

1 Reconsideration is an “extraordinary remedy, to be used sparingly in the interests of
2 finality and conservation of judicial resources.” *Kona Enters., Inc. v. Estate of Bishop*, 229 F.3d
3 877, 890 (9th Cir. 2000). Reconsideration of an interlocutory order may be appropriate “if (1)
4 the district court is presented with newly discovered evidence, (2) the district court committed
5 clear error or made an initial decision that was manifestly unjust, or (3) there is an intervening
6 change in controlling law.” *SEC. v. Platforms Wireless Int’l Corp.*, 617 F.3d 1072, 1100 (9th
7 Cir. 2010). In this District, motions for such relief are governed by Local Rule 59-1, which
8 provides “[a] party seeking reconsideration . . . must state with particularity the points of law or
9 fact that the court has overlooked or misunderstood,” and “[c]hanges in legal or factual
10 circumstances that may entitle a movant to relief must also be stated with particularity.” LR 59-
11 1(a). Furthermore, the rule makes clear that such “[m]otions for reconsideration are disfavored”
12 and cautions that “[a] movant must not repeat arguments already presented unless (and only to
13 the extent) necessary to explain controlling, intervening law or to argue new facts. A movant
14 who repeats arguments will be subject to appropriate sanctions.” LR59-1(b) (emphasis added).

15 Judd’s disguised motion for reconsideration does not follow the guidelines set forth in
16 Local Rule 59-1. It is not a motion, making it impossible for the SEC to properly respond.⁵
17 Judd cites to no new evidence: rather, the only evidentiary materials he references (Beasley’s
18 confession and the testimony of investor Taylor Richards) were attached to the SEC’s original
19 motion for a TRO and preliminary injunction, which Judge Mahan already reviewed and
20 considered. (See Dkt. No. 163, Opp. at 5–6; see Dkt. No. 2-5, Ostler Decl. ¶¶ 6–7 & Exs. 1, 2;
21 *id.* ¶ 21 & Ex. 10.) Judd also identifies no new, controlling law: he made the same arguments,
22 and cited the same primary cases, in support of his original opposition to the SEC’s preliminary
23

24 ⁵ To the extent the Court intends to consider the arguments set forth in Judd’s “opposition,” the
25 SEC requests that Judd be required to re-file such arguments as a Rule 59-1 motion for
26 reconsideration, such that the SEC can respond to such arguments in due course. Judd should
27 also be required to certify compliance with Local Rule 59-1.

1 injunction. (*Compare* Dkt. No. 163, Opp. at 10–19 *with* Dkt. No. 17, Opp. at 9–15.) And Judd
2 does not even attempt to explain how Judge Mahan made a “manifestly unjust” decision when he
3 considered the totality of the SEC’s evidence, including the very evidence Judd now cites, before
4 granting the preliminary injunction. Indeed, the real purpose of Judd’s “opposition” seems to be
5 to determine whether this Court views the same arguments and evidence differently than Judge
6 Mahan. That is not a proper basis for reconsideration.

7 **B. Judd’s Insistence On An “Evidentiary Hearing” Is Misplaced.**

8 Judd suggests that Judge Mahan erred by ruling on the prior motion without holding an
9 “evidentiary hearing,” and asks this Court to hold that hearing. This request ignores both the
10 procedural history of this case and the controlling law.

11 In support of its motion for a preliminary injunction against Judd, the SEC submitted
12 *over 1,200 pages* of evidentiary materials—including declarations from the SEC’s primary
13 investigative attorney and accountant, testimony and declarations of investors, Beasley’s own
14 admissions to FBI negotiators, communications between Defendants and the complete bank
15 records of the IOLTA Beasley used as the financial hub of the scheme. (*See* Dkt. Nos. 2-5, 2-6,
16 2-7, 2-8, 23, 23-1, 23-2, 23-3, 23-4, 23-5, 24, 24-1, 24-2, 24-3.) Judd submitted *nothing*: no
17 declarations, no testimony, no documents, no communications, and no bank records. In fact,
18 after the Court ordered Defendants to provide an accounting of assets, Judd refused, asserting his
19 “Fifth Amendment privilege against self-incrimination.” (*See* Dkt. No. 9, at 2.) He did the same
20 when responding to the SEC’s expedited discovery requests, refusing to answer interrogatories
21 and requests for admission that would clarify his supposed “victim” status in the Ponzi scheme.
22 (*See* Ex. A, Ostler Supp. Decl. ¶ 30 & Ex. 83.)

23 Judge Mahan in fact held an “evidentiary hearing” on the SEC’s motion for a preliminary
24 injunction on April 21, 2022. Judd did not subpoena any witnesses’ attendance for that hearing.
25 Nor did Judd present any documentary evidence at the hearing. The SEC brought its primary
26 declarants, Joni Ostler and Amir Salimi, to the hearing, but Judd never called them to the stand.
27

1 And Judd did not offer to testify on his own behalf. Instead, Judd submitted only lawyer
2 argument in opposition to the SEC’s request for preliminary injunctive relief and asset freeze.

3 Furthermore, rather than seriously contest the substance of the SEC’s evidence at the
4 April 21, 2022 hearing, Judd simply argued that the SEC’s declarations were (or perhaps
5 contained) hearsay and were thus not cognizable evidence. That is not the law. Rather, as the
6 Ninth Circuit has made clear, “[a] district court may . . . consider hearsay in deciding whether to
7 issue a preliminary injunction.” *Couturier*, 572 F.3d at 1083, citing *Republic of the Philippines*
8 *v. Marcos*, 862 F.2d 1355, 1363 (9th Cir. 1988) (*en banc*). “The urgency of obtaining a
9 preliminary injunction necessitates a prompt determination,” and allows a trial court to “give
10 even inadmissible evidence some weight.” *Flynt Distributing Co., Inc. v. Harvey*, 734 F.2d
11 1389, 1393 (9th Cir. 1984); *see also, e.g., BofI Fed. Bank v. Erhart*, No. 15-cv-02353, 2016 WL
12 4680291, *5–6 (S.D. Cal. Sept. 7, 2016) (overruling various evidentiary objections on a motion
13 for preliminary injunction). Judge Mahan was well within his authority to rely on the extensive
14 evidence submitted by the SEC—and the lack of countervailing evidence submitted by
15 Defendants—in determining to issue the preliminary injunction and asset freeze.

16 Even now, three months after the preliminary injunction hearing, Judd provides no new
17 evidence in support of his position. He simply repeats his arguments—rejected by Judge
18 Mahan—that the SEC’s evidence is insufficient because it does not prove knowing fraud. (*See*
19 *Dkt. No. 163*, at 12–15.) The evidence, however makes clear—among many other things—that:

- 20 • Judd received at least \$315 million (around 18.5 times more than Beasley) from the
21 investment scheme, which Judd described to C. Madsen as an “illegal business.” (*See*
22 *Dkt. No. 2-8*, Salimi Decl. ¶¶ 12–13; Ex. A, Ostler Supp. Decl. ¶ 25.)
- 23 • Judd represented to others as early as October 2018 that Judd personally “had
24 discussions with” the attorneys who were supposedly representing the settling tort
25 plaintiffs in the scheme. (Ex. A, Ostler Supp. Decl. ¶ 26.) But there were no such
26 attorneys because Beasley simply “got names of attorneys” and “never actually talked
27 to them.” (*See Dkt. No. 2-5*, Ostler Decl. ¶ 7 & Ex. 2.)

- 1 • Judd was alerted that investors or their representatives had attempted to contact the
2 attorneys supposedly behind the purchase agreements, and had been told that those
3 attorneys had no knowledge of such agreements. (*See* Ex. A, Ostler Supp. Decl. ¶ 27
4 & Ex. 81, Tanner RFA Resps. at RFA No. 1.)) Judd, nonetheless, took steps to
5 prevent any other investors from finding the truth, such as by including in the offering
6 documents a clause prohibiting investors “from contacting any parties related to the
7 injury settlement or Purchase Agreement, without the written consent of Jeffrey
8 Judd.” (*See* Dkt. No. 2-5, Ostler Decl. at Exs. 7, 12, 24.)

9 This, along with the extensive additional evidence included in the SEC’s request for preliminary
10 injunctive relief, is more than sufficient to state a *prima facie* case of fraud. And there is no
11 basis whatsoever to conclude that Judge Mahan made a “manifest error” in so ruling.

12 **C. Judd’s Request For Attorney’s Fees Is Procedurally Improper.**

13 Finally, and like his request for reconsideration, Judd’s disguised motion to modify the
14 Court’s prior order to allow payment of attorneys’ fees (*see* Dkt. No. 163, Opp. at 15–16) is
15 procedurally improper. The Court’s order sets forth a process for requesting a carve out for
16 living fees and necessary expenses, which requires that “any allowance for necessary and
17 reasonable living expenses will be granted only upon good cause shown by application to the
18 Court with notice to and an opportunity for the Commission to be heard.” (Dkt. No. 56, Order
19 § VII.) Judd already has a motion for attorneys’ fees pending (*see* Dkt. No. 142), which the SEC
20 opposes for the reasons stated in its response to that motion. (*See* Dkt No. 180.)

21 **CONCLUSION**

22 For the foregoing reason, the SEC respectfully requests that the Court enter the SEC’s
23 proposed Amended Preliminary Injunction, *see* Dkt. No. 119-6, extending the preliminary
24 injunctive and asset freeze relief already ordered as to the original defendants to the New
25 Defendants.

1 DATED this 20th day of July, 2022.

2 /s/ Casey R. Fronk _____
3 Tracy S. Combs
4 Casey R. Fronk
5 Attorney for Plaintiff
6 SECURITIES AND EXCHANGE COMMISSION
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CERTIFICATE OF SERVICE

1 I hereby certify that on the 20th day of July, 2022, I caused the **PLAINTIFF**
2
3 **SECURITIES AND EXCHANGE COMMISSION’S REPLY IN SUPPORT OF MOTION**
4 **TO AMEND PRELIMINARY INJUNCTION ORDER** to be served to all parties entitled to
5 service through the Court’s ECF system and to the following individuals by the means indicated
6 below:

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

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

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

15 Jason M. Jongeward and JL2 Investments, LLC
16 [REDACTED]
17 Washington, UT [REDACTED]

18 PAJ Consulting, Inc
19 [REDACTED]
Huntington Beach CA [REDACTED]

20 Triple Threat Basketball, LLC
21 c/o Warren Rosegreen
[REDACTED]
22 Henderson, NV [REDACTED]

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

26 Larry Jeffery
[REDACTED]
27 Laguna Beach, CA [REDACTED]

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Jason A. Jenne

Las Vegas, NV

Seth Johnson

Gilbert, AZ

Mark A. Murphy

Henderson, NV

Cameron Rohner

Gilbert, AZ

Warren Rosegreen

Henderson, NV

By email to the following:

Anthony Michael Alberto, Jr. and Monty Crew, LLC

Dyke Huish

Huish Law Firm

huishlaw@mac.com

Counsel for Roland Tanner

/s/ Casey R. Fronk

Casey R. Fronk

Exhibit A

Supplemental Declaration of Joni Ostler

1 TRACY S. COMBS (California Bar No. 298664)
Email: combst@sec.gov
2 CASEY R. FRONK (Illinois Bar No. 6296535)
Email: fronkc@sec.gov
3 SECURITIES AND EXCHANGE COMMISSION
351 South West Temple, Suite 6.100
4 Salt Lake City, Utah 84101
Tel: (801) 524-5796
5 Fax: (801) 524-3558

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;
JASON M. JONGEWARD; DENNY
16 SEYBERT; ROLAND TANNER; LARRY
JEFFERY; JASON A. JENNE; SETH
17 JOHNSON; CHRISTOPHER M. MADSEN;
RICHARD R. MADSEN; MARK A.
MURPHY; CAMERON ROHNER; AND
18 WARREN ROSEGREN;

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

**SUPPLEMENTAL DECLARATION
OF JONI OSTLER.**

25
26 I, Joni Ostler, do hereby declare, under penalty of perjury, in accordance with 28
27 U.S.C. § 1746, that the following is true and correct to the best of my belief and, further,
28

1 that this declaration is made on my personal knowledge, and that I am competent to testify
2 as to the matters herein stated.

3 1. I am over the age of 21 and a resident of the State of Utah.

4 2. I make this declaration in support of the United States Securities and
5 Exchange Commission's (the "Commission" or "SEC") Reply in Support of Motion to
6 Amend Preliminary Injunction Order, and in support of the Commission's Reply in
7 Support of Motion to Amend Receivership Order.

8 3. I am presently employed as a staff attorney in the Division of Enforcement
9 by the Commission, working from the Commission's Salt Lake Regional Office located
10 at 351 South West Temple, Suite 6.100, Salt Lake City, Utah, 84101. I have been
11 employed as an attorney with the Commission since December 2021. My official duties
12 as an attorney in the Commission's Division of Enforcement include participating in fact-
13 finding inquiries and investigations to determine whether the federal securities laws have
14 been, are presently being, or are about to be violated, and assisting, as requested, in the
15 Commission's litigation of securities laws violations.

16 4. As part of my duties, I was assigned to the Commission's investigation
17 entitled *In the Matter of J&J Consulting Services, Inc.*, matter number SL-02855
18 ("Investigation"). I learned the information set forth in this declaration from my personal
19 knowledge and experience; documents I reviewed in the course of the Investigation,
20 including bank records I or other members of the investigative team reviewed and
21 analyzed; witness interviews and testimony that I or other members of the investigative
22 team conducted; witness and investor declarations that I or other members of the
23 investigative team obtained; and other information provided to me by other Commission
24 staff.

25 5. All documents attached to this declaration have been redacted where
26 necessary to protect the privacy of investors and confidential sources.

Christopher M. Madsen and His Entity ACAC, LLC

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2 6. **Exhibits 61 to 76 and Exhibit 79** attached hereto are true and correct
3 copies of text messages between C. Madsen and Judd that C. Madsen produced to the
4 SEC pursuant to subpoena.

5 7. In February 2019, C. Madsen wrote to Judd in a text message: “You don’t
6 have Dave Lovett in with you yet? I have meeting with him on some other deals we did
7 so is it cool if I sell him on it?” Judd responded: “Yes. Do it before Shane [Jager]. I
8 know Shane wants to talk to him.” C. Madsen responded, “LOL im going to tell him the
9 real numbers and then you can just break me off because im going to sell him on the 100k
10 deals and once he does a few he will do more.” (**Exhibit 61** at MADSEN-019392.)

11 8. In March 2019, Judd wrote to C. Madsen in a text message: “I need to
12 raise some more money. One of my guys is being an ass and I want to cash his 2 million
13 eventually. Did you ever speak to Jason about it?” Madsen responded, “I did I just
14 didn’t push it hard. I will put the word out and start to get you more money.” (**Exhibit**
15 **62** at MADSEN-019386.)

16 9. On June 3, 2019, C. Madsen texted Judd, and stated: “But yes talking with
17 Steve he would like for us to sit down and talk over lunch but he said he had a half mill to
18 1mill to play with ... I think Steve’s going to put 500 with you. But obviously it will go
19 through me.” (**Exhibit 63** at MADSEN-019369.)

20 10. On May 28, 2019, C. Madsen wrote to Judd in a text message: “Hey man I
21 just got done meeting with Craig for about an hour. He’s going to reach out and give you
22 another 200. But I told him that he cannot take it out and put it back he needs to let it
23 ride.” (*Id.* at MADSEN-019372.)

24 11. On February 21, 2018, C. Madsen texted Judd: “Trust me i have been
25 selling him on it but without telling him what we make . . .” (**Exhibit 64** at MADSEN-
26 019477.)

1 12. In February 2020, C. Madsen texted Judd: “By the way I have a friend of
2 mine that is trying to make a decision but I think he’s ready to do it so if 100 K comes
3 available Sunday let me know that way I can put the pressure on him and get them to
4 send me the money on Monday.” (**Exhibit 65** at MADSEN-019291.)

5 13. In October 2017, C. Madsen texted Judd: “I will get us a few more guys
6 too!” (**Exhibit 66.**)

7 14. In May 2017, Judd texted to C. Madsen: “The attorney that we do the
8 loans with loves Roy Nielsen. . . .” C. Madsen texted to Judd: “OK I will set a lunch up
9 for us to meet him. I would say in the next 90 days I will lock him in. . . [G]ive me a
10 little time to prepare him.” (**Exhibit 67** at MADSEN-019564.) Judd texted: “Ok. You
11 just need to have him have funds available.” *Id.* Judd later texted: “Please help me get
12 that funded. Thanks.” *Id.* at MADSEN-019562.) C. Madsen texted: “Will do, I’m
13 meeting Roy at 1:30.” Later, C. Madsen wrote: “Yes I talked to him for hours yesterday
14 about it. He just has never invested and likes to analyze everything. You will be good
15 with him I promise and you can make a lot of money together.” (*Id.* at MADSEN-
16 019553.)

17 15. In a text exchange in March 2018, C. Madsen told Judd: “I’m good with
18 whatever you decide! But I would prefer to just be the one dealing with him and we just
19 give him the rate that you’re paying them bottom line . . .” and “Do me a favor tell Matt to
20 tell him his only option to do deals is they go through me bottom line. . .” and also, “. . .
21 tell Matt to text him and tell him you have to deal with Chris only or no more loans.”
22 (**Exhibit 68** at MADSEN-019467.)

23 16. In August 2021, C. Madsen wrote to Judd in a text message: “Hey man . . .
24 I have one of the investors out of Calley Jacob Enterprises and his small group I’m going
25 to wire them their money back next week . . . I’m done with them . . . They keep asking
26 too many damn questions. I personally don’t know a single one of them except for the
27 main guy.” (**Exhibit 69** at MADSEN-019065.)

1 17. In April 2019, C. Madsen wrote to Judd in a text message: “FYI im only
2 giving him \$12k on his 100k only because he’s a pain in my ass and I really shouldn’t
3 have let him in. If he wants to put a half mill in then I would give him the \$15k”.

4 (**Exhibit 70** at MADSEN-019380.)

