

1 JARROD L. RICKARD (BAR NO. 10203)  
E-Mail: jlr@semenzarickard.com  
2 SEMENZA RICKARD LAW  
10161 Park Run Drive, Suite 150  
3 Las Vegas, Nevada 89145  
Phone: (702) 835-6803  
4 Fax: (702) 920-8669

5 JOSHUA A. DEL CASTILLO (*admitted pro hac vice*)  
E-Mail: jdelcastillo@allenmatkins.com  
6 ALPHAMORLAI L. KEBEH (*admitted pro hac vice*)  
E-Mail: mkebeh@allenmatkins.com  
7 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
8 865 South Figueroa Street, Suite 2800  
Los Angeles, California 90017-2543  
9 Phone: (213) 622-5555  
Fax: (213) 620-8816

10 EDWARD G. FATES (*admitted pro hac vice*)  
E-Mail: tfates@allenmatkins.com  
11 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
12 One America Plaza  
13 600 West Broadway, 27th Floor  
San Diego, California 92101-0903  
14 Phone: (619) 233-1155  
Fax: (619) 233-1158

15 Attorneys for Receiver  
16 STEPHEN J. DONELL

17 UNITED STATES DISTRICT COURT  
18 DISTRICT OF NEVADA

19 FEDERAL TRADE COMMISSION, and  
20 STATE OF NEVADA,

21 Plaintiff,

22 v.

23 AMERICAN TAX SERVICE LLC, a  
limited liability company, et. al,

24 Defendants.  
25  
26  
27  
28

Case No. 2:25-cv-01894-GMN-EJY

**SECOND SUPPLEMENTAL  
DECLARATION OF RECEIVER,  
STEPHEN J. DONELL, REGARDING  
STATUS OF WORK AS TEMPORARY  
RECEIVER, PRELIMINARY  
OBSERVATIONS AND CONCLUSIONS**

1 SUPPLEMENTAL DECLARATION OF STEPHEN J. DONELL

2 I, Stephen J. Donell, declare as follows:

3 1. I am the Court-appointed temporary receiver in the above-entitled  
4 enforcement action, commenced by the Federal Trade Commission (“FTC”) and State of  
5 Nevada, for defendants American Tax Service LLC (“ATS”), American Tax Solutions,  
6 American Tax Solutions LLC, ATS Tax Group LLC, Elite Sales Solutions,  
7 GetATaxLawyer.com LLC, TNT Holdings Group LLC, TNT Services Group LLC, TNT  
8 Tax Associates Inc., and each of their respective subsidiaries, affiliates, successors, and  
9 assigns (collectively, the “Receivership Entities” or “Entities”), having been appointed  
10 pursuant to this Court’s October 9, 2025 *Ex Parte Temporary Restraining Order with Asset*  
11 *Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to*  
12 *Show Cause Why a Preliminary Injunction Should Not Issue* (the “Initial Appointment  
13 Order”, ECF No. 9). I make this Declaration based on my personal knowledge and on  
14 information provided to me by my staff, agents, and retained professionals in the ordinary  
15 course of this receivership as established by the Initial Appointment Order,<sup>1</sup> which  
16 information I believe to be true. If called as a witness, I could testify competently to the  
17 matters set forth herein.

18 Consumer Communications

19 2. Since my last declaration was filed (*See* ECF No. 45), my office has  
20 continued to receive numerous consumer phone calls, emails and inquiries via my website.  
21 To date, I have received approximately three hundred (300) email inquiries directly  
22 through my website, and approximately four hundred (400) consumers have subscribed to  
23 the case on my website. Subscribers receive email notifications when new information is  
24 posted.

25  
26  
27  
28 <sup>1</sup> The pendency of my appointment under the Initial Appointment Order has been  
extended by this Court’s *Stipulation and Order to Continue Hearing on Order to Show*  
*Cause Why a Preliminary Injunction Should Not Issue* [ECF No. 39].

1           3.       Consumers consistently report the same experiences detailed in my last  
 2 declaration. Many reported being rushed into making payments or signing documents, and  
 3 being instructed to obtain financing when they could not afford ATS's fees. After initially  
 4 appearing responsive, ATS representatives apparently routinely stopped answering calls or  
 5 providing updates. As an example, one consumer reported paying ATS approximately  
 6 \$70,000 and attending weekly meetings for three weeks before ATS apparently stopped  
 7 responding to his calls. He apparently received no explanation of his alleged IRS debt and  
 8 no resolution. Another consumer reported she did not fully understand who she was  
 9 paying or the status of her IRS matter, only that \$300 was being withdrawn from her  
 10 account each month. Documents revealed she had been directed to a credit union that  
 11 purchased the debt she owed to ATS, resulting in her making payments to a third-party  
 12 lender for services ATS claimed to provide. She also reported repeated unsuccessful  
 13 attempts to contact ATS.

14           **Transfers to Individual Defendants and For Their Benefit**

15           4.       With assistance from my forensic accountant, JS Held, I have been analyzing  
 16 the bank records, QuickBooks records, and other records of the Receivership Entities to  
 17 determine (a) the sources and amounts of funds that came into the Receivership Entities,  
 18 (b) the movement of funds between and among the Receivership Entities, and (c) the uses  
 19 and recipients of funds transferred from the Receivership Entities. This accounting  
 20 analysis is ongoing and the summary data discussed herein is preliminary in nature.

