United States District Court for the District of Nevada
In re J&J Investment Litigation,
Case No. 2:22-cv-00529-CDS-NJK

Class Action Notice

Authorized by the U.S. District Court

If you invested money for purchase agreements with or through J&J Consulting Services, Inc., or certain related entities

There is a $50,000,000 settlement of a lawsuit. You may be entitled to money.

To learn about your rights relating to the settlement, you should:

Read this notice.

Respond by October 12, 2026.

If you take no action, you will still be bound by the settlement, and your rights will be affected. Learn more at: www.jjconsulting-receivership.com.

Table of Contents

Key Resources

How do I get more information?

About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of related lawsuits, a class action lawsuit, *In re: J&J Investment Litigation,* Case No. 2:22-cv-00529-CDS-NJK (the "Class Action"), and related action by the Geoff Winkler (the "Receiver"), as Receiver for J&J Consulting Services, Inc. and related companies, captioned *Winkler v. Wells Fargo Bank, N.A .,* Case No. 2:23-cv-00703-CDS-NJK (the "Receiver Action"), pending in the United States District Court for the District of Nevada.

You received this notice because you may be a member of the group of people affected, called the "class." This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Do Nothing*	Automatically get your share of the settlement. Give up rights resolved by settlement.
Opt Out	Get no payment. Allows you to bring another lawsuit against Wells Fargo Bank, N.A., about the same issues.
Object	Tell the Court why you don't like the settlement.

*If you did not make a claim between September 1, 2025, and December 1, 2025, with the Receiver, you must make a claim now to receive a settlement payment. See "Submitting a Claim" below.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **October 12, 2026**
Your deadline to submit a claim form: **October 12, 2026**
Settlement approval hearing: **November 12, 2026**

Learning About the Lawsuit

What is this lawsuit about?

The plaintiffs in the lawsuit (Barrett Henzel, Allan L. Carso, Gary W. Lundin, Joshua Luekenga, Craig Rodney Michaelis, Bryce Kelly, Clint McDaniel, and Dan McDaniel) claimed that Wells Fargo Bank, N.A., aided and abetted Mathew Beasley, J&J Consulting Services, Inc., and others in operating a Ponzi scheme through the sale of fraudulent interests in purchase agreements, resulting in financial loss to Plaintiffs and members of the class. The lawsuit alleges that Wells Fargo Bank, N.A., knowingly permitted the operation by Beasley and others of the J&J Ponzi scheme.

Wells Fargo Bank denies that it did anything wrong or had any knowledge of the scheme.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at: www.jjconsulting-receivership.com

Why is there a settlement in this lawsuit?

In October 2025, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The settlement is on behalf of the plaintiffs who brought the case and all members of the settlement class. The Court has not decided this case in favor of either side.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

Where:
U.S. District Court for the District of Nevada
Courtroom 6B
333 Las Vegas Blvd South
Las Vegas, NV 89101

When:

10:00 am PT on November 12, 2026.

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to class members. To learn more and confirm the hearing date, go to www.jjconsulting-receivership.com.

Learning About the Settlement

What does the settlement provide?

Wells Fargo Bank has agreed to pay $50,000,000 to resolve the Class Action and the Receiver Action. This money will be used to reimburse lawyer fees and costs advanced, to the extent approved by the Court, and for the cost of administering this settlement. The rest will be distributed to class members by the Receiver. In exchange, the Members of the settlement class will "release" their claims as part of the settlement, which means they cannot sue Wells Fargo Bank for the same issues and alleged legal violations raised in this lawsuit. The full terms of the release can be found on the Important Documents page of the J&J Receivership website: www.jjconsulting-receivership.com.

Why is $50,000,000 fair?

The lawyers for the plaintiffs believe the settlement is fair because plaintiffs face substantial risks and delays in proving their case and/or recovering damages. These risks include the risk that the plaintiffs will not succeed in obtaining an order certifying the Class, that they may be unable to prove Wells Fargo knew of wrongdoing by Matthew Beasley and others, and the risk that they may not be successful in proving damages in full or in part. The lawyers believe that if the settlement is not approved, the Class could recover less or nothing at all from this lawsuit.

Am I a class member?

