UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO.: 21-61176-CIV-SINGHAL

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 4450, LLC, PROPERTY INCOME INVESTORS 3050, LLC, LARRY B. BRODMAN and ANTHONY NICOLOSI (f/k/a ANTHONY PELUSO),

Defendants.

RECEIVER'S FOURTH INTERIM OMNIBUS APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR JANUARY 1, 2022 – MARCH 31, 2022¹

Miranda L. Soto, Esq., solely in her capacity as Receiver (the "Receiver") for Defendants 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

¹ See Order Appointing Receiver (Doc. 10) at **P** 54.

Investors 417, LLC; Property Income Investors 4450, LLC; and Property Income Investors 3050, LLC (collectively, the "Receivership Entities"), moves this Court for the entry of an order awarding fees and reimbursement of costs to the Receiver and her professionals whose retention has been approved by the Court. *See* Doc. 10 ¶ 2. This motion covers all fees and costs incurred from January 1, 2022, through March 31, 2022 (the "Application Period"). The Securities and Exchange Commission's (the "SEC" or "Commission") Standardized Fund Accounting Report ("SFAR") for this period is attached hereto as **Exhibit 1**. In support thereof, the Receiver states as follows:

I. Preliminary Statement

The Receiver and her professionals have continued to work expeditiously and efficiently to provide valuable services, secure and begin to monetize investor assets, and begin the process of returning funds to creditors with approved claims. Given the public interest nature of this proceeding, the Receiver and her professionals have performed this work at significantly reduced rates. Pursuant to the Order Appointing Receiver, the Receiver and her professionals are entitled to reasonable payment of the fees and reimbursement of their expenses.

The Receiver seeks Court approval to pay the sum of \$113,777.00 to the Receiver and the professionals she engaged for fees incurred and reimbursement of \$1,882.45 in expenses for a total payment of \$115,659.45. This Application includes time billed from January 1, 2022 through March 31, 2022. The professionals who seek payment hereunder have agreed not to bill any time incurred prior to the Receiver's (or their own) appointment.

For the time covered by this Motion,² among other things, the Receiver and her professionals have accomplished the following:

- Devoted significant time to overseeing and closing of the sales of the following four properties during the reporting period: (i) 1361 SE 4th Street, Deerfield Beach, 33441, (ii) 530 NE 34th Street, Pompano Beach, FL 33064, (iii) 4020 Riverside Drive, Coral Springs, FL 33065, (iv) 4450 Coral Springs Drive, Coral Springs, Florida 33065, which ultimately resulted in receipt of total net sales proceeds of \$2,002,084.70 during the reporting period;
- Continued to work with Keyes Property Management, LLC to maintain and secure the remaining residential multi-family properties owned by the Receivership Entities (the "Properties"), including the collection of rent from tenants and attending to maintenance and upkeep for the Properties;
- Worked with Local Real Estate Co. to market and list the two remaining Properties for sale (3050 Coral Springs Drive, Coral Springs, FL 33605) and (201 East 30th Street Riviera Beach, FL, 33404), which resulted in the receipt and review of numerous offers from potential purchasers, and also obtained any necessary remaining valuations for the Properties as required by 28 U.S.C. 2001;
- Reviewed, negotiated, and ultimately accepted offers to sell the remaining two Properties, with each of the sales being at a premium to the price previously paid by the Receivership Entities;
- Prepared and filed motions seeking approval of the sale of the remaining two Properties, both of which were approved by the Court. For the sales, the Receiver subsequently implemented Court-approved publication and notice procedures during the reporting period. The two properties closed outside the reporting period. Specifically, the 3050 Coral Springs Drive property closed on April 1, 2022, and the 201 E 30th Street property closed on May 13, 2022;
- Renewed expiring general and casualty insurance policies and continued efforts to obtain windstorm coverage for any remaining Properties;
- Prepared and filed the Receiver's Third Interim Report on January 31, 2022 (Doc. 63) which provided a comprehensive summary, analysis, and supporting documentation of the Receiver's preliminary observations, continuing investigation, and contemplated next steps;

² Neither the Receiver nor her attorneys charged for the time spent preparing this motion.

- Continued investigation into operation of Receivership Entities, including analysis of business operations, investor files and offering documents, and financial activity;
- Worked with her forensic accountants to identify, gather, and analyze investor files and relevant financial documentation in order to understand operation of Receivership Entities and begin formulating framework for Court-approved claims process;
- Submitted Reply in support of the Receiver's Motion to Establish and Approve (i) Proof of Claim Form and Claim Bar Date; (ii) Procedure to Administer, Review, and Determine Claims; and (iii) Notice Procedures and Incorporated Memorandum of Law (the "Claims Motion"), which resulted in the Claims Motion being fully briefed as of January 21, 2022. The Claims Motion is available on the Receiver's website at www.propertyiireceivership.com. The Claims Motion was granted by the Court on April 14, 2022 (Doc. 77);
- Worked with her forensic accountants to review, analyze, and determine investment information and activity for each potential investor claimant, and assembled central database to assist with anticipated forthcoming claims process;
- Continued review of potential claims to recover investor assets wrongfully misappropriated and/or fraudulently transferred;
- Continued interviewing individuals, personnel and service providers involved with the Receivership Entities, including employees, vendors, investors, legal counsel, and other interested parties in order to ascertain locations of the properties, books, records, bank accounts and other assets of the Receivership Entities;
- Responded to phone calls and written communications from investors, tenants, and other interested parties and/or their representatives and continued to update Receiver's website with case information and document filings.

The above activities are discussed in more detail in the Receiver's Fourth Interim Report was filed on May 2, 2022 (Doc. 81) (the "Fourth Report"), which contains comprehensive and detailed information regarding the case background and status; the recovery and disposition of assets; financial information on Receivership Entities; the proposed course of action to be taken regarding assets in the Receivership estate; and potential and/or contemplated litigation involving Receivership Entities. The Fourth Report and previous Interim Reports are available on the Receiver's website at www.propertyiireceivership.com. The Receiver

incorporates the Fourth Report into this Application and attaches a true and correct copy of that report as **Exhibit 2** for the Court's convenience.

II. Background

On June 7, 2021, the Commission filed a complaint (Doc. 1) (the "Complaint") in the United States District Court for the Southern District of Florida (the "Court") against Defendants Larry Brodman, Anthony Nicolosi f/k/a Anthony Peluso, and the Receivership Entities. The Commission alleged that Defendant Brodman and the Receivership Entities raised at least \$9 million from over 150 investors who were told that their funds would be used almost entirely to purchase "turnkey, multifamily properties" in South Florida which would then be renovated, rented to tenants, and eventually sold. *Id.* ¶ 3. Investors were also told that they would be entitled to receive a portion of the rental income and any sale proceeds generated from the Property(ies) they were investing in.

Although a portion of investor funds were used to purchase various properties in the South Florida area, the Commission alleged that Defendant Brodman and the PII entities misappropriated and diverted over \$2 million in investor funds, extensively commingled investor funds, and in some instances used investor funds to make purported "profit" payments and distributions to other investors. Doc. 10 ¶ 4, 70-71. The Commission alleged that, despite statements in the offering materials that commissions would only be paid to licensed brokers, at least \$1.2 million in investor funds were used to pay undisclosed sales commissions to unlicensed sales agents including Defendant Nicolosi. *Id.* ¶ 68-69. On June 15, 2021, the Court granted the Commission's Motion for Appointment of Receiver and entered an Order appointing Miranda L. Soto as the Receiver over the Receivership Entities ("Order Appointing

Receiver") (Doc. 10). The Receiver has commenced with her initial investigation and has also taken a number of actions to preserve and safeguard Receivership documents and assets.

Relevant to this Application, the Order Appointing Receiver authorizes the Receiver to appoint professionals to assist her in "exercising the power granted by this Order …" See Order Appointing Receiver at ¶ 52. Moreover, the Receiver and her professionals are entitled to reasonable compensation and expense reimbursement from the assets of the Receivership Entities, subject to approval of the Court. *Id.* ¶ 53.

III. Professional Services

Paragraph 52 of the Order Appointing Receiver provides that:

the Receiver is authorized to solicit persons and entities ("Retained Personnel") to assist Receiver in carrying out the duties and responsibilities described in this Order. Except for counsel retained by the Receiver pursuant to Paragraph 2 of this Order, the Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement.

Paragraph 2 of the Order authorized the Receiver to retain specific counsel Raquel A. Rodriguez, Esq. and Jordan D. Maglich, Esq. with the law firm of Buchanan Ingersoll & Rooney PC ("Buchanan Ingersoll") as counsel. Ms. Rodriguez and Mr. Maglich entered their respective Notices of Appearance on June 16, 2021 (Docs. 12-13). The Receiver subsequently received approval to engage additional Retained Professionals to provide legal, forensic accounting and tax, information technology, and website services (Doc. 19).

As described in the quarterly Interim Reports, the Receiver and her Retained Personnel have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve the Receivership assets, and attempt to locate and recover additional assets. These services are for the benefit of defrauded investors, creditors, and other interested parties

of the Receivership Entities. Due to the recoveries described herein, the Receiver represents there are funds available to pay her Retained Personnel, which will not take away resources from operating, maintaining and preserving the Receivership Entities' assets.

The Order Appointing Receiver further set forth the frequency and procedures pursuant to which the Receiver was to seek compensation and expense reimbursement for the Receiver and her Retained Personnel. Doc. 10 ¶¶ 53-54. In accordance with the Commission's Billing Instructions, the Receiver states as follows:

- (a) Time period covered by the Application: January 1, 2022 March 31, 2022.
- **(b) Date of Receiver's appointment:** June 15, 2021.
- (c) Date services commenced: June 15, 2021.
- (d) Names and rates of all professionals: See Exs. 5-6.
- (e) Interim or Final Application: Interim.
- (f) Records supporting fee application: See below.

The following exhibits are provided in accordance with the Billing Instructions:

Exhibit 3: Receiver's Certification

<u>Exhibit 4</u>: Total compensation and expenses requested; any amounts previously requested; and total compensation and expenses previously awarded

<u>Exhibit 5</u>: Fee Schedule: Names and Hourly Rates of Professionals and Paraprofessionals & Total Amount Billed for each Professional and Paraprofessional:

Exhibit 5(a): Buchanan Ingersoll & Rooney PC (services provided by Receiver Miranda L. Soto)

<u>Exhibit 5(b)</u>: Buchanan Ingersoll & Rooney PC (services provided by counsel to Receiver Miranda L. Soto)

Exhibit 5(c): Kaufman & Company, P.A.

Exhibit 6:

The Professionals' time records for the time period covered by this Application, sorted in chronological order, including a summary and breakdown of the requested reimbursement of expenses:

Exhibit 6(a): Buchanan Ingersoll & Rooney PC (services provided by Receiver Miranda L. Soto)

Exhibit 6(b): Buchanan Ingersoll & Rooney PC (services provided by counsel to Receiver Miranda L. Soto)

Exhibit 6(c): Kaufman & Company, P.A.

IV. <u>Case Status</u>

(a) Cash on hand

The amount of cash on hand in the Receivership's fiduciary bank accounts opened at ServisFirst Bank (the "ServisFirst Accounts") as of the date of filing this Application is \$4,816,824.55. To date, the primary sources of deposits in the ServisFirst Accounts were: (i) the frozen balances of the Receivership Entities' bank accounts previously held at JP Morgan Chase Bank N.A.; (ii) the funds previously held by Kelley & Grant, P.A. representing escrowed sale proceeds of two properties sold by the Receivership Entities prior to the Receiver's appointment; (iii) monthly deposits from Keyes Property Management, LLC representing net monthly rental proceeds after subtracting necessary repair and maintenance costs as well as property management charges; and proceeds of the sales of the four of the Properties that closed during the reporting period, specifically, the following Properties: (i) 3775 NW 116th Terrace, Coral Springs, Florida 33065; (ii) 1361 SE 4th Street, Deerfield Beach, Florida 33064; (iii) 530 NE 34th Street, Pompano Beach, FL 33064; and (iv) 4020 Riverside Drive, Coral Springs, Florida 33065. The only disbursements to date for the benefit of the Receivership Entities have been various expenses in the ordinary course of

administering and operating the Receivership, including expenses advanced by the Receiver that were necessary to maintain, preserve, and market the Properties, the renewal of expiring property and casualty insurance policies, the obtaining of windstorm insurance, payment of 2021 property taxes, and costs to store and dispose of non-real estate Receivership Property.

(b) Summary of the administration of the case

Since her appointment on June 15, 2021, the Receiver has administered the case with the objective of efficiently fulfilling her duties under the Order Appointing Receiver while doing so in a cost-efficient manner by, wherever possible, leveraging the use of non-billing professionals or professionals with lower rate structures. After initially prioritizing the securing and marshaling of assets for the benefit of creditors, including securing the Properties and retaining a property management company services for the Properties, the Receiver and her Retained Personnel have focused on investigating the Receivership Entities' prior operations and performance, marketing and listing the Properties for sale, and taking steps to submit a claims process framework for Court approval. Due to the early state of this matter, the Receiver is unable to offer an estimate as to when the case is expected to close.

(c) Summary of creditor claims proceedings

On December 31, 2021, the Receiver filed her Claims Motion in which she submitted a proposed formal claims process for Court approval, and responses were due on or before January 14, 2022. A copy of the Claims Motion has been posted on the Receiver's website at www.propertyiireceivership.com. In short, the Claims Motion seeks Court approval of the procedures and framework for the Receiver's administration of a claims process, including notice and publication procedures, a proposed Proof of Claim Form and the method by which

claims will be calculated, and the deadline for submitting any potential claim for the Receiver's review. Although the Court issued an Order on January 10, 2022, granting the Claims Motion, the Court subsequently vacated that Order after two responses to the Claims Motion were filed on January 14, 2022. The Receiver subsequently filed a Reply in support of the Claims Motion on January 21, 2022. Doc. 61. On April 14, 2022, the Court granted the Claims Motion. (Doc. 77).

Now that the Claims Motion has been approved, the Receiver will initiate the process for and review all timely submitted claims and present her determinations of each claim for the Court's approval. Such proposed determination will include (i) whether or not the claim should be approved in part or in full, and (ii) whether the claim should be subject to a higher or lower priority than other claims. That motion will also include a proposed objection procedure to be followed by any claimant that is dissatisfied with the Court's approval of the Receiver's determination of their claim. To be clear, the Receiver has not yet made any determination as to whether there is will be a need for multiple classifications of claims.

(d) Description of assets

In additional to the descriptions provided herein, for detailed information about the assets of the receivership estate, including the anticipated or proposed disposition of the assets, the Receiver respectfully refers the Court and interested parties to the Fourth Interim Report attached hereto as **Exhibit 2**.

(e) Description of liquidated and unliquidated claims held by the Receiver

Given the early stages of her appointment, the Receiver is still evaluating potential claims the Receivership Entities may have against third parties. These claims remain subject

to the Receiver's ongoing investigation with the assistance of her legal and forensic professionals. The Receiver also continues to review potential causes of action against the principals of the Receivership Entities and various third parties. These claims may include common law claims and claims under fraudulent transfer statutes. While the Receiver cannot yet predict the likelihood, amount or cost-effectiveness of particular claims or the claims as a whole, the Receiver continues to diligently evaluate claims against third parties.

IV. Services Provided And Compensation Sought By The Professionals

(a) Services Provided By the Receiver And Buchanan Ingersoll

The Receiver is a shareholder at the law firm of Buchanan Ingersoll & Rooney PC, has been Board Certified in Civil Trial law since 2016, and has significant experience in litigation and complex commercial matters including private equity and hedge fund claims, complex fraud matters, and professional and legal malpractice. As set forth in the Order Appointing Receiver, the Court authorized the Receiver to retain the services of Raquel A. Rodriguez and Jordan D. Maglich³ to serve as her legal counsel (collectively, the Receiver's "Counsel").⁴ As an accommodation to the Receiver and given the public interest nature of this matter, Buchanan Ingersoll agreed to reduce the billing rate of the Receiver and her professionals for this case as provided in the Fee Schedules attached hereto as **Exhibit 5(a)** and **Exhibit 5(b)** which was, on average, at least 30% - 50% lower (and in some instances, significantly lower) than the customary rate charged to clients. For purposes of just this

³ As of April 1, 2022, Mr. Maglich resigned from Buchanan Ingersoll to take an in-house counsel position and has been granted leave to withdraw from this matter.

⁴ The Receiver was subsequently authorized to utilize additional Buchanan Ingersoll professionals where necessary and at a similar rate discount. Doc. 19.

