

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 0:21-cv-61176-AHS**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**PROPERTY INCOME INVESTORS LLC,  
EQUINOX HOLDINGS INC.,  
PROPERTY INCOME INVESTORS 26 LLC,  
PROPERTY INCOME INVESTORS 304 LLC,  
PROPERTY INCOME INVESTORS 201 LLC,  
PROPERTY INCOME INVESTORS 3504 LLC,  
PROPERTY INCOME INVESTORS 1361 LLC,  
PROPERTY INCOME INVESTORS 4020 LLC,  
PROPERTY INCOME INVESTORS 9007 LLC,  
PROPERTY INCOME INVESTORS 417 LLC,  
PROPERTY INCOME INVESTORS 4450 LLC,  
PROPERTY INCOME INVESTORS 3050 LLC,  
LARRY B. BRODMAN, AND  
ANTHONY NICOLOSI (F/K/A ANTHONY  
PELUSO),**

**Defendants.**

**DEFENDANT, ANTHONY NICOLOSI'S ANSWER TO PLAINTIFF'S COMPLAINT  
FOR INJUNCTIVE AND OTHER RELIEF**

COMES NOW, Defendant, ANTHONY NICOLOSI ("Defendant"), by and through his attorney, MARK C. PERRY, to file this Answer to Plaintiff Securities and Exchange Commission's ("Plaintiff") Complaint for Injunctive and Other Relief. Doc. 1. Pursuant to Defendant's Consent to Judgment of Permanent Injunction and Other Relief (see, Doc 4, Ex. F), Defendant responds as follows:

As to Paragraphs 21 and 22 of Plaintiff's Complaint, Defendant admits that this Court has

jurisdiction over this action, admits that this Court has personal jurisdiction over him, and admits that venue is proper in the Southern District of Florida.

As to Paragraphs 1 through 20 and Paragraphs 23 through 97, Defendant neither admits nor denies the allegations contained in those paragraphs, other than for the limited purposes listed in the Defendant's Consent to Judgment of Permanent Injunction and Other Relief, (Doc 4, Ex F).

As to the "Relief Requested" in Plaintiff's Complaint, Doc. 1 at pp. 17-18, Defendant reserves the right to have the Court determine the amounts of any disgorgement and/or civil penalty imposed against him. Defendant otherwise consents to the relief requested to the extent it is consistent with the specific provisions provided for in the Defendant's Consent to Judgment of Permanent Injunction and Other Relief.

Dated: June 14, 2021

Respectfully submitted,

Law Offices of Mark C. Perry, P.A.  
Attorney for Defendant, ANTHONY NICOLOSI  
2400 East Commercial Boulevard, Suite 511  
Ft. Lauderdale, FL 33308  
Office: (954) 351-2601  
Fax: (954) 351-2605  
Email: [mark@markperrylaw.com](mailto:mark@markperrylaw.com)  
[maureen@markperrylaw.com](mailto:maureen@markperrylaw.com)

By: */s/ Mark C. Perry*  
Mark C. Perry  
Fla. Bar No.: 251941

Copies furnished to:

Alice Sum, SEC, Attorney for Plaintiff at [sumal@sec.gov](mailto:sumal@sec.gov), [wardro@sec.gov](mailto:wardro@sec.gov)