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Attorneys for Receiver
STEPHEN J. DONELL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION, and Case No. 2:25-cv-01894-GMN-EJY
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

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

1 liability company, TNT SERVICES
2 GROUP LLC, a limited liability
3 company, TNT TAX ASSOCIATES
4 INC., a corporation, TERRANCE SELB,
5 individually and as an officer of
6 American Tax Service LLC, American
7 Tax Solutions, American Tax Solutions
8 LLC, ATS Tax Group LLC, TNT
9 HOLDINGS GROUP LLC, TNT
10 SERVICES GROUP LLC, and TNT
11 TAX ASSOCIATES INC., and TYLER
12 BENNETT, individually and as an officer
13 of American Tax Service LLC, American
14 Tax Solutions, American Tax Solutions
15 LLC, ATS Tax Group LLC, TNT
16 HOLDINGS GROUP LLC, TNT
17 SERVICES GROUP LLC, and TNT
18 TAX ASSOCIATES INC.,

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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];

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

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

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

14 G. The Receiver and the Individual Defendants thereafter proceeded with
15 transfer of the Property to the Receiver. Once title was transferred, the Receiver
16 engaged a licensed broker to market and sell the Property, subject to Court approval
17 of the sale. The Property was listed and widely advertised for sale. Interested parties
18 were permitted to view the Property at open houses or by appointment. The list price
19 had to be reduced several times due to the lack of offers for the Property. Ultimately,
20 the Receiver and Sunset Ventures, LLC ("Buyer") agreed on a sale price of
21 \$1,810,000, subject to Court approval.

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

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

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STIPULATION

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

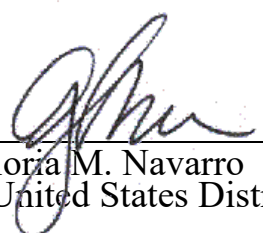
1. The proposed sale of the Property by the Receiver to Buyer for \$1,810,000 pursuant to the Purchase Agreement shall be authorized and approved. The net sale proceeds, after payment of all seller obligations, shall be transferred from escrow to the Receiver at closing. The Receiver shall thereafter 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

1 So stipulated and agreed:

2 for Plaintiffs:

3 Federal Trade Commission

4 **Dated: September 8, 2026**

5 By: /s/Simon Barth
6 **Simon Barth**, MA Bar No. 706122,
7 DC Bar No. 90035761
8 **James E. Evans**, VA Bar No. 83866
9 **Federal Trade Commission**
600 Pennsylvania Ave., NW
Washington, DC 20580
(202) 326-3317 / sbarth@ftc.gov
(202) 326-2026 / james.evans@ftc.gov
Attorneys for Plaintiff Federal Trade
Commission

10 for State of Nevada

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

13 **Dated: September 8, 2026**

14 By: /s/Ziwei Zheng
15 **Ziwei Zheng** (Bar No. 16351)
16 **Samantha B. Feeley** (Bar No. 14034)
17 **Office of Nevada Attorney General**
8945 W. Russel Road, Suite 204
Las Vegas, Nevada 89148
(702) 486-6021 / zzheng@ag.nv.gov
(702) 486-3789 / sfeeley@ag.nv.gov
Attorneys for Plaintiff
State of Nevada

19 **Tyler Bennett, Individual Defendant**

20 **Dated: September __, 2026**

21 By: _____
22 **Tyler Bennett**

23 **Terrance Selb, Individual Defendant**

24 **Dated: September __, 2026**

25 By: _____
26 **Terrance Selb**

So stipulated and agreed:

for Plaintiffs:

Federal Trade Commission

Dated: September __, 2026

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

for State of Nevada

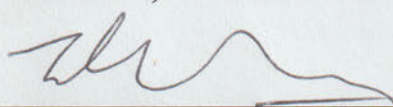
Aaron D. Ford, Attorney General
Ernest D. Figueroa, Consumer Advocate

Dated: September __, 2026

By: /s/Ziwei Zheng
Ziwei Zheng (Bar No. 16351)
Samantha B. Feeley (Bar No. 14034)
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Attorneys for Plaintiff State of Nevada

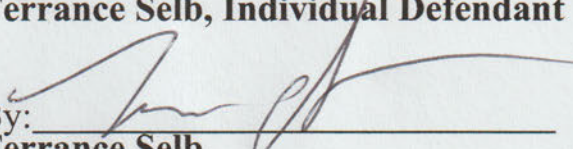
Tyler Bennett, Individual Defendant

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*)

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Dated: September 8, 2026

**for Receiver:
Stephen J. Donell**

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

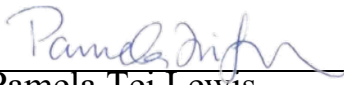
- **STIPULATION AND [PROPOSED] ORDER APPROVING SALE OF PROPERTY LOCATED AT 2057 TROON DRIVE, HENDERSON, NEVADA TO SUNSET VENTURES LLC**

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.

- **Bradley T Austin**
baustin@swlaw.com, lmosbey@swlaw.com, docketlas@swlaw.com, delvira@swlaw.com
- **Simon Barth**
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- **Samantha Bilbao Feeley**
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- **Ernest D. Figueroa**
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- **Jarrold L. Rickard**
jlr@semenzarickard.com, oak@semenzarickard.com, alb@semenzarickard.com
- **Ziwei Zheng**
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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