Application, these discounts resulted in a total reduction of over \$50,000 from the rates customarily charged by Buchanan Ingersoll attorneys to clients.

The standard hourly rate which the Receiver charges clients ranges from \$555 to \$650. However, the Receiver agreed that for purposes of her appointment as the Receiver, her hourly rate would be reduced to \$295.00 per hour, representing a discount of approximately (or over) 50% percent off the standard hourly rate which she charges clients in comparable matters. This rate was set forth in the Commission's Motion to Appoint Receiver, which the Court granted on June 15, 2021 (Doc. 10). During the time covered by this motion, the Receiver expended 84.50 hours on this Receivership and seeks compensation for professional services in the amount of \$23,954.00 and costs in the amount of \$1,698.53. A copy of the statement summarizing the services rendered by the Receiver is attached hereto as **Exhibit 6(a)**. The Receiver requests the Court award her fees for professional services rendered incurred from January 1, 2022, through March 31, 2022, in the amount of \$25,652.53.

During the period covered by this Application, Buchanan Ingersoll billed 266.50 hours in assisting the Receiver in fulfilling her duties under the Order Appointing Receiver but only seeks compensation for 233.20 of those hours. Each of the Receiver's primary Counsel agreed to reduce their hourly rate to \$295.00 per hour, which is significantly less than the standard hourly rate charged by Raquel A. Rodriguez (\$995.00 per hour as of January 1, 2022) and Jordan D. Maglich (\$450.00 per hour). Where possible, the Receiver and her Counsel were also able to minimize billable time by leveraging the use of non-billing or lower-rate professionals for a significant range of activity. The statement summarizing the services rendered by Buchanan Ingersoll is encompassed within **Exhibit 6(b)** attached hereto. The

Receiver requests that the Court award Buchanan Ingersoll fees for professional services rendered from January 1, 2022, through March 31, 2022, in the amount of \$65,878.00 in fees and \$183.92 for a total of \$66,061.92.

The work performed by the Receiver and her legal professionals with Buchanan Ingersoll has been focused on investigating the fraud and related activities underlying this matter; locating, preserving, and liquidating Receivership assets; and investigating and pursuing additional assets for the Receivership as detailed in the Fourth Interim Report. These services were incurred in connection with the administration of the Receivership and are for the benefit of aggrieved investors, creditors, and other interested parties of the Receivership Entities. All of the services for which compensation is sought were incurred in the best interests and behalf of the Receivership Entities and in furtherance of the Receiver's duties, and in performing the Receiver's responsibilities under the Order Appointing Receiver.

(b) Services Provided By Kaufman & Company, P.A.

The Receiver obtained Court approval to retain the services of Kaufman & Company, P.A. ("Kaufman") to provide forensic accounting and tax services. Kaufman has significant experience providing forensic and tax services in fraud investigations, including in receivership matters arising from enforcement actions brought by the Commission. As set forth in the Receiver's Retention Motion, Kaufman agreed to provide a 25% discount from the standard rates charged by its professionals. Dana Kaufman, who is a director and will be primarily responsible for this matter, normally charges an hourly rate of \$450.00 but has agreed to discount his hourly rate to \$337.50. Kaufman also agreed to discount the hourly rates charged by associates, senior associates, and managers from \$250.00, \$275.00, and

\$375.00 to \$187.50, \$206.25, and \$281.25, respectively. Doc. 16.

The Receiver has relied on Kaufman's extensive experience in forensic accounting and tax matters to assist her in understanding the complex relationship between the various Receivership Entities as well as to account for the numerous inflows and outflows over the preceding eight-year period for which the Receiver has obtained voluminous banking statements. These services were instrumental to helping the Receiver understand and account for the flow of funds between the various entities, and will also be necessary to assist the Receiver in formulating the appropriate method and process for distributing funds back to investors and interested parties with approved claims.

During the period covered by this Application, Kaufman expended 87 hours and billed the Receiver the sum of \$23,945.00 in fees for assisting the Receiver in fulfilling her duties under the Order Appointing Receiver. A copy of the statement summarizing the services rendered by Kaufman is attached hereto as **Exhibit 6(c)**. The Receiver requests that the Court award Kaufman & Company, P.A. fees for professional services rendered from January 1, 2022, through March 31, 2022, in the amount of \$23,945.00.

MEMORANDUM OF LAW

A receiver appointed by a court who reasonably and diligently discharges her duties is entitled to be fairly compensated for services rendered and expenses incurred. *See SEC v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) ("[I]f a receiver reasonably and diligently discharges her duties, [she] is entitled to compensation."); *Donovan v. Robbins*, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) ("[T]he receiver diligently and successfully discharged the responsibilities placed upon her by the Court and is entitled to reasonable compensation for her efforts.");

SEC v. Custable, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); SEC v. Mobley, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 2000) (court awarded reasonable fees for the receiver and her professionals). In determining reasonable compensation for the services rendered by the Receiver and her professionals, the Court should consider the circumstances surrounding the receivership. See Elliot, 953 F.2d at 1577.

In addition to fees, the receiver is "also entitled to be reimbursed for the actual and necessary expenses" that the receiver "incurred in the performance of [its] duties." *FTC v. Direct Benefits Grp., LLC*, 2013 WL 6408379, at *3 (M.D. Fla. 2013). The Receiver and her professionals support their claims for reimbursement of expenses with "sufficient information for the Court to determine that the expenses are actual and necessary costs of preserving the estate." *SEC v. Kirkland*, 2007 WL 470417, at *2 (M.D. Fla. 2007) (citing *In re Se. Banking Corp.*, 314 B.R. 250, 271 (Bankr. S.D. Fla. 2004)).

Here, because of the nature of this case, it was and remains necessary for the Receiver to employ professionals experienced and familiar with financial frauds, federal receiverships, securities laws, finance, and real estate. Further, in order to perform the services required and achieve the results obtained to date, the skills and experience of the Receiver and the professionals were indispensable.

The Receiver and her Retained Personnel have each discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the attorneys and paralegals are at or below those charged by attorneys and paralegals of comparable skill from other law firms in the Southern District of

Florida. This case has been time-intensive for the Receiver and her Retained Personnel because of the need to resolve many issues rapidly and efficiently. The attached Exhibits detail the time, nature and extent of the professional services rendered by the Receiver and her Retained Personnel for the benefit of investors, creditors, and other interested parties. The Receiver anticipates that additional funds will be obtained through the Receiver's further efforts and potential litigation with third parties.

The Receiver is sensitive to the need to conserve the Receivership Entities' assets and respectfully submits that the fees and costs expended to date were reasonable, necessary, and benefited the Receivership. Notably, the Commission has no objection to the relief sought in this motion. *Custable*, 1995 WL 117935, *7 ("In securities law receiverships, the position of the SEC in regard to the awarding of fees will be given great weight.").

CONCLUSION

Under the terms and conditions of the Order Appointing Receiver, the Receiver, among other things, is authorized, empowered, and directed to engage professionals to assist her in carrying out her duties and obligations. The Order further provides that she apply to the Court for authority to pay herself and her Retained Personnel for services rendered and costs incurred. In exercising her duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interest of the Receivership.

WHEREFORE, Miranda L. Soto, the Court-appointed Receiver, respectfully requests that this Court award the following sums and direct that payment be made from the Receivership assets:

Miranda L. Soto, as Receiver \$25,652.53

Buchanan Ingersoll & Rooney PC \$66,061.92

Kaufman & Company \$23,945.00

A proposed Order is attached as Exhibit 7.

WHEREFORE, the Receiver seeks entry of an Order granting this motion and awarding the Receiver and her professionals their interim fees, reimbursement of costs, and for such other relief that is just and proper.

LOCAL RULE 7.1(a)(3) CERTIFICATION

Pursuant to Local Rule 7.1(a)(3), the undersigned certifies that counsel for the Receiver conferred with counsel for the Commission and counsel for Defendants Anthony Nicolosi and Larry Brodman prior to filing this Motion. Counsel for the Commission has indicated they do not object to the requested relief, while counsel for Defendants Brodman and Nicolosi indicated their clients take no position on the requested relief.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Raquel A. Rodriguez
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Attorneys for Receiver Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a Notice of Electronic Filing to the following counsel of record:

Alice Sum, Esq.
Securities and Exchange Commission 801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Counsel for Plaintiff

Mark C. Perry, Esq.
2400 East Commercial Blvd., Ste 201
Fort Lauderdale, Florida 33308
Counsel for Defendant, Anthony
Nicolosi, fka Anthony Peluso

I further certify that on May 16, 2022, a true and correct copy of the foregoing was sent via electronic mail to the following:

Carl F. Schoeppl, Esq.
Schoeppl Law, P.A.
4651 North Federal Highway
Boca Raton, Florida 33431-5133
E-mail: carl@schoeppllaw.com
Counsel for Defendant Larry Brodman

/s/ Raquel A. Rodriguez
Attorney

4856-5188-9175, v. 3

EXHIBIT "1"

Miranda L. Soto 2 South Biscayne Blvd, Suite 1500 Miami, FL 33131-1822 (305) 347-4080

STANDARDIZED FUND ACCOUNTING REPORT

Civil - Receivership Fund

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL

Reporting Period 01/1/2022 to 03/31/2022



REPORT OF KAUFMAN & COMPANY ON THE STANDARDIZED FUND ACCOUNTING REPORT

Miranda L. Soto, Receiver for Property Income Investors, LLC et. al. Miami, FL

Miranda L. Soto, in her capacity as Receiver for Property Income Investors, LLC et al., is responsible for the accompanying Standardized Fund Accounting Report ("SFAR") for the period January 1, 2022 to March 31, 2022 included in the accompanying prescribed form in accordance with requirements prescribed by *Exhibit A to the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission.* The Report Instructions indicate that the SFAR "should be prepared on a cash basis which is a comprehensive basis of accounting other than generally accepted accounting principles". We have performed a compilation engagement in accordance with *Statements on Standards for Accounting and Review Services* promulgated by the Accounting and Review Services Committee of the AICPA. We did not audit or review the SFAR included in the accompanying prescribed form nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by Ms. Soto and her representatives. We do not express an opinion, a conclusion, nor provide any assurance on the SFAR included in the accompanying prescribed form.

The SFAR included in the accompanying prescribed form is presented in accordance with the requirements of *Exhibit A to the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission* and is not intended to be a presentation in accordance with accounting principles generally accepted in the United States of America.

This report is intended solely for the information and use of Ms. Soto and the U.S. Securities and Exchange Commission and is not intended to be and should not be used by anyone other than these specified parties.

(305) 455-0314 Fax: (305) 455-0315

dkaufman@kaufmancpas.com

Kaufman & Company P.A. Kaufman & Company P.A. Miami, FL May 16, 2022

1001 Brickell Bay Drive Suite 2650 Miami, FL 33131

Standardized Fund Accounting Report for Miranda L. Soto as Receiver for Property Income Investors, LLC et al. - Cash Basis Receivership; Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

FUND ACC	OUNTING (See Instructions):	Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 01/1/2022):			\$ 995,461
	Increases in Fund Balance:			
Line 2	Business Income	Schedule 2	\$ 21,541	
Line 3	Cash and Securities	Schedule 3	(3,382)	
-	Interest/Dividend Income	Schedule 14a - 2	1,320	
Line 5	Business Asset Liquidation	Schedule 5	2,294,678	
Line 6	Personal Asset Liquidation			
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other		0.044.457	3,309,618
	Total Funds Available (Line 1 - 8):		2,314,157	3,309,618
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
	Disbursements to Receiver or Other Professionals	Schedule 14a - 1	(119,371)	
	Business Asset Expenses	Schedule 14a - 1	(6,454)	
	Personal Asset Expenses			
	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			I
	1. Attorney Fees			
	2. Litigation Expenses			I
Line 10f	Total Third-Party Litigation Expenses Tax Administrator Fees and Bonds			
	Federal and State Tax Payments			I
Line rog	Total Disbursements for Receivership Operations		(125,825)	(125,825)
Line 11	Disbursements for Distribution Expenses Paid by the Fund:		(120,020)	(120,020)
	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses			
Line 11b	Distribution Plan Implementation Expenses:			
	Fees: Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			I
	2. Administrative Expenses			I
	3. Investor Identification:			I
	Notice/Publishing Approved Plan			I
	Claimant Identification			I
	Claims Processing			I
	Web Site Maintenance/Call Center			I
	4. Fund Administrator Bond			I
	5. Miscellaneous			I
	6. Federal Account for Investor Restitution			I
	(FAIR) Reporting Expenses		\vdash	I
	Total Plan Implementation Expenses Total Disbursements for Distribution Expenses Paid by the F	und		
Lino 42		unu	-	$\overline{}$
Line 12	Disbursements to Court/Other: Investment Expenses/Court Registry Investment			I
LIIIE IZA	System (CRIS) Fees			I
l ine 19h	Federal Tax Payments			I
LIIIC 120	Total Disbursements to Court/Other:			I
	Total Funds Disbursed (Lines 9 - 11)			(125,825)
Line 13	Ending Balance (As of 03/31/2022)			\$ 3,183,792
	_ , , , , , , , , , , , , , , , , , , ,			

Supplemental Disclosure

The Property Manager has disclosed the liabilities to tenants in the amount of \$12,775 as of March 31, 2022. This balance due to tenants represents a combination of prepayments, security deposits and last month's rent.

Standardized Fund Accounting Report for Miranda L. Soto as Receiver for Property Income Investors, LLC et al. - Cash Basis Receivership; Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

FUND ACCO	DUNTING (See Instructions):	Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	14a	\$ 56,555	
	Investments	14a	3,127,237	
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$ 3,183,792
OTHER CHE		Detail	Subtotal	Crowd Total
OTHER SUP	PLEMENTAL INFORMATION:	Detail	Subtotal	Grand Total
Line 15	Report of Items Not To Be Paid by the Fund	Daid by the French		
	Disbursements for Plan Administration Expenses Not F	l alu by the Fullu.		
Line Isa	Plan Development Expenses Not Paid by the Fund			
	Fees: Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses Not Paid by the Fund			
Line 15b	Plan Implementation Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	Administrative Expenses			
	Investor Identification:			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund			
Line 15c	Tax Admittatur Fees & Bonds Not Paid by the Fund:			
	Total Disbursements for Plan Administration Expenses	Not Paid by the F	und	
Line 16	Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses/CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fu	nd		
Line 17	DC & State Tax Payments			
Line 18	No of Claims			
Line 18a	# of Claims Received This Reporting Period			
Line 18b	# of Claims Received Since Inception of Fund			
Line 19	No of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period			
Line 10h	# of Claimanto/Investors Daid Cines Insention of Fund			

Line 19b

of Claimants/Investors Paid Since Inception of Fund

Receiver:		
By:	 	
Title		
Date		

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

	Revenue	Expense			Net	
1361 SE 4th St						
January 2022	\$ 1,000 \$	155		\$	845	
February 2022	(1,000)	-			(1,000)	
March 2022	_					
Total	-	155			(155)	
201 E 30th St						
January 2022	2,050	891			1,159	
February 2022	4,692	515			4,177	
March 2022	4,041	161			3,880	
Total	10,783	1,568			9,215	
3050 Coral Springs Drive						
January 2022	6,650	4,721			1,929	
February 2022	7,500	5,018			2,482	
March 2022	7,500	3,878			3,622	
Total	21,650	13,617			8,033	
3775 NW 116 Terrace						
January 2022	1,350	847			503	
February 2022	-	59			(59)	
March 2022	-	41			(41)	
Total	1,350	946			404	
4020 NW 81st Ave						
January 2022	3,150	677			2,473	
February 2022	· -	165			(165)	
March 2022	_	15			`(15)	
Total	3,150	858			2,292	
4450 Coral Springs Drive						
January 2022	6,750	3,164			3,586	
February 2022	· <u>-</u>	2,990			(2,990)	
March 2022	_	_,=====================================			-	
Total	6,750	6,154			596	
530 NE 34th St						
January 2022	400	493			(93)	
February 2022	1,250	-			1,250	
March 2022	_	-			-	
Total	1,650	493			1,157	
	.,,,,,,				-,,	
All Properties						
January 2022	21,350	10,950			10,400	
February 2022	12,442	8,747			3,695	
March 2022	11,541	4,095			7,446	
Total	\$ 45,333 \$	23,792		2		to Line 2
	Ţ 10,000 Ţ				.,	
Retained in Property Manager E	scrow account	01/1/2022	14a		29,443	
Recoupment of prior quarter diff		0.7.7.2022	2.0		89	
Prorated rent due to buyer of 53		naid senarately			(929)	
Journal entry from Property Mar					(2,542)	
Distributions to Receivership ac	-	oour or			(39,683)	(a)
2.5badono to reconversinp do					(55,555)	(4)
Equity in Property M	anagement Ac	count 3/31/2022		\$	7,919	to Schedı
_quity in Froporty in				Ť	.,010	Joneur
Transfers to receivership account	nt from Propert	v Management				
1/11/2022	it ilolli i lopelt	y Management \$	29,283			
2/15/2022		Φ	10,400			
ZI I JI ZUZZ			10,400	\$	30 693	(2)
				Ψ	39,683	(a)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

