

**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-MMD-GWF**

**Notice of Filing of Motion to Authorize Receiver to
Market and Sell Estate's Interest in Belize Beach Holdings, LTD,
and its Real Property in San Pedro, Belize and Granting Relief from Local
Rule 66-5 Pertaining to Notice to Creditors**

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13
 14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**
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17 FEDERAL TRADE COMMISSION,
 18 Plaintiff,
 19 v.
 20 JEREMY JOHNSON, individually, as officer
 of Defendants I Works, Inc., etc., et al.,
 21 Defendants.
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Case No. 2:10-CV-02203-MMD-GWF

**NOTICE OF FILING OF MOTION TO
 AUTHORIZE RECEIVER TO MARKET
 AND SELL ESTATE'S INTEREST IN
 BELIZE BEACH HOLDINGS, LTD. AND
 ITS REAL PROPERTY IN SAN PEDRO,
 BELIZE AND GRANTING RELIEF
 FROM LOCAL RULE 66-5 PERTAINING
 TO NOTICE TO CREDITORS**

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 25 PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC
 26 ("Receiver"), the Receiver pursuant to the Court's Preliminary Injunction Order issued February
 27 10, 2011, has filed his Motion to Authorize Receiver to Market and Sell Estate's Interest in Belize
 28 Beach Holdings, Ltd. and Its Real Property in San Pedro, Belize and Granting Relief from Local

1 Rule 66-5 Pertaining to Notice to Creditors ("Motion"). Pursuant to the Motion, the Receiver has
2 moved the Court for an order for the following relief:

3 1. An order authorizing the Receiver to market and offer for sale the receivership
4 estate's interest in the entity Belize Beach Holdings, Ltd. ("Belize Beach"), consisting of 9,999
5 shares of stock in Belize Beach titled in the name of Receivership Defendant Jeremy Johnson
6 ("Belize Beach Stock") and to enter into a contract for the sale of the Belize Beach Stock subject
7 to approval of any proposed sale by this Court after notice and an opportunity for hearing;

8 2. An order authorizing the Receiver to list and market for sale the sole known asset
9 of Belize Beach consisting of certain real property located at Parcel 1277 Block 42 San Pedro
10 Registration Section, San Pedro Town, Ambergris Caye, Belize District of Belize ("San Pedro
11 Property") and to enter into a contract for the sale of the San Pedro Property subject to approval of
12 any proposed sale by this Court after notice and an opportunity for hearing;

13 3. In connection with the listing and marketing of the San Pedro Property, an order
14 authorizing the Receiver to engage a real estate broker experienced in the sale of real property in
15 Belize, in the Receiver's opinion and judgment (the "Broker"), and to enter into an exclusive
16 listing agreement with the Broker providing for ordinary and customary terms and conditions for
17 the listing of similar real property in Belize, including the payment of ordinary and customary
18 sales commissions upon the closing of a sale of the San Pedro Property, providing for ordinary and
19 customary advertising expenses, and further providing that acceptance of offers and completion of
20 any sale of the San Pedro Property is subject to entry of an order of this Court approving such sale
21 on terms and conditions as the Court may determine are proper and after notice and an opportunity
22 for hearing;

23 4. An order for such other and further relief and orders of the Court as may be just and
24 proper in connection with the disposition of the Belize Beach Stock and/or the San Pedro
25 Property; and

26 5. An order deeming notice of the Motion to be sufficient under Local Civil Rule 66-5
27 based on the service of this notice of the filing of the Motion and the Motion on all parties, and
28 service of this notice of the filing of the Motion on all known non-consumer creditors of the estate

1 and known taxing authorities with potential claims against the estate concurrent with the filing of
2 the Motion with the Court, but not on the tens of thousands of potential consumer creditors.

3 The Motion is made pursuant to Local Civil Rules 7-2, and 66-5, 28 U.S.C. § 2001 and
4 2004, and other applicable law. The Motion is based upon the Motion, this separate Notice of
5 Filing of the Motion, the memorandum of points and authorities and Declaration of Kenton
6 Johnson filed in support of the Motion, the proposed order filed in support of the Motion, on any
7 reply, on the pleadings, records and files of the Court in this receivership proceeding of which the
8 Receiver requests the Court take judicial notice, including without limitation the Preliminary
9 Injunction (Doc. No. 130), the Report of Receiver's Financial Reconstruction filed February 3,
10 2012 (Doc. No. 464) which is supported by a four-volume Appendix of Exhibits (Doc. Nos. 465-
11 468) (collectively "Second Report"), the Order Granting Motion for Order Clarifying Preliminary
12 Injunction Order and for Further Instructions Regarding Scope of Receivership Defendants under
13 Preliminary Injunction Order and Report of Receiver's Financial Reconstruction and Granting
14 Relief from Local Rule 66-5 Pertaining to Notice to Creditors After Hearing ("Clarifying Order"),
15 and on such further oral and documentary evidence and arguments of counsel as may be presented
16 at any hearing on the Motion.

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18 DATED: April 18, 2016

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By: /s/ Gary Owen Caris

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Lesley Anne Hawes

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