

**ROBB EVANS OF  
ROBB EVANS & ASSOCIATES LLC  
Receiver of I Works, Inc., et al. and  
the Assets of Jeremy Johnson**

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**Federal Trade Commission v. Jeremy Johnson, I Works, Inc., et al.  
CASE No. 2:10-CV-02203-RLH-GWF**

**Notice of Filing of Motion for Order Clarifying Preliminary Injunction  
Order and for Further Instructions Regarding Scope of Receivership  
Defendants Under Preliminary Injunction Order and Report of  
Receiver's Financial Reconstruction and Granting Relief from Local  
Rule 66-5 Pertaining to Notice to Creditors**

**Filed May 30, 2012**

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11 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**  
12 **LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

16 FEDERAL TRADE COMMISSION,

17 Plaintiff,

18 v.

19 JEREMY JOHNSON, etc., et al.,

20 Defendants.  
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Case No. 2:10-CV-02203-MMD-GWF

**NOTICE OF FILING OF MOTION FOR  
ORDER CLARIFYING PRELIMINARY  
INJUNCTION ORDER AND FOR  
FURTHER INSTRUCTIONS  
REGARDING SCOPE OF  
RECEIVERSHIP DEFENDANTS UNDER  
PRELIMINARY INJUNCTION ORDER  
AND REPORT OF RECEIVER'S  
FINANCIAL RECONSTRUCTION AND  
GRANTING RELIEF FROM LOCAL  
RULE 66-5 PERTAINING TO NOTICE  
TO CREDITORS**

1 PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC  
2 (“Receiver”), the Receiver pursuant to the Court’s Preliminary Injunction Order issued February  
3 10, 2011, has filed with the Court his Notice of Motion and Motion for Order Clarifying  
4 Preliminary Injunction Order and for Further Instructions Regarding Scope of Receivership  
5 Defendants under Preliminary Injunction Order and Report of Receiver’s Financial  
6 Reconstruction and Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors  
7 (“Motion”). Pursuant to the Motion, the Receiver moves the Court for an order for the following  
8 relief:

9 1. An order clarifying and confirming that the following entities are Receivership  
10 Defendants within the meaning of the Temporary Restraining Order issued January 13, 2011 and  
11 the Preliminary Injunction Order issued February 10, 2011 as subsidiaries, affiliates, successors,  
12 assigns and/or alter egos of the named Receivership Defendants as defined in those orders and  
13 that their assets constitute property of the receivership estate in this case: Zibby, LLC; Zibby  
14 Flight Service, LLC; Orange Cat Investments, LLC; New Horizons Finance, Inc.; SLI, LLC;  
15 Trigger, LLC; iPrerogative Inc.; and the assets of Sharla Johnson other than her interest in Quilted  
16 Works, Inc.;

17 2. An order clarifying and confirming that the receivership estate includes: (a) as  
18 Receivership Defendants under the Preliminary Injunction Order the entities listed on Exhibit A  
19 hereto as subsidiaries, affiliates, successors, assigns and/or alter egos of the named Receivership  
20 Defendants, (b) as property of the receivership estate (“Receivership Property”) the assets of the  
21 individuals listed on Exhibit A, and (c) as Receivership Defendants and Receivership Property  
22 under the Preliminary Injunction Order all other entities and assets owned or controlled, directly  
23 or indirectly, by Jeremy Johnson (“Johnson”), including but not limited to (i) all assets and  
24 entities held in the name of a third party for the benefit of Johnson and/or (ii) all assets the source  
25 of funding of which came in whole or in part from funds or assets of the Receivership Defendants  
26 as defined in the Preliminary Injunction Order and as clarified pursuant to this Motion, subject to  
27 the following:

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1           A.     That the Receiver be granted all of the powers and duties provided under  
2 the Preliminary Injunction Order with respect to all Receivership Defendants and Receivership  
3 Property as clarified under the Motion;

4           B.     That the owners of any assets determined to constitute Receivership  
5 Property and/or the entities determined to constitute Receivership Property under paragraph 2(c)  
6 above may request a determination by the Court that such asset or entity should not be deemed  
7 Receivership Property by noticed motion to the Court, which noticed motion shall (1) be in  
8 writing, (2) be filed with the Court and served on the Receiver and the parties to this action, (3)  
9 set forth all reasons why such asset or such entity should be excepted from the scope of the  
10 receivership, and (4) set forth by competent evidence the reasons why such asset or entity should  
11 be excepted from the scope of the receivership.