If you are a natural or legal person who invested in a J&J Entity (see below) lawsuit settlement contract between January 2017 and March 2022 and incurred a loss of your principal investment (in whole or in part) as determined by the Receiver pursuant to his court-appointed duties and as identified in the Receiver's official records submitted to the Court in the SEC Action, you are a class member.

The J&J Entities are:

- J&J Consulting Services, Inc., a Nevada corporation
- J&J Consulting Services, Inc., an Alaska corporation
- J&J Purchasing, LLC, a Florida limited liability company

There are exceptions. You are not a class member if:

- you are a Relevant Non-Party, as defined in the Consolidated Class Action Complaint, or related to a Relevant Non-Party; or
- you are a judicial officer, or an immediate family member of a judicial officer, to whom this litigation is assigned.

If you are still unsure if you are a class member, call (833) 366-6236

(US or Canada) or (747) 215-2283 (International) or visit www.jjconsulting-receivership.com.

Deciding What to Do

How do I weigh my options?

Your options are to stay in the settlement, opt out of the settlement, object to the settlement, or do nothing. This chart shows the effects of each:

	Opt out	**Object**	**Do Nothing**
Can I receive settlement money if I . . .	NO	YES	YES*
Am I bound by the terms of this lawsuit if I . . .	NO	YES	YES
Can I pursue my own case if I . . .	YES	NO	NO
Will the class lawyers represent me if I . . .	NO	NO	YES

*If you did not make a claim between September 1, 2025, and December 1, 2025, in the J&J Consulting Services, Inc., Receivership, you must make a claim now to receive a settlement payment. See "Submitting a Claim" below.

**You can object to the settlement AND submit a claim form to receive payment.*

Do I need a lawyer?

In a class action, the court appoints class representatives and lawyers to represent the interests of all the class members, they do not act as your personal attorneys.

For this settlement, the Court has appointed the following lawyers.

Class Action lawyers: Girard Sharp LLP, Gibbs Mura, A Law Group, and Law Offices of Robert L. Brace. These are the lawyers who represent the plaintiffs in the Class Action.

Levine Kellogg Lehman Schneider and Grossman LLP are the attorneys for Receiver Geoff Winkler in the Receiver Action. They will share in any attorneys' fees awarded to the Class Action attorneys.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Payments

How will my payment be determined?

The amount you receive as a settlement payment will be determined by the claim you submitted between September 1, 2025, and December 1, 2025, in the J&J Consulting Services, Inc., Receivership, which will be approved or adjudicated based on the Receiver's claims process (your "Claim Amount"). Your payment will be calculated by dividing your Claim Amount by the total value of all Claim Amounts and multiplying the resulting fraction by the amount remaining in the settlement fund, after deducting the amounts approved by the Court to compensate the lawyers, pay costs of administration, and payments to the plaintiffs.

If you are a class member who did not make a claim in the Receivership, you can receive a settlement payment by following the instructions below under the heading, "Submitting a Claim." The Receiver will evaluate your claim using the same rules as in the SEC Action.

How will I get my payment?

Payments will be made to all claimants based on their Claim Amount and as determined by order of the Court in the SEC Action. Payments will be sent by the Receiver.

Submitting a Claim

If you are a class member, but you did not make a claim in the J&J Receivership, you can still claim a share of the settlement. Download the claim for at www.jjconsulting-receivership.com and mail it with supporting documentation to the Receiver no later than October 12, 2026 (address below).

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund.

Since 2022 when they began working on the case, the class action lawyers have not been paid attorneys’ fees or reimbursed for expenses they advanced in connection with the case. To pay for their time and risk of non-payment, the lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to $16.6 million total in attorneys’ fees plus the reimbursement of out-of-pocket expenses not to exceed $900,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of $10,000 to each of the plaintiffs for the time and effort they contributed to the case. If approved by the Court, these payments will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive a payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit. That means you keep the right to sue Wells Fargo Bank or be part of another case against them about the issues in this lawsuit. If you have a pending lawsuit against Wells Fargo Bank, speak to your lawyer in that case immediately. You must exclude yourself from this Class to continue your own lawsuit.

How do I opt out?

To opt out of the settlement, you must write a letter and mail it by October 12, 2026, to the Settlement Administrator at:

J&J Bank Settlement
c/o Exclusion Requests
Stretto, Inc.
410 Exchange Ste. 100
Irvine, CA 92602

Be sure to include the case name, your name, address, telephone number, and signature. If you are represented by your own counsel, be sure to include the signature of your counsel.

