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Attorneys for Receiver
STEPHEN J. DONELL

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION, and STATE OF NEVADA,

Plaintiffs,

v.

AMERICAN TAX SERVICE LLC, a limited liability company, AMERICAN TAX SOLUTIONS, a corporation, AMERICAN TAX SOLUTIONS LLC, a limited liability company, ATS TAX GROUP LLC, a limited liability company, ELITE SALES SOLUTIONS, a corporation, also d/b/a American Tax Service, GetATaxLawyer.com LLC, a limited liability company, TNT HOLDINGS GROUP, LLC, a limited

Case No. 2:25-cv-01894-GMN-EJY

**STIPULATION AND ORDER APPROVING SALE OF REAL PROPERTY LOCATED AT 2057 TROON DRIVE, HENDERSON, NEVADA TO SUNSET VENTURES LLC**

liability company, TNT SERVICES GROUP LLC, a limited liability company, TNT TAX ASSOCIATES INC., a corporation, TERRANCE SELB, individually and as an officer of American Tax Service LLC, American Tax Solutions, American Tax Solutions LLC, ATS Tax Group LLC, TNT HOLDINGS GROUP LLC, TNT SERVICES GROUP LLC, and TNT TAX ASSOCIATES INC., and TYLER BENNETT, individually and as an officer of American Tax Service LLC, American Tax Solutions, American Tax Solutions LLC, ATS Tax Group LLC, TNT HOLDINGS GROUP LLC, TNT SERVICES GROUP LLC, and TNT TAX ASSOCIATES INC.,

Defendants.

**STIPULATION AND ORDER**

The following Stipulation and Order Approving Sale of Real Property Located at 2057 Troon Drive, Henderson, Nevada to Sunset Ventures LLC (the "Stipulation") is made by and between Stephen J. Donell (the "Receiver"), the Court-appointed receiver in the above-entitled action, the Plaintiffs Federal Trade Commission and State of Nevada (the "Plaintiffs") and individual Defendants Tyler Bennett and Terrance Selb (the "Individual Defendants"), by and through their respective representatives, and with respect to the following facts:

A. The Receiver was appointed in the above-entitled action on October 7, 2025 pursuant to this Court's *Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue* (the "Appointment Order") [ECF No. 9];

B. Pursuant to the Appointment Order, the Receiver was appointed for American Tax Service LLC; American Tax Solutions; American Tax Solutions LLC; ATS Tax Group LLC; Elite Sales Solutions d/b/a American Tax Service; GetATaxLawyer.com LLC; TNT Holdings Group LLC; TNT Services Group LLC; TNT Tax Associates Inc.; each of the foregoing's subsidiaries, affiliates, successors, and assigns; and any other entity that has conducted any business related to the alleged marketing and sale products or services of the defendants and which the Receiver determines also falls within his authority and control as provided in the Appointment Order (all, collectively, the "Receivership Entities");

C. The Receiver's appointment was made permanent on November 20, 2025 pursuant to this Court's *Preliminary Injunction* (the "Preliminary Injunction") [ECF No. 64];

D. Among other things, the Appointment Order and the Preliminary Injunction vested the Receiver with exclusive authority and control over the assets of the Receivership Entities, and charged the Receiver with marshaling and undertaking the disposition of assets for the benefit of the receivership estate;

E. The Receiver has been pursuing his duties and obligations under the Appointment Order since receiving it on October 9, 2025;

F. On February 10, 2026, the Court approved a stipulation that modified the Preliminary Injunction and directed the Individual Defendants to transfer legal and equitable title to the real property located at 2057 Troon Drive, Henderson, Nevada and bearing assessor's parcel number 178-17-212-027 (the "Property") to the Receiver, to be marketed and sold, subject to Court approval of the sale (the "Troon Transfer Stipulation"). [ECF No. 78]. The Troon Transfer Stipulation stated that the Receiver would seek approval of the sale via noticed motion.