12           C.     That as to all assets and entities listed in Exhibit A, the Receiver be granted  
13 the authority and discretion, in the Receiver's opinion and judgment based on the Receiver's  
14 investigation, to determine that certain entities, assets and/or business activities of certain entities  
15 are sufficiently independent of and not affiliated with or related to Johnson and/or the other  
16 Receivership Defendants and/or which the Receiver believes can be managed, administered  
17 and/or operated by the record owners, shareholders, managers or members without interfering  
18 with the Receiver's administration of the receivership estate and its assets, and based on such  
19 determination, the Receiver may turn over the management, possession and control of such  
20 assets, entities and/or business activities without further order of the Court.

21           The Motion is made pursuant to Local Civil Rules 7-2 and 66-5(a) and other applicable  
22 law and is based upon this notice of filing of the Motion, the Motion, the memorandum of points  
23 and authorities and the Declarations of Brick Kane and Gary Owen Caris filed in support thereof,  
24 any reply, the pleadings, records and files of the Court in this action of which the Receiver  
25 requests the Court take judicial notice, including but not limited to the Report of Temporary  
26 Receiver's Activities filed February 8, 2011 (Doc. No. 127) ("First Report") and the Report of  
27 Receiver's Financial Reconstruction filed February 3, 2012 (Doc. No. 464) which is supported by  
28 a four-volume Appendix of Exhibits (Doc. Nos. 465-468) (collectively "Second Report"), and

1 upon all other pleadings and documentary evidence as may be presented to the Court by the  
2 Receiver in support of the Motion.

3 PLEASE TAKE FURTHER NOTICE that a copy of the Motion may be obtained by any  
4 interested party by written request to the Receiver directed as follows: Robb Evans & Associates  
5 LLC, Attn: Cherrie Eustaquio, 11450 Sheldon Street, Sun Valley, CA 91352-1121; Telephone  
6 (818) 768-8100; Facsimile: (818) 768-8802.

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Dated: May 30, 2012

Respectfully submitted,  
  
RANDOLPH L. HOWARD  
KOLESAR & LEATHAM, CHTD.  
  
MCKENNA LONG & ALDRIDGE LLP  
GARY OWEN CARIS  
LESLEY ANNE HAWES

By: /s/ Gary Owen Caris  
Gary Owen Caris  
  
Attorneys for Receiver  
**ROBB EVANS OF ROBB EVANS &  
ASSOCIATES LLC**

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**EXHIBIT A**

**EXHIBIT A****I Works Receivership Entities and Individuals**

| <b>Entity/Individual Name</b>   | <b>Report / Evidence References*</b>  |
|---------------------------------|---|
| Alpha Yankee LLC                | Second Report, pp. 7, 44, 71; App. Tab 50; Kane Decl., paras. 48, 49  |
| Attack Productions LLC          | Second Report, p. 6; App. Tabs 17, 35, 36, 66   |
| C2 Holdings, LLC                | App. Tab 36   |
| Capital Energy Corporation      | App. Tabs 17, 35, 36  |
| CECJ Enterprises LLC            | Second Report, p. 6   |
| Cerberus Management LLC         | Second Report, pp. 6, 19-22, 32; App. Tabs 12, 66; Caris Decl., para. 14; Kane Decl., paras. 38, 39, 47, 62 |
| Chateau Circle LLC              | Kane Decl., paras. 70-73 and Exhs. 20-31  |
| Choker Block LLC                | Second Report, pp. 7, 44, 71; Kane Decl., paras. 48, 49   |
| Commerce Financial LLC          | Second Report, pp. 21, 38; App. Tabs 17, 35, 36, 43; Kane Decl., para. 64                                   |
| Destiny Marketing LLC           | Second Report, p. 6   |
| Digital Currency LLC            | Second Report, pp. 7, 21; App. Tabs 12, 17, 43, 66; Kane Decl., paras. 38, 64, 65                           |
| Dreamland Capital LLC           | Second Report, pp. 7, 46, 47, 64; App. Tabs 43, 59, 66  |
| Elite Asset Management LLC      | Second Report, pp. 7, 21, 36, 48; App. Tabs 61 and 66; Kane Decl., paras. 55, 62                            |
| ePayment Solutions LLC          | Second Report, pp. 7, 27, 45; App. Tabs 53, 66  |
| Executive Auto Group            | App. Tabs 35, 36, 43  |
| Executive Car Sales, Inc.       | Second Report, pp. 9, 10, 34, 35, 67  |
| Executive Service Center LLC    | App. Tabs 36, 43  |
| Fishhook Partners LLC           | Second Report, pp. 7, 12, 46, 48, 54, 63; App. Tabs 60, 66  |
| Flatline Investments LP         | Second Report, pp. 7, 47, 48, 64; App. Tabs 59, 66  |
| Flying High Enterprises LLC     | Second Report, pp. 6, 21, 32; App. Tabs 17, 66; Kane Decl., paras. 38, 39, 47                               |
| Global Media 7 LLC              | Kane Decl., para. 69 and Exhs. 14-19  |
| Hafen, John, Assets of          | Caris Decl., paras. 12, 13; Second Report, pp. 21, 49-51; Kane Decl., paras. 21, 30, 53, 68                 |
| IC Development LLC              | App. Tabs 35, 36  |
| Interstate Lending LLC          | App. Tabs 35, 36, 43  |
| iPrerogative Inc.               | Second Report, pp. 6, 70-71; Kane Decl., para. 50   |
| Jason T. Vowell Sole Prop. Gigs | App. Tab 36   |