Be sure to also include an explicit and unambiguous statement that the person seeking exclusion falls within the definition of the Settlement Class and desires to be excluded from the Settlement Class such as "I hereby request that I be excluded from the proposed Settlement Class in the Class Action."

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you. You will be responsible for compensating any lawyer that you hire.

To object, you must send a letter to the Court that:

(1) is postmarked by October 12, 2026;
(2) includes the case name and number (*In re J&J Investment Litigation*, Case No. 2:22-cv-00529-CDS-NJK);
(3) includes your full name, address and telephone number;

(4) the basis for your objection;
(5) if applicable, includes copies of any papers, briefs, or other documents upon which the objection is based;
(6) says whether either you or your lawyer intend to appear at the final approval hearing;
(7) the name, address, email address, and telephone number of every attorney representing you or who previously represented you who may be entitled to compensation related to the objection or fee application;
(8) the identity of all counsel who will appear at the final approval hearing
(9) your signature.

Mail the letter to:

J&J Bank Settlement c/o Objections Stretto, Inc. 410 Exchange Ste. 100 Irvine, CA 92602	U.S. District Court for the District of Nevada Courtroom 6B 333 Las Vegas Blvd. South Las Vegas, NV CA 89101
<u>Plaintiffs' Counsel</u> Daniel C. Girard Jordan Isern GIRARD SHARP LLP 601 California Street, Suite 1400 San Francisco, CA 94108 Eric Gibbs David K. Stein Spencer S. Hughes GIBBS MURA LLP 1111 Broadway, Suite 2100 Oakland, CA 94607 Emily Beale GIBBS MURA LLP 136 Madison Avenue, Suite 541 New York, NY 10016	<u>Wells Fargo's Counsel</u> K. Issac deVyver Karla L. Johnson McGUIREWOODS LLP 260 Forbes Avenue, Suite 1800 Pittsburgh, PA 15222 Anthony Q. Le Molly M. White McGUIREWOODS LLP 1800 Century Park East, 8th Floor Los Angeles, CA 90067 Alicia A. Baiardo McGUIREWOODS LLP Two Embarcadero Center Suite 1300 San Francisco, CA 94111 Joseph G. Went

Robert L. Brace Maria F. Elosu LAW OFFICES OF ROBERT L. BRACE 1807 Santa Barbara Street Santa Barbara, CA 93101 Miles N. Clark LAW OFFICE OF MILES N. CLARK, LLC 5510 S. Fort Apache Road, Suite 30 Las Vegas, NV 89148	Sydney R. Gambee HOLLAND & HART LLP 9555 Hillwood Drive, 2nd Floor Las Vegas, NV 89134

If you intend to appear at the final approval hearing, you must file with the Court a "Notice of Intention to Appear" by the above deadline and mail a copy to class counsel and defense counsel.

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will receive a share of the settlement fund, and you will be bound by the settlement and its "release" provisions. That means you won't be able to start, continue, or be part of any other lawsuit against Wells Fargo Bank about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found on the Important Documents page of the Settlement website: www.jjconsulting-receivership.com.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found here. To get a copy of the settlement agreement or get answers to your questions:

- contact the class action lawyers (information below)
- visit the case website at www.jjconsulting-receivership.com
- access the Court's Court Electronic Records (PACER) system online or by visiting the Court Clerk's (address below).

Resource	Contact Information
Case website	www.jjconsulting-receivership.com
Settlement Administrator	J&J Bank Settlement c/o Settlement Administrator Stretto, Inc. 410 Exchange Ste. 100 Irvine, CA 92602 (833) 366-6236 (US or Canada) or (747) 215-2283 (International)
Class Action Lawyers	Girard Sharp LLP J&J@girardsharp.com 601 California Street, Suite 1400 San Francisco, California 94108 415-981-4800 Gibbs Mura, A Law Group 1111 Broadway, Suite 2100 Oakland, California 94607 510-350-9700 Law Office of Robert L. Brace. 1807 Santa Barbara Street Santa Barabra, California 93101 805-886-8458
Court (DO NOT CONTACT)	U.S. District Court for the District of Nevada 333 Las Vegas Blvd. South Las Vegas, NV CA 89101