5 18. In October 2018, C. Madsen texted Judd that he told an investor “that
6 deals we’re going to start dropping by \$1000 in November. And he said so now my
7 hundreds are only going to pay 15 K and I said Yep at least for me they are. ... Just so I
8 can still keep making mine off him too.” Judd responded, “I wish I would have known
9 that. We kept him at 16k. We will still pay you 3k on each if that is ok.” (**Exhibit 71** at

10 MADSEN-019409.)

11 19. In April 2021, C. Madsen and Judd discussed the way C. Madsen’s
12 brother Richard Rocco Madsen was raising money and how much R. Madsen and C.
13 Madsen got paid. C. Madsen wrote, “. . . [R. Madsen] does think I only get paid 16 K . . .
14 he’s put some clients in with me that I deal with . . . I pay Rocco 12,500 on his deals and
15 he only pays his clients like 9K per deal.” (**Exhibit 72** at MADSEN-019102.) Judd later
16 wrote, “I need to keep him at 16 ... You Shane Humphries all get 19K.” (*Id.* at
17 MADSEN-019101.) In May 2021, Judd told C. Madsen, “If you give him [R. Madsen]
18 15k you still make 4k or 14k you make 5k.” (*Id.* at MADSEN-019096.) C. Madsen
19 responded, “I’ll just tell him I’ll give him 15 K on all the deals and I’ll tell him it’s easier
20 for you to just keep running every Thing through me and your few other investors.” (*Id.*
21 at MADSEN-019095.) A few days later, Judd wrote, “I did speak to him [R. Madsen] . .
22 . He says that he has 6 million dollars underneath you and won’t remove it from you. . . .
23 Of course he wants to go with me and make 16k instead of 12.5. I did mention the 15k. I
24 can cut him off and not give him anymore if you want. . . . I don’t need his money but I
25 think I’m his only income source.” (*Id.* at MADSEN-019094.)

26 20. When Judd instituted the new paperwork for J and J Purchasing LLC in
27 late 2021, C. Madsen repeatedly asked Judd about the status. For example, on November
28

1 10, 2021, C. Madsen wrote to Jeff, “Hey what’s going on Jeff, I was just checking in with
2 you to see where you are at with getting all the contracts so we can get all of the investors
3 to sign? Let me know man.” (**Exhibit 73** at MADSEN-019038.) Following up in
4 December 2021, C. Madsen wrote to Judd: “Jeff quick question moving forward in
5 January will all the new deals that I purchase will the funds go through my account and
6 then directly to you or directly to Matt Beasley from my account or directly from the
7 client to Matt Beasley how are we doing that.” (**Exhibit 74** at MADSEN-019024.)

8 21. In January 2022, C. Madsen sent Judd the spreadsheet that Judd requested
9 (*see* Ostler Declaration, Dkt. No. 119-2, ¶ 45 & Ex. 41). C. Madsen told Judd:
10 “Everything I have is pretty dang clean I have a spreadsheet for each investor I just
11 wanted [sic] to look right when I sent it to you so you can compare it to your contracts.”
12 (**Exhibit 75** at MADSEN-019007-008.)

13 22. In February 2022, Judd wrote C. Madsen about getting investors to sign
14 the new paperwork: “You need to make sure you get the addendums signed too.” “Or I
15 will have to fire you lol.” “. . . Make sure you update your spreadsheet for the new deals.
16 I have not seen an update from you.” (**Exhibit 76** at MADSEN-018998.) C. Madsen
17 responded, “100% I’m on it.” “Yes I’m working on getting them all amended a lot of
18 this is all new money.” (*Id.* at MADSEN-018997-998.)

19 23. Attached as **Exhibit 77** is a true and correct copy of a text conversation
20 between C. Madsen, R. Madsen, and Judd that C. Madsen produced to the SEC. In the
21 text conversation, C. Madsen, R. Madsen, and Judd discussed getting all of C. Madsen’s
22 and R. Madsen’s investors to complete the new paperwork for J and J Purchasing LLC,
23 and complete the spreadsheet of investors that Judd requested. At one point C. Madsen
24 wrote to Judd: “I’m trying to get it done and make it precise but you Gotta be patient
25 because I’m reconciling all of the 1099 payments before I send out the spreadsheet.”
26 (**Exhibit 77** at MADSEN-019700.)

1 the demand for this? ... How big is the company? If they've done 5k deals, why are they
2 raising more? Why not fund themselves and just keep all the profit?" Mr. Bean also
3 asked for the company's website, and how many people work at the company. Mr.
4 Cenname passed Mr. Bean's questions along to Judd. Attached as **Exhibit 82** is a true
5 and correct copy of the text exchange that Mr. Cenname had with Judd regarding Mr.
6 Bean, which Mr. Cenname produced pursuant to subpoena.

7 29. Judd wrote in a text to Mr. Cenname: "The only issue I have is that we are
8 not supposed to be selling this. It's an offering to people we know. We don't know this
9 guy." *Id.* at 3. In numerous other instances, however, Judd had no problem "selling this"
10 to people he did not know – including, for example, Judd's telephone solicitation with the
11 confidential sources who made undercover recordings of Judd, Shane Jager, and Jason
12 Jongeward. (*See* Ostler Decl. Dkt. No. 2-5 at ¶ 29 & Ex. 15.)

13 30. Attached hereto as **Exhibit 83** is a true a correct copy of Defendant Jeffrey
14 L. Judd's Objections to Plaintiff Securities and Exchange Commission's Expedited
15 Discovery Requests to Defendants Jeffrey L. Judd, Christopher R. Humphries, Shane M.
16 Jager, Jason M. Jongeward, Denny Seybert, and Roland Tanner Pursuant to April 13,
17 2022 Temporary Restraining Order.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed this 20th day of July, 2022 in Salt Lake City, Utah.

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21 /s/ Joni Ostler

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Exhibit 61

Me

Cool man

4:09 PM

Jeffrey Judd



8:30 AM

Me

That he does but he seemed interested in throwing a 100 and that's why i told him to reach out since he knows you and it made him feel good. He did not like tanner bringing it up at a golf game with everyone around. He said he would never invest with him lol

8:14 AM

Jeffrey Judd

Whatever happened with david Lovit.

8:04 AM

Tuesday, February 26, 2019

Me

Ok cool man

12:19 PM

Jeffrey Judd

I told Shane to tell him to knock it off. I'm going to have to tell him again. Nerdy tanner. Lol

8:16 AM

Me

I talk to him for about an hour and at the end of it I told him that it would be best if he reached out to you directly. 12 K and 15 K

8:05 AM

Me

Hey buddy, do you need the wires today or tomorrow? I at the airport but I can pull out my laptop

12:18 PM

Me

I sent the wire this morning for \$200 K

8:20 AM

Jeffrey Judd

Ok. I have not heard from him so he must not be interested. He has enough money. Lol

8:07 AM

Jeffrey Judd

Tomorrow morning is fine

12:18 PM

Sunday, February 24, 2019

Me

Coo man!! I will send wire

11:29 AM

Jeffrey Judd

I got you 2 new 100k deals. Put money in Tuesday please. I will get you contracts on Tuesday.

11:28 AM

Monday, February 18, 2019

Me

Ok cool man let me know

10:17 AM

Me

Did you find me another \$100k

10:16 AM

Jeffrey Judd

No. Sorry. I had to replace all the ones that closed. I will try again next weekend. I should have some extra ones.

10:16 AM

Thursday, February 14, 2019

Jeffrey Judd

Good. That's 60% a year. He will like that

12:29 PM

Jeffrey Judd

Shane would give him 12k. Lol

12:30 PM

Me

Ok 15

12:29 PM

Me

Yes I will let you know

12:29 PM

Me

Lol

12:30 PM

Jeffrey Judd

Tell him 15 or 16k on the 100k. That's up to you.

12:28 PM

Jeffrey Judd

Shane is a Jew so I doubt it

12:26 PM

Me

Is Shane telling him them all the real numbers

12:25 PM

Me
You don't have Dave Lovett in with you yet? I have meeting with him on some other deals we did so is it cool if I sell him on it? 12:24 PM

Jeffrey Judd
I don't know if he talked to him 12:27 PM

Jeffrey Judd
Yes. Do it before Shane. I know Shane wants to talk to him. 12:25 PM

Me
Lol im going to tell him the real numbers and then you can just break me off because im going to sell him on the 100k deals and once he does a few he will do more. 12:27 PM

Wednesday, February 13, 2019

Jeffrey Judd
Ok. 2:42 PM

Me
I have \$200k available for the next week also 2:28 PM

Monday, February 11, 2019

Me
Ok cool 12:17 PM

Me
Let me know if you have 2 more deals that pop up this week. If i'm not going to pay my cabin off and roll the money with you for a minute I might as well use it all 12:14 PM

Jeffrey Judd
Ok. I won't have anymore until Sunday. I will let you know. 12:17 PM

Sunday, February 10, 2019

Me
I could take \$3 deals this week if you have them. 1:36 PM

Saturday, February 9, 2019

Jeffrey Judd
Coming now 8:18 PM

Jeffrey Judd
Please 4:11 PM

Exhibit 62



4:52 PM

Jeffrey Judd

I can get you one. Yes. I will call u

1:00 PM

Jeffrey Judd

Routing: 121000248
Wells Fargo
Acct [REDACTED] 5598
Beasley Law Group
IOLTA

2:26 PM

Me

Give me a call when you get a chance I want to see if you have a deal that we can put a friend of mine in for 100? Next week his dad wants him to check it out if everything goes good to put 1 million in with you

12:59 PM

Me

Ok

1:00 PM

Me

Send me the wiring instructions and I'll let you know when I'm going to have him send the wire and maybe next week we can get together and I'll do an intro. I told him Monday on wire

2:16 PM

Wednesday, March 13, 2019

Jeffrey Judd

He can as long as he plays by the rules

1:05 PM

Jeffrey Judd

I need to raise some more money. One of my guys is being an ass and I want to cash his 2 million eventually. Did you ever speak to Jason about it?

1:03 PM

Me

I did I just didn't push it hard. I will put the word out and start to get you more money. Roy hit me up on doing more too but its up to you. Im supposed to go to lunch with him Friday

1:05 PM

Thursday, March 7, 2019

Jeffrey Judd

She was a breast cancer survivor. Overweight and went to do gastric bypass and got an infection and died of sepsis. Crazy.

9:20 PM

Me

Sorry man

9:19 PM

Jeffrey Judd

We had a friend die yesterday. Super nice lady.

9:19 PM

Jeffrey Judd

Ok. I think I told my wife. That's it. I will make sure. Keep me posted about the funeral services. Thanks.

9:18 PM

Me

No i had no clue

8:53 PM

Jeffrey Judd

You got it. You know he was baptized.

8:49 PM

Me

Looks like we got to go back and hang out let me know win

8:49 PM

Jeffrey Judd

Sorry wrong guy

9:18 PM

Jeffrey Judd

Yep. He is a Mormon now.

8:55 PM

Me

When

8:49 PM

Me

Ok

9:18 PM

Exhibit 63

Monday, June 3, 2019

Jeffrey Judd

Lol. So you have 500k.

4:52 PM

Jeffrey Judd

Ok. Let me know. I'm back late tomorrow night

5:35 PM

Me

I will figure it out he wanted to meet this week but he leaves town Wednesday I'm just not sure when

5:35 PM

Me

Yeah you're going too

5:34 PM

Jeffrey Judd

I'm going to need another group anyway.

5:33 PM

Jeffrey Judd

You got it. Going to need another attorney group.

5:23 PM

Me

I know you're always working, I have my 200k and it's available for next week. I'm also expecting my balance paid off of an additional 300K by Friday. So I will have 500k available at the end of this week. Just let me know what deal you get and I will wire you the money.
Thanks bro enjoy the weather and use sunblock

4:40 PM

Me

Ok I will reach out to him in the morning

5:36 PM

Jeffrey Judd

When does he want to meet

5:34 PM

Me

All good brother I'll take what you have if not just keep me in mind. But yes talking with Steve he would like for us to sit down and talk over lunch but he said he had a half mill to 1mill to play with

5:24 PM

Me

Yeah that's pretty much what I'm telling you. I'm going all IN....And then when you are back we still got to get with Steve Byrne, Greg's partner I talk with both of them and I think Steve's going to put 500 with you. But obviously it will go through me

5:13 PM

Sunday, June 2, 2019

Jeffrey Judd

Which one of your cars does he get?

5:37 PM

Me

Thanks bro travel safe

5:25 PM

Me

He's laughing

5:41 PM

Me

Will do

5:38 PM

Me

Tomorrow 16

5:37 PM

Jeffrey Judd

Thanks

5:26 PM

Jeffrey Judd

Ok

5:23 PM

Me

For sure two 100s

5:15 PM

Me

Hey man let me know if you got a couple deals coming in this week that I can take enjoy your vacation bye

4:58 PM

Me



5:38 PM

Jeffrey Judd

Nice. Tell him happy birthday!!

5:37 PM

Jeffrey Judd

Is it Gage's birthday?

5:36 PM

Jeffrey Judd

I didn't get any this week. I will get them next week. 2 100s, 2 80s or one of each? Or whatever I get?

5:02 PM

Jeffrey Judd

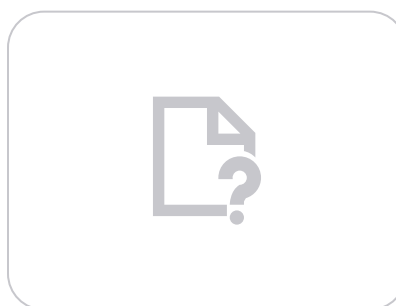
Nice. Can't believe yo como mocos is 16!!!

5:39 PM

Me



5:38 PM



5:38 PM

Friday, May 31, 2019

Me

👊 thx enjoy

12:31 PM

Jeffrey Judd

Ok. I will let you know.

11:19 AM

Me

Hey man I hope you're enjoying your vacation let me know if you have any deals come available next week. I should have 100k available maybe \$200

10:00 AM

Tuesday, May 28, 2019

Jeffrey Judd

I will. As soon as it's done. I'm trying to get him to finish faster.

7:45 PM

Me
Hey man I just got done meeting with Craig for about an hour. He's going to reach out and give you another 200. But I told him that he cannot take it out and put it back he needs to let it ride 7:07 PM

Me
Or did you takeoff for the week? 7:57 PM

Jeffrey Judd
Ok. Gotcha. 7:29 PM

Me
Awesome bro!! When your back i want to meet with you with a friend. Lmk what your next week looks like. Enjoy my friend 8:12 PM

Me
How's the condo coming 7:29 PM


Me
Right on man, enjoy buddy 8:33 PM

Me
Nice man you have to go use it 7:32 PM

Me
Ha, Greg Herlean 7:23 PM

Me
You here in vegas 7:56 PM

Jeffrey Judd
We are at Atlantis in Bahamas with ken for her graduation trip. 8:10 PM

Me
 7:29 PM

Jeffrey Judd
Thanks. I will be back next Tuesday night. Just got here today. 8:32 PM

Jeffrey Judd
Good. They are putting it back together now. Hopefully done by July 15 7:31 PM

Jeffrey Judd

Who is Craig?

7:22 PM

Thursday, May 23, 2019

Me

Dang man, We are headed to the cabin tomorrow. Thanks for the heads up LOL

5:04 PM

Jeffrey Judd

Let me know. How do you get to choose the games

5:32 PM

Jeffrey Judd

Ok.

5:29 PM

Jeffrey Judd

No

5:25 PM

Me

I told him you do not deal with anyone directly unless they put 1 million or more in

5:23 PM

Jeffrey Judd

Yep because when I drive by I don't stop. lol. Heard too many things from you and Shane. I do wave though.

5:18 PM

Jeffrey Judd

I know. She said thanks and sent you a card. Safe travels.

5:16 PM

Jeffrey Judd

No problem. I thought she had sent it to you

5:05 PM

Jeffrey Judd



5:02 PM

If you have time. No pressure.

5:02 PM

Or maybe I'll split mine with you. I have four seats for half the games

Me

5:29 PM

Yes

Me

5:25 PM

By the way did you buy any knights tickets

Me

5:24 PM

Jeffrey Judd
Perfect

5:23 PM

Ha, I kind a wish I wouldn't have let him in. He drives me nuts

Me

5:22 PM

She might have but I didn't see it but I did send her a graduation gift

Me

5:06 PM

You can't but I have a friend that has four seats and I think he's looking for a partner let me call him back

Me

5:25 PM

Jeffrey Judd
I didn't know I could.

5:25 PM

Jeffrey Judd

For next season?

5:25 PM

Me



5:24 PM

Jeffrey Judd

Yeh. I don't want to deal with him.

5:23 PM

Me

Cool brother by the way Rhett hit me up and said does Jeff know I have money with him LOL I said he knows you have money with me LOL

5:17 PM

Wednesday, May 22, 2019

Me

Nice👍 i think i might have a friend that wants to put \$300 with you. I will let you know by the weekend

8:10 AM

Jeffrey Judd

Great. Let me know. Thanks

8:11 AM

Me

Hey bud, you paid me \$25k but i was only owed \$22k. Not sure if you paid me for another deal

8:06 AM

Me

For sure

8:11 AM

Jeffrey Judd

Herlean. 👍

8:09 AM

Thursday, May 16, 2019

Me



6:57 PM

Me

I received the wires this week. Thx for paying those two loans off.

5:45 PM

Jeffrey Judd

Of course

6:32 PM

Exhibit 64

Wednesday, February 21, 2018

Me

You bet!

8:05 AM

Me

I always do

4:31 PM

Me

Yea about! I'm Fucked if she goes bad.... 🤔

4:27 PM

Jeffrey Judd

Ok. No problem

4:15 PM

Jeffrey Judd

Please transfer the 50k in to Matt's account today. He is going out of town so we are trying to fund a little early.

7:26 AM

Jeffrey Judd

Did you tell her its your money anyway. Lol

4:30 PM

Jeffrey Judd

890k

4:24 PM

Me

Yea i know, i trust in you bro. My wife has tripped out once she seen our Acct last week. lol

4:30 PM

Jeffrey Judd

Did you know you have 840k with me?

4:23 PM

Me

Sorry man i just sent wire so it will be there first thing 9eastern

4:13 PM

Jeffrey Judd

Mine loves it when I say that

4:31 PM

Monday, February 19, 2018

Jeffrey Judd

Smh. Tell that guy to call me directly give me 500k and I will give him greg rates and cut you in lol.

12:40 PM

Jeffrey Judd

I get it. I'm talking to him at 1. If greg can sleep at night then it's on him.

1:14 PM

Jeffrey Judd

Greg is a nice guy and I like him but kind of a weasel. Lol

1:39 PM

Jeffrey Judd

\$7500 on 100k

12:28 PM

Me

Yea he's been wanting to put more in but can not get a straight answer from Greg

1:36 PM

Me

What a Jew!

12:31 PM

Me

Why is only given his boy like \$2k on his 50

12:19 PM

Jeffrey Judd

Greg is a Jew

11:26 AM

Me

Trust me i have been selling him on it but without telling him what we make because Greg told me not to tell him. David keeps asking me though and i don't want to screw things up between them

12:43 PM

Jeffrey Judd

I'm going to be on phone with greg and him. I will

1:27 PM

Jeffrey Judd

He said if he gives him anymore then he won't fund his other deals. Which make 2 points. Like 2k on 100. I wouldn't either. Lol

12:30 PM

Me

FYI i told Greg yesterday that i put 380 in last week because he called wanting to know

1:37 PM

Me

Just tell Dave I have been doing it for over a year

1:22 PM

Me

Yes he is

1:39 PM

Me

Dang man

12:29 PM

Saturday, February 17, 2018

Me

Tell Greg that and tell him you will break him off

2:57 PM

Me

Yea on tv

3:35 PM

Jeffrey Judd

Gregs guy should work directly with us.