1361 SE 4th St		Revenue	Expense		Net	
February 2022	1361 SE 4th St					
March 2022	January 2022	\$ 1,000 \$	155		\$ 845	
March 2022	February 2022	(1,000)	-		(1,000)	
### 201	March 2022		-			
201 E 30th St January 2022	Total	-	155		(155)	•
January 2022						•
February 2022	201 E 30th St					
February 2022	January 2022	2.050	891		1.159	
March 2022	•					
Total 10,783 1,568 9,215	•	•				
Section Springs Drive January 2022						-
January 2022			,			-
January 2022	3050 Coral Springs Drive					
February 2022		6.650	4.721		1.929	
March 2022	-					
Total 21,650 13,617 8,033	•					
3775 NW 116 Terrace January 2022						-
January 2022 1,350 847 503 February 2022 - 59 (59) March 2022 - 41 (411) Total 1,350 946 404 4020 NW 81st Ave January 2022 3,150 677 2,473 February 2022 - 165 (165) March 2022 - 155 (165) March 2022 - 155 (15) Total 3,150 858 2,292 4450 Coral Springs Drive January 2022 6,70 3,164 3,586 February 2022 7- 2,990 (2,990) March 2022 1,250 7- 1,250 March 2022 7- 1,250 7- 1,250 March 2022 7- 1,250 7- 1,250 March 2022 7- 1,650 493 1,157 All Properties January 2022 21,350 10,950 10,400 All Properties January 2022 12,442 8,747 3,695 March 2022 11,541 4,095 7,446 March 2022 11,541 4,095 7,446 March 2022 11,541 4,095 7,446 Total \$45,333 \$23,792 21,541 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 140 29,443 Recoupment of prior quarter differential 89 Prorated rend due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account from Property Management Equity in Property Management Account 3/31/2022 \$7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$2,283 2/15/2022 29,283 10,400	1000	21,000	10,011		0,000	-
January 2022 1,350 847 503 February 2022 - 59 (59) March 2022 - 41 (411) Total 1,350 946 404 4020 NW 81st Ave January 2022 3,150 677 2,473 February 2022 - 165 (165) March 2022 - 155 (165) March 2022 - 155 (15) Total 3,150 858 2,292 4450 Coral Springs Drive January 2022 6,70 3,164 3,586 February 2022 7- 2,990 (2,990) March 2022 1,250 7- 1,250 March 2022 7- 1,250 7- 1,250 March 2022 7- 1,250 7- 1,250 March 2022 7- 1,650 493 1,157 All Properties January 2022 21,350 10,950 10,400 All Properties January 2022 12,442 8,747 3,695 March 2022 11,541 4,095 7,446 March 2022 11,541 4,095 7,446 March 2022 11,541 4,095 7,446 Total \$45,333 \$23,792 21,541 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 140 29,443 Recoupment of prior quarter differential 89 Prorated rend due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account from Property Management Equity in Property Management Account 3/31/2022 \$7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$2,283 2/15/2022 29,283 10,400	3775 NW 116 Terrace					
February 2022		1 350	847		503	
March 2022 - 41 (41) Total 1,350 946 404 4020 NW 81st Ave 4020 NW 81st Ave 3,150 677 2,473 February 2022 - 165 (165) March 2022 - 155 (15) Total 3,150 858 2,292 4450 Coral Springs Drive 3,164 3,586 January 2022 6,750 3,164 3,586 February 2022 - 2,990 (2,990) March 2022 - - - Total 6,750 6,154 596 530 NE 34th st 3,586 596 530 NE 34th st 3,586 596 530 NE 34th st 3,586 596 January 2022 1,250 - 1,250 March 2022 1,250 - 1,250 March 2022 12,442 8,747 3,695 March 2022 11,541 4,095 7,446 Total <td< td=""><td>-</td><td>-</td><td></td><td></td><td></td><td></td></td<>	-	-				
### Total ### To	•	_			: :	
A020 NW 81st Ave		1 350				-
January 2022 3,150 677 677 678	Total	1,000	340		404	-
January 2022 3,150 677 677 678	4020 NW 91st Avo					
February 2022		2 150	677		2 472	
March 2022 15 (15) Total 3,150 858 2,292 4450 Coral Springs Drive 3,164 3,586 January 2022 6,750 3,164 3,586 February 2022 - 2,990 (2,990) March 2022 - - - Total 6,750 6,154 596 530 NE 34th St January 2022 400 493 (93) January 2022 1,250 - 1,250 March 2022 - - - Total 1,650 493 1,157 All Properties January 2022 21,350 10,950 10,400 February 2022 12,442 8,747 3,695 March 2022 11,541 4,095 7,446 March 2022 11,541 4,095 7,446 Total \$45,333 23,792 21,541 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 14a 29,443 </td <td>-</td> <td>3, 130</td> <td></td> <td></td> <td></td> <td></td>	-	3, 130				
Total 3,150 858 2,292		-			` ,	
### A		2.450				-
January 2022 6,750 3,164 3,586 February 2022 - 2,990 (2,990) March 2022 Total 6,750 6,154 596 S30 NE 34th St	rotar	3,150	858		2,292	-
January 2022 6,750 3,164 3,586 February 2022 - 2,990 (2,990) March 2022 Total 6,750 6,154 596 S30 NE 34th St	4450 Caral Springs Drive					
February 2022		0.750	0.404		2.500	
Total Control Contro	•	6,750	•			
Total 6,750 6,154 596		-	2,990		(2,990)	
Sanuary 2022		- 0.750	- 0.454		- 500	-
January 2022	rotar	6,750	6,154		596	-
January 2022	500 NE 04th 04					
Transfers to receivership account from Property Management 1/11/2022 1/15/2022 1/15/2022 1/15/2022 1/15/2022 1/15/2022 1/15/2022 1/15/2022 1/15/2022 1/15/202 1/15/202 1/15/202 1/15/202 1/15/202 1/15/202 1/15/202 1/15/202 1/15/202 1/15/20 1/15/2		400	400		(00)	
March 2022	-					
All Properties January 2022 21,350 10,950 10,400 February 2022 12,442 8,747 3,695 March 2022 11,541 4,095 Total 45,333 23,792 21,541 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account Equity in Property Management Account 3/31/2022 \$7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$29,283 2/15/2022 \$29,283 10,400		1,250			•	
All Properties January 2022 21,350 10,950 10,400 February 2022 12,442 8,747 3,695 March 2022 11,541 4,095 7,446 Total \$\frac{4}{5}\$ 45,333 \$\frac{23,792}{23,792}\$ Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account Equity in Property Management Account 3/31/2022 \$7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$29,283 2/15/2022 \$29,283 10,400						-
January 2022 21,350 10,950 10,400 February 2022 12,442 8,747 3,695 March 2022 11,541 4,095 Total \$\frac{1}{3}\frac{45}{333} \frac{23,792}{23,792}\$ 21,541 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account (1/1/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 29,283 10,400	lotal	1,650	493		1,157	-
January 2022 21,350 10,950 10,400 February 2022 12,442 8,747 3,695 March 2022 11,541 4,095 Total \$\frac{1}{3}\frac{45}{333} \frac{23,792}{23,792}\$ 21,541 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account (1/1/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 29,283 10,400	All Boson and an					
Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St (2,542) (39,683) (a) Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a	-	04.050	40.050		40.400	
March 2022 11,541 4,095 7,446 to Line 2 - Business Income Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately (929) Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account (39,683) (a) Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 10,400	•		•			
Total \$\\$ 45,333 \\$ 23,792 21,541 to Line 2 - Business Income	•					
Retained in Property Manager Escrow account 01/1/2022 14a 29,443 Recoupment of prior quarter differential 89 Prorated rent due to buyer of 530 NE 34th St - paid separately (929) Journal entry from Property Manager re 201 E 30th St (2,542) Distributions to Receivership account (39,683) (a) Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 10,400						
Recoupment of prior quarter differential Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St Distributions to Receivership account Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 10,400	lotal	\$ 45,333	3 23,792		21,541	to Line 2 - Business Income
Recoupment of prior quarter differential Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St Distributions to Receivership account Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 10,400						
Prorated rent due to buyer of 530 NE 34th St - paid separately Journal entry from Property Manager re 201 E 30th St Distributions to Receivership account Equity in Property Management Account 3/31/2022 Fransfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 10,400			nt 01/1/2022	14a	•	
Journal entry from Property Manager re 201 E 30th St Distributions to Receivership account Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 10,400						
Distributions to Receivership account (39,683) (a) Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 \$ 10,400					, ,	
Equity in Property Management Account 3/31/2022 \$ 7,919 to Schedule 14a Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 10,400			30th St		(2,542)	
Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 10,400	Distributions to Receivership acc	count			(39,683)	(a)
Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 10,400						
Transfers to receivership account from Property Management 1/11/2022 \$ 29,283 2/15/2022 10,400						
1/11/2022 \$ 29,283 2/15/2022 10,400	Equity in Property Ma	anagement A	account 3/31/2022		\$ 7,919	to Schedule 14a
1/11/2022 \$ 29,283 2/15/2022 10,400						
2/15/2022	Transfers to receivership accour	nt from Proper	rty Management			
	1/11/2022		\$	29,283		
	2/15/2022			10,400		
					\$ 39,683	(a)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

to Line 3 - Cash and Securities	\$ (3,382)
Journal entry from Property Manager re 201 E 30th St	 (2,542)
Prorated rent due to buyer of 530 NE 34th St - paid separately	(929)
Recoupment of prior quarter charge - Credit from City of Coral Springs	\$ 89
From Property Management Account	

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022 Business Asset Liquidation

1361 LLC	Schedule 14a - 2 (Sub 1 of 6)	\$ 800,778
Property Income Investors LLC	Schedule 14a - 2 (Sub 2 of 6)	379,258
4020 LLC	Schedule 14a - 2 (Sub 3 of 6)	316,865
3504 LLC	Schedule 14a - 2 (Sub 4 of 6)	287,977
4450 LLC	Schedule 14a - 2 (Sub 5 of 6)	508,201
304 LLC	Schedule 14a - 2 (Sub 6 of 6)	1,598
Total Business Asse	t Liquidation to Page 1 Line 5	\$ 2,294,678

Schedule 14a

3,183,792

\$

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

	Reference	
Receivership Operating account	14a - 1	\$ 44,575
Money Market account	14a - 2	3,127,237
1361 LLC Checking account Property Income Investors LLC Check 4020 LLC Checking account 3504 LLC Checking account 4450 LLC Checking account 304 LLC Checking Account	14a - 1 (sub 1 of 6) 14a - 1 (sub 2 of 6) 14a - 1 (sub 3 of 6) 14a - 1 (sub 4 of 6) 14a - 1 (sub 5 of 6) 14a - 1 (sub 6 of 6)	1,083 460 844 76 - 1,598
Keyes Property Manager Account	2	7,919
Total Cash and investments		\$ 3,183,792
Cash in receivership accounts		\$ 56,555
Investments		 3,127,237

Total Cash and investments

Schedule 14a -1

(6,454) to Page 1

\$

			Sche	dule 14a -1				
Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022								
Activity in Receivership Operating Bank Account								
Balance 01/1/2022			\$	10,715				
Deposits Keyes Property Management 1/11/2022 2/15/2022	\$ 29,283 10,400 39,683							
Insurance				39,683	(a)			
January February March	1,055 2,483 2,170			(5.700)				
	5,709			(5,709)	(c)			
Fees * Legal Accounting	105,770 13,601 119,371			(119,371)	(b)			
	110,071			(110,071)	(2)			
Quickbooks January February March	25 25 25 75			(75)	(c)			
Bank Charges **								
January February March Refund of bank fees	16 22 32 70							
1/12/2020	(30)			(40)	(c)			
Transfer from money market account 3/1/2022	119,371	from Schedule 14a-2		119,371				
Balance 03	3/31/2022		\$	44,575	to Schedule 14a			
(a) Transfers from Keyes Property Management - See Schedule 2								
(b) Disbursements to Receiver and Other Professionals (b)			\$	(119,371)	to Page 1			
Business Expenses (c) Business expenses for the quarter ended 03/3 Business Expenses - FL Dept of Rev- from PII LL		(C) Schedule 14a - 2 (Sub 2 of 6)	\$	(5,824) (630)	above			
		4 0000		(0.4=4)				

^{*} Fees - Paid pursuant to Court's Order dated February 28, 2022, granting Receiver's Third Interim Fee Application and Second Fee Application

Total Business Expenses for the quarter ended March 31, 2022

^{**} The Receiver has applied to the bank for a reversal of this bank charge.

Schedule 14a - 2

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL

Reporting Period 01/1/2022 to 03/31/2022

Activity in Receivership Money Market Account

Balance in Receivership Mone	y Market Account 01/1/202	22	\$ 955,302	
Transfers from Net Proceeds of	of Sales of Assets			
ac 9029 1361 LLC	14a - 1 (sub 1 of 6)	\$ 799,695		
ac 8955 PII LLC	14a - 1 (sub 2 of 6)	378,168		
ac 9037 4020 LLC	14a - 1 (sub 3 of 6)	316,021		
ac 9011 3405 LLC	14a - 1 (sub 4 of 6)	287,901		
ac 9078 4450 LLC	14a - 1 (sub 5 of 6)	508,201		
			2,289,986	
Transfers to operating account	: from Sched	lule 14a-1	(119,371)	
Interest income			, ,	
January		\$ 203		
Febuary		453		
March		664		
			 1,320	to Line 4 Interest/Dividend Income
Balance 03/31/2022			\$ 3,127,237	

Schedule 14a - 2 (Sub 1 of 6)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

Activity in 1361 LLC Checking Account ac 9029

Balance 01/1/2022				\$ -
Deposits				
1/18/2022 Buchanan Ingersoll & Rooney PC	\$	794,695		
1/18/2022 Buchanan Ingersoll & Rooney PC		5,000		
				799,695 (a)
Wire Transfer Fees				
1/18/2022 Wire Transfer Fee		10		
1/18/2022 Wire Transfer Fee		10		
				(20)
2/1/2022 Reversal of Wire Transfer F	=	10		
2/1/2022 Reversal of Wire Transfer F	=	10		
				20
Transfer to Money Market Account				
2/10/2022 Transfer to ac 5349			to Sch 14a - 2	(799,695)
Refund of Deposits				
3/16/2022		735		
3/22/2022 Florida Power & Light		251		
3/22/2022 Florida Power & Light		97		
				1,083 (a)
Balance 3/31/22			to Sch 14a	\$ 1,083
Business Asset Liquidation - to Schedule 5			(a)	\$ 800,778
			• •	

Schedule 14a - 2 (Sub 2 of 6)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

Activity in Property Income Investors LLC Checking Account ac 8955

Balance 01/1/2022				\$	-
Deposits	•	070 005			
1/18/2022 Buchanan Ingersoll & Rooney PC	\$	378,095			
1/20/2022 Buchanan Ingersoll & Rooney PC		283			
1/31/2022 Buchanan Ingersoll & Rooney PC		420			070 700 (-)
Wire Transfer Fees					378,798 (a)
1/18/2022 Wire Transfer Fee		10			
1/20/2022 Wire Transfer Fee		10			
1/31/2022		10			(00)
0/4/0000 Mins For Barrers		40			(30)
2/1/2022 Wire Fee Reversal		10			
2/1/2022 Wire Fee Reversal		10			
2/1/2022 Wire Fee Reversal		10			20
Transfer to Manay Market Account					30
Transfer to Money Market Account 2/10/2022 Transfer to ac 5349			ta Cab 44a 0		(270.460)
2/10/2022 Transfer to ac 5349			to Sch 14a - 2		(378,168)
Satisfaction of obligations					
2/2/2022 Florida Department of Revenue		330			
2/2/2022 Florida Department of Revenue		300			
·			to Sch 14a - 1		(630)
Refund of Deposits					, ,
3/16/2022 Florida Power & Light		57			
3/15/2022 Buchanan Ingersoll & Rooney		403			
					460 (a)
				-	
Balance 3/31/22			to Sch 14a	\$	460
Business Asset Liquidation to Schedule 5		((a)	\$	379,258

