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*Attorneys for David K. Broadbent as Court-Appointed Receiver*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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FEDERAL TRADE COMMISSION; and  
UTAH DIVISION OF CONSUMER  
PROTECTION,

Plaintiffs,

vs.

ZURIXX, LLC, a Utah limited liability company; BRAND MANAGEMENT HOLDINGS, LLC, a Delaware limited liability company; CAC INVESTMENT VENTURES, LLC, a Puerto Rico limited liability company; CARLSON DEVELOPMENT GROUP UTAH, a Utah limited liability company; CARLSON DEVELOPMENT GROUP PUERTO RICO, a Puerto Rico limited liability company; CJ SEMINAR HOLDINGS, LLC, a Utah limited liability company; DORADO MARKETING AND MANAGEMENT, LLC, f/k/a Zurixx, LLC, a Puerto Rico limited liability company; JSS INVESTMENT VENTURES, LLC, a Utah limited liability company; JSS TRUST, individually and as an

**STIPULATED MOTION TO ADD  
ADVANCED EDUCATION (CA) LLC  
D/B/A WILL TO WIN ENTREPRENEUR  
AS A RECEIVERSHIP ENTITY**

Case No. 2:19-cv-00713-DAK-DAO

owner of JSS INVESTMENT VENTURES, LLC; ZURIXX FINANCIAL UTAH, a Utah limited liability company; ZURIXX FINANCIAL PUERTO RICO, a Puerto Rico limited liability company; CRISTOPHER A. CANNON, individually and as an officer of ZURIXX, LLC; JAMES M. CARLSON, individually and as an officer of ZURIXX, LLC; JEFFREY D. SPANGLER, individually and as an officer of ZURIXX, LLC; and GERALD D. SPANGLER, a trustee for the JSS TRUST,

Defendants.

The parties listed below move the Court for an order identifying Advanced Education (Ca) LLC d/b/a Will to Win Entrepreneur (the “**Subsidiary**”) as a “Receivership Entity” under the Stipulated Preliminary Injunction (Dkt. No. 54).

In the Stipulated Preliminary Injunction, the Court appointed David K. Broadbent as receiver (the “Receiver”) and defined “Receivership Entities” as follows:

M. “**Receivership Entities**” means the Corporate Defendants as well as any other entity that the Receiver determines is controlled or owned by any Defendant and (1) conducted any business related to Defendants’ advertising, marketing, distributing, promoting, or selling of any real estate-related investing products and services, (2) commingled or pooled Assets with any Defendant, or (3) otherwise participated in the transfer of Assets stemming from the advertising, marketing, distributing, promoting, or selling of real estate-related investing products and services, including, but not limited to, Dorado Marketing and Management, LLC, Zurixx Financial, LLC (Puerto Rico), RE Cash Source, LLC, and Brand Management Holdings, LLC. Upon determining that a nonparty entity is a Receivership Entity, the Receiver shall promptly notify the entity as well as the parties, and shall inform the entity that it can challenge the Receiver’s determination by filing a motion with the Court.

(Dkt. No. 54 at 5-6.) The Subsidiary is an indirect, wholly-owned subsidiary of the Receivership Entity Brand Management Holdings LLC. The parties stipulate and agree that the Subsidiary is a Receivership Entity as defined in the Stipulated Preliminary Injunction.

The parties are submitting this Motion because on November 4, 2019, the Subsidiary was sued in the Provincial Court of Alberta, Canada, in a case styled *Lindsay Pol vs. Advanced Education (CA) LLC operating as Will to Win Entrepreneur*, Action No. P. 1990103922 (the “Alberta Action”). Canadian counsel to the Subsidiary has advised the Receiver that, in order for the Alberta Court to stay proceedings in the Alberta Action pursuant to the receivership order, the Subsidiary must be formally declared a Receivership Entity. An order to that effect from this Court will help the Receiver avoid the time and expense of litigating the issue in the Alberta Action.

A proposed order granting this Motion is submitted herewith.

RESPECTFULLY SUBMITTED July 21, 2020.

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/s/ Cory A. Talbot

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Ventures, Carlson Development Group Puerto Rico,  
Dorado Marketing and Management, and Zurixx  
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/s/ Brennan H. Moss

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*Attorneys for Defendants JSS Investment Ventures,  
JSS Trust, and Gerald D. Spangler as trustee for the  
JSS Trust*

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**ORDER GRANTING STIPULATED  
MOTION TO ADD ADVANCED  
EDUCATION (CA) LLC D/B/A WILL TO  
WIN ENTREPRENEUR AS A  
RECEIVERSHIP ENTITY**

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Defendants.

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Having considered the Stipulated Motion to Add Advanced Education (Ca) LLC d/b/a Will to Win Entrepreneur as a Receivership Entity (the “Motion”), and good cause appearing, the Court GRANTS the Motion. Accordingly, Advanced Education (Ca) LLC d/b/a Will to Win Entrepreneur is a Receivership Entity as that term is defined in the Stipulated Preliminary Injunction (Dkt. No. 54).

DATED this \_\_\_\_ day of July, 2020.

BY THE COURT:

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Honorable Dale A. Kimball  
U.S. District Court Judge

APPROVED-AS-TO-FORM:

HOLLAND & HART LLP

*/s/ Cory A. Talbot* \_\_\_\_\_

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*/s/ Collot Guerard* \_\_\_\_\_

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UTAH ATTORNEY GENERAL'S OFFICE

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Christopher A. Cannon, James M. Carlson,  
Jeffrey D. Spangler, Brand Management  
Holdings, CAC Investment Ventures,  
Carlson Development Group Puerto Rico,  
Dorado Marketing and Management, and  
Zurixx Financial Puerto Rico*

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/s/ Brennan H. Moss

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as trustee for the JSS Trust*

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