21           5.       Based on the data analyzed thus far, which only covers the period from  
 22 October 2023 forward, it appears that Defendant Terrence Selb received the following  
 23 amounts from the Receivership Entities:

Description	Total	Transactions
Loan-Terrance Selb	4,120,167	29
Officer's Salaries	94,840	5
Intercom- ATS/ESS	82,562	2
Refunds/Discounts	11,000	1
Spiff- Sales	6,600	2

1	Employee Loan/Advance	5,000	1
2	Computer, Software & Apps	1,439	1
3		<b>\$4,321,607</b>	41

4           6.       Based on the data analyzed thus far (again, October 2023 and forward), it  
 5 appears that Defendant Tyler Bennett received the following amounts from the  
 6 Receivership Entities:

	<b>Description</b>	<b>Total</b>	<b>Transactions</b>
7			
8	Loan - Tyler Bennett	4,128,900	25
9	Salaries & Wages	118,575	8
10	Misc (no detail)	41,977	1
11	Spiff- Sales	30,100	4
12	Legal Fees	19,900	2
13	Meals & Entertainment	12,957	3
14	Contracted Labor	10,600	2
15	Spiffs & Travel (no split)	5,500	1
16	Bonuses	5,000	1
17	Reimbursement (no detail)	4,250	1
18	Travel & Lodging	3,720	4
19	Housekeeping	750	1
20		<b>\$4,382,230</b>	53

21           7.       In addition, it appears that the Receivership Entities made payments for  
 22 vehicles owned by Defendants Selb and Bennett as follows:

	<b>Year</b>	<b>Make</b>	<b>Model</b>	<b>Payments during Analyzed Period</b>
23	2022	Range Rover	Land Rover	\$15,141
24	2024	Tesla	Cyber Truck	\$185,308
25	2023	Tesla	Model X	\$36,445
26	2024	Chrysler	Jeep Grand Cherokee	\$25,213

27           8.       In addition, it appears that the Receivership Entities made payments for real  
 28 properties owned by Defendants Selb and Bennett as follows:

Year	Premier America	SLS Mortgage	Newrez / Shellpoint	Luxury Real Estate	Total
<i>Related Address:</i>	<i>8184 Mannix Drive, Los Angeles</i>	<i>Currently Unknown</i>	<i>2057 Troon Drive, Henderson</i>	<i>222 Karen Ave # 4305 Las Vegas</i>	
2024	\$106,086	\$56,623	\$70,025	\$10,058	\$232,734
2025 YTD	\$86,798	-	\$119,352	-	\$216,207
Total	\$192,884	\$56,623	\$189,376	\$10,058	\$448,942

9. As noted above, my accounting analysis, with assistance from JS Held, is ongoing. These amounts are preliminary in nature and will likely need to be supplemented and revised as additional data is gathered and analyzed.

**Initial Conclusion Regarding Receivership Entities’ Operations**

10. The Initial Appointment Order authorizes me to take certain actions, including to suspend operations of the Receivership Entities, if I determine the entities cannot be operated legally and profitably. ECF 9, Initial Appointment Order, Section XII.T.

11. Upon my appointment, I reviewed the evidence filed by the Federal Trade Commission in connection with the Ex Parte Motion for TRO filed with its Complaint. My initial assessment, in line with the Court’s issuance of the TRO, was that the Receivership Entities appeared likely to be engaged in deceptive marketing practices. During the takeover conducted on October 10, 2025, I observed and reviewed additional documents and evidence that further supported that initial conclusion. As a result, I temporarily suspended the Receivership Entities’ operations pending further orders from the Court.

12. Since that time, I have gathered and reviewed more documents and information and have received communications from numerous consumers (as discussed above). All of this additional information adds further support to my initial conclusion. Moreover, it appears the deceptive practices employed by the Defendants likely permeated the entire enterprise. In other words, at this point, there does not appear to be any

1 identifiable aspect of the business that was fully isolated from, or untouched by, the  
2 deceptive practices or that could be operated in a legal and profitable way.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on November 21, 2025, at Los Angeles, California.

5 

6 \_\_\_\_\_  
Stephen J. Donell

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) and am not a party to this action. My business address is 600 West Broadway, 27th Floor, San Diego, California 92101-0903.

On November 21, 2025, I served the within document(s) described as:

**SECOND SUPPLEMENTAL DECLARATION OF RECEIVER, STEPHEN J. DONELL, REGARDING STATUS OF WORK AS TEMPORARY RECEIVER, PRELIMINARY OBSERVATIONS AND CONCLUSIONS**

by placing the  original  a true copy of the above and foregoing via:

a. **CM/ECF System** to the following registered e-mail addresses:

FEDERAL TRADE COMMISSION  
Simon Barth, Esq., sbarth@ftc.gov  
James E. Evans, Esq., james.evans@ftc.gov  
*Attorneys for Plaintiff Federal Trade Commission*

STATE OF NEVADA, OFFICE OF THE ATTORNEY GENERAL  
Aaron D. Ford, Attorney General  
Ernest D. Figueroa, Consumer Advocate, efigueroa@ag.nv.gov  
Ziwei Zheng, Esq., zzheng@ag.nv.gov  
Samantha B. Feeley, Esq., sfeeley@ag.nv.gov  
*Attorneys for Plaintiff State of Nevada*

SNELL & WILMER L.L.P.  
Bradley T. Austin, Esq., baustin@swlaw.com  
Blakeley E. Griffith, Esq., bgriffith@swlaw.com  
*Attorneys for the Individual Defendants*

b. **BY U.S. MAIL.** I placed a true copy of the document in a sealed envelope or package addressed as indicated above on the above-mentioned date in San Diego, California for collection and mailing pursuant to the firm’s ordinary business practice. I am familiar with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.:

SNELL & WILMER L.L.P.  
Benjamin W. Reeves, Esq., breeves@swlaw.com  
One E. Washington Street, Suite 2700  
Phoenix, AZ 85004  
*Attorneys for the Individual Defendants*

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on November 21, 2025, at San Diego, California.

\_\_\_\_\_  
Pamela Tei Lewis  
(Type or print name)

\_\_\_\_\_  
  
(Signature of Declarant)