2:56 PM

Jeffrey Judd

Did you watch the fight

3:27 PM

Jeffrey Judd

Ok. You got it.

2:56 PM

Me

Yea loss

3:14 PM

Me

I want the 50

2:55 PM

Jeffrey Judd

Did Roy fight last night?

3:14 PM

Sunday, February 11, 2018

Jeffrey Judd

You had a 50k come in. So I have a 50k to replace it. It's your Marzulla loan and i have a 100k for you. You want them both?

7:24 PM

Jeffrey Judd

Greg just called me asking me a whole bunch of questions.

8:14 PM

Jeffrey Judd

Are you at the hockey game.

7:22 PM

Me

You have any \$50's pop up?

3:04 PM

Jeffrey Judd

You got it. Are you at the game.

7:30 PM

Jeffrey Judd

Ok. I will let you know as soon as Matt tells me what I need to roll

4:23 PM

Jeffrey Judd

I have the list for next week but I'm waiting for Matt to send me what contracts we have in that have paid so I know what I need to replace. Do you want a 50 or a 100?

3:51 PM

Me

Yea both

7:29 PM

Me

I have a 100

4:12 PM

Jeffrey Judd

His buddy would do better going through you. Lol

8:14 PM

Friday, February 9, 2018

Me

Drinks and appetizers on me

5:40 PM

Me

Yes sir!! Let's go there! What time should we go

7:03 PM

Me

Let me know

6:44 PM

Jeffrey Judd

Ok. Let me see if I can get in touch with her.

5:42 PM

Jeffrey Judd

Ok. See you then

7:07 PM

Me

You get the wires ok

5:38 PM

Me

Dinner?

5:39 PM

Jeffrey Judd

Actually belly.

7:01 PM

Me

Out front

8:14 PM

Jeffrey Judd

She isn't responding to me. I know she was at singing with Khloe. We are going to Disneyland next week so Khloe can sing there. So they may be doing rehearsals. I will keep you posted.

6:35 PM

Exhibit 65

Me

Hey bro so I talked to Mark he said the wire went out but he missed the 2 o'clock he promises it will be there in the morning also Jason is going to reach out to you because he wants to do another hundred K he wants to do it for his wife and daughters LOL

3:48 PM

Me

And here I am headed to spicy tuna when I could be with you

7:08 PM

Me

Perfect bro

6:56 PM

Me

By the way I have a friend of mine that is trying to make a decision but I think he's ready to do it so if 100 K comes available Sunday let me know that way I can put the pressure on him and get them to send me the money on Monday

4:49 PM

Me

I'm not sure I'm not taking any of the furniture to the new place but half the time they don't pay you anything for it but it does look good just a stage it

8:44 PM

Jeffrey Judd

21st. It appraised higher than I bought it for. So that's good.

6:54 PM

Me

When are you closing on the house?

6:53 PM

Jeffrey Judd

When are you listing yours

8:02 PM

Jeffrey Judd

Nice

6:52 PM

Exhibit 66

Jeffrey Judd

Are you cool with splitting our greg and Roy loans 3 ways with matt? So for example on 100k we pay him 16k so there is 9k left over plus Matt's part of the admin fee which is \$2500. It would be \$11,500 divided by 3 so \$3833 a piece. Or do you just want me to do normal fees like I usually do. Matt gets his \$2500 then you and I split \$9000, \$4500 each. I'm fine with either. I just like to cut matt in.

8:31 PM

Me

Cool bro, as always thanks again and yes I believe in taking care of all of us.

8:42 PM

Me

Of course bro! I really just want to give back to you for taking care of me. That's all I'm trying to do. That works for me. Tell Matt thanks also and make sure my deals are solid. Love ya bro for the friendship.

8:37 PM

Jeffrey Judd

When you are involved it's normal fees. We don't take extra.

8:32 PM

Me

I will get us a few more guys too!!

8:43 PM

Jeffrey Judd

Cool. I figured you would say that. Thats the kind of guy you are. A great dude. Let's just split it 3 ways. Matt is a good guy too.

8:38 PM

Jeffrey Judd

Or did you have something else in mind.

8:35 PM

Thursday, October 12, 2017

Me

I will take \$50

10:50 AM

Jeffrey Judd

I'm here now too. Lol. Gate 19

10:54 AM

Jeffrey Judd

Ok. Have fun. I'm going to Cali.

10:52 AM

Jeffrey Judd

Pres is good for him and he likes him too. I will take him again.

11:00 AM

Exhibit 67

Jeffrey Judd

Jeff, Talked to wife we are good for 1 more. Talked to chris, the reason I ask questions about the business my wife and myself want to know because it is

a lot of money that I have made beating my body up and I like to know my investments and understand them like getting in the cage. I want you to know as

long as I making money I want you to make money. Chris said this was a concern. I want this to be profitable enterprise with 5-10 mil fund or more. Then no more fighting lol.

So I will usually ask the same questions and try to get a process for this so myself and wife are good. But I do have 1 concern how do we have so many settlements for 3 attorneys? It just seems like a lot. So how come?

6:51 PM

On the three loans which has the highest Itv? No, medicade. Who is the payer? What was the reason they got sued? When does need to be funded? So I can tell my wife.

Thanks

Matt was pissed about these texts. Lol. Thought Roy was accusing us of taking money. I think it's one too many punches to the head. Lol

Jeffrey Judd

Is the deal we are doing with you or Roy. Better with you then I can sign it. Either way it's fine. Let me know.

6:11 PM

Jeffrey Judd

All deals that we get are good. The only thing that differs is the amount and time frame. We don't take bad loans. I'm in Seattle with preston for

Regionals. Let's go when I get back. Next week. All good.

7:07 PM

Jeffrey Judd

Ok. All good. Get your money back too. I usually roll 300 to 400k. You can do the same if you want. I will make over 250k this year just doing that.

7:10 PM

Jeffrey Judd

Ok.

6:23 PM

Me

I want to use Matt too 100 percent

7:09 PM

Me

Yea I talked to him for hours yesterday about it. He just has never invested and likes to analyze everything. You will be good with him I promise and you can make a lot of money together. He has one friend alone he told me would invest 5mil. Roy just wants to understand it all so he knows how to bring it up in conversation with his people. He will not go behind your back either. I asked him and he said he has many of attorney friends and would love to use his name with them but have you be the middle man that they all deal with. He is good with you making your money and wants to make you more then you can on your own. He's just wanting to make sure there becomes a checklist that is used on every deal with every client so it's just easier for him to pick and choose or know the real solid deals compared to the ones that might not be as good. He wants them all but is cool with not getting them all. Let's go eat together this week

7:04 PM

Friday, June 16, 2017

Jeffrey Judd

You know you get 22.5k. Does this go through you then so I can sign it?

12:19 PM

Jeffrey Judd

Give me 15 minutes. I have a couch being delivered to the house.

12:43 PM

Jeffrey Judd

He text me that he has to talk to his wife but will most likely take one.

12:04 PM

Jeffrey Judd

Ok. Thanks.

12:05 PM

Me

Call me when you are done traveling

12:30 PM

Me

I told Roy I would split one with him

12:04 PM

Me
Yea we good 12:05 PM

Jeffrey Judd
Ok. Let me know. I'm on the clock. 11:01 AM

Jeffrey Judd
I know. 10:51 AM

Jeffrey Judd
Roy said no. I don't get people. Lol 10:51 AM

Me
Find an attorney?? 10:42 AM

Me
Cool when did you send them to him 10:33 AM

Jeffrey Judd
He asked me for more. Need to know asap he knows the drill. 10:32 AM

Jeffrey Judd
I have 3 100k loans. I told Roy about them. Try to get him to respond fast. All pay 20k. One is a Medicare so it may go over. 10:31 AM

Jeffrey Judd
What's his name. 9:45 AM

Me
I'm giving a friend trim body contact and told him to say you referred him 9:37 AM

Jeffrey Judd
Do you want one? I have 2 left to place now. 10:59 AM

Jeffrey Judd
Why does he ask if we have more then say no. I don't get people. 10:52 AM

Jeffrey Judd
Find an attorney to split up. Lol 10:51 AM

Me
Ok 10:36 AM

Jeffrey Judd

Can't send to him until I know he wants them. I sent him a text about them

10:34 AM

Me

Ok I will talk to him

10:32 AM

Jeffrey Judd

Ok

9:44 AM

Me

Let me see if Roy wants to split one with me!

11:01 AM

Me

I do t know

10:52 AM

Me

No you are not splitting up, fu

10:51 AM

Jeffrey Judd

Do you want one of those for yourself? It's 22.5k back to you. I forgot to call you yesterday. Sorry inward dealing with Jennifer issues. She told me to find an attorney.

10:42 AM

Me

Shea Thueringer

9:45 AM

Thursday, June 15, 2017

Jeffrey Judd

Sorry not for you

11:35 AM

Jeffrey Judd

Yes I will call you

11:35 AM

Me

Ok when your available

11:46 AM

Jeffrey Judd

No

11:35 AM

Me

Give me a call today when you have a sec about my meds

10:13 AM

Monday, June 12, 2017

Me

Pulling in to get my omega 950

5:50 PM

Jeffrey Judd

Ok. Tell them 30% per Jeff Judd.

5:51 PM

Jeffrey Judd

They can call me if needed

5:51 PM

Me

Ok coo brotha

5:52 PM

Me

Questions?

How do you find the deals?

All deals come from the 3 lawyers?

How much money do we need every quarter?

Can we get a list of pending cases?

How do we know each attorney has good deals or good clients.

1:15 PM

This is from Roy and his wife. I told them we needed to mostly deal with you on all deals as your the broker bottom line. Let me know if you can answer these when you have time. I think they are mostly asking because he wants to dump a bunch of money with you. Just think they are doing there due diligence like most people with money

Jeffrey Judd

Sounds like trying to figure out how to do it. Lol

1:16 PM

Me

No he's doing it with you

1:17 PM

Jeffrey Judd

Deals come from 4 attorneys. Matt knows all of the. All stand up guys. The nature of the attorney is what matters. How the client is does not. This is why we have a contract. Everything is paid by the attorneys. Money doesn't go to clients. Attorneys do not have a list. The only know they have a deal once they reach a settlement. If they want to fund 500k a quarter then we can find those deals. If they want 1 million. Then we can get that as well. We have other investors but we can make everyone happy. More important because of my relationship with you. You will get priority.

1:20 PM

Me

Thx I will pass on info

1:33 PM

Sunday, June 11, 2017

Jeffrey Judd

Everyone can come

5:11 PM

Me

Kids or adults tonight

5:10 PM

Me

lol I have done that

5:12 PM

Jeffrey Judd

We forgot khloe at church. Parker is coming to get her

5:12 PM

Friday, June 9, 2017

Me

Coo bro thx

10:32 AM

Jeffrey Judd

Funder

12:04 PM

Jeffrey Judd

Yes. I'm going to have a pharmacist look at it.

10:31 AM

Me

What did you figure she might need

12:01 PM

Jeffrey Judd

Patience bud. Don't know yet. Lol. Tell Roy not to try to circumvent me with Matt or he will get cut out. Lol. I'm the finder of the loans.

12:04 PM

Me

Did Andrea ever send you her blood work, she has been worked up all night about her thyroid

10:27 AM

Monday, June 5, 2017

Me

We are coming

1:23 PM

Jeffrey Judd

Change of plans. We had to move Preston's party to Sunday at 6:30. I hope everyone can still attend. Please let us know if you can or can not.

1:18 PM

Jeffrey Judd



1:22 PM

Jeffrey Judd

He did this!!! Not us. He wants to play with a semi pro team on Saturday at UNLV. And some of his friends could not come.

1:21 PM

Me

What!! You must love making it difficult for all his friends

1:19 PM

Friday, June 2, 2017

Jeffrey Judd

I did

5:32 PM

Jeffrey Judd

Graduation party for Preston Saturday June 10th at 6pm at our house please come see the graduate before he leaves Las Vegas.
🤔🏀🤔🏀

5:05 PM

Jeffrey Judd

Between me and him. lol

5:29 PM

Jeffrey Judd

Check out the email from Roy

5:28 PM

Me

Send me the email

5:32 PM

Jeffrey Judd

No

5:28 PM

Me
Coo 5:33 PM

Me
Did he cc me 5:28 PM

Me
Sounds good bra 5:06 PM

Jeffrey Judd
He wants to do a lot of loans. Lol 5:29 PM

Me
Ok I'm driving to cabin but I will 5:28 PM

Tuesday, May 30, 2017

Me
Coo 6:43 PM

Me
How's this work 6:38 PM

Me
I'm headed to your store to pick up Andreas meds. Do I get my family rate 3:30 PM

Jeffrey Judd
It's sublingual drops. So the one with the blue cap becomes the top. You stick it through then you draw out the amount with the syringe. It attaches on to the top. 6:41 PM

Jeffrey Judd
Yes on both. Call me when you are there. 3:31 PM

Me
Then take the thing out of bottle each time 6:43 PM

Me



6:43 PM

Me



6:38 PM

Me

I'm at your store

3:51 PM

Me

I'm a builder!!

6:39 PM

Me

They will release her stuff to me

3:30 PM

Me

Got it

6:41 PM

Me

Ok 10 min

3:32 PM

Jeffrey Judd

No. You leave it in

6:43 PM

Monday, May 29, 2017

Jeffrey Judd

I would spend 30 to 35k

8:22 PM

Jeffrey Judd

Your boy left the UFC

8:21 PM

Me

Yea I had dinner with him Friday but I knew he was for months

8:22 PM

Me

I paid \$35k for hunters and they are \$40 new

8:21 PM

Me

Yea like I told Preston the other day the biggest issue is Toyota trucks never are cheap. They just hold there value to much

8:20 PM

Jeffrey Judd

If you come across a truck deal let me know. Like Hunters truck. Preston likes it. I have a feeling you are in the loop since you have so many cars. 😂

8:17 PM

Jeffrey Judd

Is that a good move.

8:23 PM

Jeffrey Judd

Matt told me. Funny thing in text and emails he keeps calling him Mary.

8:22 PM

Jeffrey Judd

Ok. That's good though.

8:21 PM

Thursday, May 25, 2017

Jeffrey Judd

Me too. And I cried

1:02 PM

Jeffrey Judd



IMG_2239.MOV.mov

12:51 PM

Jeffrey Judd

Ok. I will send the agreement right now between me and him. Also let me know today if you can do the one next week. I need to get someone else if not.

12:23 PM

Jeffrey Judd

Jen did it.

1:05 PM

Me

That's funny crap

1:01 PM

Me

I will for sure

12:27 PM

Me

Don't forget to take care of me, cialis

1:27 PM

Jeffrey Judd

He is a crier and wants boobies. Lol

1:01 PM

Me

I laughed my but off

1:02 PM

Me

Will do, I'm meeting Roy at 1:30

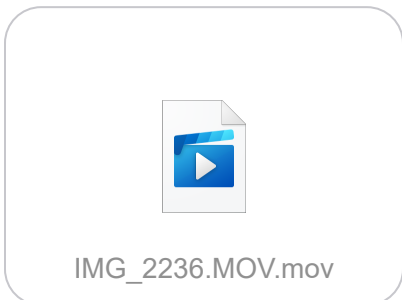
12:22 PM

Me

He's going to kill you when he sees this video

1:03 PM

Jeffrey Judd



12:51 PM

Me

Blame her!!

1:26 PM

Jeffrey Judd

Please help me get that funded. Thanks

12:19 PM

Wednesday, May 24, 2017

Jeffrey Judd

Ok. I won't

7:39 PM

Jeffrey Judd

Tell him to learn how to text. Lol. My corporation is J and J consulting. That's easy. Lol

12:35 AM

Jeffrey Judd

Ok. I will tell Matt

3:07 PM

Me

I have many of them. He just said he was setting a new one up tonight just for this.

12:36 AM

Me

Yup he is big time

12:36 AM

Me

I will for sure. I talked to him and will get it before noon

12:34 AM

Me

Don't forget me bud, my samples are gone!!!

7:34 PM

Jeffrey Judd

Hey bud sorry to bother you. Try to get me the corporation name in the morning so we can prepare it for the meeting. Thanks

12:32 AM

Me

I'm running 20 min behind

3:07 PM

Me

Thx

3:07 PM

Jeffrey Judd

Wow. He is anal. Lol

12:36 AM

Tuesday, May 23, 2017

Me

Let's meet tomorrow after 2 with Roy and attorney. Tell me what time works and we can come to his firm or whatever works.

6:52 PM

Jeffrey Judd

Matt wants to bring the contract tomorrow with his LLC name on it so try to get it tonight

8:34 PM

Jeffrey Judd

Get me the corporation so he can put it on the contract.

7:06 PM

Me

Ok cool

7:05 PM

Jeffrey Judd

We are good for 2:30

7:02 PM

Me

Ok I will

7:06 PM

Jeffrey Judd

Sooner the better. 😂😂

7:07 PM

Jeffrey Judd

Send me his corporations name.

7:02 PM

Friday, May 19, 2017

Jeffrey Judd

I have another 100k deal. 90 days. 22.5 k to you. Do you want it?

3:12 PM

Me

Call me when you get time

4:20 PM

Wednesday, May 17, 2017

Me

Yes I will so give me a little time to prepare him

4:04 PM

Me

Ok I will set a lunch up for us to meet him. I would say in the next 90 days I will lock him in.

4:03 PM

Jeffrey Judd

The attorney that we do the loans with loves Roy Nielsen. He is on board we will add an another attorney or 2.

3:30 PM

Jeffrey Judd

He is leaving anyway.

4:17 PM

Jeffrey Judd

He was not there today.

4:05 PM

Jeffrey Judd

Ok. You just need to have him have funds available.

4:04 PM

Exhibit 68

Me

Yea i will take it this week

2:29 PM

Me

Yes the sellers but not who the loans paid off of. I will figure it out.
Thx man

9:27 AM

Wednesday, April 11, 2018

Jeffrey Judd

Yes

3:32 PM

Me

The loan that is paying off this week what is client name? Rirby?
\$50

3:26 PM

Me

Thx bro

4:43 PM

Wednesday, April 4, 2018

Me

Lol

6:47 PM

Me

Yo sorry man I didn't have my phone on me talk to me what's going on? I talked to Roy over text tonight's ago and he said he would like to set up a revolving line with you guys for a half 1,000,000 to 1,000,000 with one contract. He said he was going to reach out to you and Matt this week. Not sure if that's what this is about let me kno

6:31 PM

Jeffrey Judd

Yes I agree. Only you

6:49 PM

Jeffrey Judd

He called Matt. He wanted to know why we don't like to do the transfers each time the deals close. I told Matt he is last resort. If we are desperate.

