Simon Barth, MA Bar No. 706122, DC Bar No. 90035761
James E. Evans, VA Bar No. 83866
Federal Trade Commission
600 Pennsylvania Ave., NW, Mailstop CC-6316/1144
Washington, DC 20580
(202) 326-3317 / sbarth@ftc.gov
(202) 326-2026 / james.evans@ftc.gov

Attorneys for Plaintiff
Federal Trade Commission

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

Ziwei Zheng, NV Bar No. 16351
Samantha B. Feeley, NV Bar No. 14034
State of Nevada, Office of the Attorney General
Bureau of Consumer Protection
8945 W. Russell Road, Suite 204
Las Vegas, NV 89148
(702) 486-6021 / zzheng@ag.nv.gov
(702) 486-3789 / sfeeley@ag.nv.gov

Attorneys for Plaintiff
State of Nevada

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Federal Trade Commission, and

State of Nevada,

Plaintiffs,

v.

American Tax Service LLC, et al.,

Defendants.

No. 2:25-cv-1894-GMN-EJY

Stipulation and [Proposed] Order Modifying the Preliminary Injunction

Defendants Terrance Selb and Tyler Bennett ("the Individual Defendants") and Plaintiffs, the Federal Trade Commission and State of Nevada, hereby stipulate to modify the Preliminary Injunction (Docket No. 64) to permit the sale of their residence in Henderson, Nevada 89074, by the Receiver, Stephen J. Donell of FedReceiver, Inc.

As of February 10, 2026, neither Individual Defendant resides in Henderson, Nevada, and the sale of the residence will minimize unnecessary expenditures. As such, the Individual Defendants and Plaintiffs consent to the Receiver's sale of the Property and stipulate as follows:

Within seven (7) days of the date of entry of this Order, the Individual Defendants will transfer legal and equitable title of their residence located in Henderson, Nevada 89074, as described in Exhibit 2 to Individual Defendants' Emergency Motion to Modify Temporary Restraining Order (ECF 57-2) (hereinafter, the "Property") to the Receiver.[1] To transfer title, the Individual Defendants will follow all written instructions from the Receiver. Upon such transfer of title, the Property will be subject to the Stay of Actions set forth in Section XVII of the Preliminary Injunction. ECF 64.

Individual Defendants are permitted a reasonable amount of time (up to, and including through February 27, 2026, or as further agreed and/or extended between the Receiver and Individual Defendants) to move home furnishings and personal property from the Property. On February 28, 2026 (or as further agreed and/or extended between the Receiver and Individual Defendants), Individual Defendants will transfer possession of the Property to the Receiver. To transfer possession, the Individual Defendants will vacate the Property in "broom clean condition" and deliver all keys and security codes, if any, to the Receiver along with written notice that possession is surrendered.

The Receiver may engage a licensed broker to list and market the Property for sale. Subject to the Court approving the sale via a noticed motion, the Receiver or his designated agent may sell the Property and hold the net proceeds from the sale in a separate account until

[1] The Receiver reserves all rights regarding the issue of the rightful owner of the Property and payments made by the entities in receivership toward the Property.

further order of this Court. Any mortgages, fees, taxes, broker commission, or other payments mandated from the sale by law will be paid from the proceeds of the sale.

It is so ordered:

Hon. Gloria M. Navarro
United States District Judge

Dated: February 10, 2026

So stipulated and agreed:

for Plaintiffs:

/s/ Simon Barth

Dated:

Simon Barth, MA Bar No. 706122,
DC Bar No. 90035761
James E. Evans, VA Bar No. 83866
Federal Trade Commission
600 Pennsylvania Ave., NW, CC-6316/1144
Washington, DC 20580
(202) 326-3317 / sbarth@ftc.gov
(202) 326-2026 / james.evans@ftc.gov

Attorneys for Plaintiff
Federal Trade Commission

Ziwei Zheng, NV Bar No. 16351
Samantha B. Feeley, NV Bar No. 14034
Office of the Nevada Attorney General
8945 W. Russell Road, Suite 204
Las Vegas, NV 89148
(702) 486-6021 / zzheng@ag.nv.gov
(702) 486-3789 / sfeeley@ag.nv.gov

Attorneys for Plaintiff
State of Nevada

for Defendants:

Dated:

/s/ Blakeley E. Griffith

Blakeley E. Griffith, NV Bar No. 12386
Bradley T. Austin, NV Bar No. 13064
Snell & Wilmer LLP
1700 South Pavilion Center Drive, Suite 700
Las Vegas, NV 89135
(702) 784-5200
bgriffith@swlaw.com
baustin@swlaw.com

Benjamin W. Reeves, pro hac vice
Snell & Wilmer LLP
1 East Washington St., Suite 2700
Phoenix, AZ 85004
(602) 382-6000
breeves@swlaw.com

Attorneys for the Individual Defendants

Dated:

for Receiver Stephen J. Donell:

/s/ Edward G. Fates

Edward G. Fates, pro hac vice
Allen Matkins Leck Gamble Mallory & Natsis LLP
One America Plaza
600 West Broadway, 27th Floor
San Diego, CA 92101
(619) 233-1155
tfates@allenmatkins.com

Joshua A. Del Castillo, pro hac vice
Alphamorlai L. Kebeh, pro hac vice
Allen Matkins Leck Gamble Mallory & Natsis LLP
865 South Figueroa St., Suite 2800
Los Angeles, CA 90017
(213) 622-5555
jdelcastillo@allenmatkins.com
mkebeh@allenmatkins.com

Jarrod L. Rickard, NV Bar No. 10203
Semenza Rickard Law
10161 Park Run Dr., Suite 150
Las Vegas, Nevada 89145
(702) 835-6803
jlr@semenzarickard.com

Attorneys for Receiver Stephen J. Donell, Court-Appointed Receiver for Corporate Defendants American Tax Service LLC, American Tax Solutions, American Tax Solutions LLC, ATS Tax Group LLC, Elite Sales Solutions also d/b/a American Tax Service, GetaTaxLawyer.com LLC, TNT Holdings Group LLC, TNT Services Group LLC, TNT Tax Associates Inc.