Schedule 14a - 2 (Sub 3 of 6)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

Activity in 4020 LLC Checking Account ac 9037

Danasita	Balance 01/1/2022				\$ -	
Deposits 1/31/2022	Buchanan Ingersoll & Rooney PC	\$	316,021		316,021	(a)
Wire Transfer Fees					010,021	(a)
	1/31/2022 Wire Transfer Fee		10			
	0/4/0000 14/7 5 5		40		(10)	
	2/1/2022 Wire Fee Reversal		10		10	
Transfer to M	oney Market Account				10	
	Transfer to ac 5349			to Sch 14a - 2	(316,021)	
Refund of De	•		470			
3/30/2022	Reliance Title		172 673			
0/10/2022			010		844	(a)
						` '
	Balance 3/31/22			to Sch 14a	\$ 844	
Business Ass	et Liquidation - to Schedule 5			(a)	\$ 316,865	
	•			(2)	 212,000	

Schedule 14a - 2 (Sub 4 of 6)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

Activity in 3504 LLC Checking Account ac 9011

	alance 01/1/2022				\$ -	
Deposits 1/4/2022 Bi	uchanan Ingersoll & Rooney PC	\$	287,901		287,901	(a)
Wire Transfer Fee	S				201,001	(α)
	1/4/2022 Wire Transfer Fee		10		(10)	
	2/1/2022 Wire Fee Reversal		10		(10)	
					10	
Transfer to Money Market Account				(007.004)		
2/10/2022 Tr	ransfer to ac 5349			to Sch 14a - 2	(287,901)	
Refund of Deposit	S					
3/4/2022 C	ity of Coral Springs		76			
					 76	(a)
Ва	alance 3/31/22			to Sch 14a	\$ 76	
Business Asset Lie	quidation - to Schedule 5			(a)	\$ 287,977	
				• *		

Schedule 14a - 2 (Sub 5 of 6)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

Activity in 4450 LLC Checking Account ac 9078

Balance 01/1/2022				\$ -	
Deposits					
1/31/2022 Buchanan Ingersoll & Rooney PC	\$	1,500			
2/18/2022 Buchanan Ingersoll & Rooney PC		506,701			
				508,201	(a)
Wire Transfer Fees					
1/31/2022 Wire Transfer Fee		10			
				(10)	
2/1/2022 Wire Fee Reversal		10			
				10	
Transfer to Money Market Account					
2/18/2022 Transfer to ac 5349			to Sch 14a - 2	(508,201)	
Balance 3/31/22			to Sch 14a	\$ 	
Business Asset Liquidation - to Schedule 5			(a)	\$ 508,201	
				,	

Schedule 14a - 2 (Sub 6 of 6)

Property Income Investors, LLC et al. Civil Court Docket No. 21-61176-CIV-SINGHAL Reporting Period 01/1/2022 to 03/31/2022

Activity in 304 LLC Checking Account ac 8989

_	Balance 01/1/2022			\$ -
Deposi	its 3/4/2022 Refund - Johnson & Johnson			
	Preferred Financing	\$ 1,598		4.500
			to Sch 5	1,598
	Balance 3/31/22		to Sch 14a	\$ 1,598

EXHIBIT "2"

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO.: 21-61176-CIV-SINGHAL

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 4020, LLC, PROPERTY INCOME INVESTORS 417, 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),

RECEIVER'S FOURTH INTERIM QUARTERLY REPORT

Miranda L. Soto, Esq., solely in her capacity as Receiver (the "Receiver") for Defendants, 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; and Property Income Investors 3050, LLC (collectively, the "Receivership Entities"), and pursuant to the Order Granting Plaintiff Securities and Exchange Commission's (the "Commission") Motion for Appointing Receiver, dated June 15, 2021 (Doc. 10), respectfully files her Fourth Interim Report.

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I. INTRODUCTION

Miranda L. Soto, Esq., solely in her capacity as Receiver (the "Receiver") for Receivership Entities Property Income Investors, LLC ("PII"); Equinox Holdings, Inc. ("Equinox"); 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; and Property Income Investors 3050, LLC, hereby files this Fourth Interim Report to inform the Court, investors, and interested parties of the significant activities undertaken from January 1, 2022 to March 31, 2022, as well as proposed courses of action moving forward. In addition to providing notice of the receivership to all known investors shortly after her appointment, the Receiver has established an informational website at www.propertyiireceivership.com which is regularly updated with important court filings (including all Interim Reports), announcements, and other news that might be of interest to affected individuals and third-party entities.

A. Overview of Significant Activities During This Reporting Period

During the time period covered by this Interim Report (January 1, 2022 through March 31, 2022), the Receiver and her counsel have engaged in significant activities including but not limited to:

- Continued to work with Keyes Property Management, LLC to maintain and secure the remaining two residential multi-family properties owned by the Receivership Entities (the "Properties"), including the collection of rent from tenants and attending to maintenance and upkeep for the properties;
- Devoted significant time to overseeing and closing of the sales of the following four properties during the reporting period: (i) 1361 SE 4th Street, Deerfield Beach, 33441, (ii) 530 NE 34th Street, Pompano Beach, FL 33064, (iii) 4020 Riverside Drive, Coral Springs, FL 33065, (iv) 4450 Coral Springs Drive, Coral Springs, Florida 33065, which

- ultimately resulted in receipt of total net sales proceeds of \$2,002,084.70 during the reporting period;
- Worked with Local Real Estate Co. to market and list the two remaining Properties for sale (3050 Coral Springs Drive, Coral Springs, FL 33605) and (201 East 30th Street Riviera Beach, FL, 33404), which resulted in the receipt and review of numerous offers from potential purchasers, and also obtained any necessary remaining valuations for the Properties as required by 28 U.S.C. 2001;
- Reviewed, negotiated, and ultimately accepted offers to sell the two Properties, with each of the sales being at a premium to the price previously paid by the Receivership Entities;
- Prepared and filed motions seeking approval of the sale of the remaining two Properties, both of which were approved by the Court. For the sales, the Receiver subsequently implemented Court-approved publication and notice procedures during the reporting period. The two properties have closed or will close outside the reporting period. Specifically, the 3050 Coral Springs Drive property closed on April 1, 2022, and the 201 E 30th Street property is scheduled to close in May 2022;
- Renewed expiring general and casualty insurance policies and continued efforts to obtain windstorm coverage for any remaining Receivership Properties;
- Prepared and filed the Receiver's Third Interim Report on January 31, 2022 (Doc. 63) which provided a comprehensive summary, analysis, and supporting documentation of the Receiver's preliminary observations, continuing investigation, and contemplated next steps;
- Continued investigation into operation of Receivership Entities, including analysis of business operations, investor files and offering documents, and financial activity;
- Worked with her forensic accountants to identify, gather, and analyze investor files and relevant financial documentation in order to understand operation of Receivership Entities and begin formulating framework for Court-approved claims process;
- Submitted Reply in support of the Receiver's Motion to Establish and Approve (i) Proof of Claim Form and Claim Bar Date; (ii) Procedure to Administer, Review, and Determine Claims; and (iii) Notice Procedures and Incorporated Memorandum of Law (the "Claims Motion"), which resulted in the Claims Motion being fully briefed as of January 21, 2022. The Claims Motion is available on the Receiver's website at www.propertyiireceivership.com. The Claims Motion was granted by the Court on April 14, 2022 (Doc. 77);
- Worked with her forensic accountants to review, analyze, and determine investment information and activity for each potential investor claimant, and assembled central database to assist with anticipated forthcoming claims process;

- Continued review of potential claims to recover investor assets wrongfully misappropriated and/or fraudulently transferred;
- Continued interviewing individuals, personnel and service providers involved with the Receivership Entities, including employees, vendors, investors, legal counsel, and other interested parties in order to ascertain locations of the properties, books, records, bank accounts and other assets of the Receivership Entities;
- Responded to phone calls and written communications from investors, tenants, and
 other interested parties and/or their representatives and continued to update Receiver's
 website with case information and document filings.

The above referenced activities are discussed in more detail in the pertinent sections of this Interim Report.

II. BACKGROUND

A. **Procedure and Chronology**

On June 7, 2021, the Commission filed a complaint (Doc. 1) (the "Complaint") in the United States District Court for the Southern District of Florida (the "Court") against Defendants Larry Brodman, Anthony Nicolosi f/k/a Anthony Peluso, and the Receivership Entities. The Commission alleged that Defendant Brodman and the Receivership Entities raised at least \$9 million from over 150 investors who were told that their funds would be used almost entirely to purchase "turnkey, multifamily properties" in South Florida which would then be renovated, rented to tenants, and eventually sold. *Id.* ¶ 3. Investors were also told that they would be entitled to receive a portion of the rental income and any sale proceeds generated from the Properties they were investing in.

Although a portion of investor funds were used to purchase various properties in the South Florida area, the Commission alleged that Defendant Brodman and the PII entities misappropriated and diverted over \$2 million in investor funds, extensively commingled investor funds, and in some instances used investor funds to make purported "profit" payments and distributions to other investors. Doc. 10 ¶¶ 4, 70-71. The Commission also alleged that, despite statements in the

offering materials that commissions would only be paid to licensed brokers, PII and Brodman used at least \$1.2 million in investor funds to pay undisclosed sales commissions to unlicensed sales agents including Defendant Nicolosi. *Id.* ¶¶ 68-69.

On June 15, 2021, the Court granted the Commission's Motion for Appointment of Receiver and entered an Order appointing Miranda L. Soto as the Receiver over the Receivership Entities ("Order Appointing Receiver") (Doc. 10). The Commission and the individual Defendants are scheduled to mediate this case on April 5, 2022. Doc. 47.

B. The Receiver's Role and Responsibilities

As an independent agent of the Court, the Receiver's powers and responsibilities are set forth in the Order Appointing Receiver which provides, in relevant part, that the Receiver:

- "[S]hall have all powers, authorities, rights and privileges heretofore possessed by the officers, directors, managers and general and limited partners of the Receivership Entities under applicable state and federal law..." and "shall assume and control the operation of the Receivership Entities and shall pursue and preserve all of their claims." Doc. 10 ¶¶ 4-5;
- Shall "take custody, control, and possession of all Receivership Property and records relevant thereto from the Receivership Entities..." and "manage, control, operate and maintain the Receivership Estates and hold in Receiver's possession, custody and control all Receivership Property, pending further Order of the Court." *Id.* ¶ 7(b)-(c);
- Is "authorized, empowered, and directed to investigate the manner in which the financial and business affairs of the Receivership Entities were conducted and (after obtaining leave of this Court) to institute such actions and legal proceedings...as the Receiver deems necessary and appropriate..." *Id.* ¶ 37; and
- Is directed to "develop a plan for the fair, reasonable, and efficient recovery and liquidation of all remaining, recovered, and recoverable Receivership Property...and to "file and serve a full report and accounting of each Receivership Estate" for each calendar quarter. *Id.* ¶¶ 46, 48.

III. THE RECEIVER'S PROGRESS AND PRELIMINARY FINDINGS DURING THE RELEVANT PERIOD

The Receiver's issuance of interim quarterly reports is intended to, among other things, present a detailed summary of actions taken by the Receiver during the reporting period as well as

to share the status of her various preliminary findings and ongoing investigation. Unless specifically indicated herein, any previously-expressed preliminary findings are incorporated herein and remain consistent with the Receiver's ongoing investigation. The Receiver reserves the right to revise, amend, and/or supplement these conclusions as the investigation progresses. The Receiver presents the following non-exclusive conclusions that she continues to supplement based on her ongoing investigation and document review and with the assistance of her Retained Professionals.

A. Actions Taken By the Receiver During Reporting Period

i. Securing Receivership Estate Personal Property

a. Bank Accounts and Cash Proceeds

As reported in detail in previous Reports, the Receiver proceeded to open fiduciary bank accounts at ServisFirst Bank (the "ServisFirst Accounts") following her appointment and coordinated the freeze and closure of the Receivership Entities' existing bank accounts with JP Morgan Chase Bank, N.A. ("Chase Bank"). The Receiver also took action to secure approximately \$1.125 million consisting of proceeds from the recent sale of two properties formerly owned by the Receivership Entities that were being held in escrow by a Boca Raton law firm. After securing those funds, the Receiver then transferred those funds to the ServisFirst Accounts. During the reporting period, the primary activity that occurred in the ServisFirst Accounts was (i) the deposit of net sale proceeds of \$2,002,084.70 from the closing of the sale of the four Properties referenced above on Page 2, including associated post-closing refunds and holdbacks; (ii) the deposit of monthly rental income from the Receiver's property management firm; (iii) the payment of insurance premiums property and casualty and windstorm insurance on the remaining Properties;

and (iv) the payment of Court-approved fees and costs to the Receiver and her Retained Professionals.

As of the date of the filing of this Report, the total balance of the ServisFirst Accounts was \$4,816,776.90.

b. Other Personal Property

After taking possession of various computers and paper files kept in a storage unit previously used by the Receivership Entities, the Receiver has disposed of the remaining contents and vacated the storage unit to avoid continuing monthly costs of over \$300. The Receiver continues to maintain and store the various company documents and computer hardware that were previously removed from the storage unit, and she is also currently storing four flat-screen televisions that she will try to donate to a local non-profit or charity.

ii. Securing and Maintaining Receivership Real Property

a. <u>Managing and Maintaining Real Property Assets</u>

At the time of the Receiver's appointment, the Receivership Entities owned seven multifamily residential properties in the South Florida area. Further details on each of these properties, including purchase and property information, is set forth in Section V.F of the First Interim Report (Doc. 20) and incorporated herein. The Receiver's immediate priority at that time was to secure the Properties, ensure that tenants were aware of her appointment and their continuing obligation to pay monthly rent, and investigate the condition of the Properties and whether there were any existing encumbrances. The Receiver subsequently interviewed several property management companies and ultimately received Court approval to retain Keyes Property Management ("Keyes") on July 1, 2021 (Doc. 15). Keyes immediately began outreach to current tenants, inspection of the Properties, and implemented its proposed property management services.

The Receiver also provided all of the tenants with correspondence notifying them of Keyes' retention and has been pleased with Keyes' diligence and service thus far.

As discussed in previous Reports, the Properties visually appeared to be in good condition but it has become apparent that the Receivership Entities were behind in attending to maintenance issues in the months preceding the Receiver's appointment. Since the Receiver's appointment, tenants have submitted nearly 100 work orders through a tenant communication portal established by Keyes, ranging from minor maintenance issues to more serious issues, including the replacement of appliances and an air conditioning system as well as a roof leak repair. The Receiver and Keyes have also learned of a number of existing code compliance issues which have required (sometimes significant) attention and the expenditure of funds to remedy any deficiencies. The Receiver has been in constant contact with Keyes to ensure any issues are promptly and efficiently addressed.

These maintenance requests have reduced the net rental income generated by the Properties which is ultimately deposited into the Receivership Estate. The following chart depicts the approximate repair costs and utility expenses (which does not include Keyes' 6.5% management fee) during the past several reporting periods, as well as the approximate total amount of rental income collected during those periods:

Time Period	Approximate Repair/Utility Expenses	Total Rental Income
7/1/21 - 9/30/21	\$20,000.00	\$73,000.00
10/1/21 - 12/31/21	\$30,000.00	\$80,000.00
1/1/22 – 3/31/22	\$24,721.00	\$45,330.00

Thus, when factoring in Keyes' management fees for the Relevant Period, the remaining Properties ultimately generated approximately \$20,611.83 in net rental income paid to the Receivership.

The Receiver also worked with Keyes to understand and investigate each tenant's relationship, including previous rent history, lease status, and other obligations. Based on Keyes' analysis, it appears that (i) nearly all of the leases had expired and were continuing on a month-to-month basis, and (ii) nearly all of the tenants were paying monthly rent that was below market – and in many instances significantly below market. Although the Receiver considered attempting to raise the rents to bring them closer to the market rates for the respective locales, the Receiver consulted with her professionals and ultimately determined to keep the rents as-is given a number of factors, such as (i) tenants could refuse to agree to the new increases but refuse to vacate the units, thus resulting in lost rent and possibly necessitating eviction proceedings; (ii) tenants could refuse to agree to the new increases and vacate the units, thus resulting in vacancies and lost rent while a new tenant was located (which would have also resulted in payment of a commission to Keyes amounting to the first month's rent); and (iii) because the Properties were also listed for sale, tenants on month-to-month leases would be seen as more desirable by potential buyers. ¹

The Receiver's investigation also showed that, prior to her appointment, tenant security deposits do not appear to have been properly handled and/or segregated. Specifically, records reviewed by the Receiver showed that the Receivership Entities had collected approximately \$23,000 in security deposits on the Properties; yet, the total balance of the various Receivership accounts at Chase Bank was approximately \$14,000 at the time of the Receiver's appointment, and no account was titled as a segregated security deposit account. Consequently, credits for security deposits will have to be (and have been) given to the ultimate purchasers of each property.