6:38 PM

Jeffrey Judd

I guess you want to wash your hands of that since you didn't respond to the other stuff before. Which is fine.

6:15 PM

Me

Unless you want me to tell him that you called me and that's only way you're going to do loans with him

6:48 PM

Me
Do me a favor tell Matt to tell him his only option to do deals is they go through me bottom line and we will still do our deal 6:36 PM

Jeffrey Judd
Ok 6:50 PM

Jeffrey Judd
Roy is calling Matt. He called him 6 times 6:13 PM

Me
I'm good with whatever you decide! But I would prefer to just be the one dealing with him and we just give him the rate that you're paying them bottom line and Matt just need to tell him 6:48 PM

Jeffrey Judd
Im sure it is. But we aren't going to deal with him. Too much brain damage. 6:32 PM

Me
Well if he calls matt again tell Matt the same thing or tell Matt to text him and tell him you have to deal with Chris only or no more loans. 6:50 PM

Monday, April 2, 2018

Jeffrey Judd
Your Rirby 50k is in. I have a new one to replace it. 11:27 AM

Me
Ok cool 11:52 AM

Friday, March 30, 2018

Me
Lol 2:33 PM

Jeffrey Judd
They kicked it back again. He is going to resend. 2:31 PM

Me
Thx bro 2:28 PM

Jeffrey Judd
Yep that's in it. \$21,500 is the wire. 2:26 PM

Jeffrey Judd
You didn't get it 2:25 PM

Me
Cool man! Not sure why it keeps doing that 2:31 PM

Jeffrey Judd
Check both your banks. He said that he sent it. 2:29 PM

Me
Nothing my man 2:26 PM

Me
Not to me! 2:25 PM

Me
You sending wire today 2:24 PM

Jeffrey Judd
Matt 2:33 PM

Me
Nothing bro i just checked 2:29 PM

Jeffrey Judd
Checking with Matt now 2:27 PM

Me
Also our 3 way split for Roy loan 2:25 PM

Jeffrey Judd
Matt sent yesterday. 2:24 PM

Thursday, March 29, 2018

Jeffrey Judd
Back to sleep. lol. I did give Roy all his money back though. He is tough to deal with. 8:34 AM

Jeffrey Judd
Yes you get 17k. Sorry. I had sent out like 4 other 80k contracts. 8:33 AM

Jeffrey Judd
I should have some new ones on Sunday. I will let you know. 8:48 AM

Me
Ok cool 8:49 AM

Me
Ok cool go back to sleep 8:34 AM

Exhibit 69

Me

Hey man I thought I sent a group text but it only went to Matt anyways I did talk to him briefly I have one of the investors out of Calley Jacob Enterprises and his small group I'm going to wire them their money back next week I think there's a total of six or seven deals I'm headed to my office now to confirm but I'm done with them so anyways I did talk to Shane he will wire the money to Beasley to take the replacement of these deals thanks man I'm not sure if You're flying back today

1:15 PM

Jeffrey Judd

Are these deals closed?

1:35 PM

Me

All of them except for I think two or three. I'll let you know the names of the contracts I can replace them with sorry it's a pain in the ass but I can get rid of them now. They keep asking too many damn questions. I personally don't know a single one of them except for the main guy

1:36 PM

Saturday, August 14, 2021

Me

LOL

12:29 PM

Me

Yea i know

12:27 PM

Jeffrey Judd

Why is Shane telling me about a land and hospital deal and not you.

12:25 PM

Me

This is going to be big bro

12:27 PM

Me

Ha, we talked about you together and he said he wanted to talk to you

12:26 PM

Jeffrey Judd

Good call

11:45 AM

Jeffrey Judd

Unless Jesus comes

12:28 PM

Exhibit 70

Me

Your new buddies

3:07 PM

Jeffrey Judd

Sounds good. Let me know.

4:02 PM

Me

And greg lol, he said its party time

3:10 PM

Jeffrey Judd

Does he know it's me

3:09 PM

Me

FYI im only giving him \$12k on his 100k only because he's a pain in my ass and I really shouldn't have let him him. If he wants to put a half mill in then I would give him the \$15k

3:09 PM

Jeffrey Judd

Nah.

3:07 PM

Jeffrey Judd

The Mareks are moving down the street from me

3:06 PM

Me

I feel you man I feel the same way

4:00 PM

Sunday, April 21, 2019

Me

You bet bro happy Easter

12:48 PM

Jeffrey Judd

Im not getting home from Denver in time or I would have taken them. Thanks for thinking of me. Happy Easter.

12:48 PM

Me

I assume you already have tickets My buddy has two tickets center ice both for \$600 face value if you want them at bud light lounge

12:29 PM

Tuesday, April 16, 2019

Jeffrey Judd

Are you still staying down here

11:26 PM

Me

10:59 PM

Exhibit 71

Jeffrey Judd

Sorry. I didn't want to change you to an 80. Knowing I will have more 100s this week.

10:08 AM

Me

Call good brother man

10:08 AM

Thursday, October 18, 2018

Jeffrey Judd

Shoot. I wish I would have known that. We kept him at 16k. We will still pay you 3k on each if that is ok. I can't change it now.

3:50 PM

Me

Ok let me know! Give me a few days notice. Thx bro

3:37 PM

Me

Also i have \$30k deposit pending. Is some of that for Greg or Roy?

3:38 PM

Jeffrey Judd

Roy

3:45 PM

Jeffrey Judd

are you going to call me about your New deal.

4:03 PM

Me

Lol, ok!!
FYI i had lunch with him yesterday and I told him that you told me Wednesday that deals we're going to start dropping by \$1000 in November. And he said so now my hundreds are only going to pay 15 K and I said Yep at least for me they are. I said I'm not sure when Jeff was gonna let others know but he told me that. Just so I can still keep making mine off him too

3:48 PM

Jeffrey Judd

I should. If not for sure in the next 2 weeks.

3:37 PM

Me

Yes i will later

4:04 PM

Me

Yea i know that's why i said November

3:50 PM

Jeffrey Judd

You got it.

3:38 PM

Exhibit 72

Me

Not sure if my text went through but thank you, did you guys make it home OK

7:18 PM

Jeffrey Judd

We just got home. All good. Crazy day

7:39 PM

Jeffrey Judd

Got you 300k too

3:16 PM

Thursday, May 13, 2021

Jeffrey Judd

I did speak to him and he wants to keep it like it is. He says that he has 6 million dollars underneath you and won't remove it from you. I will get you the 3 new deals. Of course he wants to go with me and make 16k instead of 12.5. I did mention the 15k. I can cut him off and not give him anymore if you want. He's your brother not mine. Lol. If you want to talk to him you can. I don't need his money but I think I'm his only income source.

11:30 AM

Me

I will let you know I'm going to have a chat with him

11:42 AM

Jeffrey Judd

Ok. Let me know what you want me to do. I don't blame you.

11:41 AM

Me

Hey good morning bro just checking in with you to see if you ever talked to Rocco and how that conversation went. Also I would take three \$100 deals next week if you can.

8:49 AM

Me

Yes you are his only source right now it just pisses me off that he went behind me so I guess I need to have that talk with him and he has a little less than 5 million with me

11:41 AM

Monday, May 10, 2021

Jeffrey Judd



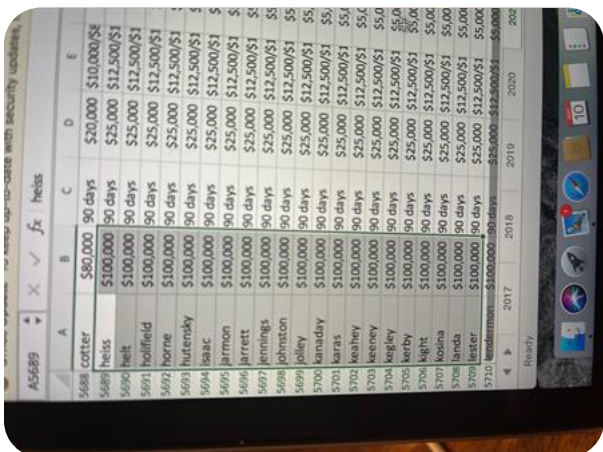
9:56 PM

Jeffrey Judd

23 100s. Not 27

9:55 PM

Jeffrey Judd



9:56 PM

Me

Nice bro

10:08 PM

Sunday, May 9, 2021

Jeffrey Judd

Wow. What street.

4:18 PM

Me

I'm not sure where it's at but call my friends I was with yesterday he's best friends with Mike Austin and he said the deal is closed he purchased it about a week ago

4:19 PM

Me

Hey bro did you hear that Gene Simmons from kiss just bought Mike Austin's house up there in your neighborhood 8.5 mill

4:15 PM

Saturday, May 8, 2021

Me

I know you didn't, I just know how he's working. I wouldn't care if he wasn't trying to take the clients he had originally brought through me and asking them to cash out. I love the dude I want him to make money but it's just going about it the wrong way. I'll just tell him I'll give him 15 K on all the deals and I'll tell him it's easier for you to just keep running every Thing through me and your few other investors. Anyways let's just talk next week before you say anything. But seriously I'd love to go check out a game give me some dates and let me know. I'm not sure what areas they're letting fans come watch

12:24 PM

Jeffrey Judd

I didn't give him any this week. I think I want to tell him to Just go under you. I never recruited him to raise money for me. I like him. I don't know him that well. What if we do this. Put him under you and you give him 14 or 15k per deal. I don't care which one you do. Or you don't have to. Up to you. I've been in and out of town watching preston so I have not had time to meet up. Let me know what you want to do. If you give him 15k you still make 4k or 14k you make 5k.

12:20 PM

Me



Right on bro thank you thank you

11:53 AM

Me

Call by the way when you get a chance let's talk about what to do with Rocco. Walking on eggshells just because I don't wanna have an issue with family but I just sent another one of his clients back 80 K yesterday because he said they wanted their money back for their kids and I already know what he's doing is reinvesting it with you. So think about how we could work this without it becoming an issue thanks brotha.

12:15 PM

By the way Preston is killing it I like to go check out a game with you

Jeffrey Judd

These closed. Got you 500k. Plus 2 80s. For 660k in new money

11:21 AM

Jeffrey Judd

	A	B	C	D	E
5667	5/1	100,000	90 days	\$100,000	\$100,000
5668	5/1	100,000	90 days	\$100,000	\$100,000
5669	5/1	100,000	90 days	\$100,000	\$100,000
5670	5/1	100,000	90 days	\$100,000	\$100,000
5671	5/1	100,000	90 days	\$100,000	\$100,000
5672	5/1	100,000	90 days	\$100,000	\$100,000
5673	5/1	100,000	90 days	\$100,000	\$100,000
5674	5/1	100,000	90 days	\$100,000	\$100,000
5675	5/1	100,000	90 days	\$100,000	\$100,000
5676	5/1	100,000	90 days	\$100,000	\$100,000
5677	5/1	100,000	90 days	\$100,000	\$100,000
5678	5/1	100,000	90 days	\$100,000	\$100,000
5679	5/1	100,000	90 days	\$100,000	\$100,000
5680	5/1	100,000	90 days	\$100,000	\$100,000
5681	5/1	100,000	90 days	\$100,000	\$100,000
5682	5/1	100,000	90 days	\$100,000	\$100,000
5683	5/1	100,000	90 days	\$100,000	\$100,000
5684	5/1	100,000	90 days	\$100,000	\$100,000
5685	5/1	100,000	90 days	\$100,000	\$100,000
5686	5/1	100,000	90 days	\$100,000	\$100,000
5687	5/1	100,000	90 days	\$100,000	\$100,000
5688	5/1	100,000	90 days	\$100,000	\$100,000
5689	5/1	100,000	90 days	\$100,000	\$100,000
5690	5/1	100,000	90 days	\$100,000	\$100,000
5691	5/1	100,000	90 days	\$100,000	\$100,000
5692	5/1	100,000	90 days	\$100,000	\$100,000
5693	5/1	100,000	90 days	\$100,000	\$100,000
5694	5/1	100,000	90 days	\$100,000	\$100,000
5695	5/1	100,000	90 days	\$100,000	\$100,000
5696	5/1	100,000	90 days	\$100,000	\$100,000
5697	5/1	100,000	90 days	\$100,000	\$100,000
5698	5/1	100,000	90 days	\$100,000	\$100,000
5699	5/1	100,000	90 days	\$100,000	\$100,000
5700	5/1	100,000	90 days	\$100,000	\$100,000

11:21 AM

Thursday, May 6, 2021

Me

If you end up with a few extras I would take them.

5:52 PM

Jeffrey Judd

Ok. I will let you know

5:55 PM

Me

Thx bro

5:56 PM

Jeffrey Judd

Yes

1:32 PM

Me

My dude 🖐️🖐️

1:32 PM

Me

What up bud you still got me down for five new deals next week?
Make shane wait

1:32 PM

Tuesday, May 4, 2021

Me

LOL

12:33 PM

Jeffrey Judd

Look at the list

12:32 PM

Jeffrey Judd

Sent all. Should have 19

12:31 PM

Me

The five just came through right now

12:33 PM

Jeffrey Judd

100s

12:31 PM

Jeffrey Judd

They were stuck again.

12:33 PM

Me

Hey bro, will you be sending over the 5 new contracts also?

12:31 PM

Monday, May 3, 2021

Me

I know it's not my style but it is kind of cool I love the Porsche

10:16 PM

Jeffrey Judd

Not your style

10:12 PM

Me

Nice Jeff thx bro

10:04 PM

Jeffrey Judd

I could see you in a Porsche. You are a good looking dude. That would be your Bougee side.

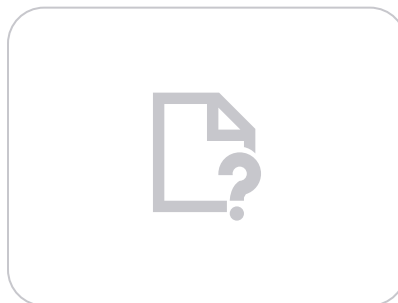
10:17 PM

Jeffrey Judd

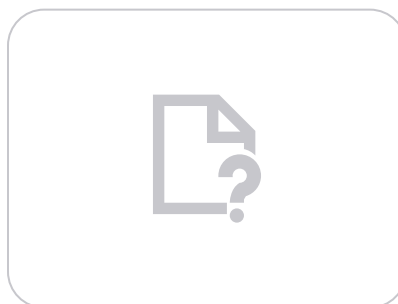
Ha

10:12 PM

Me



10:11 PM



10:11 PM

Jeffrey Judd

	A	B	C	D	E
5458	hellman	\$100,000	90 days	\$25,000	\$12,500/\$1
5459	couture	\$80,000	90 days	\$20,000	\$10,000/\$4
5460	daivis	\$80,000	90 days	\$20,000	\$10,000/\$4
5461	henry	\$100,000	90 days	\$25,000	\$12,500/\$1
5462	lighttower	\$100,000	90 days	\$25,000	\$12,500/\$1
5463	holder	\$100,000	90 days	\$25,000	\$12,500/\$1
5464	hollinworth	\$100,000	90 days	\$25,000	\$12,500/\$1
5465	horson	\$100,000	90 days	\$25,000	\$12,500/\$1
5466	hudson	\$100,000	90 days	\$25,000	\$12,500/\$1
5467	hulsey	\$100,000	90 days	\$25,000	\$12,500/\$1
5468	hurd	\$100,000	90 days	\$25,000	\$12,500/\$1
5469	karr	\$100,000	90 days	\$25,000	\$12,500/\$1
5470	keene	\$100,000	90 days	\$25,000	\$12,500/\$1
5471	kenzle	\$100,000	90 days	\$25,000	\$12,500/\$1
5472	kimble	\$100,000	90 days	\$25,000	\$12,500/\$1
5473	larchez	\$100,000	90 days	\$25,000	\$12,500/\$1
5474	lauber	\$100,000	90 days	\$25,000	\$12,500/\$1
5475	lawler	\$100,000	90 days	\$25,000	\$12,500/\$1
5476	leach	\$100,000	90 days	\$25,000	\$12,500/\$1
5477	leford	\$100,000	90 days	\$25,000	\$12,500/\$1
5478	liles	\$100,000	90 days	\$25,000	\$12,500/\$1
5479	longston	\$100,000	90 days	\$25,000	\$12,500/\$1
5480	louis	\$100,000	90 days	\$25,000	\$12,500/\$1

9:59 PM

Me

Ha ha yeah I've only owned one how was the four-door Panamera

10:17 PM

Jeffrey Judd

Badass. Those aren't yours though. Lol. I like the Porsche but I would get the convertible one.

10:11 PM

Jeffrey Judd

All your contract. I didn't number all of them. 19 100s too many and I couldn't remember the sequence because I kept getting 80s that would pop up.

10:00 PM

Saturday, May 1, 2021

Jeffrey Judd

Got you 500k too

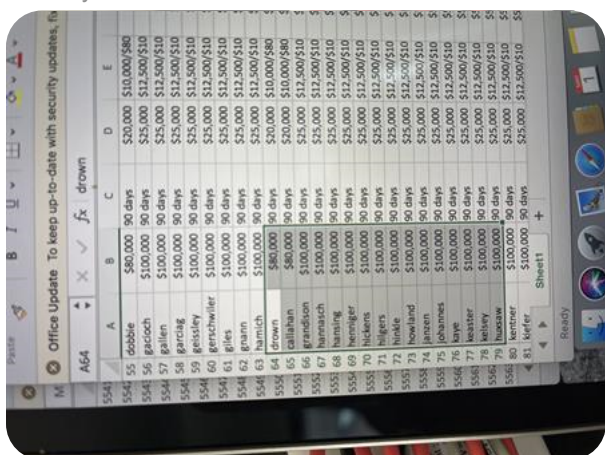
12:16 PM

Me

Nice bro thank you

12:31 PM

Jeffrey Judd



12:16 PM

Friday, April 30, 2021

Me

It's crazy how it gets in your blood bro and then it doesn't stop but you know what it's just money parked that you get to enjoy

9:27 AM

Jeffrey Judd

Double wide or your RV on the property. Lol

8:53 AM

Jeffrey Judd

Sounds good. Where are you living?

8:49 AM

Jeffrey Judd

Those cars hold their value and make money. Haggerty appraised it at 375k.

9:23 AM

Me

Call bro you did it right cause. People never realize how much money it really takes to build a classic. If I told them how much I'm in some of my cars they would shit but that's why people know I have the best of the best. That's how it's going to be for you hands-down anyone that sees it that really knows Will understand what it took to get to that

9:22 AM

Jeffrey Judd

It's going to all the C10 shows this year and CIMA

9:21 AM

Jeffrey Judd

You got it

12:12 PM

Jeffrey Judd

Sold your house

8:33 AM

Jeffrey Judd

Then we take him back to you. I'm good with that.