| Entity/Individual Name                              | Report / Evidence References*  |
|---|--|
|   | 26, 38, 61, 63, 64; Caris Decl. paras. 7, 8  |
| Kingfish Management LLC                             | Second Report, pp. 7, 46-47; App. Tabs 43, 66; Kane Decl. paras. 64, 65  |
| Kingston Enterprises LLC                            | Second Report, pp. 6, 45; App. Tabs 51, 66; Kane Decl. paras. 52, 54   |
| Kombi Capital LP                                    | Second Report, pp. 6, 40-43; App. Tabs 47, 66; Kane Decl., paras. 42-43; Caris Decl. para. 5.                              |
| Liahona Academy for Youth LLC/LP                    | Caris Decl., para. 12; App. Tabs 35, 36, 43; Kane Decl., paras. 61, 68   |
| Liahona Holdings LP                                 | Second Report, p. 38; App. Tabs 36, 51, 66   |
| Lift Off Financial LLC                              | Second Report, pp. 6, 42; App. Tabs 17, 66, Kane Decl., para. 43   |
| Lilhaf Holdings LLC                                 | Second Report, pp. 49-51, 54; App. Tabs 35, 36, 66; Kane Decl. paras. 30, 68; Caris Decl. para. 12                         |
| Market Mastery Trading LLC                          | Second Report, p. 38; App. Tabs 36, 43   |
| Mastery Merchant, LLC and dba Money Master for Life | <i>passim</i>  |
| Moneymaker Strategies LLC                           | Second Report, p. 6  |
| Mountain Financial, LLC                             | Second Report, pp. 42, 77; App. Tab 47; Kane Decl., para. 70   |
| Omaha Eight LLC                                     | Second Report, pp. 7, 71-72; Kane Decl. paras. 48, 49; Caris Decl. para. 13  |
| Online Weight Loss                                  | App. Tabs 35, 36   |
| Paradise Ranch Development LLC                      | Second Report, pp. 7, 21; App. Tabs 12, 17, 35, 56, 57, 66, Kane Decl., para. 47   |
| Paydirt Capital, Inc.                               | Second Report, pp.33-35; App. Tabs 37, 66; Kane Decl. paras. 42, 57-62; Caris Decl. paras. 7, 8                            |
| Paydirt Management, Inc.                            | Second Report, pp. 33, 35-36; App. Tabs 38, 66; Kane Decl. paras. 58-62; Caris Decl. para. 7                               |
| Paydirt Properties LLC                              | Second Report, pp. 33, 36; App. Tabs 39, 66; Kane Decl. paras. 58-62; Caris Decl. paras. 7, 8                              |
| Paydirt, L.P.                                       | Second Report, pp. 33, 36; App. Tab 39; Kane Decl. paras. 58-62  |
| Phoenix Rising LLC                                  | Second Report, pp. 6, 44-45; App. Tabs 50, 66; Kane Decl., paras. 48, 49, 52, 54   |
| Powder Monkeys, LLC                                 | <i>Passim</i>  |
| Robin V Foundation                                  | Second Report, p. 7  |
| Rotortrends Inc.                                    | Second Report, pp. 6, 70; Kane Decl., paras. 50, 51  |
| ScamVictimHelp.com, LLC                             | App. Tab 36  |
| Scud Runner LLC                                     | Second Report, pp. 7, 71; Kane Decl. paras. 48, 49   |
| Silvernix Holdings LLC                              | Second Report, pp. 7, 45, 47, 71-72; App. Tabs 36, 43, 53, 56, 66; Kane Decl., paras. 48, 49, 64, 65; Caris Decl. para. 13 |