¹ Certain tenants were either receiving housing assistance or had begun the process of seeking housing assistance. As part of the requirements for receiving housing assistance, the tenant was required to be on a new one-year lease. Where necessary, in order to continue receiving that housing assistance income, the Receiver agreed to enter into a new one-year lease with that particular tenant. Where possible, the Receiver also requested an increase in the monthly rent.

b. Mortgage and Tax Obligations

As previously detailed in the First Interim Report, the Receiver discovered that two of the Properties had an outstanding mortgage at the time of her appointment. Both of the mortgaged properties have since been sold and closed, and the outstanding respective mortgage balance was paid off at the time of closing.

The Receiver's investigation also showed that a number of the Receivership Entities failed to pay property taxes owing in 2020.² As a result, the collecting county sold approximately \$70,000 in "tax certificates" for the relevant Properties in order to recoup the delinquent amounts.³ Given that the tax certificates had been recently issued at the time of the Receiver's appointment and, thus, were not immediately at risk of being converted to a tax deed, the Receiver did not take any action on repaying the tax certificates, anticipating that each certificate will be redeemed at the time the corresponding property is sold and closed. The Receiver had previously indicated that she would reevaluate this plan if any of the Properties remain unsold by June 1, 2022, but this appears unnecessary, as the Receiver has sold, or is in the process of closing the sale of, all Properties and expects no property to remain in the Receivership by June 1, 2022.

c. Insurance Status and Renewals

One of the Receiver's immediate priorities following her appointment was to verify that each of the Properties was covered by property and casualty insurance. The Receiver was able to

² As detailed in Section III.A.ii.b in the Third Interim Report, the Receiver took steps to pay the currently owing 2021 real property taxes on November 30, 2021, which resulted in savings of approximately \$1,000 over the amount due had the Receiver waited until the March 31, 2022 deadline.

³ A "tax certificate" is an interest-bearing first lien representing unpaid delinquent real estate property taxes which are sold through a public auction to the buyer offering the lowest rate of interest. If the tax certificate remains outstanding and unpaid for two years, the owner of the certificate may apply for a tax deed and ultimately seek to foreclose and even acquire the property.

locate the insurance agency that had written the current policies and verify that all Properties were covered by property and casualty insurance. However, the Receiver's investigation showed that none of the Properties carried windstorm insurance coverage despite their location in South Florida. As the insurance policies in place for the Properties came up for renewal, the Receiver solicited quotes to both renew the casualty insurance and also to implement windstorm coverage. The Receiver elected to finance the insurance premiums given the concurrent listing of the Properties, which has allowed the Receiver to expend fewer funds in initially securing the policies and also provided greater flexibility to cancel the policies at the time of sale. As the Properties have been sold and closed, the Receiver has been cancelling the respective policies and requesting refunds of any unearned premiums.

iii. Marketing and Selling Receivership Real Estate

a. <u>Listing Properties for Sale</u>

As detailed in previous Reports, the Receiver selected Daniel Otten with Local Real Estate Co. to serve as her listing agent after interviewing several interested agents. Following his engagement, Mr. Otten and his team worked diligently to visit and inspect the Properties, utilize a professional photographer to prepare offering materials, and develop a comprehensive pricing and listing strategy. Following extensive discussions and collaboration with Mr. Otten and his team, the Receiver authorized the listing of the Properties, which went live in September 2021. The Properties were listed on several listing sites as well as on the Receiver's Assets for Sale page of her website.⁴

The Receiver's sale of real estate is subject to compliance with relevant federal statutes as well as approval by the Court. Specifically, the Receiver must abide by 28 U.S.C. § 2001(b),

⁴ See <u>www.propertyiireceivership.com/assets-for-sale</u>

which not only requires that any sale of real estate must be approved by the Court and supported by three independent appraisals, but also requires that the Receiver publish notice of the sale in a local newspaper for at least ten days before any sale may be confirmed and allows an interested third-party to submit a "bona fide offer" which guarantees at least a 10% increase over the proposed sale price during the ten-day period following publication of the notice. Unless otherwise warranted, the Receiver intends to abide by these requirements and will seek Court approval of any sale of the Properties pursuant to 28 U.S.C. § 2001. The Receiver has posted copies of all sale motions on her website.

b. <u>Court-Approved Sales and Closing Status</u>

The listings generated significant demand from prospective buyers, with all Properties receiving multiple (and sometimes numerous) offers. With the assistance of Mr. Otten and his team, the Receiver evaluated these offers and, as appropriate, accepted or made a counter-offer. If and when the Receiver entered into a contract with a potential buyer, the Receiver was then required to seek Court approval. The Receiver filed her motion seeking the Court's approval of the last remaining Property during the Relevant Period, and a list of her efforts in selling each of the Properties is provided below for reference:

Property ⁵	Sales Price	Purchase Price	% Increase
3775 116 th Terrace	\$790,000.00	\$550,000.00	43.6%
1361 SE 4 th Street	\$835,000.00	\$635,000.00	31.5%
530 NE 34 th Street	\$410,500.00	\$345,000.00	19.0%
4450 Coral Springs Drive	\$550,000.00	\$405,000.00	35.8%

⁵ For ease of reference, this Report will reference the specific properties using an abbreviation of the street number and the word "Property." For example, reference to the property located at 3775 NW 116th Terrace, Coral Springs, FL 33065 will be made as the "3775 Property."

4020 Riverside Drive	\$775,000.00	\$468,000.00	65.6%
3050 Coral Springs Drive	\$1,775,000.00	\$1,250,000.00	42%
201 E. 30 th Street	\$495,000.00	\$265,000.00	86.7%

Pursuant to the underlying Purchase and Sale Agreement for each of the Properties, the closing was to occur within 30 days of the Court's Order approving the sale. Following execution of each Purchase and Sale Agreement, the Receiver prepared and filed a motion seeking Court approval of the sale of the respective property as well as the proposed procedures to comply with 28 U.S.C. § 2001 and close the sale. Since the beginning of the Receivership through the end of the Reporting Period, six of seven sale motions have been granted by the Court, and the motion for the 201 Property remained pending⁶. *See* Docs. 32-33, 40-42, 69

Following the Court's approval of a property sale, the Receiver then published notice of the proposed sale in the county where the respective Property was located.⁷ The notice advised any prospective buyers of their ability to submit a *bona fide* offer pursuant to 28 U.S.C. § 2001 within ten (10) days of the publication of the notice. For each of the six Properties for which the Court has approved the proposed sale, the Receiver did not receive any timely submitted *bona fide* offers and proceeded to work with the prospective buyers to prepare for closing.

During the Reporting Period, the Receiver has made significant progress in liquidating the remaining Properties, including successfully closing the sale of four properties: the 530 Property,

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⁶ As of April 14, 2022, the Court approved the sale motion for the 201 Property (Doc. 78), and the overbid deadline expired on April 29, 2022, which means the sale will close within the next several days.

⁷ The majority of the notices were published in the *Sun-Sentinel* located in Broward County. However, for the sole property which is located in Palm Beach county, the Receiver has asked the Court for approval to publish the proposed sale notice in the *Palm Beach Post* which is the local newspaper in that county. Doc. 68.

the 4020 Property, the 1361 Property⁸, and the 4450 Property. These sales, when accounting for the payment of any mortgage and other closing costs, resulted in total net proceeds to the Receivership Estate of \$2,002,011.95. Docs. 59-60, 64, 67. On February 7, 2022, the Receiver filed her *Unopposed Motion to Approve Private Sale of Real Property Located at 3050 Coral Springs Drive, Coral Springs, FL 33065* (Doc. 65). The Court approved that sale on February 28, 2022, and the Receiver published the required sale notice in the *Sun-Sentinel* on March 3, 2022. On March 31, 2022, the Receiver closed the sale of the 3050 Property which resulted in a deposit on April 1, 2022, of total net proceeds of \$1,633,235.90 to the Receivership Estate. On February 28, 2022, the Receiver filed her *Unopposed Motion to Approve Private Sale of Real Property Located at 201 E. 30th Street, Riviera Beach, FL 33404* (Doc. 68), which was granted by the Court.

Once the sale of the 201 Property is closed (likely in May 2022), the Receiver will have successfully sold all of the Properties owned by the Receivership Entities at the time of her appointment.

iv. Analyzed Various Documentation and Worked With Retained Forensic Accountant

The Receiver continues to review company records and third-party productions in order to (i) understand the Receivership Entities' business operations and relationships prior to her appointment; (ii) identify any potential assets that belong to the Receivership Entities; and (iii) identify and analyze investor transactions. Given the Commission's allegations of "extensive commingling of investor funds," the Court approved the Receiver's retention of Kaufman &

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⁸ The closing of the 1361 Property was originally scheduled to take place on December 28, 2021, but the Receiver agreed to extend the closing date at the buyer's request given certain personal and transaction-specific circumstances. The Receiver ultimately negotiated and was paid a \$5,000.00 extension fee from the buyer of the 1361 Property in order to compensate the Receiver and her legal team for the work involved in extending the closing, and that extension fee was deposited into the Receivership Estate.

Company, P.A. ("Kaufman") to provide forensic accounting and tax services to the Receiver. The Receiver has asked Kaufman to prioritize the analysis of the bank accounts and assembly of an investor roster showing the amounts raised from and distributed to each investor. Kaufman has provided the Receiver with its preliminary findings on the "extensive commingling" alleged to have taken place within the Receivership Entities' bank accounts.

The Receiver also continues to investigate any potential claims the Receivership Estate may have against any third-parties based on funds transferred to those third parties or services provided by those third parties.

v. Filed and Fully Briefed Motion Seeking Approval of Claims Process

As detailed in previous Reports, the Receiver's goal since her appointment was to be in a position to file a motion with the Court by December 31, 2021, seeking approval of the framework and procedures for a claims process that can return assets to investors and other interested parties with approved claims. Based on her team's efforts and progress, the Receiver was able to meet this goal and filed her *Motion to Establish and Approve (i) Proof of Claim Form and Claim Bar Date; (ii) Procedure to Administer, Review, and Determine Claims; and (iii) Notice Procedures and Incorporated Memorandum of Law (the "Claims Motion") on December 31, 2021. The Claims Motion is available on the Receiver's website at www.propertyjireceivership.com.*

In the Claims Motion, the Receiver proposed (i) the establishment of a deadline for the submission of claims, (ii) approved forms for claim submissions, (iii) claims notification and publication procedures, and (iv) the framework by which the Receiver will calculate and administer the claims process. Doc. 48. Although the Court issued an Order on January 10, 2022, granting the Claims Motion, the Court subsequently vacated that Order after two responses to the Claims Motion were filed on January 14, 2022. The Receiver subsequently filed a Reply in support

of the Claims Motion on January 21, 2022. Doc. 61. On April 14, 2022, the Court granted the Claims Motion. (Doc. 77).

Now that the Claims Motion has been approved, the Receiver will distribute the approved Proof of Claim form to all potential claimants along with detailed instructions on preparing and submitting the completed form to the Receiver by the established submission deadline. Once that deadline passes and the Receiver has reviewed all timely-submitted claims, she will then file one or more motions seeking the Court's approval of (i) her determinations of timely submitted claims, and (ii) an interim (and additional as necessary) distribution to claimants with approved claims and the source(s) of funds used to make any distribution(s).

vi. Continued Outreach with Investors and Interested Parties

The Receiver and her counsel have been in contact with a number of investors and interested parties since her appointment. The Court approved the Receiver's retention of a website vendor to establish an informational website that would provide relevant court documents, news, and other updates for investors and interested parties, and that website went live in July 2021 and is located at www.propertyiireceivership.com. The website also allows interested parties to submit their contact information to the Receiver, and the Receiver's team has been compiling that information and speaking with interested parties.

B. Receiver's Preliminary Findings from Her Ongoing Investigation

The Receiver continues to locate, gather, and review company documents and other responsive records as part of her investigation. This has included the identification and review of company documents located in the storage unit, the imaging and review of documents stored in several computers previously used by the Receivership Entities, and obtaining documents from various third parties through subpoenas or other requests. This process has been complicated by

the fact that Defendants do not appear to have maintained complete, current, and separate books and records for the various businesses operated by the Receivership Entities. Indeed, the Receiver's current investigation suggests that corporate formalities of those various businesses were routinely disregarded. The Receiver also understands that Defendants Brodman and Nicolosi have previously asserted their Fifth Amendment right against self-incrimination during the Commission's investigation and it has been communicated through their respective counsel that Mr. Brodman will continue to assert those rights during the Receiver's investigation. The Receiver and her team have worked tirelessly and proactively to push through these obstacles.

i. The Equinox and Property Income Investors Offerings

a. <u>The Equinox Offering</u>

On or around November 14, 2012, Equinox was formed by Jeffrey Rosenfeld and David Cohen. On or around December 11, 2012, Equinox Holdings filed a Form D Notice of Exempt Offering of Securities with the Commission indicating it intended to raise up to \$20 million in an offering that was purportedly exempt from registration pursuant to Rule 506. The Receiver has seen several connections between Equinox and a company named Medical Connections Holdings, Inc. ("MCH"), including that (i) Jeffrey Rosenfeld previously served as the CEO of MCH, (ii) Defendant Nicolosi at one point served as the President of MCH, and (iii) several previous investors in MCH subsequently invested in Equinox.

As set forth in a Private Placement Memorandum dated January 17, 2013 (the "Equinox PPM"), Equinox told prospective investors it sought to capitalize from identifying and investing in "distressed and opportunistic real estate investments." The Equinox PPM indicated it was seeking to raise up to \$7 million from investors, of which up to 10% of the proceeds would be used to compensate licensed broker/dealers for their efforts, and the vast majority of the proceeds would

be used for "real estate acquisition development." The PPM described two "targeted acquisitions" consisting of large parcels of undeveloped land that Equinox sought to purchase and subsequently develop with proceeds from the offering.

During that time period, Mr. Brodman was listed as Equinox's Chief Operating Officer and Director while Theodore Grothe was listed as the Vice President, Secretary, and Director. Mr. Rosenfeld resigned from Equinox later in 2013, and Mr. Brodman is listed as the company's CEO in its 2013 amended annual report. As of the February 2016 annual report, Mr. Brodman was the only listed officer and director for Equinox.

The Receiver has obtained bank records for three bank accounts maintained by Equinox dating back to June 2013. Based on the Receiver's preliminary investigation, it appears that Equinox raised approximately \$3 million from at least 35 investors as early as November 18, 2012, and that Equinox continued to raise funds from investors as recently as August 2020. A significant portion of these funds were raised prior to late 2016 when the Property Income Investors offerings began. Although Equinox does appear to have used some investor funds to purchase real estate during 2012 – 2015, it appears that a significant portion of the \$3 million was not used for the purchase of real estate. Indeed, the Receiver has only been able to identify three real estate

⁹http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C 2013%5C0906%5C00195349.Tif&documentNumber=P12000094600

¹⁰ http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C 2013%5C1115%5C53565093.Tif&documentNumber=P12000094600

¹¹http://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-p12000094600-0a7d4e41-25ed-485b-a8ff-a26d32f50db3&transactionId=p12000094600-464d4b95-cc3d-49f7-82a3-b7b539b9ab37&formatType=PDF

 $[\]frac{12}{http://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-p12000094600-0a7d4e41-25ed-485b-a8ff-a26d32f50db3\&transactionId=p12000094600-494ca438-0bf0-4b90-96a2-5f9d7fba3024\&formatType=PDF$

transactions in Broward and Palm Beach Counties involving Equinox during the time period from December 2012 to February 2015, none of which involved Equinox paying a purchase price higher than \$108,000. Moreover, although Equinox has not owned any real estate since February 2015, it appears that nearly \$2 million was raised from Equinox investors from that time to the Receiver's appointment. This investigation remains ongoing.

b. The Property Income Investors Offerings

In March 2016, Brodman formed PII. Brodman subsequently formed at least 10 entities between December 2016 and June 2019 that each contained "Property Income Investors" in the name followed by a specific number (which in most cases appears to have been a reference to the street number of a specific property). These entities were formed for the purpose of purchasing specific real estate parcels, and in most cases each entity opened a separate bank account at JP Morgan Chase.