10:19 AM

Me

So when you get a chance tomorrow just let me know how many deals you can get me for next week and the following week thanks bro enjoy your weekend

12:04 PM

Jeffrey Judd

Ha

8:59 AM

Jeffrey Judd

Ok

11:38 AM

Me

Bro, that's one bad ass truck

9:20 AM

Jeffrey Judd



MOV_4281.mov

9:19 AM

Me

Let's do lunch later next week bro

11:10 AM

Me

Yea bro now time to pay for the new build 🙌 i will take 5 deals next week then for sure

8:35 AM

Me

Good morning bro, let me know how many deals you have available for next week. I'd like to put 1 million with you of my personal money

8:33 AM

Jeffrey Judd

I know. No one else does that but him. I need to keep him at 16 because that's how I pay the big attorneys extra. The ones that get us more. You Shane Humphries all get 19k. I may have to cut him off or just have him deal through you.

9:55 AM

Me

LOL no I'm going to park at a RV spot

8:57 AM

Jeffrey Judd

That Porsche I'm going to build now is sick. I have the illness.

9:26 AM

Jeffrey Judd

That's crazy.

8:54 AM

Me

Hell yeah I want to see it. Yeah bro I know you will never sell it but that is the kind of vehicle that brings that kind of money especially running through Barrett

9:24 AM

Me

We don't have any place yet we cannot find a rental anywhere if you hear of anything let me know I'm going to stay in the motorhome for the next month until I can find some thing

8:50 AM

Jeffrey Judd

Let's meet up next week. I will show you it.

9:24 AM

Jeffrey Judd

It's loud like me. Ha

9:20 AM

Me



12:12 PM

Jeffrey Judd

Ok. I can probably do 500k for 2 weeks.

8:33 AM

Me

Yeah originally when I started talking to him about him leaving gray the deal was for him to go through me but he kind of went around me because he knew he would make more money. It's typical but kind of sucks because it's family

10:18 AM

Me

Yeah I told him not to raise it like a fund it makes me nervous also and between you and I he does think I only get paid 16 K and I was going to talk to you about that but I'm not sure if you were going to do anything with me but my biggest concern is he's put some clients in with me that I deal with but he said some of them want to get paid off and I have a feeling it's because he wants to roll them directly. I pay Rocco 12,500 on his deals and he only pays his clients like 9K per deal. Just so you know every deal I have only one investor owns that contract I do not raise any money and share any contracts with multiple people. Anyways at some point I would like to sit down and have some lunch just to discuss and stay on the same page with you bro let me know how next week looks

9:52 AM

Jeffrey Judd

Exactly. God has blessed us. We need to meet up with your brother. I don't like how he raises his money so I need to see him and clarify some things. His account helps me because I don't pay him as much so I have extra to pay the attorneys that bring us a lot of business so I don't not want to help him. Just need to stay on same page. Don't mention anything. I will take care of it. It would be good for you to come though.

9:31 AM

Exhibit 73

Jeffrey Judd



4:06 PM

Jeffrey Judd

Closed deals

4:06 PM

Wednesday, November 10, 2021

Me

Hey what's going on Jeff, I was just checking in with you to see where you are at with getting all the contracts so we can get all of the investors to sign? Let me know man

11:03 AM

Jeffrey Judd

Ok. Most likely just the Tuesday one. Khloe has her musical Thursday to Sunday until the 2nd week of December.

8:36 PM

Me

OK well just let me know bro not sure if you wanna offer a game to let Dustin take his family

8:37 PM

Me

Ok cool OK just let me know this week what you want

8:35 PM

Jeffrey Judd

I'm good with that



8:40 PM

Jeffrey Judd

Sure.

8:34 PM

Jeffrey Judd

Ok let me look at it

8:33 PM

Me

OK bro just let me know, My brother asked if I would let him take Saturday's games so he can take his son and his friends for ryders birthday

8:34 PM

Exhibit 74

Me

I will text you on my way thx I was headed to dmv on Friday in AZ

8:51 PM

Jeffrey Judd

Ok. I'm leaving town tomorrow morning will be back Thursday night. Do you want to get in Friday from me

8:40 PM

Me

Jeff quick question moving forward in January will all the new deals that I purchase will the funds go through my account and then directly to you or directly to Matt Beasley from my account or directly from the client to Matt Beasley how are we doing that

2:15 PM

Me

Ok I'm going to think about that one

9:01 PM

Me

Ok, so no more between me at all....So will I just be requesting new deals as needed and then confirming Matt received the funds

2:35 PM

Jeffrey Judd

Because we don't do business in Nevada since they implemented the dumb loan rule in 2019. Which still wouldn't apply to us but was easier to just not do business here. It was Florida or Texas. I chose Florida because I would rather have a place there than Texas if needed.

8:59 PM

Jeffrey Judd

I'm leaving at 8 to go to airport but I will let her know.

8:51 PM

Jeffrey Judd

You are getting your guys to sign paperwork. So direct to Matt from them

2:17 PM

Me

I can Or if you can stash it at your house I can drive through and grab it in the morning

8:44 PM

Jeffrey Judd



8:26 PM

Monday, December 13, 2021

Me

Thanks man I also have a meeting with my DocuSign rep today at 2 PM I'll let you know what they figure out

10:42 AM

Jeffrey Judd

OK got it

10:25 AM

Me

Jeff,

I'm good with my investors because i already had almost everyone at 50% except for a few close friends.

ROCCO...this is what I'm putting him on just so you know.

\$100k = \$15k

\$80k = \$12k

I'm telling a Rocco this is what your giving me just a FYI

100k = 17k

80k = 13k

I just wanted to make sure if he reached out to you you would keep the numbers the same

10:21 AM

Jeffrey Judd

Ok. If it does we will try.

11:08 AM

Me

They're telling me that it will work so she's putting together a little tutorial to show me I will let you know

10:43 AM

Me



10:22 AM

Just sending you a screenshot so it's always available. I'm going to meet with him today

10:22 AM

Jeffrey Judd

I don't think that you sign will work because of it's mostly for signatures

10:42 AM

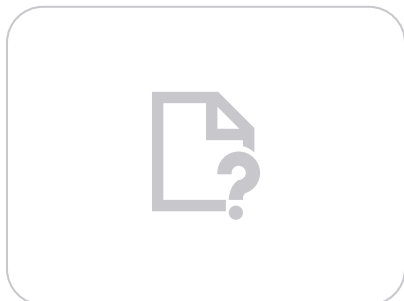
Saturday, December 11, 2021

Me

Thx bro

3:57 PM

Jeffrey Judd



3:57 PM

Jeffrey Judd

Closed deals

3:57 PM

Tuesday, December 7, 2021

Jeffrey Judd

I will take this Sunday and Tampa bay if that's ok

6:34 PM

Exhibit 75

Jeffrey Judd



2:07 PM

Friday, January 28, 2022

Jeffrey Judd

Ok. Thanks

2:32 PM

Me



10:11 PM

Jeffrey Judd

I see they did

2:36 PM

Jeffrey Judd

Did your numbers match

2:32 PM

Me

Yes we good

2:39 PM

Me

Sorry \$600k

2:28 PM

Me

Hey buddy I will take 500 K next week. I also sent you the spreadsheet

2:28 PM

Thursday, January 27, 2022

Jeffrey Judd

Gotcha.

8:06 PM

Jeffrey Judd

Contracts missing?

8:02 PM

Jeffrey Judd

It's fine

8:01 PM

Jeffrey Judd

I know it's you because if the 19. Lol

8:01 PM

Me

Done	Total Deals.xlsx
	600,000
	50,000
	200,000
	100,000
	100,000
	300,000
	300,000
	100,000
	300,000
	100,000
	300,000
	200,000
	80,000
	500,000
	200,000
	200,000
	150,000
	100,000
	15,500,000
	\$32,019,000

8:00 PM

Me

You're pretty damn close buddy

7:59 PM

Me

Thx Jeff

8:12 PM

Me

If you get a chance send me yours and I'll just double check everything and i went through this week

8:08 PM

Me

DocuSign

8:03 PM

Me

Lol we're off somewhere but we'll get it figured out

8:01 PM

Me
I have it pretty dang accurate I'm just trying to clean up the names so they make sense to the contracts I will have it to you tomorrow I promise 8:01 PM

Jeffrey Judd
Do you need a spreadsheet 8:00 PM

Jeffrey Judd
You better get close because that's the number. Lol 8:00 PM

Me
Thx 8:19 PM

Jeffrey Judd
Sent 8:14 PM

Jeffrey Judd
Doing it now 8:08 PM

Me
Everything I have is pretty dang clean I have a spreadsheet for each investor I just wanted to look right when I sent it to you so you can compare it to your contracts. Plus I'm trying to let you know which contracts I'm still missing 8:02 PM

Jeffrey Judd
Thank you 8:01 PM

Jeffrey Judd
I don't work in these numbers 8:01 PM

Jeffrey Judd
That's for all of it with Rocco 8:00 PM

Jeffrey Judd
\$31,840,000 is the total I have for you. That's what you need to account for. I just did them 7:59 PM

Wednesday, January 26, 2022

Jeffrey Judd
Ok 7:26 PM

Me
Hey what's up buddy I think I need 300 or 400 K next week 6:50 PM

Exhibit 76

Jeffrey Judd

Do you like Metallica. Do you want to go tonight with me Humphries and parker. We are guests of the band. Turns out their psychologist has money with us. Hump hooked it up

10:28 AM

Me

Sent buddy

9:50 AM

Me

I'm not sure but if not they're yours

9:45 AM

Jeffrey Judd

Can I get the tix for March 1st Knights game?

9:43 AM

Me

Yeah bro you're busy man. go enjoy it

9:52 AM

Jeffrey Judd

Thanks bud. I'm out of town the 6th to 11th. Going to St. Barts with Jen for my bday. Had to reschedule from beginning of February. Too much going on

9:51 AM

Me

All good bro then that's yours I'll send them to you right now let me know if I can do anything for you guys when they're here. It is going to be a big day

9:50 AM

Jeffrey Judd

Ok. Thanks. I have lots of family here next week. Kennedy's big day is next Friday

9:46 AM

Jeffrey Judd

Are you going to bruins game on Thursday. If not I will take those too. If you are keep them

9:45 AM

Me

Sent

9:44 AM

Wednesday, February 23, 2022

Me

Yes I'm working on getting them all amended a lot of this is all new money

5:26 PM

Me

Tell Brock I don't have in-laws with money everything I have is from my hard work and a little credit to the Judd family 🙌

5:26 PM

Jeffrey Judd

Please

5:25 PM

Me

Hey bro I need 10 deals next week if you can do it let me know

5:16 PM

Jeffrey Judd

Oh geez I for sure need that paperwork signed. I'm not supposed to take the money without having the documents signed. Please get them out.

5:27 PM

Jeffrey Judd

Lol

5:26 PM

Jeffrey Judd

Weekly is easier then they don't accumulate.

5:25 PM

Jeffrey Judd

I should be able do that. Make sure you update your spreadsheet for the new deals. I have not seen an update from you

5:23 PM

Me

100% I'm on it

5:28 PM

Jeffrey Judd

Or I will have to fire you lol

5:26 PM

Jeffrey Judd

You need to make sure you get the addendums signed too

5:25 PM

Jeffrey Judd

Brock says you never even built anything. It's just a shell company.

5:24 PM

Me

I already plan to have it to you I figured every month because weekly is too hard for me to stay on top of each transaction When I have a full-time job lol

5:24 PM

Tuesday, February 22, 2022

Jeffrey Judd

They don't want to give it to us because they have someone else they want to give it to. The raiders. That is

10:53 AM

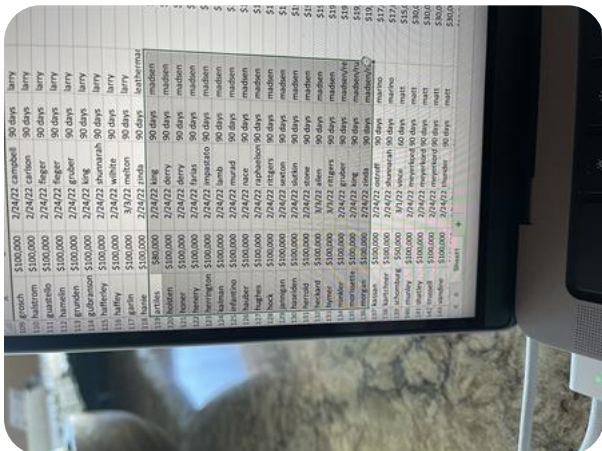
Me

That could be the case but i hope these guys are working it for us

10:54 AM

Saturday, February 19, 2022

Jeffrey Judd



2:55 PM

Me

Thx Jeff

3:41 PM

Jeffrey Judd

Closed deals got you 300k

2:55 PM

Friday, February 18, 2022

Jeffrey Judd

I can just buy them lol

4:31 PM

Jeffrey Judd

I wanted to go to Metallica next Friday. Lol. I gave up my 2 seats with Greg

4:01 PM

Jeffrey Judd

Still nothing about suite

3:01 PM

Me

Do you want me to text the group chat and ask if you could get us tickets or get us a suite?

4:28 PM

Me

Nothing

3:50 PM

Jeffrey Judd

I have plenty

2:11 PM

Me

Ok cool

2:12 PM

Exhibit 77

Chat with Rocco & Jeffrey Judd

2/24/2022 6:09:23 PM - 4/1/2021 4:12:17 PM

Export Details:

Device Name Madsen's iPhone
Device ID 00008110-001931A02193801E
Backup Date Wednesday, May 11, 2022 3:30 PM
Backup Directory C:\Users\tp\Apple\MobileSync\Backup\00008110-001931A02193801E
iOS 15.4.1
Current Time Zone (UTC-07:00) Mountain Time (US & Canada)
Created with iExplorer v4.5.0.0

Participants:



+1 7 [REDACTED], Rocco Madsen #2580

+1 7 [REDACTED] Jeffrey Judd

Thursday, February 24, 2022

Me

Oh you're talking about just the bottom line

6:09 PM

Jeffrey Judd



5:58 PM

Jeffrey Judd

J

J

I set up DocuSign and I don't have this on mine. So you can remove it too. Please

5:58 PM

Me
OK no problem I'll get it done 6:09 PM

Me
Who is that 6:04 PM

Jeffrey Judd
I'm talking about in general. Remove that from making me sign it 6:04 PM

Saturday, February 12, 2022

Rocco Madsen #2580
Go out on the 95 heading to wards Searchlight and you can get some open rode out there Or turn off towards Nelsons Landing 8:41 AM

Rocco Madsen #2580
Shit I've been on my Harley over 150 8:39 AM

Jeffrey Judd
Nice. You are just a baby. Lol 8:37 AM

Rocco Madsen #2580
Looks bad ass 8:37 AM

Jeffrey Judd
You don't want none of that 812 superfast. Ha. It's a beast. 8:36 AM

Me
That's a bad boy superfast 8:35 AM

Jeffrey Judd
I will have to do that 8:41 AM

Rocco Madsen #2580
I took it on the 95 toward Searchlight yesterday got it up to 190 fairly quickly and had to back off because there was traffic up ahead 8:38 AM

Jeffrey Judd
Happy 50th bday to me 8:37 AM

Jeffrey Judd
The R8 looks nice 8:36 AM

Rocco Madsen #2580



It's been the car I've always wanted

8:35 AM

Jeffrey Judd



8:34 AM



Jeffrey Judd



8:34 AM



Jeffrey Judd



8:34 AM



Jeffrey Judd



8:34 AM

J

Jeffrey Judd

Come on with the R8. Get something with balls. Lol. Congrats.

8:34 AM

J

Rocco Madsen #2580

Just don't do it on the highway 11 the new one around Boulder City there's more cops on that one

8:42 AM



Jeffrey Judd

I have not opened the 812 up yet. Need to get it somewhere where no one else is

8:40 AM

J

Jeffrey Judd

That's scary.

8:39 AM

J

Jeffrey Judd

Tha taycan will get it it 30 yards but after that forget it.

8:38 AM

J

Rocco Madsen #2580

The R8 is super clean and definitely fast but not messing with that 😊 happy 42nd b day to me 😊

8:37 AM



Rocco Madsen #2580

Oh I bet

8:36 AM



Rocco Madsen #2580

U wanna race lol I wasn't in the market but my buddy give me a smoking deal

8:35 AM




Tuesday, January 25, 2022



Jeffrey Judd


Haven't heard anything from Raiders


5:18 PM


J

Rocco Madsen #2580
 Idk I need to look into it tomorrow morning 4:42 PM


Rocco Madsen #2580
  4:42 PM


Jeffrey Judd
 Rocco will get it done. Ha 4:41 PM


Rocco Madsen #2580
 That's weird I will have to look into see why but my assistant brought to my attention again today that there's a bunch waiting for your signature so I'll see what is going on 4:39 PM


Jeffrey Judd
 Not true 4:34 PM


Me
You're just now getting around to Brian? He submitted that a long time ago. Do you like his title investor 4:33 PM

Jeffrey Judd
 Can you manually send them 4:42 PM


Rocco Madsen #2580
 That's why I need to figure out why they have not been sent to you because it should automatically be sent to you once the client signed it and they're just sitting there so let me look into it tomorrow 4:41 PM


Jeffrey Judd
 Then send them to me. Also help Chris get the spreadsheet over to me that I have asked for for 2 weeks now. Lol 4:40 PM

Jeffrey Judd
 When they come to me I sign them. 4:39 PM

Rocco Madsen #2580
 Speaking on the Jeff we have a bunch sitting showing waiting on your signature is that because they do not come to you yet because we have a dozen or more saying awaiting your signature 4:36 PM

Jeffrey Judd
J What do you mean. I just got it. 4:33 PM

Rocco Madsen #2580
 4:32 PM

Jeffrey Judd
 4:30 PM

Me
Lol I should be good to get it to you I have another meeting with my accountant on Thursday to finalize all the 1099s 4:59 PM

Jeffrey Judd
J I need it by Friday. Whatever you got. Because parker is compiling a master one. Have your secretary Rocco help you. Ha 4:54 PM

Me
I'm trying to get it done and make it precise but you Gotta be patient because I'm reconciling all of the 1099 payments before I send out the spreadsheet 4:42 PM

Me
Stop 4:41 PM

Jeffrey Judd
J So apparently they have not come 4:39 PM

Me
Looks like I'll have to question him 4:35 PM

Me
That's weird he text me and told me he completed it like two weeks ago 4:34 PM

Rocco Madsen #2580



These fucking people kill me 😂😂

4:33 PM

Jeffrey Judd



4:32 PM



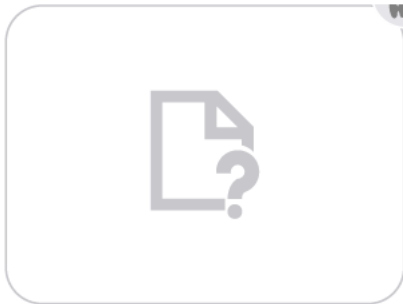
Me

I don't know how some of these guys make money as stupid as they are

4:31 PM

Monday, January 24, 2022

Jeffrey Judd



8:07 PM



Jeffrey Judd

If Rodney dangerfield put company he should list it here. Don't care that much. Just saying.

