

1 KARA B. HENDRICKS, Bar No. 07743  
 2 hendricksk@gtlaw.com  
 3 JASON K. HICKS, Bar No. 13149  
 4 hicksja@glaw.com  
 5 KYLE A. EWING, Bar No 14051  
 6 ewingk@gtlaw.com  
**GREENBERG TRAUIG, LLP**  
 10845 Griffith Peak Drive, Suite 600  
 Las Vegas, Nevada 89135  
 Telephone: (702) 792-3773  
 Facsimile: (702) 792-9002

7 JARROD L. RICKARD, Bar No. 10203  
 8 jlr@skrlawyers.com  
 9 KATIE L. CANNATA, Bar No. 14848  
 10 klc@skrlawyers.com  
**SEMENZA KIRCHER RICKARD**  
 10161 Park Run Drive, Suite 150  
 Las Vegas, Nevada 89145  
 Telephone: (702) 835-6803  
 Facsimile: (702) 920-8669

13 *Attorneys for Receiver*

DAVID R. ZARO\*  
 dzaro@allenmatkins.com  
 JOSHUA A. del CASTILLO\*  
 jdelcastillo@allenmatkins.com  
 MATTHEW D. PHAM\*  
 mphan@allenmatkins.com  
 \*admitted *pro hac vice*  
**ALLEN MATKINS LECK GAMBLE**  
**MALLORY & NATSIS LLP**  
 865 South Figueroa Street  
 Suite 2800  
 Los Angeles, California 90017-2543  
 Telephone: (213) 622-5555  
 Facsimile: (213) 620-8816

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SECURITIES AND EXCHANGE  
17 COMMISSION,

18 Plaintiff,

19 vs.

20 MATTHEW WADE BEASLEY *et al.*

21 Defendants;

22 THE JUDD IRREVOCABLE TRUST *et al.*

23 Relief Defendants.

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

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION’S, THE  
RECEIVER’S, DEFENDANT  
CHRISTOPHER HUMPHRIES’, AND  
NON-PARTY JESSICA  
HUMPHRIES’ FIRST STIPULATION  
CONCERNING LIVING EXPENSES**

24 Plaintiff United States Securities and Exchange Commission (“SEC”, “Commission”, or  
 25 “Plaintiff”), the Court’s appointed Receiver, Geoff Winkler of American Fiduciary Services LLC  
 26 (the “Receiver”), defendant Christopher Humphries (“Mr. Humphries”), relief defendant CJ  
 27 Investments, LLC (“Relief Humphries Company”), and non-party Jessica Humphries (“Mrs.  
 28 Humphries”) (collectively the “Humphries”) hereby provide this first stipulation regarding the

Greenberg Traurig, LLP  
 10845 Griffith Peak Drive, Suite 600  
 Las Vegas, NV 89135  
 (702) 792-3773  
 (702) 792-9002 (fax)

1 following and ask this Court to enter an ORDER consistent with this stipulation regarding the  
2 release of living expenses for Mrs. Humphries, her husband defendant Christopher Humphries,  
3 and their four children.

4 **I. RECITALS**

5 **WHEREAS**, on April 12, 2022, Plaintiff filed its Complaint in this matter, alleging  
6 violations of the registration and/or antifraud provisions of the federal securities laws by the eleven  
7 named Defendants (who include Mr. Humphries), and the receipt of ill-gotten proceeds of such  
8 violations by the eleven Relief Defendants (which include CJ Investments, LLC). (Dkt. No. 1.)

9 **WHEREAS**, on April 13, 2022, the Commission filed an Ex Parte Application for Entry  
10 of a Temporary Restraining Order and other equitable relief as to Defendants and an asset freeze  
11 as to Defendants and Relief Defendants (Dkt. No. 2), which was granted by the Court on April 13,  
12 2022. (Dkt. No. 3.)