No later than 2016, the Receiver understands that prospective investors were targeted to invest in PII (or related entities) through "cold calls" made by Brodman, Nicolosi, and apparently other sales agents working at Nicolosi's direction. From speaking with investors, the Receiver has been told that the "cold calls" touted specific property(ies) that had been or would be purchased and promised annual returns ranging from 5% to 10% (with some investors being promised even higher returns). Specifically, investors were told that they would receive returns derived from the Receivership Entities' renovation and ownership of multi-family properties consisting of (i) 70% of the net rental profits (with Brodman receiving the remaining 30%), and (ii) 50% of the profits

¹³ For example, PII 26 was formed in December 2016 and listed Mr. Brodman as the manager. In or around December 28, 2016, PII 26 paid \$495,000 to purchase a seven-unit multifamily residential property located at 26 Wisconsin St., Lake Worth, FL 33461.

when the property was sold (with Brodman receiving the remaining 50%). Investors were assured that there was minimal risk and little to no downside associated with the investments.

The Receiver has identified private placement memoranda that were prepared by several of the Receivership Entities, including a September 2016 private placement memorandum prepared for PII (the "PII PPM"). ¹⁴ The PII PPM indicated to prospective investors, among other things, that:

- PII would "use the net proceeds from this offering to acquire property and for general working capital purposes";
- Cash commissions of up to 10% of the raised proceeds would be paid to any "licensed broker/dealers" assisting in the offering;
- Officers (i.e., Defendant Brodman) "will not receive a salary or management fee," but rather would be entitled to 30% of the Company's net income (or loss) from operations as well as 50% of the Company's gains (or losses) from the sale of any property.
- Investors holding Class B membership interests would be entitled to their pro rata share of 30% of the Company's net income (or loss) from operations as well as 50% of the Company's gains (or losses) from the sale of any property.
- "Investors should not purchase our Class B membership interests if they need or expect to receive quarterly distributions."
- "We will use debt financing to acquire most of our properties. Lenders will place mortgages on these properties."
- "We expect to incur operating losses in future periods because we expect to incur expenses which will exceed revenues for an unknown period of time."

The "Use of Proceeds" section further specified that, assuming \$4 million was raised during the offering, \$3.6 million would be used to make real estate acquisitions and the remaining \$400,000 would be used for working capital. The section further indicated that PII "reserve[s] the right to modify the use of proceeds as we deem fit at our sole discretion." The Commission has

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¹⁴ As discussed below in Section V.B., it does not appear that the PII PPM was provided to a significant number of investors.

alleged that although the Receivership Entities raised at least \$9 million from investors, at least \$2.44 million was misappropriated by PII and Brodman. Doc. 1 60-61. These allegations are consistent with the Receiver's preliminary review of the documents and financial statements in her possession.

ii. At Least Some Receivership Entities Did Not Generate Sufficient Cash Flow to Cover Distributions to Investors and Depended on "Loans" From Other Receivership Entities to Meet any Shortfalls

Prospective investors in the PII entities were told that they would receive quarterly distributions generated by the rental income received from the property owned by the entity they invested with. Although it appears that many investors simply received identical quarterly distributions that equated to an annual return ranging from 6% to 7%, the investment documents signed by each investor specified that any distributions paid to investors would be made from a percentage of the "Net Cash From Operations" with the remainder going to Mr. Brodman. However, it appears that at least several of the Receivership Entities did not generate sufficient cash flow from operations to pay the quarterly distributions made to investors, and those entities instead depended on transfers (or "loans" which do not appear to have ever been repaid) from other Receivership Entities to pay the distributions.

For example, prospective investors interested in investing with PII 1361 were required to execute an Operating Agreement as a Class B Member. In relevant part, Section 4.1(c) of that Operating Agreement provided that Class B Members would be entitled to receive periodic distributions in the amount of "70% of the Net Cash From Operations." The Operating Agreement defined Net Cash From Operations as:

¹⁵ Mr. Brodman is believed to be the sole Class A Member of all PII entities.

"Net Cash From Operations" means the gross cash proceeds from Company operations (including sales and dispositions of Company property in the ordinary course of business) less the portion thereof used to pay or establish reserves for all Company expenses, debt payments, capital improvements, replacements, and contingencies, all as determined by the Manager. Net Cash From Operations shall not be reduced by depreciation, amortization, cost recovery deductions or similar

allowances, but shall be increased by any reductions of reserves as herein provided previously established pursuant to the first sentence hereof and from Net Cash From Sales or Refinancings.

Thus, the amount that should have been paid to a Class B Member would have been calculated by subtracting Company expenses, capital improvements, and other reserves from the income received during the company's operations which typically solely consisted of tenant rental income. During 2019, according to a Profit and Loss Statement generated by the Quickbooks software maintained by the Receivership Entities, PII 1361 generated \$43,395.00 in rental income. However, PII 1361 also incurred \$38,685.90 in expenses from operations, including \$10,444.50 in property taxes, \$3,534.31 in insurance expense, and \$16,261.34 in repairs and maintenance. This resulted in PII 1361 generating net income of \$4,709.10 during 2019. Pursuant to the Operating Agreement, investors (Class B Members) would have been entitled to 70% of this Net Cash From Operations which should have resulted in total annual distributions to Class B Members of \$3,296.37.

However, a review of PII 1361's bank statements show that a total of \$42,484.00 in distribution checks were made during 2019 to investors. Standing alone, this represented a nearly 100% distribution of all gross rental income received from tenants and was approximately 1,000% higher than the net cash from operations purportedly generated by PII 1361 during 2019. Additionally, the bank statements also suggest that PII 1361 may have significantly understated its repair and maintenance expenses based on \$49,120.00 in apparently-unreported payments that appear to be for the renovation of one of the units – approximately \$30,000 higher than the \$16,261.34 in repairs and maintenance reported in PII 1361's 2019 Profit and Loss Statement. In

order to meet its ongoing expenses, including quarterly distributions paid to investors and other obligations including renovation expenses, PII 1361's bank account statements reflect <u>over</u> \$100,000.00 in incoming transfers from nine different PII entities. In addition, the statements also reflect that \$24,230.00 was transferred from PII 1361 to four different PII entities during that time period.

A similar pattern was seen in an analysis of financial and bank statements for PII 3504, which owned a property located at 3775 NW 116th Terrace, Coral Springs, FL 33065. Although PII 3504 received \$58,530 in rental income during 2019, the Profit and Loss Statement generated by the QuickBooks software maintained by the Receivership Entities reflected \$34,358.98 in expenses which resulted in net income of \$24,370.13. However, during 2019, PII 3504 paid out nearly \$28,000 in quarterly distributions to investors – more than the purported net income. In addition, the P&L did not reflect (nor were investors informed) that PII 3504 had taken out a mortgage on the 3775 Property and that it made a total of \$22,040.87 in monthly mortgage payments during the majority of the year – in addition to the \$34,358.98 in expenses reflected on the Profit and Loss Statement.¹⁶

The \$58,530 in rental income received by PII 3504 during 2019 was not sufficient to pay the combined \$84,382 in expenses, investor distributions, and mortgage payments. In order to cover this shortfall, PII 3504's bank account statements reflect **over \$50,000.00** in transfers from at least nine different PII entities. In addition, the statements also reflect that \$127,770 – which

¹⁶ The existing mortgage was satisfied in October 2019 when PII 3504 took out a new mortgage which resulted in the deposit of \$106,443.62 in PII 3504's bank account. Following deposit of the \$106,443.62 mortgage proceeds, PII 3504 made a total of \$107,200.00 in transfers to other PII entities – including the vast majority to the Property Income Investors Holdings account controlled by Brodman.

included the mortgage proceeds deposited in PII 3504's bank account in October 2019 – was transferred from PII 3504 to at least six different PII entities during that time period.

In sum, PII 1361 generated \$43,395.00 in rental income during 2019, but during the same period it made total payments of over \$100,000 for property expenses and investors distributions. Similarly, the \$58,530 in rental income received by PII 3504 was not sufficient to cover the total payments of the combined \$84,382 in expenses, investor distributions, and mortgage payments. Because the rental income generated by PII 1361 and PII 3504 during 2019 was not sufficient to cover the corresponding entity's expenses during that same time period, each entity thus necessarily depended on the deposit of funds from other entities (consisting of investments by other investors) to meet these shortfalls. The Receiver is continuing her investigation to determine if similar shortfalls were present in other PII entities.

iii. Nearly \$2 Million Was Paid To Company Insiders Including Brodman

A significant percentage of funds raised from investors were paid to company insiders – including Brodman. According to payroll records from ADP, Brodman received at least \$1,206,302 in Form 1099 compensation from 2014 to 2020 (excluding compensation paid during 2019, which was not included in the provided records). The Receiver has also seen evidence that Brodman made significant withdrawals from various bank accounts belonging to the Receivership Entities in the past year. The Companies' primary administrative employee, Cindy Lieberman, also received nearly \$500,000 in salary during the same period – including a salary of \$93,900 in 2019 and \$107,000 in 2020.

From 2019 to 2021, it appears that nearly \$500,000 was transferred from various company bank accounts to a bank account owned by LBB Maintenance & Repair, LLC ("LBB"), a company owned by Brodman. Despite the name of the company suggesting it was in the business of

maintenance and repair, it appears that LBB's primary purpose was to transfer funds from the PII Entities to Mr. Brodman or for his benefit. A significant portion of funds transferred to LBB were then sent to Brodman's personal account where they were then used for Brodman's personal benefit including the payment of a mortgage, monthly lease payments for a Maserati, and other expenses.

These regular and recurring distributions to Brodman are contrary to representations in the PII PPM that "Mr. Brodman will not receive any compensation or management fee while overseeing the Company's operations," and several investors have also indicated that they were told this by Mr. Brodman or other sales agents. A subsequent section of the PII PPM confirmed that "[o]ur officers will not receive a salary or management fees." Rather, Mr. Brodman "would be allocated Class A Membership interests which would entitle him to 30% of the Company's net income (or loss) from operations and 50% of the Company's gains (losses) from the sale of any property."

The Commission has alleged that approximately \$1.04 million was generated in **gross** rent payments during the Relevant Period (spanning over seven years), which would have entitled Brodman to at most approximately \$312,000 as his share of rental payments during that span. This of course does not account for any other expenses incurred during the Companies' operations, which would serve to correspondingly reduce the amount owed to Brodman (and investors). As for the proceeds of property sales, the Commission has alleged (and the Receiver has not seen any contrary information) that no property sale proceeds were distributed to investors during the Relevant Period. Instead, it appears that many investors were encouraged to "roll over" their profits from a property sale into another PII entity. Accordingly, based on the representations to investors, Brodman would have been entitled **at most** to \$312,000 (and likely less, after expenses)

during the seven-year Relevant Period – an amount that is dwarfed by the \$500,000 in transfers that was transferred to LBB alone from 2019 to 2021.

iv. The Use of Sales Agents to Solicit Investors and Payment of Transaction-Based Compensation

As referenced above, the Receiver has seen evidence that the Receivership Entities relied on sales agents to solicit prospective investors in the various Receivership Entities. These sales agents include Defendant Brodman, an individual who appears to be Mr. Brodman's relative, Defendant Nicolosi, and several other individuals that were apparently affiliated with Nicolosi's company, CMP. In a previous filing with the Commission, CMP was described as "a brokerage firm" and listed Nicolosi as its CEO.¹⁷ Of note, at least one of the sales agents affiliated with CMP appear to have used fictitious names when communicating with prospective investors. It appears that these sales agents primarily contacted prospective investors through the use of "cold calls" based on lead lists purchased from third parties.

The Receiver has not seen any evidence that any sales agents held the requisite licenses to sell securities. The Receiver has learned that Defendant Nicolosi (when he was known as Anthony Peluso) was barred from the securities industry in June 2001 for engaging in high-pressure sales tactics and making misrepresentations to customers. In June 2003, Mr. Peluso changed his name from Anthony Joseph Peluso to Anthony Joseph Nicolosi. In 2010, Mr. Nicolosi was the subject of a cease and desist order from the Alabama Securities Commission based on his role in soliciting investors in a different company and his misrepresentations and omissions concerning his previous industry bar and name change. ¹⁸

¹⁷ See https://www.sec.gov/Archives/edgar/data/1140303/000135448811001230/mcth 10ka.htm

¹⁸ See https://asc.alabama.gov/Orders/2010/CD-2010-0062.PDF

After making these "cold calls," those agents — either themselves or through an administrative employee at PII — sent correspondence (typically by email) to those prospective investors containing information on the proposed investment. This correspondence usually consisted of a short description and potential returns of the specific property investment, an attachment containing pictures and projections for the property, and a "Subscription Booklet" containing instructions to complete an investment. Of note, while the "Subscription Booklet" instructed interested investors to complete the attached Subscription Agreement and Operating Agreement, the vast majority of the Subscription Booklets distributed to prospective investors appear to only include the Subscription Agreement (and did not include the Operating Agreement). Further, although the Subscription Agreement provides that the "offer and sale of securities is being made in connection with the private placement memorandum," it appears the "Subscription Booklet" often did not contain a copy of the PII PPM. The Receiver has only seen that a very limited amount of prospective investors received the PII PPM (and typically only when requested by a diligent prospective investor).

Some emails were sent directly by the sales agents, including the below email sent by Defendant Nicolosi:



In some instances, the agents advertised the ability for prospective investors to use their retirement funds for the investment.

The Receiver has seen information supporting the Commission's allegations that a significant amount of investor funds were used to pay commissions to these sales agents. For example, Nicolosi's company, CMP, received at least \$888,170 in payments from the Receivership Entities during the Relevant Period. The Receiver has also seen additional payments to other sales agents made through other bank accounts. The Receiver believes that most, if not all, of these payments were provided as compensation for the solicitation of investors to the Receivership Entities. Although Defendant Nicolosi has taken the position that at least a portion of his compensation was purportedly attributable to other non-solicitation activities, the Receiver

understands that other individuals affiliated with CMP (including those who used fictitious names with prospective investors) had no duties other than soliciting investors.

v. Investor Funds Appear to Have Been Routinely Commingled and Used for Unauthorized Purposes for Several Years

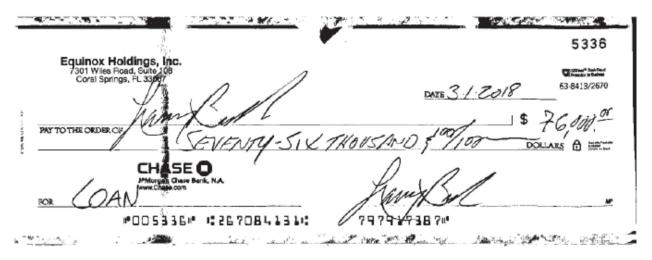
A preliminary analysis conducted by the Receiver's forensic accountants indicates that approximately \$9 million was raised from at least 150 investors during the relevant time period. The Receiver has seen significant evidence that investor funds were routinely commingled between the Receivership Entities' bank accounts for no apparent legitimate or business purpose; rather, it appears that corporate formalities were frequently disregarded and that a Receivership Entity facing a shortfall in currently-available funds would regularly use funds from other Receivership Entities as needed. The Receiver has asked her forensic accountants whether it would be feasible to essentially "unwind" these various transactions and to attempt to treat each entity separately. Although that inquiry remains ongoing, the Receiver has been informed that it would be significantly time-intensive (and costly) to attempt to reconcile material differences between the reported intercompany obligations owed among the companies, and that even after completing such a task it would still be uncertain whether the entities would be able to be treated as independent companies.

The Receiver has also seen a troubling pattern of investor funds being routinely misused or misappropriated as early as 2018 (and perhaps earlier). For example, investor J.R. made an investment of \$501,000 with Equinox Holdings in January 2018, of which \$487,000 was deposited into Equinox's bank account ending in x7387 (the "Equinox Account") on January 23, 2018 and the remaining \$13,000 was deposited into the same account on January 30, 2018. Prior to the initial deposit on January 23, 2018, the balance of the Equinox Account was less than \$1,000.