8:07 PM





12:30 PM

Jeffrey Judd

Come on with your people. Michael Santens

12:30 PM

Jeffrey Judd



12:23 PM

Jeffrey Judd

Another one. Mike worthington

12:23 PM

Rocco Madsen #2580

I swear no matter how much money people have they are still compete morons. I was on the phone telling him to only mark the one box that applies to him

12:31 PM

Rocco Madsen #2580



OK I just hung up with her she's an idiot as well she was supposed to mark the correct one

12:23 PM

Saturday, January 22, 2022

Jeffrey Judd



Lol. Have her fix it

11:37 PM

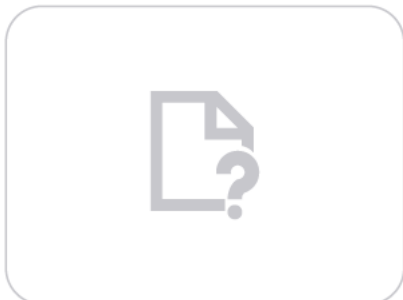
Rocco Madsen #2580



Will do bud

11:38 PM

Jeffrey Judd



11:34 PM

Jeffrey Judd



11:34 PM

Jeffrey Judd



If not accredited and you don't really know her cash her out. If she made a mistake have her fix it

11:34 PM

Rocco Madsen #2580



She's very accredited just not smart

11:37 PM

Sunday, January 16, 2022

Jeffrey Judd



Please do. Need to wrap this up

4:39 PM

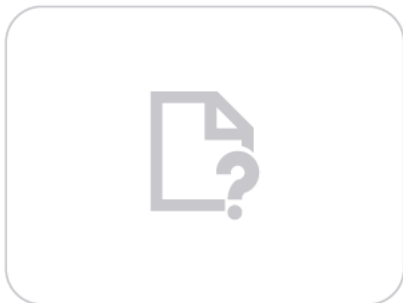
Me



We will get on it you'll see a bunch of them coming through

4:41 PM

Jeffrey Judd



4:08 PM

Jeffrey Judd

Not accredited? You want to keep him in. We are under our limit still. You will need to guarantee him if something goes wrong though

4:08 PM



Me

I will get him fixed he just doesn't understand it. Plus we are going to send out a whole bunch more this week to try to get everything cleaned up and closed out on the ones that have not completed

4:39 PM

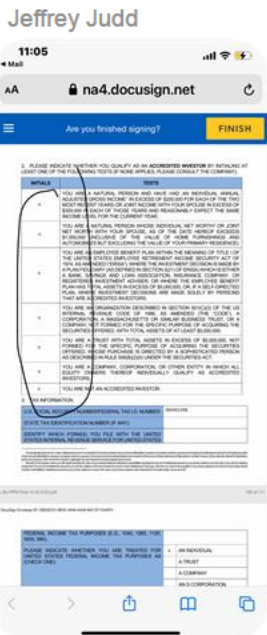
Sunday, January 2, 2022

Rocco Madsen #2580



Is that your guy Chris ?

9:06 PM



9:05 PM

Jeffrey Judd
Please have fix

9:05 PM

Me
Yeah I'll get it fixed

9:12 PM



9:06 PM

Wednesday, December 29, 2021

Rocco Madsen #2580
She is

9:53 AM

Jeffrey Judd
Then have her fix her document

9:54 AM

Rocco Madsen #2580



Ok

9:54 AM

Jeffrey Judd

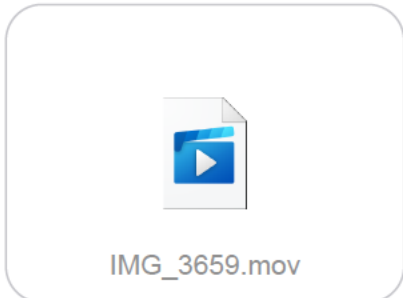


Sophia Filosa. Says not accredited. Buy her out if that's true.

9:50 AM

Sunday, December 26, 2021

Rocco Madsen #2580



9:16 AM

Me

Yeah we had that one on there only if the spouse signed

9:14 AM

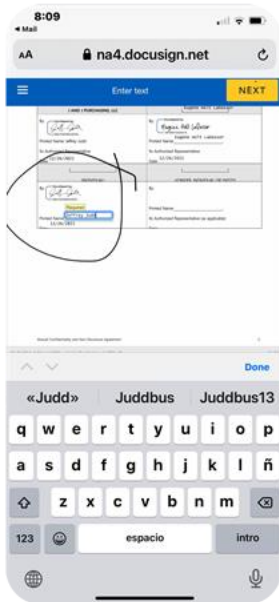
Jeffrey Judd



Eugene

9:12 AM

Jeffrey Judd



9:10 AM

Jeffrey Judd

Can you remove the signature off of that one. I don't need to sign it. Thanks. Hope you had a good Christmas.

9:10 AM

Rocco Madsen #2580



It's amazing

10:17 AM

Jeffrey Judd

J

Looks like fun.

9:20 AM

Jeffrey Judd

J

Wow. Hope you can get out. I think they are not seeing the not part on that phrase

9:14 AM

Rocco Madsen #2580



I'll get it fixed

9:13 AM

Jeffrey Judd



9:12 AM

J

Me

That looks miserable

9:21 AM

Jeffrey Judd

J

Ok just leave it then

9:14 AM

Rocco Madsen #2580



Dude is loaded and marked that spot 🤔

9:13 AM

Rocco Madsen #2580

That's funny he just sent me a text 2 min ago asking to confirm when I got his signed docs ... merry Christmas, I'm up here in a crazy snow storm just got 18in over night and still

9:12 AM

More coming



Thursday, December 23, 2021

Me

His funds are sourced from Horizon

6:39 PM



6:34 PM

Jeffrey Judd

That's the guy

6:34 PM

Rocco Madsen #2580

Ok phew he's a buddy of mine

6:44 PM

Rocco Madsen #2580

What about him? I've worked with him for years

6:36 PM

Rocco Madsen #2580

Are they not allowed to be ? I have moved my personal friends and investors to that company for the last 4.5 years

6:40 PM

Jeffrey Judd



6:31 PM

Jeffrey Judd

It's fine. Just making sure.

6:43 PM

Wednesday, December 22, 2021

Jeffrey Judd

He is doing the other ones. I'm doing the DocuSign's. It's easier. Ha

7:55 PM

Jeffrey Judd
J Make that kid earn all the money I'm paying him. He is a good kid. 7:58 PM

Jeffrey Judd
J Randy Cothran. 7:52 PM

Me
Yea he's doing good bud 8:14 PM

Jeffrey Judd
J Parker isn't looking at these yet. I am. I've sent you 4 that need to be revised. 7:54 PM

Rocco Madsen #2580
Some of these people are idiots . We explain in the email how to fill that form out. 7:52 PM

Me
Jeff I can move the numbers around but those are the accurate numbers. He is in with his partner who has the balance which is 1.7 aand change that equals up to even numbers but it's hard to get them to sign a contract if it's any less than what they really have 7:25 PM

Me
Sounds good man I'll get it taken care of 7:54 PM

Me
OK I'll reach out to Randy and have him redo it I would figure it's probably easier Parker just gives me a list of the few that are off by Monday and I'll get them all resent out and get it taken care of 7:53 PM

Jeffrey Judd
J It's ok. Just try to pay them Out to a degree that we can keep there numbers even. Like one take 70k and the other take 30k. Stuff like that. Thanks chris. DocuSign was the way to go. Shane needs to switch to your guy. The other guy is a moron. 7:37 PM

Jeffrey Judd
J Lol. Ok. Let's try 7:30 PM

Jeffrey Judd

I understand. But it makes no sense to an auditor. So we need even numbers. Please pay them some money out to even it out.

7:26 PM

Me

Lol

7:57 PM

Jeffrey Judd



7:51 PM

Me

You know I am trying there's only a few of them like that but they have big money and they know the exact penny they have. So let me know if you'd like we can cash them out on one and I can just give them their money back to reduce the contract. Sorry man the rest of them should be pretty dang straightforward

7:31 PM

Rocco Madsen #2580

Make that doooh

7:59 PM

Rocco Madsen #2580

Once we get the list of any dummies I can help call And get it all fixed

7:53 PM

Jeffrey Judd

Needs to be fixed.

7:52 PM

Jeffrey Judd



7:09 PM

J

Jeffrey Judd

Guys I can't have amounts like this. Clean this up please. Needs to be in 40, 50 80 100. Someone would look at that and say what the hell?

7:09 PM

J

Jeffrey Judd



Lol. He is all of it. Ha

7:52 PM

J

Me

I can we would just have to pay them back on one contract that is \$100,000 split, Jon has \$33,333 Dan has \$66,667

7:29 PM

Tuesday, December 21, 2021

Jeffrey Judd

No you have to have an idea of who is qualified and who isn't. If you know they aren't dont send.

3:58 PM

J

Me

We can't see it once the client signs it automatically goes directly to you

3:56 PM

Jeffrey Judd

If you know that they aren't qualified. Do not send. We need to discuss those. I can't have that many

3:55 PM

J

Rocco Madsen #2580

I will get it fixed so much paperwork some of these people just rush through it I've had dozens of calls already with people trying to figure out what boxes things like that

3:50 PM



Jeffrey Judd



3:35 PM

Jeffrey Judd

You have had 4 of these do this. They can't be accredited and unaccredited

3:35 PM

Jeffrey Judd

Ok

3:58 PM

Jeffrey Judd

Also if someone is not qualified and they split with a brother or family member that is, have that family member take it on.

3:57 PM

Jeffrey Judd

Makalia Jessup?

3:56 PM

Me

Jeff once you get all of them done which ever names are not correct just let us know and we will call them individually and resend it all to them and void that particular DocuSign

3:54 PM

Me

Ok we Will reach out

3:36 PM

Rocco Madsen #2580

Yes

3:58 PM

Rocco Madsen #2580

That's exactly what we did with one client most of my people are accredited

3:57 PM

Rocco Madsen #2580
What telling them upfront if they're not accredited to not sign 3:56 PM

Jeffrey Judd
I have sent you 4 back. 3:55 PM

Wednesday, October 27, 2021

Me
Ok that works 10:57 AM

Rocco Madsen #2580
Ok no problem 10:48 AM

Jeffrey Judd
Please send all money to Chris first so Chris can send it to Beasley from now on. A precaution we need to take. Thanks 10:42 AM

Thursday, October 7, 2021

Jeffrey Judd
Yeh let's just funnel the money through Chris 12:59 PM

Rocco Madsen #2580
Yea he sent it to Mojave also . 12:57 PM

Rocco Madsen #2580
Ok 12:59 PM

Rocco Madsen #2580
I didn't even send you Capsource money directly just FYI . Most of my Cs clients went through my brother 12:59 PM

Jeffrey Judd
We got a letter from Greg's attorney. All of roccos money needs to go directly to you first. Please. 12:56 PM

Me
I will handle the payouts for here... 1:48 PM

Jeffrey Judd
What's that for? 8:31 AM

Me
That was One of the two deals you sent me 8:32 AM

Me
Plus i sent \$100 8:32 AM

Jeffrey Judd
From Matt.
I got 100 from ruger. He wasn't on your list. Is that for next week? 8:31 AM

J


Rocco Madsen #2580
I needed a new deal for this week 8:32 AM

Jeffrey Judd
Ok 8:32 AM

J

Thursday, April 1, 2021

Rocco Madsen #2580
Damn 🙄🙄🙄🙄🙄 4:09 PM

Jeffrey Judd

IMG_3336.mov 4:07 PM

J

Me
Bad ass bro 4:12 PM

Exhibit 78

Chat with Matt Beasley

3/4/2022 7:40:47 PM - 2/27/2019 7:14:08 PM

Export Details:

Device Name Madsen's iPhone
Device ID 00008110-001931A02193801E
Backup Date Wednesday, May 11, 2022 3:30 PM
Backup Directory C:\Users\tp\Apple\MobileSync\Backup\00008110-001931A02193801E
iOS 15.4.1
Current Time Zone (UTC-07:00) Mountain Time (US & Canada)
Created with iExplorer v4.5.0.0

Participants:

+1 [REDACTED] Matt Beasley

Friday, March 4, 2022

Me 7:40 PM

Is this for real Matt?

Me 7:40 PM

<https://www.fbi.gov/resources/victim-services/seeking-victim-information/seeking-victim-information-in-slip-and-fall-lawsuit-ponzi-scheme-investigation>

Thursday, March 3, 2022

Matt Beasley 12:10 PM
Oh wow. I tried to call him for jeff and it went to voicemail.

Me 12:10 PM

I'm surprised they haven't reached out to you yet. I heard Humphries is getting searched also

Matt Beasley 12:10 PM
Really surprised they have come to me.

Me 12:07 PM

Nice, the sad thing is he has all of his family in town for that big wedding

Matt Beasley 12:07 PM
I know. It sucks.

Matt Beasley

Yeah. Just got off the phone with him. The lawyer says it could take all day. That lawyer he hired is coming in town to help deal with it.

12:06 PM

Me

They still there? Hopefully this only delays things for a short period so he can show them that everything is legit

12:05 PM

Wednesday, March 2, 2022

Me

Hey bro I think I owe you another hundred K

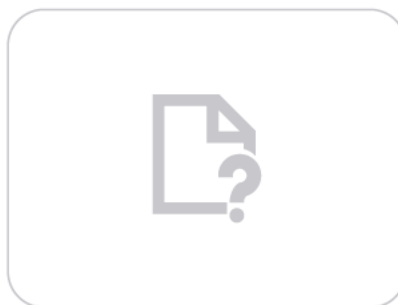
3:05 PM

Matt Beasley

I do have jh3

11:48 AM

Me



11:47 AM

Matt Beasley

No sir. Not yet.

11:46 AM

Matt Beasley

I have 60 from lozier
100 from toresdahl
300 jh3
300 Anthony Adams
50 from roping rodeo

11:54 AM

Me

OK perfect so now I need to see what you're missing for this week so I can get the wire out

11:48 AM

Me

This is our company

11:47 AM

Me

What about from JH3 consulting

11:46 AM

Exhibit 79

Jeffrey Judd

I agree.

3:04 PM

Me

I wish I could minus federal I need a presidential pardon

3:02 PM

Jeffrey Judd

You can vote now. The dems paid off a bunch of felons payments so they can vote.

3:02 PM

Me

Ha Yeah I would too bro you have a gold mind it will sell for big money if I were you I would wait for the five year mark before you advertise

2:59 PM

Jeffrey Judd

It would be that for sure

2:55 PM

Me

Lol It's a start bro

2:53 PM

Jeffrey Judd

I need to sell it for 150 million. Lol

2:48 PM

Jeffrey Judd

Probably. 150 million in deals. With this illegal business. Lmao

2:47 PM

Jeffrey Judd

Your closed deals and I got you 4 new 100s

2:43 PM

Jeffrey Judd

I have no idea who to sell it to. Plus too many people count on me. It's not hard to run it. It would be nice to get a big payout like that. I will call Trump for you.

3:03 PM

Jeffrey Judd

I read about it in Florida.

3:02 PM

Jeffrey Judd

I don't think it's sellable. No tangible asset. We will see. I'm going to vote early next week so I can keep more of my money. Lol

3:00 PM

Me

OK let's settle with 50 mill upfront the balance over five year payout

2:57 PM

Exhibit 80

Re: New Payouts

JASON JENNE [REDACTED] >

Thu 10/4/2018 7:06 PM

To: Jeffrey Judd [REDACTED] >

Cc: matthew@beasleylawgrouplv.com <matthew@beasleylawgrouplv.com>

Whatch u talk about Willis???

Sent from my iPhone

On Oct 4, 2018, at 7:03 PM, Jeffrey Judd [REDACTED] wrote:

Matt and I had discussions with the Attorneys that provide us the contracts. We have always followed the model of making sure that the investors made or make the majority of the money which will still hold true. We also need to make sure that the sources that provide us these tremendous investment opportunities are happy as well. That being said the following will be the new payouts:

100k = 19k every 90 days for a 76% annual payout (\$76,000)
80k = 15k every 90 days for a 75% annual payout (\$60,000)
50k = 7k every 60 days for an 82% annual payout (\$42,000)

These new rates will take effect with the new contracts that will be distributed next week. I know that no one likes to have payouts reduced, but its still an outstanding and very secure investment. I am grateful for the investment and I hope that you are too.

Sincerely,

Jeffrey Judd

Exhibit 81

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that prior to January 1, 2022, You learned that one or more of the attorneys or law offices identified as counsel for a personal injury plaintiff who purportedly entered one of the Purchase Agreements had no record of representing the purported personal injury plaintiff named in the Purchase Agreement.

I was contacted by a gentleman from Utah (who stated he was an accountant for an investor) in July 2021, who said he contracted associates of 3 law firms and the person who he talked to said they did not know who J&J Consulting was. I contacted Shane Jager and Jeff Judd and they were aware of this transaction from another investor, Jeff said that it wasn't true, they do have business dealings with those attorneys but that they are under an NDA and can't disclose the relationship with outside callers. Jeff contacted Matt Beasley who provided evidence that he did work with those law firms. Matt Beasley provided signed Purchase Agreements with the signatures of lawyers from those firms, and provided a redacted bank statement showing wire transfers back and forth between Matt Beasley's IOLTA account and the law firms.

REQUEST FOR ADMISSION NO. 2: Admit that prior to January 1, 2022, one or more investors in the Purchase Agreements told you that they had communicated with one or more of the attorneys or law offices identified as counsel for a personal injury plaintiff who purportedly entered one of the Purchase Agreements, and the investor(s) were told that the attorney or law office contacted by the investor(s) had no record of representing the purported personal injury plaintiff named in the Purchase Agreement.

No, that is not true. See response to Request for Admission No 1.

REQUEST FOR ADMISSION NO. 3: Admit that, at some point between January 1, 2017 and January 1, 2022, You became aware that the Purchase Agreements were fake.

No, that is not true. My knowledge of the potential falsehood of these documents occurred when I heard in the media of the Beasley incident with the F.B.I. in March 2022. It was only after that event I became aware of the falsehoods.