13 **WHEREAS**, on or about April 15th, 2022, pursuant to the Court’s asset freeze, Wells  
14 Fargo bank and U.S. Bank froze the following accounts with the following balances:

- |    |  |                        |
|----|--|------------------------|
| 15 | a) US Bank Personal Checking xx8067            | Balance \$1,338,691.24 |
| 16 | b) US Bank Personal Savings xx1591             | Balance \$500.00       |
| 17 | c) US Bank CJ Investments xx0526               | Balance \$1,128,269.48 |
| 18 | d) US Bank CJ Humphries Foundation xx0913      | Balance \$346,704.08   |
| 19 | e) Wells Fargo Personal Checking xx5547        | Balance \$47,203.75    |
| 20 | f) Wells Fargo Personal Savings xx2164         | Balance \$1,100.27     |
| 21 | g) Wells Fargo Teen Checking xx0829            | Balance \$17.65        |
| 22 | h) Wells Fargo Doterra Essential Oils xx8722   | Balance \$5,186.21     |
| 23 | i) Wells Fargo Anderson Dairy Creamery xx 1189 | Balance \$2.24         |
| 24 | j) Wells Fargo CJ Investments LLC xx6358       | Balance \$52,650.58    |
| 25 | k) Wells Fargo BugRaiders Checking xx0377      | Balance \$51,314.74    |
| 26 | l) Wells Fargo BugRaiders Savings xx9745       | Balance \$1,800.34     |
| 27 | m) Wells Fargo JCH Consulting LLC xx1243       | Balance \$8,427.38     |

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1           **WHEREAS**, on April 21, 2022, the Court issued its Order Entering Preliminary  
2 Injunction, Asset Freeze, and other Equitable Relief as to Defendants and Relief Defendants,  
3 which, *inter alia*, continued the asset freeze imposed by the Court on April 13, 2022. (Dkt. No.  
4 56.) The Court’s Order provided that “any allowance for necessary and reasonable living expenses  
5 will be granted only upon good cause shown by application to the Court with notice and an  
6 opportunity for the Commission to be heard.”

7           **WHEREAS**, at the show cause hearing before the Court on April 21, 2022, the Court  
8 directed counsel for the Humphries to discuss the issues with the SEC and seek to resolve the  
9 issues surrounding the Humphries’ living expenses in an amicable manner. If no voluntary  
10 arrangement could be reached, then the Humphries could bring the unresolved issues to the Court  
11 for decision.

12           **WHEREAS**, on June 3, 2022, the Court appointed a Receiver, Geoff Winkler, and ordered  
13 him to take possession of the personal assets of Mr. Humphries during the pendency of this Action.  
14 (the “Receivership Order”)(Dkt. 88).

15           **WHEREAS**, on or about June 24, 2022, the Receiver took possession of the following  
16 personal assets from Wells Fargo bank with the following balances transferred to the Receiver:

- 17           a) Wells Fargo Personal Checking xx5547                      Balance \$47,203.75
- 18           b) Wells Fargo Doterra Essential Oils xx8722                 Balance \$5,186.21
- 19           c) Wells Fargo CJ Investments LLC xx6358                     Balance \$52,650.58
- 20           d) Wells Fargo BugRaiders Checking xx0377                    Balance \$51,314.74
- 21           e) Wells Fargo JCH Consulting LLC xx1243                     Balance \$8,427.38

22           **WHEREAS**, on June 29, 2022, the SEC filed an Amended Complaint (Dkt. 118).

23           **WHEREAS**, now counsel for Plaintiff, the Receiver, and the Humphries have reached the  
24 following agreement as to an allowance for living expenses for the Humphries and jointly provide  
25 this proposed agreement for approval by the Court.