From January 23, 2018 to March 7, 2018, less than \$500 in other deposits were made to the account. During that period, the following activity took place in the Equinox Account:

- \$101,200 in checks were written to Capital Market Partners, Defendant Nicolosi's company;
- \$112,000 in checks were written to Defendant Brodman;
- \$82,000 was transferred to a different Equinox Holdings bank account which was used to make payments of \$77,162.50 to four investors;
- Various purchases that did not appear to be business expenses, including transactions at Best Buy, NYY Steakhouse, Dolphin Stadium, and Boston's on the Beach; and
- At least \$10,500 in withdrawals.

Of the \$112,000 in checks that were written to Brodman, one check for \$76,000 dated March 1, 2018 was deposited into his personal account with the notation "Loan" in the memo:



The proceeds from this "loan" were apparently used (i) to make payments of approximately \$70,000 to the U.S. Treasury/IRS, (ii) to make a \$6,719.15 purchase at "Teacups Puppies and Boutiques," and (iii) a \$3,000 payment on Brodman's home mortgage. The Receiver has not seen any indication this "loan" was repaid or any documentation one would expect in an arm's length transaction.

In another example, PII 26 purchased a property located at 417 N. E St., Lake Worth, FL in May 2018. After that sale had closed, several additional investor deposits totaling \$175,000 were deposited into PII 26's bank account (the "PII 26 Account") in June 2018. ¹⁹ The PII 26 Account had a beginning balance in June 2018 of \$1,958.50. During the following month, over \$150,000 was transferred from the PII 26 Account to PII's bank account (the "PII Account"). Prior to these deposits, the PII Account had a beginning balance in June 2018 of less than \$1,000. Following receipt of these transfers from the PII 26 Account, the PII Account made the following transfers:

- \$102,436.82 to the Equinox Account;
- \$12,272 to an account belonging to PII 9007;
- \$14,000 to an account belonging to PII 201;
- \$18,500 to an account belonging to PII 304; and
- \$6,000 to an account belonging to PII 3504.

The \$102,436.82 transferred to the Equinox Account (which had a beginning monthly balance of \$2,637.18 prior to the transfers) was used to make the following transactions:

- A purchase of \$795.00 at the "Palm Beach Equine Clinic" and a purchase of \$1,036.23 at Dolphins Stadium.
- Nearly \$50,000 in checks to Capital Market Partners, Defendant Nicolosi's company;
- Over \$30,000 in checks to Mr. Brodman; and
- \$1,036.23 to "Jetblue Vacations."

In short, it appears that very little – if any – of the investor deposits in the PII 26 account during the June 2018 timeframe were used for any purpose relating to the 417 Property.

¹⁹ Indeed, at least one wire transfer in the amount of \$50,000 specifically includes the address for the 417 Property in the wire details.

In early August 2020, at the same time that the Commission issued a subpoena to Defendant Brodman and the Receivership Entities, Brodman apparently reached out to investor J.R. – the same investor that had made the \$501,000 investment referenced above – about an "opportunity that had come up" that required additional funds to close on a property. Based on those representations, J.R. agreed to make an additional \$400,000 investment (consisting of retirement funds) that were deposited into the Equinox Account on August 5, 2020. Prior to that \$400,000 deposit, the Equinox Account had a balance of \$2,756.65. The same day that the \$400,000 was deposited, the Equinox Account made the following transfers:

- \$99,000 to an account belonging to PII;
- \$22,000 to an account belonging to PII 26;
- \$52,000 to an account belonging to PII 304;
- \$16,000 to an account belonging to PII 9007;
- \$13,000 to an account belonging to PII 4450; and
- \$27,500 to an account belonging to Property Income Investors Holdings, LLC.

Of note, J.R. was not an investor in any of these PII entities.

Despite Brodman's representations to investor J.R. that the \$400,000 investment would be used to purchase a property, the bank statements show that <u>none of the funds were used to purchase any real estate</u>. Instead, at that time, the Receiver understands that quarterly distributions to investors for the first quarter of 2020 were several months overdue and that distributions for the second quarter of 2020 were currently due. Records reviewed by the Receiver indicate that at least \$125,000 traceable to the \$400,000 deposit were used to pay overdue quarterly

²⁰ Based on the Receiver's review of records, it appears this deposit was made the day after a credit card for the Receivership Entities was used for a \$3,000 charge to Mr. Brodman's attorney.

purported distributions to existing investors that was represented to be income from operations. Brodman also diverted (i) at least \$46,000 traceable to the \$400,000 deposit to the LBB Account which he controlled; (ii) \$15,000 to make payments towards an overdue company credit card; and (iii) at least \$30,000 to other Receivership Entities. The Receiver is continuing to investigate these circumstances.

vi. Over \$50,000 of Investor Funds Were Lost When Brodman Forfeited a Real Estate Purchase Deposit

The Receiver discovered that, in January 2021 and February 2021 (several months after the Commission issued a subpoena to Defendant Brodman and the Receivership Entities), the PII 26 Account wired a total of \$55,000 to a law firm that Brodman had frequently used to handle real estate transactions on behalf of the Receivership Entities. Further investigation showed that these transfers were a deposit for the purchase of a single-family residential property containing a horse barn and stalls located in Parkland, Florida. It appears that Brodman intended for this property to be purchased by PII 26 using a loan that would be collateralized both by the property being purchased and the 3050 Property that had recently been purchased in August 2019 by PII 304. The 3050 Property had been purchased free-and-clear (by a separate Receivership Entity with different investors), and this cross-collateralization would have significantly encumbered the property and thus diminished the value of any PII 304 investments. In addition, the purchase of a single-family residential property (with a horse barn and stables) is inconsistent with the representations to investors that PII would use their funds to purchase residential multi-family properties for renovation, leasing, and resale.

The day before the transaction was scheduled to close, Brodman informed his realtor that he would not be able to close the transaction. As a result, the \$55,000 in investor funds that were

being held as a deposit were forfeited to the seller and thus lost. There is no indication these losses were disclosed to investors.

IV. THE NEXT QUARTER

A. Investigation

Based on the Receiver's preliminary investigation, it appears that the Properties (together with the \$1.15 million in sale proceeds that were being held in trust at the time of the Receiver's appointment) represent the largest (and likely only) assets of material value that are attributable to investor funds. With the assistance of her retained professionals, the Receiver will continue to interview third parties and gather and review relevant documents from the Receivership Entities and third parties. It will be necessary to obtain and review all such documents in order to complete an understanding of the operation of the various Receivership Entities, the flow of funds through and for the benefit of those Receivership Entities, to identify any additional sources of recovery, and to prepare an accounting. The Receiver continues to work diligently on this task, but without knowing the volume of documents she expects to receive, it is difficult to estimate the time needed for completion.

The Receiver's investigation will also focus on identifying relevant documentation to allow her forensic accountants to complete an analysis of all investor transactions, a necessary task to assess and administer a Court-approved claims process. In the course of reviewing, analyzing, and compiling this information, the Receiver may also request that certain investors provide copies of relevant documentation evidencing their relationship with the Receivership Entities.

The Receiver will continue to attempt to locate additional funds and other assets and may institute proceedings to recover assets on behalf of the Receivership Entities. In an effort to more fully understand the conduct at issue and in an attempt to locate more assets, the Receiver will

continue to conduct interviews and/or depositions of parties and third parties who may have knowledge of the fraudulent scheme.

B. Maintaining, Marketing, and Selling Receivership Properties

The Receiver and her team have devoted significant time to working to market and liquidate the Properties, and those efforts have resulted in the closing of the sale of four Properties during the Reporting Period. The final property, the 201 Property, was under contract and following the expiration of the April 29 deadline for receiving *bona fide* offers, will close. Up to and until the last of the sales of the Properties are closed, the Receiver will continue to work with Keyes to ensure the remaining Properties are maintained and managed. The sale of all of the Properties will necessarily eliminate the need for any further expenses associated with maintenance or upkeep of the Properties.

C. <u>Administering Claims Process, Determining Submitted Claims, and Seeking Court Approval of Claim Determinations and Distribution Plan</u>

On December 31, 2021, the Receiver filed her Claims Motion with the Court, which, in relevant part, sought approval of the framework and procedures for a claims process through which recovered funds could eventually be distributed to claimants with approved claims. The Claims Motion has been fully briefed as of January 21, 2022. Now that the Court has approved the Claims Motion, the Receiver will move forward with mailing the approved Proof of Claim form to all potential claimants along with detailed instructions on preparing and submitting the completed form to the Receiver by the established submission deadline. Once that deadline passes and the Receiver has reviewed all timely-submitted claims, she will then file a one or more motions seeking the Court's approval of (i) her determinations of timely submitted claims, and (ii) an interim (and additional as necessary) distribution to claimants with approved claims and the source(s) of funds used to make any distribution(s).

The Receiver has updated her informational website at www.propertyiireceivership.com to provide the latest guidance for prospective claimants.

D. Third Party Claims

The Receiver continues to analyze the existence and viability of potential claims against third parties that may have received payments or transfers to which they were not entitled to receive or persons or entities that provided services to or otherwise improperly benefitted from their affiliation with the Receivership Entities. It is too early to estimate whether or not the Receiver will bring any such claims or whether any claims will result in any recovery to the Receivership Estate. In proceeding with these determinations, the Receiver intends to consider a number of factors, including the cost-benefit analysis of bringing any potential claim. Thus, the Receiver is not yet able to predict the likelihood, amount, or effectiveness of any particular claim or the claims as a whole. The Receiver may, however, plan to first offer those who are required to return money to the Receivership Estate the opportunity to do so cooperatively in an effort to avoid costly litigation for all involved. The Receiver intends to seek Court approval before instituting any such third-party actions.

Date: May 2, 2022 Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

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F: 305-347-4089

raquel.rodriguez@bipc.com

By: /s/ Raquel A. Rodriguez
Raquel A. Rodriguez, Esq.

Raquel A. Rodriguez, Esq Florida Bar No. 511439

and

BUCHANAN INGERSOLL & ROONEY PC

Truist Financial Place 401 E. Jackson St., Suite 2400 Tampa, FL 33602 T: 813-222-1141 F: 813-222-8189

By: /s/ Lauren V. Humphries

Lauren V. Humphries, Esq. Florida Bar No. 117517 lauren.humphries@bipc.com

Attorneys for Receiver, Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a Notice of Electronic Filing to the following counsel of record:

Alice Sum, Esq.
Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Counsel for Plaintiff, Securities and
Exchange Commission

Mark C. Perry, Esq. 2400 East Commercial Blvd., Ste 201 Fort Lauderdale, Florida 33308 Counsel for Defendant, Anthony Nicolosi, f/k/a Anthony Peluso

I further certify that on May 2, 2022, a true and correct copy of the foregoing was sent via electronic mail to the following:

Carl F. Schoeppl, Esq. Schoeppl Law, P.A. 4651 North Federal Highway Boca Raton, Florida 33431-5133 Telephone: (561) 394-8301

Facsimile: (561) 394-3121 E-mail: carl@schoeppllaw.com

Counsel for Defendant Larry Brodman

Larry Brodman

E-mail: larrybro58@gmail.com

/s/ Raquel A. Rodriguez

BUCHANAN INGERSOLL & ROONEY PC

EXHIBIT "3"

CERTIFICATION

- I, MIRANDA L. SOTO (the "Applicant"), declare under penalty of perjury that the following is true and correct:
- 1. The Applicant is a Shareholder in the law firm of Buchanan Ingersoll & Rooney PC ("Buchanan Ingersoll") and the Receiver in this action. This Certification is based on the Applicant's first-hand knowledge of and review of the books, records and documents prepared and maintained by Buchanan Ingersoll in the ordinary course of its business. The Applicant knows that the facts contained in this motion regarding work performed by the Receiver and his staff and the facts contained in this Certification are true, and the Applicant is authorized by Quarles and Buchanan Ingersoll to make this Certification. Having reviewed the time records and data which support the motion, the Applicant further certifies that said motion is well grounded in fact and justified.
- 2. The billing records of Buchanan Ingersoll which are attached to this Application are true and correct copies of the records maintained by Buchanan Ingersoll. These records were made at or near the time the acts, events, conditions or opinions described in such records occurred or were made. The Applicant knows that the records were made by persons with knowledge of the transactions or occurrences described in such records or that the information contained in the records was transmitted by a person with knowledge of the transactions or occurrences described in the records. The records were kept in the ordinary course of the regularly conducted business activity of Buchanan Ingersoll and it is the regular business practice of Buchanan Ingersoll to prepare these records.

3. To the best of the Applicant's knowledge, information and belief formed after

reasonable inquiry, this motion and all fees and expenses herein are true and accurate and

comply with the Billing Instructions for Receivers in Civil Actions Commenced by the SEC.

4. All fees contained in this Application are based on the rates listed in the fee

schedule attached hereto and such fees are reasonable, necessary and commensurate with the

skill and experience required for the activity performed.

5. The Applicant has not included in the amount for which reimbursement is sought

the amortization of the cost of any investment, equipment, or capital outlay (except to the extent

that any such amortization is included within the permitted allowable amounts set forth herein

for photocopies and facsimile transmission).

6. In seeking reimbursement for a service which Buchanan Ingersoll justifiably

purchased or contracted for from a third party, the Applicant requests reimbursement only for a

service which the Applicant justifiably purchased or contracted for from a third party, the

Applicant requests reimbursement only for the amount billed to the Applicant by the third-party

vendor and paid by the Applicant to such vendor. If such services are performed by the

Applicant, the Applicant will certify that he is not making a profit on such reimbursable service.

Executed this 12th day of May, 2022.

<u> |s| Míranda L. Soto</u>

MIRANDA L. SOTO

Receiver

EXHIBIT "4"

Total Compensation And Expenses Requested; Any Amounts Previously Requested; And Total Compensation And Expenses Previously Awarded

Name	Specialty	Hours	Fees	Expenses	Total	Fees Previously	Expenses
						Awarded	Previously
							Awarded
Receiver	Receiver	81.20	\$23,954.00	\$1,698.53	\$25,652.53	\$52,079.75	\$5,883.57
Buchanan	Attorneys	233.20	\$65,878.00	\$183.92	\$66,061.92	\$191,304.44	\$0.00
Ingersoll &							
Rooney PC							
E-Hounds		0.0	\$0.00	\$0.00	\$0.00	\$3,540.50	\$0.00
K-Tek		0.00	\$0.00	\$0.00	\$0.00	\$4,300.00	\$0.00
Kaufman		87.00	\$23,945.00	\$0.00	\$23,945.00	\$24,081.25	\$0.00
Total		401.40	\$113,777.00	\$1,882.45	\$115,659.45	\$275,305.94	\$5,883.57

EXHIBIT "5a"

Name	Practice Area	Title	Year Licensed	Standard Rate	Rec	duced Rate	Total Hours	Expenses	Billa	able Amount
Miranda L. Soto	Litigation	Shareholder	2003	\$ 650.00	\$	295.00	81.20		\$	23,954.00
Lit Tech Support					\$	215.00	0.00		\$	-
								\$ 1,698.53	\$	1,698.53
Total							81.20		\$	25,652.53

EXHIBIT "5b"

Name	Practice Area	Title	Year Licensed	Standa	ard Rate	Rec	duced Rate	Total Hours	E	xpenses	Billa	able Amount
Raquel A. Rodriguez	Litigation	Shareholder	1985	\$	995.00	\$	295.00	13.30			\$	3,923.50
Jordan D. Maglich	Litigation	Counsel	2010	\$	490.00	\$	295.00	187.50			\$	55,312.50
Dan Lazaro	Litigation	Associate	2012	\$	495.00	\$	255.00				\$	-
Eileen Murphy	Litigation	Paralegal		\$	270.00	\$	205.00				\$	-
Joshua King	Litigation	Paralegal		\$	235.00	\$	205.00				\$	-
Kimberly Ecker	Litigation	Paralegal		\$	230.00	\$	205.00	31.00			\$	6,355.00
Sara Enwright	Real Estate	Paralegal		\$	255.00	\$	205.00	1.40			\$	287.00
Sheada Madani	Real Estate	Senior Attorney	2004	\$	520.00	\$	295.00				\$	-
					·				\$	183.92	\$	183.92
Total								233.20			\$	66,061.92

EXHIBIT "5c"

Name	Title	Standard R	ate	Rec	luced Rate	Total Hours	Total Billed
Heike Funk		\$ 20	00.00	\$	150.00	14.2	\$ 2,840.00
Iana Andonova		\$ 37	75.00	\$	281.25		\$ -
Michael Orourke		\$ 40	00.00	\$	300.00	66.8	\$ 26,720.00
Dana Kaufman		\$ 40	00.00	\$	300.00	6	\$ 2,400.00
Total Fees							\$ 31,960.00
Less 25% Discount							\$ (8,015.00)
Total Expenses							\$ -
Total						87	\$ 23,945.00