| Entity/Individual Name               | Report / Evidence References*  |
|--------------------------------------|--|
|                                      | Kane Decl., paras. 48, 49, 64, 65; Caris Decl. para. 13  |
| SmartNet Development LLC             | App. Tab 36  |
| Spindletop Investments LLC           | Second Report, pp. 7, 71   |
| Spyglass Enterprises LLC             | Second Report, pp. 6, 37-40; App. Tabs 41, 66; Kane Decl. paras. 21, 26, 60, 61, 63, 64, 74; Caris Decl. paras. 7, 8 |
| Spyglass Holdings LLC                | Second Report, pp. 6, 37-40; App. Tabs 42, 66; Kane Decl. para. 63   |
| SRLA Association LLC                 | Second Report, p. 7, Kane Decl., para. 48  |
| SRLA LLC                             | Second Report, pp. 7, 71-72; App. Tabs 43, 66; Kane Decl., paras. 48, 49, 65   |
| Summerset Ranch LLC                  | Second Report, p. 7; App. Tabs 17, 35, 43, 54, 66; Kane Decl., paras. 45 and 47                                      |
| T. Vowell Sole Prop. Capital Holding | App. Tabs 35, 36, 43   |
| Taggart Management LLC               | Second Report, pp. 7, 46, 47; App. Tabs 56, 66; Kane Decl. paras. 64, 65   |
| Tiburon Enterprises LLC              | Second Report, pp. 7, 50-51, 54; App. Tabs 36,43,57,66; Kane Decl., paras. 62, 68; Caris Decl. para. 12              |
| TJJ Properties LLC                   | App. Tabs 36, 43   |
| TLV Enterprises Inc.                 | Second Report, p. 6  |
| Treadstone Partners LP               | Second Report, pp. 7, 46, 47 App. Tab 57   |
| Triple Play Group LLC                | Second Report, p. 38; App. Tabs 35, 36, 43   |
| Triple Seven LP/LLC                  | <i>passim</i>  |
| Triple Seven, Inc.                   | Second Report, p. 68; App. Tab 35  |
| USB Media LLC dba Computista         | Second Report, p. 6; App. Tabs 35, 36  |
| Valentino Holdings LP                | Second Report, p. 7; App. Tabs 17, 66  |
| Valentino Properties LLC             | Second Report, p. 38; App. Tabs 36, 43   |
| Vanquish Enterprises LLC             | Second Report, p. 6; App. Tabs 35, 36, 66; Kane Decl. para. 65   |
| Virgin Properties LLC                | Second Report, p. 38; App. Tabs 36, 43, 50, 66   |
| Volair Flight Management LLC         | App. Tabs 36, 43   |
| Vowell, Jason, Assets of             | <i>passim</i>  |
| Vowell, Sheree, Assets of            | Kane Decl., paras. 70-73   |
| Vowell, Todd, Assets of              | <i>passim</i>  |
| WCDI Land Management LLC             | Second Report, pp. 6, 45; App. Tab 66; Kane Decl. paras. 45, 65  |
| Wealth Matters LLC                   | Second Report, p. 6  |
| Woodview Holdings LLC                | Second Report, pp. 7, 48-49; Appl Tabs 62-65; Kane Decl., para. 46   |

\* The citations to the Receiver's Reports and other evidence on this chart are set forth for the convenience of the Court and the parties and are not a complete or exhaustive recitation of all evidence relating to the persons and entities identified herein, and included in the Receiver's First Report, the Receiver's Second Report, the supporting declarations and documents of which the Court may take judicial notice. References to the "Second Report" and "App. Tabs" refer to the Report of Receiver's Financial Reconstruction [January 31, 2012] filed February 3, 2012 and the supporting four-volume Appendix of Exhibits. References to the Kane Declaration and the Caris Declaration refer to the declarations filed by the Receiver in support of the Motion for Order Clarifying Preliminary Injunction Order and for Further Instructions Regarding Scope of Receivership Defendants under Preliminary Injunction Order and Report of Receiver's Financial Reconstruction.