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

Securities and Exchange Commission,

Plaintiff

v.

Matthew Wade Beasley, et al., and

Defendants

The Judd Irrevocable Trust, et al.,

Relief Defendants

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

**STIPULATION AND ORDER
CONCERNING RELEASE OF
CERTAIN FUNDS OF SETH
JOHNSON AND LIS PENDENS**

[ECF No. 829]

1 **WHEREAS**, on April 12, 2022, Plaintiff United States Securities and Exchange
2 Commission (“SEC”, “Commission”, or “Plaintiff”) filed a Complaint in this matter,
3 alleging violations of the registration and/or antifraud provisions of the federal
4 securities laws by Defendants, and the receipt of ill-gotten proceeds of such violations by
5 Relief Defendants. (Dkt. No. 1.)

6 **WHEREAS**, on or about June 3, 2022, Geoff Winkler of American Fiduciary Services
7 was appointed as Receiver by order of this Court (Dkt. No. 88) (the “Receivership Order”).

8 **WHEREAS**, on June 29, 2022, the Commission filed its Amended Complaint in this
9 matter, which added Seth Johnson as a defendant (“Defendant”). (Dkt. No. 118.)

10 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Preliminary
11 Injunction and Asset Freeze Order, which extended the asset freeze previously imposed by the
12 Court to those defendants added in the Commission’s Amended Complaint, including
13 Defendant. (Dkt. No. 206.)

14 **WHEREAS**, on July 29, 2022, the Court issued its Order Amending Receivership
15 Order, which extended the receivership previously imposed by the Court to the assets of those
16 defendants added in the Commission’s Amended Complaint, including Defendant. (Dkt. No.
17 207.)

18 **WHEREAS**, on August 31, 2022, the Court granted a stipulation regarding Defendant’s
19 living expenses, including the right of the Receiver to record a *lis pendens* for certain real
20 property owned by Defendant. (Dkt. No. 280.)

21 **WHEREAS**, on September 16, 2024, the Court granted a stipulation between counsel
22 for the Commission, Defendant, and the Receiver regarding Defendant’s living expenses,
23 including releasing the *lis pendens* for certain real property owned by Defendant. (Dkt. No.
24 705.)

25 **WHEREAS**, the Receiver has received the total sum of \$353,993 (“Deposit”) from
26 Defendant.
27

1 **WHEREAS**, pursuant to a bifurcated settlement with the Commission, the Court entered
 2 judgment against Defendant as to liability, reserving for later determination the amounts of
 3 disgorgement, prejudgment interest, and civil penalties for which Defendant will be liable. (Dkt.
 4 No. 746.)

5 **WHEREAS**, counsel for Defendant has maintained certain funds of Defendant in the
 6 IOLTA trust account of Jackson White Law, PC, as disclosed to counsel for the Commission
 7 and Receiver in Exhibit 1 to Dkt. No. 251.

8 **WHEREAS**, the Commission, and Defendant believe, based on available information,
 9 that the total remaining disgorgement, prejudgment interest, and civil penalties that the
 10 Commission will seek in this action from the Defendant may be within the amounts of the
 11 Deposit and if over and above the Deposit likely will not exceed \$12,000.

12 **WHEREAS**, and the Commission, Defendant, and the Receiver further agree that
 13 Defendant will maintain \$12,000 in the IOLTA trust account of Jackson White Law, PC until
 14 the Court enters final judgment as to Defendant.

15 **WHEREAS**, counsel for the Commission, Defendant, and Receiver have reached an
 16 agreement allowing the release of all funds held in the IOLTA trust account of Defendant's
 17 counsel Jackson White Law, PC in excess of \$12,000, to be used for any lawful purpose.

18 **NOW THEREFORE**, counsel for the Commission, Receiver, and Defendant stipulate
 19 and request that the Court allow the release of all but \$12,000 of the funds held in the IOLTA
 20 trust account of Jackson White Law, PC, identified herein and owned by Defendant Seth
 21 Johnson.

22 Dated: July 30, 2025

**U.S. SECURITIES AND EXCHANGE
 COMMISSION**

/s/ Pat Huddleston

PAT HUDDLESTON

*Attorneys for Plaintiff U.S. Securities and
 Exchange Commission*

1 Dated: July 30, 2025

RECEIVER

2 /s/ Kara B. Hendricks

3 KARA B. HENDRICKS

4 *Attorneys for Receiver*

5 Dated: July 30, 2025

SETH JOHNSON

6 /s/ David C. Clukey

7 DAVID C. CLUKEY

8 *Attorneys for Seth Johnson*

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10
11 **BASED ON THE FORGOING, IT IS HEREBY ORDERED** that:

12 a. \$12,000 of the defendant's funds shall remain in the IOLTA trust account of
13 Jackson White Law, PC, until final judgment is entered as to the defendant;

14 b. the remaining funds held on the defendant's behalf in the IOLTA trust
15 account of Jackson White Law, PC may be released and used for any lawful purpose.

16 Dated: July 31, 2025

17
18 
Cristina D. Silva

19 United States District Judge