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1 **II. STIPULATED TERMS**

- 2 1. Living expenses for Mr. and Mrs. Humphries and their four minor children are  
3 approved for a six month period in the amount of \$6,630 per month for a total of  
4 \$39,780.
- 5 2. In lieu of paying the living expenses identified above, the \$39,780 will be credited  
6 towards the outstanding amount owed on the mortgage for the Humphries residence  
7 in Huntington Beach (the precise address is listed in the sealed assets list filed with  
8 the Court April 20, 2022; DKT 37) and the Receiver will forbear the right to seek  
9 any remaining amounts from the Humphries relating to the Huntington Beach  
10 property and will utilize the proceeds of the sale of the property to address any  
11 deficit.
- 12 3. The Receiver and the SEC shall permit the Humphries to retain the following  
13 vehicles. The Humphries agree to maintain insurance on these vehicles:
- 14 a. 2021 Chevrolet Tahoe (NV License Plate ALC402) registered to CJ  
15 Investments that Mr. Humphries drives as his primary vehicle;
  - 16 b. 2020 Tesla Model X (NV License Plate ALC406) registered to CJ  
17 Investments that Mrs. Humphries drives as her primary vehicle;
  - 18 c. 2014 Nissan Frontier (NV License Plate 120U84) registered to BugRaiders  
19 Pest Control which is used as a work vehicle by the BugRaiders business  
20 (replacement for the totaled 2022 Chevrolet Colorado work truck); and
  - 21 d. 2021 Chevrolet Colorado (NV License Plate 729N71) registered to  
22 BugRaiders Pest Control which is used as a work vehicle by the BugRaiders  
23 business.
- 24 4. The Humphries agree to cooperate with the Receiver and the SEC to turn over no  
25 later than August 31, 2022, to the Receiver at the Huntington Beach house the  
26 following vehicles:

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- 1 a. 1977 VW Bus (NV License Plate 5Y78) registered to CJ Investments; and
- 2 b. 2021 Tomberlin Golf Cart (CA License Plate 8XYS271) registered to Mr.
- 3 and Mrs. Humphries.

4 5. The Humphries agree to cooperate with the Receiver and the SEC to turn over no  
5 later than September 30, 2022, to the Receiver at the Huntington Beach house the  
6 following vehicle:

- 7 a. 2021 Jeep Wrangler (NV License Plate xx0242) registered to Mr. and Mrs.
- 8 Humphries which their 16 year old daughter has been using while attending
- 9 high school.

10 6. Once they turn over the keys of the vehicles identified in paragraphs 4 and 5 to the  
11 Receiver, the Humphries have no responsibility to maintain these vehicles, pay  
12 taxes, insure them, or pay any other costs associated with any of these vehicles.

13 7. The Humphries have moved back into their home in Henderson, Nevada (the  
14 precise address is listed in the sealed assets list filed with the Court April 20, 2022;  
15 DKT 37). Mrs. Humphries and their four children have vacated the residence in  
16 Huntington Beach as promised by August 15, 2022 (the precise address is listed in  
17 the sealed assets list filed with the Court April 20, 2022; DKT 37) to live full-time  
18 in the Henderson house. The Humphries agree to turn over the keys and access to  
19 the house by no later than August 31, 2022. Once they turn over the keys to the  
20 Receiver, the Humphries have no responsibility to maintain the home, the  
21 mortgage, the taxes, the insurance or any other costs associated with the Huntington  
22 Beach house.

23 8. Mrs. Humphries' parents have also moved into the Henderson house. Mr. and Mrs.  
24 Humphries have a homestead recorded against their Henderson house. The house  
25 is owned by the Humphries' Living Trust. The Receiver and the SEC agree to  
26 permit the Humphries and their extended family to reside in this Henderson home  
27 for the time being in light of their cooperation and the large number of  
28 family members living in the Henderson house. If the Receiver or the SEC wants

1 the Humphries to leave the Henderson house, the SEC, the Receiver and the  
2 Humphries will meet and confer at least 60 days ahead of any requested date to  
3 leave to discuss the request. While they reside in the Henderson house, the  
4 Humphries agree to maintain insurance on the Henderson house, pay the property  
5 taxes, and pay the HOA fees.

6 9. The Humphries own a rental property in Hurricane, Utah (the precise address is  
7 listed in the sealed assets list filed with the Court April 20, 2022; DKT 37) which  
8 currently has a tenant residing in the property; the current lease expires in or about  
9 February 2022. The Humphries agree to cooperate with the Receiver and the SEC  
10 to turn over to the Receiver the Hurricane rental property so that the Receiver can  
11 sell it. It is not responsibility of the Humphries to pay the tenant or evict the tenant.  
12 The Humphries agree to turn over the owner's set of the keys to the Receiver by  
13 September 9, 2022. Once they turn over the keys to the Receiver, the Humphries  
14 have no responsibility to maintain the home, the taxes, the insurance or any other  
15 costs associated with the Hurricane house.