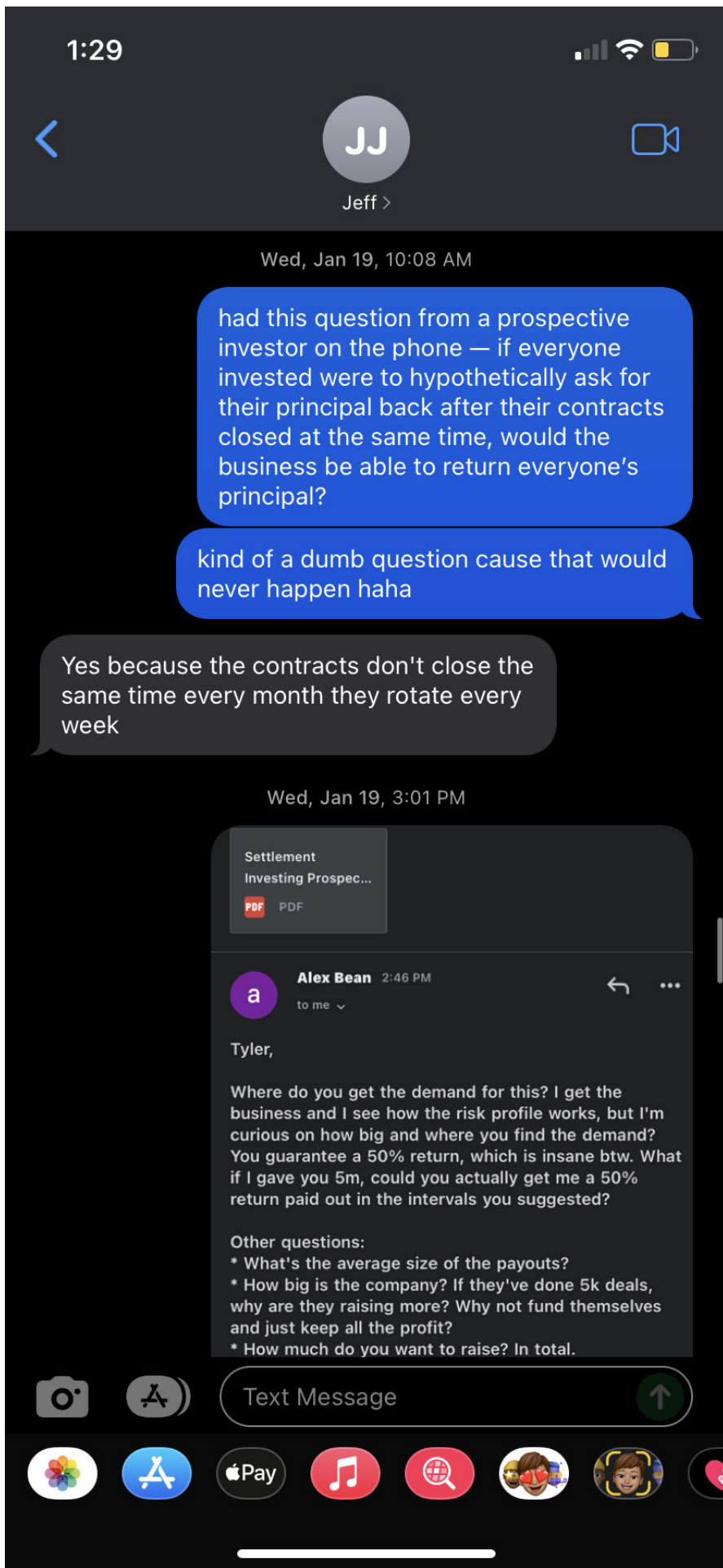
REQUEST FOR ADMISSION NO. 4: Admit that, at some point between January 1, 2017, and January 1, 2022, You became aware that investor money provided to buy interests in the Purchase Agreements was not used to fund personal injury settlements.

No, that is not true. My knowledge of the potential fraud occurred when I heard in the media of the Beasley incident with the F.B.I. in March 2022. It was only after that event I became aware of the nature of the fraud. I am still learning the extent of the fraud.

REQUEST FOR ADMISSION NO. 5: Admit that, at some point between January 1, 2017, and March 1, 2022, You, directly or indirectly, received payment(s) for soliciting actual or potential investors to buy interests in the Purchase Agreements.

Yes, I admit to that. I did not know these were considered securities, nor that it was a fraud nor any type of scam. As to the term soliciting, I object as I did not solicit but rather people came to me by word of mouth. I do agree that I shared with a few people that I had personally invested and some of those people later asked if they could invest. I did not make cold calls or seek out people to invest. I did make calls to a few friends and told them of the investment. A couple later invested. I also told my sons, two brothers and brother-in-law, about the investment, and they also invested.

Exhibit 82



1:29



Jeff >

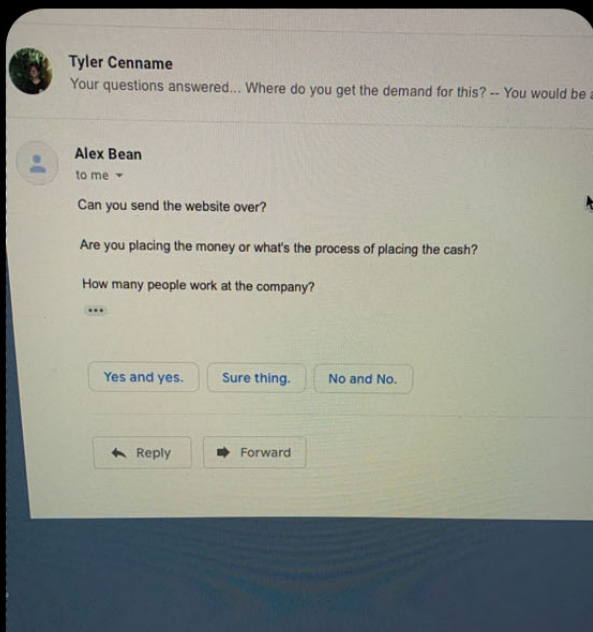


Alex Bean. He spoke to my entrepreneurship class at BYU yesterday. He just sold his software company "Divvy" for 2.5 billion. I sent him an email with the prospectus and it looks like he may want to put in 5 million. How do you want me to answer these questions? I want your help with this one cause this could be a gold mine for the 2 of us.

We have done over 15k deals. I don't have 400 million dollars. Lol

I probably need to speak to him.

you don't have 400 million as in you don't have 400 million in contract space? lol



Text Message



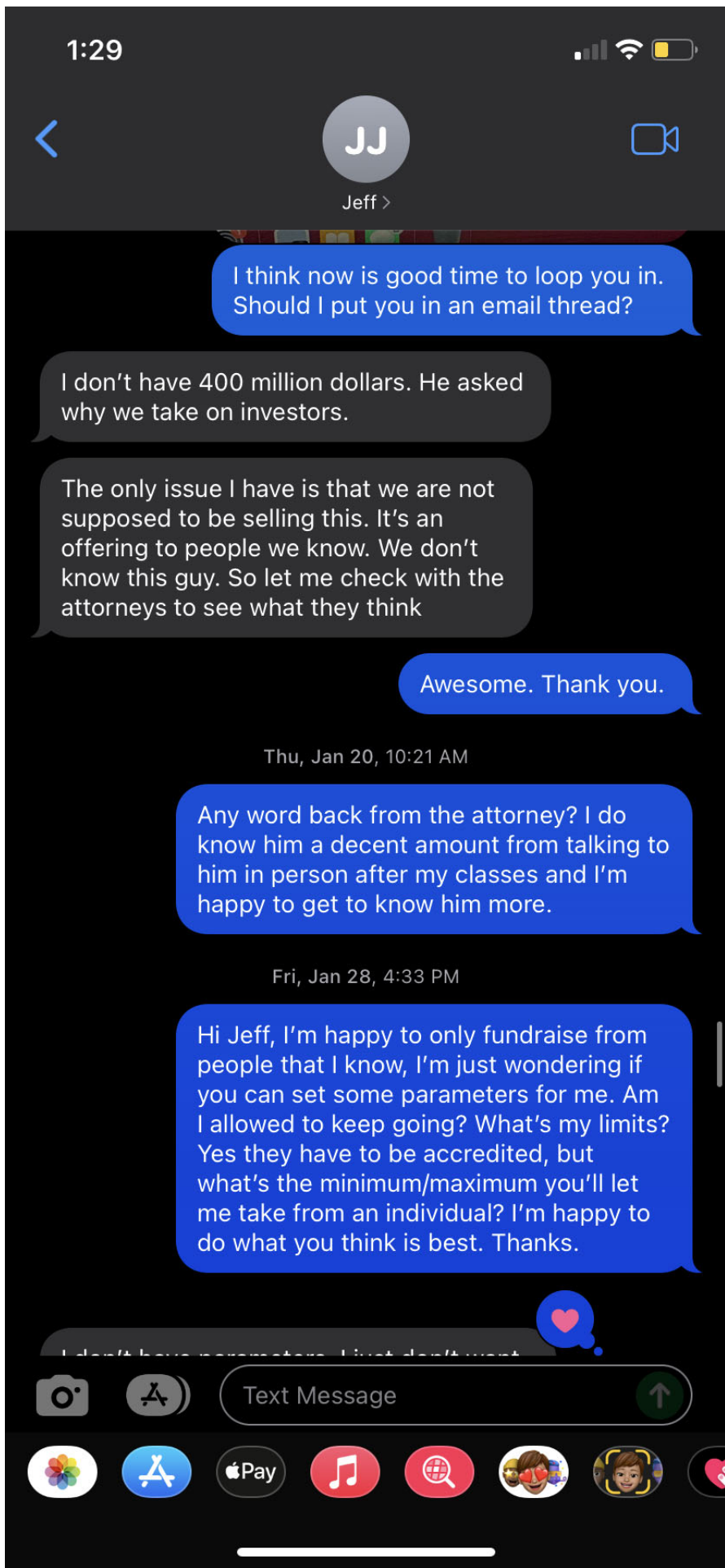


Exhibit 83

1 KEVIN N. ANDERSON, ESQ.
 Nevada State Bar No. 4512
 2 TREVOR R. WAITE, ESQ.
 Nevada State Bar No. 13779
 3 FabianVanCott
 411 E. Bonneville Ave., Suite 400
 4 Las Vegas, NV 89101
 Telephone: (702) 233-4444
 5 E-Mail: kanderson@fabianvancott.com
 twaite@fabianvancott.com
 6 *Attorneys for Jeffrey J. Judd*

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

9 SECURITIES AND EXCHANGE
 10 COMMISSION,

11 Plaintiff,

v.

12 MATTHEW WADE BEASLEY; BEASLEY
 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
 15 AND J PURCHASING LLC; SHANE M.
 JAGER; JASON M. JONGEWARD;
 16 DENNY SEYBERT; and ROLAND
 TANNER;

17 Defendants,

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

23 Relief Defendants.
 24

Case No. 2:22-cv-0612-JCM-EJY

**DEFENDANT JEFFREY L. JUDD'S
 OBJECTIONS TO PLAINTIFF
 SECURITIES AND EXCHANGE
 COMMISSION'S EXPEDITED
 DISCOVERY REQUESTS TO
 DEFENDANTS JEFFREY J. JUDD,
 CHRISTOPHER R. HUMPHRIES,
 SHANE M. JAGER, JASON M.
 JONGEWARD, DENNY SEYBERT, AND
 ROLAND TANNER PURSUANT TO
 APRIL 13, 2022 TEMPORARY
 RESTRAINING ORDER**

1 Pursuant to the Court’s April 13, 2022 Temporary Restraining Order granting Expedited
2 Discovery in addition to other relief, and pursuant to Federal Rules of Civil Procedure 33 and 36,
3 Defendant Jeffrey L. Judd (“Judd”) by and through counsel of record, submits the following
4 objections to Plaintiff’s Expedited Discovery Requests (the “Discovery Requests”) as follows:

5 **PRELIMINARY STATEMENT**

6 A. Judd continues to investigate the facts and allegations in the pleadings. Most if not
7 all of Judd’s documents are currently within the custody and control of third-parties and outside
8 Judd’s custody and control (including by the FBI) and Judd specifically reserves the right to
9 provide evidence from any source and testimony from any witness in any future proceedings in
10 this action. No objection made herein, or lack thereof, shall be deemed an admission by Judd as
11 to the existence or nonexistence of any requested information.

12 B. Judd responds to each request as he interprets and understands such request. Judd
13 reserves the right to supplement his objections and/or responses if Plaintiff subsequently asserts
14 to Judd an interpretation that differs from the understanding of Judd.

15 C. Judd make these responses and/or objections solely for the purpose of, and in
16 relation to, this action. Each response herein is made subject to all appropriate objections
17 (including, but not limited to, objections concerning privilege, competency, relevance,
18 materiality, proportionality, propriety, and admissibility) that would require the exclusion of any
19 information, document, or thing at the time of trial. All such objections, and the grounds for such
20 objections, are reserved and may be interposed at the time of trial or any other proceeding in this
21 consolidated action.

22 D. Except for the facts explicitly admitted herein (if any), no admission of any nature
23 whatsoever is to be implied or inferred from these responses. The fact that Judd responds to a
24 request should not be taken as an admission, or concession of the existence, of any fact set forth,
25

1 assumed or implied by such request, or that the request is relevant or otherwise constitutes
2 evidence of any fact thus set forth, assumed or implied.

3 E. All responses are given on the basis of present recollection.

4 F. Without assuming any obligation to do so, Judd expressly reserves the right to
5 revise, correct, add to, or clarify any of their responses herein or to supplement their document
6 production.

7 G. The term “objections,” as used in these responses to the Discovery Requests,
8 refers to and includes Judd’s preliminary statement and their specific objections to each
9 individual request.

10 **JUDD’S OBJECTIONS TO REQUEST FOR ANSWERS TO INTERROGATORIES**

11 **INTERROGATORY NO. 1:** List each and every account presently owned, directly or
12 indirectly, by or for the benefit of You or Your spouse held at any bank, credit union, credit
13 institution, savings association, trust company, brokerage, or any other financial institution.
14 Include in the list: (1) the financial institution at which the account is held; (2) the owners,
15 trustees, beneficiaries, and signatories on the account; and (3) the date on which the account was
16 opened.

17 **OBJECTION:** Judd objects to Interrogatory No. 1 on the basis that it is unduly
18 burdensome, overbroad, and seeks information regarding his non-party spouse who was not
19 encompassed within the Court’s April 13, 2022 order. Moreover, Judd objects to Interrogatory
20 No. 1 to the extent it seeks privileged attorney-client communications and/or work product. Judd
21 further objects to Interrogatory No. 1 on the basis that such information is irrelevant as the April
22 13, 2022 Order enjoins Judd from using any financial account he has. Additionally, Judd objects
23 to Request No. 1 on the basis that a responsive answer to the question calls for waiving his rights
24
25

1 protected by the Fifth Amendment to the United States Constitution, which he hereby evokes.¹
2 Judd further objects to Request No. 1 on the basis that an explanation of why it cannot be
3 answered might be used in a future criminal proceeding against him. “[T]he privilege [against
4 compelled self-incrimination] protects the right of a person to remain silent unless he chooses to
5 speak in the unfettered exercise of his own will, and that he is to suffer no penalty for his
6 silence.” *Campbell v. Gerrans*, 592 F.2d 1054, 1057 (9th Cir. 1979). Nor can the SEC draw an
7 adverse inference from Judd’s refusal to respond to Request No. 1 since the SEC cannot meet its
8 burden to establish the exception. “[N]o negative inference can be drawn against a civil litigant’s
9 assertion of his privilege against self-incrimination unless there is a substantial need for the
10 information and there is not another less burdensome way of obtaining that information.” *Doe ex*
11 *rel. Rudy-Glanzer v. Glanzer*, 232 F.3d 1258, 1265 (9th Cir. 2000). “Moreover, the inference
12 may be drawn only when there is independent evidence of the fact about which the party refuses
13 to testify.” *Id.* Based on the foregoing objections, **JUDD WILL NOT ANSWER INTERROGATORY**
14 **NO. 1.**

15 **INTERROGATORY NO. 2:** List each and every Asset owned, directly or indirectly, by or for
16 the benefit of You or Your spouse, with a present value of \$1000 or more. In the list, describe
17 each Asset, where it is held or located (if applicable), and its approximate fair market value.

18 **OBJECTION:** Judd objects to Interrogatory No. 2 on the basis that it is unduly
19 burdensome, overbroad, and seeks information regarding his non-party spouse who was not
20 encompassed within the Court’s April 13, 2022 order. Moreover, Judd objects to Interrogatory

21
22 ¹ “The Fifth Amendment not only protects the individual against being involuntarily called as a witness
23 against himself in a criminal prosecution but also privileges him not to answer official questions put to
24 him in any other proceeding, civil or criminal, formal or informal, where the answers might incriminate
25 him in future criminal proceedings.” *United States v. Sommerstedt*, No. 206CV00273BESGWF, 2008 WL
11388580, at *7 (D. Nev. July 31, 2008) (internal quotation marks omitted).