G. The Receiver and the Individual Defendants thereafter proceeded with transfer of the Property to the Receiver. Once title was transferred, the Receiver engaged a licensed broker to market and sell the Property, subject to Court approval of the sale. The Property was listed and widely advertised for sale. Interested parties were permitted to view the Property at open houses or by appointment. The list price had to be reduced several times due to the lack of offers for the Property. Ultimately, the Receiver and Sunset Ventures, LLC ("Buyer") agreed on a sale price of $1,810,000, subject to Court approval.

H. A Residential Purchase Agreement ("Purchase Agreement") was signed and the Property went into escrow. Attached hereto as **Exhibit A** is a true and correct copy of the Purchase Agreement;

I. Buyer has deposited $50,000 into escrow and has removed contingencies.

**STIPULATION**

Based on the foregoing, and subject to this Court's approval, the Parties hereby stipulate and agree as follows:

1. The proposed sale of the Property by the Receiver to Buyer for $1,810,000 pursuant to the Purchase Agreement shall be authorized and approved. The net sale proceeds, after payment of all seller obligations, shall be transferred from escrow to the Receiver at closing. The Receiver shall thereafter transfer such net proceeds to the Federal Trade Commission pursuant to the Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief as to Individual Defendants Terrance Selb and Tyler Bennett [ECF No. 99];

2. The Troon Transfer Stipulation [ECF No. 78] is hereby modified to allow for the sale of the Property to be approved via stipulation and proposed order; and

3. The Parties agree and acknowledge that this Stipulation reflects a waiver of 28 U.S.C. § 2001, *et seq.* with respect to the marketing and sale of the Property, as permitted under the law. *See*, *e.g.*, *Huntington Nat'l Bank v. Najero, Inc.*, 2014 WL 5473054, *1 (E.D. Mich. Oct. 27, 2014) (while "the court cannot waive the requirements of § 2001(b), the requirement can be waived by the parties").

SO ORDERED.

Dated: October 1, 2026

Hon. Gloria M. Navarro
Judge, United States District Court

**So stipulated and agreed:**

**for Plaintiffs:**

**Federal Trade Commission**

**Dated: September 8, 2026**

By: /s/Simon Barth
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DC Bar No. 90035761
**James E. Evans**, VA Bar No. 83866
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**for State of Nevada**

**Aaron D. Ford,** Attorney General
**Ernest D. Figueroa,** Consumer Advocate

**Dated: September 8, 2026**

By: /s/Ziwei Zheng
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**Attorneys for Plaintiff**
**State of Nevada**

**Tyler Bennett, Individual Defendant**

**Dated: September ___, 2026**

By: _____
**Tyler Bennett**

**Terrance Selb, Individual Defendant**

**Dated: September ___, 2026**

By: _____
**Terrance Selb**

**So stipulated and agreed:**

**for Plaintiffs:**

**Federal Trade Commission**

**Dated: September ___, 2026**

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**Dated: September ___, 2026**

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**Attorneys for Plaintiff**
**State of Nevada**

**Tyler Bennett, Individual Defendant**

**Dated: September 3, 2026**

By: _____
**Tyler Bennett**

**Terrance Selb, Individual Defendant**

**Dated: September 3, 2026**

By: _____
**Terrance Selb**

**for Receiver:**
**Stephen J. Donell**

**Dated: September ___, 2026**

By: /s/Edward G. Fates
**Edward G. Fates** (admitted *pro hac vice*)

**for Receiver:**
**Stephen J. Donell**

**Dated: September 8, 2026**

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**Stephen J. Donell**

**CERTIFICATE OF SERVICE**

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 600 West Broadway, 27th Floor, San Diego, California 92101-0903.

On September 8, 2026, I used the United States District Court, District of Nevada's Electronic Case Filing System, with the ECF registered to Edward G. Fates to file the following document(s):

- **STIPULATION AND [PROPOSED] ORDER APPROVING SALE OF PROPERTY LOCATED AT 2057 TROON DRIVE, HENDERSON, NEVADA TO SUNSET VENTURES LLC**

The ECF system is designed to send an e-mail message to all parties in the case, which constitutes service. The parties served by e-mail in this case are found on the Court's Electronic Mail Notice List.

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

Executed on September 8, 2026, at San Diego, California.

Pamela Tei Lewis