16 10. Wells Fargo Bank froze the account of Nathan Hall (Account XXX0420; the full  
17 account number is listed in the sealed assets list filed with the Court April 20, 2022;  
18 DKT 37). Nathan Hall, who is Mrs. Humphries' uncle, needs the funds and has  
19 supplied a declaration signed by Nathan Hall to the Receiver and the SEC. Within  
20 10 days of this Order, the monies in this Nathan Hall account shall be unfrozen and  
21 made available against to Mr. Hall. The account statements for this account shall  
22 not be subject to the requirements set forth below in paragraph 11.

23 11. Mr. Humphries and Mrs. Humphries must provide to counsel to the Commission  
24 and counsel to the Receiver, without further request or subpoena, their monthly  
25 account statements. These consist of (a) Jessica Humphries new checking account  
26 at Farmers & Merchants and her old Ally Bank account; (b) Christopher Humphries  
27 new checking account at Ally Bank; and (c) the Bug Raiders new checking account  
28 at East West Bank, for review and inspection by no later than the 5<sup>th</sup> of each month  
while this stipulation is in effect. The Humphries agree to provide the earlier

1 statements for these accounts from January 1, 2022 or opening of these new  
2 accounts (whichever is earlier) through the date of this stipulation. These  
3 statements shall be provided to counsel to the Commission by email to Casey R.  
4 Fronk (fronkc@sec.gov) and Tracy S. Combs ([combst@sec.gov](mailto:combst@sec.gov)). These  
5 statements shall also be provided to the Receiver  
6 (geoff@americanfiduciaryservices.com) and to his counsel Kara Hendricks  
7 (hendricksk@gtlaw.com).

8 12. To the extent Mr. Humphries and Mrs. Humphries earn additional, going-forward  
9 income that they demonstrate, to the satisfaction of counsel for the Commission  
10 and the Receiver, is unconnected to the conduct alleged in the Amended Complaint,  
11 such income may be used for the payment of necessary and reasonable living  
12 expenses and a portion of the civil and criminal attorney’s fees and defense costs  
13 needed for this Action and the pending parallel criminal investigation. As of the  
14 date of this stipulation, such income consists of the following:

- 15 a. the income and other earnings of Jessica Humphries at her law firm in
- 16 California that began on or about May 18, 2022 and future earnings at a law
- 17 firm in Nevada after the August 2022 move back to Henderson; and
- 18 b. the income and future earnings from the Bug Raiders Pest Control business.

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1 Before October 31, 2022, the Humphries reserve the right to seek the release of additional  
2 living expenses and housing expenses, and monies for attorneys' fees and costs.

3 Dated: September 14, 2022.

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

4  
5 /s/Casey R. Fronk  
6 TRACY S. COMBS  
7 CASEY R. FRONK  
8 *Attorneys for Plaintiff U.S. Securities and  
Exchange Commission*

9 Dated: September 14, 2022.

**Defendant Christopher Humphries and relief  
Defendant CJ Investments, LLC**

10 /s/ Kendelee Leascher Works  
11 PETER CHRISTIANSEN  
12 KENDELEE WORKS  
13  
14 CHRISTIANSEN TRIAL LAWYERS

15 Dated: September 14, 2022.

**Non-Party Jessica Humphries**

16 /s/ Pamela L. Johnston  
17 FOLEY & LARDNER LLP  
18 THOMAS CARLUCCI  
19 PAMELA JOHNSTON  
20 555 S. Flower Street, Suite 3300  
21 Los Angeles, CA 90071

22 Dated: September 14, 2022.

**GREENBERG TRAUERIG, LLP**

23 By: Kara B. Hendricks  
24 KARA B. HENDRICKS  
25 JASON K. HICKS  
26 KYLE A. EWING  
27 10845 Griffiffith Peak Dr. Ste. 600  
28 Las Vegas, NV 89135

*Attorneys for Receiver Geoff Winkler*  
IT IS SO ORDERED:

29  
30   
31 CRISTINA D. SILVA  
32 UNITED STATES DISTRICT JUDGE

DATED: September 15, 2022

Greenberg Traurig, LLP  
10845 Griffiffith Peak Drive, Suite 600  
Las Vegas, NV 89135  
(702) 792-3773  
(702) 792-9002 (fax)