1 No. 2 to the extent it seeks privileged attorney-client communications and/or work product. Judd
2 further objects to Interrogatory No. 2 on the basis that such information is irrelevant as the April
3 13, 2022 Order enjoins Judd from liquidating such assets. Additionally, Judd objects to
4 Interrogatory No. 2 on the basis a responsive answer to the question calls for waiving his rights
5 protected by the Fifth Amendment to the United States Constitution, which he hereby evokes.
6 Judd further objects to Request No. 2 on the basis that an explanation of why it cannot be
7 answered might be used in a future criminal proceeding against him. “[T]he privilege [against
8 compelled self-incrimination] protects the right of a person to remain silent unless he chooses to
9 speak in the unfettered exercise of his own will, and that he is to suffer no penalty for his
10 silence.” *Campbell*, 592 F.2d at 1057. Nor can the SEC draw an adverse inference from Judd’s
11 refusal to respond to Request No. 2 since the SEC cannot meet its burden to establish the
12 exception. “[N]o negative inference can be drawn against a civil litigant’s assertion of his
13 privilege against self-incrimination unless there is a substantial need for the information and
14 there is not another less burdensome way of obtaining that information.” *Glanzer*, 232 F.3d at
15 1265. “Moreover, the inference may be drawn only when there is independent evidence of the
16 fact about which the party refuses to testify.” *Id.* Based on the foregoing objections, **JUDD WILL**
17 **NOT ANSWER INTERROGATORY NO. 2.**

18 **INTERROGATORY NO. 3:** If You or Your spouse have transferred, assigned, sold,
19 mortgaged, pledged, given away, or donated any Asset with a present value of \$1000 or more
20 since March 1, 2022, list each such Asset, provide the name and address of the Person to whom
21 said Asset was transferred, assigned, sold, mortgaged, pledged, given away, or donated, the date
22 of said transfer, assignment, sale, mortgage, pledge, gift, or donation, and state what
23 consideration Your (or Your spouse) received in exchange.
24
25

1 **OBJECTION:** Judd objects to Interrogatory No. 3 on the basis that it is unduly
2 burdensome, overbroad, and seeks information regarding his non-party spouse who was not
3 encompassed within the Court’s April 13, 2022 order. Moreover, Judd objects to Interrogatory
4 No. 3 to the extent it seeks privileged attorney-client communications and/or work product. Judd
5 further objects to Interrogatory No. 3 on the basis that such information is irrelevant as the April
6 13, 2022 Order does not have retroactive effect and nothing in the SEC’s moving papers indicate
7 that it has any evidence that Judd is liquidating assets. Going forward, the April 13, 2022 Order
8 enjoins Judd from liquidating such assets. Additionally, Judd objects to Interrogatory No. 3 on
9 the basis that a responsive answer to the question calls for waiving his rights protected by the
10 Fifth Amendment to the United States Constitution, which he hereby evokes. Judd further
11 objects to Request No. 3 on the basis that an explanation of why it cannot be answered might be
12 used in a future criminal proceeding against him. “[T]he privilege [against compelled self-
13 incrimination] protects the right of a person to remain silent unless he chooses to speak in the
14 unfettered exercise of his own will, and that he is to suffer no penalty for his silence.” *Campbell*,
15 592 F.2d at 1057. Nor can the SEC draw an adverse inference from Judd’s refusal to respond to
16 Request No. 3 since the SEC cannot meet its burden to establish the exception. “[N]o negative
17 inference can be drawn against a civil litigant’s assertion of his privilege against self-
18 incrimination unless there is a substantial need for the information and there is not another less
19 burdensome way of obtaining that information.” *Glanzer*, 232 F.3d at 1265. “Moreover, the
20 inference may be drawn only when there is independent evidence of the fact about which the
21 party refuses to testify.” *Id.* Based on the foregoing objections, **JUDD WILL NOT ANSWER**
22 **INTERROGATORY NO. 3.**

1 **JUDD’S OBJECTIONS TO REQUESTS FOR ADMISSIONS**

2 **REQUEST FOR ADMISSION NO. 1:** Admit that prior to January 1, 2022, You learned that
3 one or more of the attorneys or law offices identified as counsel for a personal injury plaintiff
4 who purportedly entered one of the Purchase Agreements had no record of representing the
5 purported personal injury plaintiff named in the Purchase Agreement.

6 **OBJECTION:** Mr. Judd objects to Request No. 1 to the extent that it calls for the
7 revelation of attorney-client communications and/or work product. Additionally, Mr. Judd
8 objects to Request No. 1 on the basis that basis a responsive answer to the question calls for
9 waiving his rights protected by the Fifth Amendment to the United States Constitution, which he
10 hereby evokes. Judd further objects to Request No. 1 on the basis that an explanation of why it
11 cannot be fully admitted or denied might be used in a future criminal proceeding against him.
12 “[T]he privilege [against compelled self-incrimination] protects the right of a person to remain
13 silent unless he chooses to speak in the unfettered exercise of his own will, and that he is to
14 suffer no penalty for his silence.” *Campbell*, 592 F.2d at 1057. Nor can the SEC draw an adverse
15 inference from Judd’s refusal to respond to Request No. 1 since the SEC cannot meet its burden
16 to establish the exception. “[N]o negative inference can be drawn against a civil litigant’s
17 assertion of his privilege against self-incrimination unless there is a substantial need for the
18 information and there is not another less burdensome way of obtaining that information.”
19 *Glanzer*, 232 F.3d at 1265. “Moreover, the inference may be drawn only when there is
20 independent evidence of the fact about which the party refuses to testify.” *Id.* Based on the
21 foregoing objections, Judd DENIES Request No. 1 without explanation.

22 **REQUEST FOR ADMISSION NO. 2:** Admit that prior to January 1, 2022, one or more
23 investors in the Purchase Agreements told you that they had communicated with one or more of
24 the attorneys or law offices identified as counsel for a personal injury plaintiff who purportedly
25

1 entered one of the Purchase Agreements, and the investor(s) were told that the attorney or law
2 office contacted by the investor(s) had no record of representing the purported personal injury
3 plaintiff named in the Purchase Agreement.

4 **OBJECTION:** Mr. Judd objects to Request No. 2 on the basis that it is vague and
5 ambiguous with respect to the undefined terms “told” and “communicated.” Mr. Judd
6 additionally, objects to Request No. 2 to the extent that it calls for the revelation of attorney-
7 client communications and/or work product. Moreover, Mr. Judd objects to Request No. 2 on the
8 basis that a responsive answer to the question calls for waiving his rights protected by the Fifth
9 Amendment to the United States Constitution, which he hereby evokes. Judd further objects to
10 Request No. 2 on the basis that an explanation of why it cannot be fully admitted or denied might
11 be used in a future criminal proceeding against him. “[T]he privilege [against compelled self-
12 incrimination] protects the right of a person to remain silent unless he chooses to speak in the
13 unfettered exercise of his own will, and that he is to suffer no penalty for his silence.” *Campbell*,
14 592 F.2d at 1057. Nor can the SEC draw an adverse inference from Judd’s refusal to respond to
15 Request No. 2 since the SEC cannot meet its burden to establish the exception. “[N]o negative
16 inference can be drawn against a civil litigant’s assertion of his privilege against self-
17 incrimination unless there is a substantial need for the information and there is not another less
18 burdensome way of obtaining that information.” *Glanzer*, 232 F.3d at 1265. “Moreover, the
19 inference may be drawn only when there is independent evidence of the fact about which the
20 party refuses to testify.” *Id.* Based on the foregoing objections, Judd **DENIES** Request No. 2
21 without explanation.

22 **REQUEST FOR ADMISSION NO. 3:** Admit that, at some point between January 1, 2017 and
23 January 1, 2022, You became aware that the Purchase Agreements were fake.
24
25

1 **OBJECTION:** Mr. Judd objects to Request No. 3 on the basis that it is vague and
2 ambiguous with respect to the undefined terms “aware” and “fake.” Mr. Judd additionally,
3 objects to Request No. 3 to the extent that it calls for the revelation of attorney-client
4 communications and/or work product. Moreover, Mr. Judd objects to Request No. 3 on the basis
5 that a responsive answer to the question calls for waiving his rights protected by the Fifth
6 Amendment to the United States Constitution, which he hereby evokes. Judd further objects to
7 Request No. 3 on the basis that an explanation of why it cannot be fully admitted or denied might
8 be used in a future criminal proceeding against him. “[T]he privilege [against compelled self-
9 incrimination] protects the right of a person to remain silent unless he chooses to speak in the
10 unfettered exercise of his own will, and that he is to suffer no penalty for his silence.” *Campbell*,
11 592 F.2d at 1057. Nor can the SEC draw an adverse inference from Judd’s refusal to respond to
12 Request No. 3 since the SEC cannot meet its burden to establish the exception. “[N]o negative
13 inference can be drawn against a civil litigant’s assertion of his privilege against self-
14 incrimination unless there is a substantial need for the information and there is not another less
15 burdensome way of obtaining that information.” *Glanzer*, 232 F.3d at 1265. “Moreover, the
16 inference may be drawn only when there is independent evidence of the fact about which the
17 party refuses to testify.” *Id.* Based on the foregoing objections, Judd **DENIES** Request No. 3
18 without explanation.

19 **REQUEST FOR ADMISSION NO. 4:** Admit that, at some point between January 1, 2017, and
20 January 1, 2022, You became aware that investor money provided to buy interests in the
21 Purchase Agreements was not used to fund personal injury settlements.

22 **OBJECTION:** Mr. Judd objects to Request No. 4 on the basis that it is vague and
23 ambiguous with respect to the undefined terms “aware” and “fund.” Mr. Judd additionally
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1 objects to Request No. 4 to the extent that it calls for the revelation of attorney-client
2 communications and/or work product. Moreover, Mr. Judd objects to Request No. 4 on the basis
3 that a responsive answer to the question calls for waiving his rights protected by the Fifth
4 Amendment to the United States Constitution, which he hereby evokes. Judd further objects to
5 Request No. 4 on the basis that an explanation of why it cannot be fully admitted or denied might
6 be used in a future criminal proceeding against him. “[T]he privilege [against compelled self-
7 incrimination] protects the right of a person to remain silent unless he chooses to speak in the
8 unfettered exercise of his own will, and that he is to suffer no penalty for his silence.” *Campbell*,
9 592 F.2d at 1057. Nor can the SEC draw an adverse inference from Judd’s refusal to respond to
10 Request No. 1 since the SEC cannot meet its burden to establish the exception. “[N]o negative
11 inference can be drawn against a civil litigant’s assertion of his privilege against self-
12 incrimination unless there is a substantial need for the information and there is not another less
13 burdensome way of obtaining that information.” *Glanzer*, 232 F.3d at 1265. “Moreover, the
14 inference may be drawn only when there is independent evidence of the fact about which the
15 party refuses to testify.” *Id.* Based on the foregoing objections, Judd **DENIES** Request No. 4
16 without explanation.

17 **REQUEST FOR ADMISSION NO. 5:** Admit that, at some point between January 1, 2017 and
18 March 1, 2022, You, directly or indirectly, received payment(s) for soliciting actual or potential
19 investors to buy interests in the Purchase Agreements.

20 **OBJECTION:** Mr. Judd objects to Request No. 5 on the basis that it is vague and
21 ambiguous with respect to the undefined terms “directly or indirectly,” “soliciting actual or
22 potential investors” and “interest.” Mr. Judd additionally objects to Request No. 5 to the extent
23 that it calls for the revelation of attorney-client communications and/or work product. Moreover,
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1 Mr. Judd objects to Request No. 5 on the basis that a responsive answer to the question calls for
2 waiving his rights protected by the Fifth Amendment to the United States Constitution, which he
3 hereby evokes. Judd further objects to Request No. 5 on the basis that an explanation of why it
4 cannot be fully admitted or denied might be used in a future criminal proceeding against him.
5 “[T]he privilege [against compelled self-incrimination] protects the right of a person to remain
6 silent unless he chooses to speak in the unfettered exercise of his own will, and that he is to
7 suffer no penalty for his silence.” *Campbell*, 592 F.2d at 1057. Nor can the SEC draw an adverse
8 inference from Judd’s refusal to respond to Request No. 1 since the SEC cannot meet its burden
9 to establish the exception. “[N]o negative inference can be drawn against a civil litigant’s
10 assertion of his privilege against self-incrimination unless there is a substantial need for the
11 information and there is not another less burdensome way of obtaining that information.”
12 *Glanzer*, 232 F.3d at 1265. “Moreover, the inference may be drawn only when there is
13 independent evidence of the fact about which the party refuses to testify.” *Id.* Based on the
14 foregoing objections, Judd **DENIES** Request No. 5 without explanation.

15 DATED this 20th day of April, 2022.

16
17 /s/ Kevin N. Anderson
18 KEVIN N. ANDERSON, ESQ.
19 Nevada State Bar No. 4512
20 TREVOR R. WAITE, ESQ.
21 Nevada State Bar No. 13779
22 FabianVanCott
23 411 E. Bonneville Ave., Suite 400
24 Las Vegas, NV 89101
25 Telephone: (702) 233-4444
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Attorneys for Jeffrey A. Judd

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 20th day of April, 2022, I caused a true and correct copy of the foregoing to be served on all those entitled to receive service via the Court's CM/ECF service.

I hereby further certify that I caused a copy of the foregoing to be served via e-mail and/or the United States Mail, with first-class postage prepaid, on the following as indicated as follows:

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Via E-mail

Tracy S. Combs,
Securities and Exchange
Commission
Salt Lake Regional Office
Counsel for the Commission
combst@sec.gov
Counsel for Plaintiff

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Investments, LLC*

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*Counsel for Peter Kravitz,
as Chief Restructuring
Officer for J and J
Purchasing LLC and J&J
Consulting Services, Inc.*

Courtesy copy by email to:
Nathan A. Crane
Snow Christensen &
Martineau
nac@scmlaw.com

Via U.S. Mail

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

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

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

Rocking Horse Properties,
LLC
[REDACTED]
Henderson, NV [REDACTED]

ACAC, LLC
[REDACTED]
Las Vegas, NV [REDACTED]

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

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

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DATED this 20th day of April, 2022.

/s/ Kevin N. Anderson
KEVIN N. ANDERSON, ESQ.

4884-2924-3164, v. 1

Exhibit B

Supplemental Declaration of Amir Salimi

1 TRACY S. COMBS (California Bar No. 298664)
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2 CASEY R. FRONK (Illinois Bar No. 6296535)
Email: fronkc@sec.gov
3 SECURITIES AND EXCHANGE COMMISSION
351 South West Temple, Suite 6.100
4 Salt Lake City, Utah 84101
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5 Fax: (801) 524-3558

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 ROSEGREN;

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

**SUPPLEMENTAL DECLARATION
OF AMIR SALIMI**

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1 I, Amir Salimi, do hereby declare, under penalty of perjury, in accordance with 28 U.S.C.
2 § 1746, that the following is true and correct to the best of my belief and, further, that this
3 declaration is made on my personal knowledge, and that I am competent to testify as to the
4 matters herein stated:

5 1. I am over the age of 21 and a resident of the State of Utah.

6 2. I make this declaration in support of the United States Securities and Exchange
7 Commission's ("Commission's") motion to amend the Court's preliminary injunction order and
8 receivership order in the above-captioned case.

9 3. As described in my prior declaration in support of the Commission's *Ex Parte*
10 Motion for Temporary Injunctive Order and other relief (*see* Dkt. No. 2-8), as part of my duties
11 as an accountant with the Commission, I was assigned to the investigation entitled *In the Matter*
12 *of J&J Consulting Services, Inc.* (SL-02855), and I analyzed the bank and financial records of
13 the Nevada law firm of Matthew Beasley, Beasley Law Group PC, that were produced in
14 response to a subpoena issued by the Commission staff to Wells Fargo Bank, N.A. ("Wells
15 Fargo"), for the period of January 1, 2017 through February 28, 2022.

16 4. As also described in my first supplemental declaration in support of the
17 Commission's motion for a preliminary injunction and asset freeze (*see* Dkt. No. 24), I reviewed
18 the bank records of J & J Consulting Services, Inc.'s US Bank account ending in 2073 ("J&J
19 U.S. Bank Account 2073") for the period of January 2018 through February 2022 that were
20 produced in response to a subpoena issued by the Commission staff to U.S. Bank.

21 5. As also described in my second supplemental declaration in support of the
22 Commission's motion for a preliminary injunction and asset freeze (*see* Dkt. No. 24), I analyzed
23 additional records for individuals identified as promoters in the Declaration of Joni Ostler (Dkt.
24 No. 119-2, "Ostler Decl.") and entities under their control, including bank records for Seth
25 Johnson, CR6 LLC, and Prestige Consulting LLC.

26 6. In addition to analyzing the bank records described in paragraphs 3-5 above, I
27 have analyzed additional records for entities under the control of individuals identified as

1 promoters in the Declaration of Joni Ostler (Dkt. No. 119-2), including bank records for ACAC,
2 LLC, Ruger RM Investments, Ruger Investments, and Red Hills LLC.

3 7. I analyzed copies of bank records for the Bank of America Account No.
4 XXXXX1826 in the name of Ruger Investments RM Inc for the period of March 1, 2022 – April
5 30, 2022 that were produced in response to a subpoena issued by the Commission staff. This
6 entity is identified as being controlled by Richard Madsen in the Ostler Decl., Dkt. No. 119-2,
7 ¶ 58. My analysis of these records determined that they were true and accurate copies of Bank of
8 America bank records.

9 8. I analyzed copies of bank records for the Bank of America Account No.
10 XXXXX1677 in the name of Ruger Investments Inc for the period of March 1, 2022 – April 30,
11 2022 that were produced in response to a subpoena issued by the Commission staff.. This entity
12 is identified as being controlled by Richard Madsen in the Ostler Decl., Dkt. No. 119-2, ¶ 57. My
13 analysis of these records determined that they were true and accurate copies of Bank of America
14 bank records.

15 9. I analyzed copies of bank records for the Bank of America Account No.
16 XXXXX9413 in the name of Red Hills Investments Inc for the period of March 1, 2022 – April
17 30, 2022 that were produced in response to a subpoena issued by the Commission staff.. This
18 entity is identified as being controlled by Richard Madsen in the Ostler Decl., Dkt. No. 119-2,
19 ¶ 59. My analysis of these records determined that they were true and accurate copies of Bank of
20 America bank records.

21 10. I analyzed copies of bank records for the Bank of America Account No.
22 XXXXX8397 in the name of ACAC, LLC (“ACAC BOA Account 8397”) for the period of
23 January 1, 2017 – March 31, 2022 that were produced in response to a subpoena issued by the
24 Commission staff. This entity is identified as being controlled by Chris Madsen in the Ostler
25 Decl., Dkt. No. 119-2, ¶ 40. My analysis of these records determined that they were true and
26 accurate copies of Bank of America bank records.

1 11. My analysis of the additional bank records described above in paragraphs 7-9,
2 identified total net disbursements of over \$75,000 out of accounts belonging to entities under the
3 control of Richard Madsen from March 3, 2022 – April 30, 2022. This includes checks that
4 appear to be payments of fictitious returns to investors which were written prior to March 3,
5 2022, but which continued to be cashed on and after March 3, 2022. Checks that appear to be
6 fictitious returns to investors continued to be cashed until March 15, 2022.

7 12. My analysis of the additional bank records described above in paragraph 10
8 identified total net disbursements of over \$450,000 out ACAC BOA Account 8397, an account
9 belonging to an entity under the control of Chris Madsen, from March 3, 2022 – March 31, 2022.

10 13. In addition, an analysis of the activity in the ACAC, LLC account from March 1,
11 2022 – March 31, 2022 identified transactions referencing the names of over 100 individuals.
12 These transactions were often in the form of deposits made by individuals directly into the
13 ACAC BOA Account 8397 account in \$40,000, \$50,000, \$80,000, or \$100,000 increments. I
14 identified a pattern in which, after deposits were made into the ACAC, LLC accounts in these
15 increments, transfers were often soon made in similar amounts from the ACAC, LLC account
16 into the Beasley IOLTA 5598 account. In total, over \$18.2M was transferred from the ACAC,
17 LLC account into the Beasley IOLTA 5598 account from January 1, 2017 – March 31, 2022.

18 Executed this 20th day of July, 2022 in Salt Lake City, Utah.

19
20 /s/ Amir Salimi
 Amir Salimi