EXHIBIT "6a"



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Miami, FL 33131-1822

Two South Biscayne Blvd., Suite 1500

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April 13, 2022 Invoice No. 12156508

INVOICE SUMMARY

For Professional Services Rendered:

RE: SEC RECEIVERSHIP

Our Reference: 0104027-000001

Fees: \$23,954.00 Disbursements: \$1,698.53

Total Current Invoice: \$25,652.53

INCORPORATED IN PENNSYLVANIA :: TAX ID. 25-1381032



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April 13, 2022 Invoice No. 12156508

For Professional Services Rendered:

RE: SEC RECEIVERSHIP

Our Reference: 0104027-000001

SERVICES AND COSTS INCLUDING

Timekeeper	Date	Task	Narrative	Hours	Amount
Case Administra	tion				
M. L. Soto	1/3/2022	B110	Review emails to and from SEC and mediator re: mediation scheduled for April 5, 2022.	0.10	29.50
M. L. Soto	1/3/2022	B110	Review emails to and from C. Eelman, J. Maglich, A. McCoy, and M. Sebazco re: status of overbid, HUD final balance, and closing on 530 NE 34th St.	0.20	59.00
M. L. Soto	1/3/2022	B110	Review email from A. Sum re: SEC having no objection to Receiver's Motion to Approve Claims Process.	0.10	29.50
M. L. Soto	1/3/2022	B110	Review email with corresponding attachments from L. Pruneda re: cancellation of insurance policy for property 3775.	0.10	29.50
M. L. Soto	1/3/2022	B110	Emails to and from S. Madani, K. Ecker, and J. Maglich re: closing on 530 NE 34th St.	0.10	29.50
M. L. Soto	1/3/2022	B110	Emails to and from K. Ecker re: closing process and procedures for subsequent closings.	0.10	29.50
M. L. Soto	1/4/2022	B110	Review email from KPM re: rents collected for 3050 Coral Springs Drive, Units 2 and 7.	0.10	29.50
M. L. Soto	1/4/2022	B110	Emails to and from D. Otten re: new contract for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	1/4/2022	B110	Review emails to and from L. Pruneda re: cancellation of insurance policy for 3775 Coral Springs Dr.	0.10	29.50

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/4/2022	B110	Review email to B. Gene and M. Venereo re: Deerfield Beach Code Enforcement unpaid amount and hold back for utilities from Public Works for property 1361 and status on 3050 inspection.	0.10	29.50
M. L. Soto	1/4/2022	B110	Conference call with J. Maglich to discuss closings and property management issues.	0.70	206.50
M. L. Soto	1/4/2022	B110	Review email to C. Martin re: forwarding of tenant payment for 3775 NW 116 Terr.	0.10	29.50
M. L. Soto	1/4/2022	B110	Emails to and from C. Eelman, J. Maglich, and Modus re: closing on 530 NE 34th St.	0.20	59.00
M. L. Soto	1/4/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: closings on pending receivership properties.	0.10	29.50
M. L. Soto	1/4/2022	B110	Emails to and from J. Maglich re: transferral of funds from sale of property to ServisFirst.	0.10	29.50
M. L. Soto	1/4/2022	B110	Emails to and from J. Maglich, R. Rodriguez, and K. Ecker re: cancellation of insurance policy for 3775, closing on 530 NE 34th St., and depositing check from sale of properties.	0.20	59.00
M. L. Soto	1/5/2022	B110	Review emails to C. Schoeppl and L. Brodman re: Release of Lis Pendens Recorded on August 4, 2021 as Instrument #117477969 and #117477968 in the Public Records of Broward County.	0.10	29.50
M. L. Soto	1/5/2022	B110	Emails to and from L. Pruneda re: cancellation of insurance policy for property 3775.	0.20	59.00
M. L. Soto	1/5/2022	B110	Emails to and from R. Rodriguez and J. Maglich with review of corresponding documents re: new offer on 3050 Coral Springs Dr. property and ALTA for Sale of 1361 SE 4th Street, Deerfield Beach.	0.30	88.50

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/5/2022	B110	Review Receiver's Notice of Completed Sale for 3775 NW 116th Terrace, Coral Springs, Florida 33065, Receiver's Notice Regarding the Sale of Real Property Located at 530 NE 34th St, Pompano Beach, FL 44064, Receiver's Notice Regarding the Sale of Real Property Located at 4020 Riverside Drive, Coral Springs, Florida 33065, and Receiver's Notice Regarding the Sale of Real Property Located at 4450 Coral Springs Drive, Coral Springs, Florida 33065.	0.20	59.00
M. L. Soto	1/5/2022	B110	Review emails to and from L. Russell, J. Maglich, and D. Otten re: new lender information for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/5/2022	B110	Review emails to and from Modus re: preparation of closing documents, Commitment for Title Insurance, and closing on 530 NE 34th St.	0.50	147.50
M. L. Soto	1/5/2022	B110	Emails to and from KPM and J. Maglich re: inspection of property 3050.	0.20	59.00
M. L. Soto	1/5/2022	B110	Emails to and from J. Maglich, R. Rodriguez, and K. Ecker re: processing and depositing receivership checks, 4020 Riverside Drive, Coral Springs, Florida 33065, and closing on 530 NE 34th St.	0.40	118.00
M. L. Soto	1/5/2022	B110	Review emails to and from D. Otten re: contract for 201 E. 30th Street, Riviera Beach, FL 33404.	0.10	29.50
M. L. Soto	1/5/2022	B110	Review Notices of Release of Lis Pendens Recorded on August 4, 2021 as Instrument #117477969 and #117477968 in the Public Records of Broward County.	0.10	29.50
M. L. Soto	1/5/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: notices of sale and completion of sale to be filed with court.	0.10	29.50
M. L. Soto	1/5/2022	B110	Review redline version of Purchase and Sale Agreement for 201 E. 30th Street, Riviera Beach, FL 33404.	0.30	88.50

 ${\bf MIRANDA~L.~SOTO, RECEIVER}$

RE: SEC RECEIVERSHIP 0104027-000001

Page 4 April 13, 2022 Invoice No. 12156508

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/5/2022	B110	Review and execute cancellation of insurance coverage for property 3775.	0.10	29.50
M. L. Soto	1/6/2022	B110	Review email from investor L.A. providing investment information.	0.10	29.50
M. L. Soto	1/6/2022	B110	Review emails from FPL re: invoices for Account #s: 41529-32499 and 32784-10208.	0.10	29.50
M. L. Soto	1/6/2022	B110	Review emails to and from J. Maglich, D. Otten, B. Henry, B. Laster, A. Ostrega, S. Madani, S. Mossini, and K. Ecker re: closing on 4450 Coral Springs property.	0.10	29.50
M. L. Soto	1/6/2022	B110	Emails to and from KPM and J. Maglich re: status of inspection of property 3050.	0.10	29.50
M. L. Soto	1/6/2022	B110	Review email from KPM re: rents collected from 201 E 30th St. Unit B, 4020 NW 81st Ave., Units 2 and 4.	0.10	29.50
M. L. Soto	1/6/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: filing of updated notices.	0.10	29.50
M. L. Soto	1/7/2022	B110	Emails to and from A. Ripple, Modus, S. Mossini, D. Otten, K. Ecker, L. Smith, M. Sebazco, and S. Madani reclosing on 530 NE 34th St.	0.20	59.00
M. L. Soto	1/7/2022	B110	Review emails to and from Modus re: sellers documents, security deposits/rents, and tenant estoppels for 530 NE 34th St.	0.80	236.00
M. L. Soto	1/7/2022	B110	Review email from KPM re: rents collected for 3050 Coral Springs Drive, Unit 8, 4020 NW 81st Ave., Unit 1.	0.10	29.50
M. L. Soto	1/7/2022	B110	Review emails to and from J. Maglich and A. Ostrega with corresponding attached documents re: closings for 1361 SE 4th Street, Deerfield Beach and 4450.	0.50	147.50
M. L. Soto	1/7/2022	B110	Review emails to and from D. Otten and J. Maglich re: closing on 201 E. 30th.	0.10	29.50
M. L. Soto	1/7/2022	B110	Review emails to and from L. Russell re: closing on 4020 Riverside Dr., Coral Springs, FL 33065.	0.10	29.50

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/7/2022	B110	Review emails to and from R. Rodriguez, K. Ecker, and J. Maglich re: strategy for closings on 530, 4450, and 1361 properties.	0.20	59.00
M. L. Soto	1/7/2022	B110	Review emails to and from R. Rodriguez and J. Maglich re: amendment to contract for 1361 SE 4th Street, Deerfield Beach.	0.10	29.50
M. L. Soto	1/7/2022	B110	Review redlined contract for closing on 201 E. 30th.	0.20	59.00
M. L. Soto	1/7/2022	B110	Review emails to and from R. Rodriguez, S. Madani, and J. Maglich re: closing on 530 NE 34th St. and 1361 SE 4th Street, Deerfield Beach.	0.20	59.00
M. L. Soto	1/7/2022	B110	Review Third Fee Application. (NO CHARGE)	0.50	N/C
M. L. Soto	1/8/2022	B110	Review email to H. Zalman re: closing documents for 4450 Coral Springs Drive, #N-S, Coral Springs, FL 33065.	0.20	59.00
M. L. Soto	1/8/2022	B110	Review email to Modus re: closing documents for 530 NE 34th Street, Pompano Beach, #1-2, FL 33064.	0.20	59.00
M. L. Soto	1/10/2022	B110	Review emails to and from L. Pruneda with review of corresponding attachments re: notice of cancellation for failure to comply with loss control recommendations.	0.30	88.50
M. L. Soto	1/10/2022	B110	Emails to and from D. Otten, S. Mossini, J. Maglich, and R. Rodriguez re: status of contract for 201 E. 30th.	0.10	29.50
M. L. Soto	1/10/2022	B110	Review emails to and from L. Russell re: addendum for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/10/2022	B110	Review emails from FPL re: payments for account #s 32784-10208, 28681-22173, 05810-09347, 41529-32499, and 66501-83517.	0.10	29.50
M. L. Soto	1/10/2022	B110	Review emails to and from Modus re: closing documents for 530 NE 34th St.	0.50	147.50
M. L. Soto	1/10/2022	B110	Review email from KPM re: rent collected for 3050 Coral Springs Drive, Unit 1.	0.10	29.50

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/10/2022	B110	Review emails to and from A. Ostrega re: final changes to closing documents for 1361 SE 4th Street, Deerfield Beach.	0.20	59.00
M. L. Soto	1/10/2022	B110	Review granting Receiver's Motion to Establish and Approve Claims Process.	0.10	29.50
M. L. Soto	1/10/2022	B110	Emails to and from R. Rodriguez and J. Maglich re: new offer on 3050 Coral Springs Dr. property and order granting motion to approve claims process.	0.30	88.50
M. L. Soto	1/10/2022	B110	Review emails to and from J. Maglich, S. Enwright, and K. Ecker re: Receiver's revisions to seller's documents not incorporated for 530 NE 34th St.	0.30	88.50
M. L. Soto	1/10/2022	B110	Review and execute Addendum to Contract on 1361 SE 4th St., Deerfield Beach, FL 33441.	0.10	29.50
M. L. Soto	1/10/2022	B110	Brief review commercial policy package for 4420, LLC.	0.40	118.00
M. L. Soto	1/11/2022	B110	Review emails to and from H. Zalman and J. Maglich re: closing on 1361 SE 4th Street, Deerfield Beach.	0.20	59.00
M. L. Soto	1/11/2022	B110	Emails to and from Modus re: closing on 530 NE 34th St.	0.50	147.50
M. L. Soto	1/11/2022	B110	Review email to L. Russell re: status of addendum.	0.10	29.50
M. L. Soto	1/11/2022	B110	Review emails to and from investor M.S. re: proof of claim form.	0.10	29.50
M. L. Soto	1/11/2022	B110	Review email from KPM re: deposit pending for Receivership funds.	0.10	29.50
M. L. Soto	1/11/2022	B110	Review email from KPM re: invoice for testing to 3050 Coral Springs Drive.	0.10	29.50
M. L. Soto	1/11/2022	B110	Emails to and from R. Rodriguez, J. Maglich, and K. Ecker in preparation for 3 closings.	0.50	147.50
M. L. Soto	1/11/2022	B110	Review emails to and from A. Ostrega, K. Ecker, and J. Maglich re: closing on 4450 Coral Springs Dr., Coral Springs, FL 33065.	0.40	118.00
M. L. Soto	1/11/2022	B110	Brief review of invoices in preparation for Third Fee Application. (NO CHARGE)	0.70	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/12/2022	B110	Review emails to and from H. Zalman and J. Maglich re: closing on 1361 SE 4th Street, Deerfield Beach.	0.20	59.00
M. L. Soto	1/12/2022	B110	Review email from L. Russell re: status of closing on 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/12/2022	B110	Review email from FPL re: invoice for Account #: 82354-20406.	0.10	29.50
M. L. Soto	1/12/2022	B110	Review email from KPM re: rent collected for 3050 Coral Springs Drive, Units 3 and 6.	0.10	29.50
M. L. Soto	1/12/2022	B110	Review and execute documents for 3 closings, attend remote notary session to complete notarization process, and follow up from closings.	2.50	737.50
M. L. Soto	1/13/2022	B110	Review emails to and from L. Russell re: addendum for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/13/2022	B110	Review emails to and from Modus restatus of closing on 530 NE 34th St #1-2.	0.20	59.00
M. L. Soto	1/13/2022	B110	Review emails to and from A. Ostrega and J. Maglich re: ALTA for 1361 SE 4th Street, Deerfield Beach.	0.30	88.50
M. L. Soto	1/13/2022	B110	Review emails to and from J. Maglich and D. Otten re: addendum for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/13/2022	B110	Review emails to and from J. Maglich and R. Rodriguez re: Addendum for 4020 Riverside Dr. contract.	0.10	29.50
M. L. Soto	1/13/2022	B110	Review and execute Addendum for extension of closing on 4020 property.	0.10	29.50
M. L. Soto	1/13/2022	B110	Emails to and from J. Maglich and K. Ecker re: closing for 1361 and 4450 closing.	0.10	29.50
M. L. Soto	1/13/2022	B110	Review emails to and from L. Pruneda re: inspection regarding location 4020 NW 81st Ave, Coral Springs, FL 33065.	0.10	29.50
M. L. Soto	1/14/2022	B110	Review emails to and from S. Hardy re: 4450 property extension of time addendum.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/14/2022	B110	Review emails to and from D. Otten and L. Russell re: executed addendum.	0.20	59.00
M. L. Soto	1/14/2022	B110	Review emails to and from L. Pruneda re: Loss Recommendation for 4450 Coral Springs Drive, Coral Springs, FL 33065 and Inspection on property 4020.	0.20	59.00
M. L. Soto	1/14/2022	B110	Review emails to and from A. Ostrega and J. Maglich with review of corresponding attachment re: countersigned closing documents.	0.20	59.00
M. L. Soto	1/14/2022	B110	Emails to and from KPM re: Loss Control Recommendation for 4450 property and closings on 530 and 1361 properties.	0.20	59.00
M. L. Soto	1/14/2022	B110	Review emails to and from Modus and J. Maglich re: wire transfer on 530 NE 34th Street, Pompano Beach, #1-2, FL 33064.	0.10	29.50
M. L. Soto	1/14/2022	B110	Review emails to and from H. Zalman and J. Maglich re: receipt of closing funds/wire transfer for property 1361.	0.10	29.50
M. L. Soto	1/14/2022	B110	Review email to B. Mittelberg re: Opposition to the Receiver's Claims Motion.	0.10	29.50
M. L. Soto	1/14/2022	B110	Emails to and from J. Maglich, D. Otten, and buyer's agents re: extension of time to close on property 4450.	0.10	29.50
M. L. Soto	1/14/2022	B110	Review Motion To Establish and Approve Claims Process and Incorporated Memorandum of Law Defendant, Anthony Nicolosi's Response to Receiver's Motion to Establish and Approve Claim Process.	0.10	29.50
M. L. Soto	1/14/2022	B110	Emails to and from J. Maglich, R. Rodriguez, and K. Ecker re: closing on 4450 property.	0.10	29.50
M. L. Soto	1/14/2022	B110	Review D. Kaufman's October, November and December 2021 invoices in preparation for Third Fee Application.	0.20	59.00
M. L. Soto	1/14/2022	B110	Review wire transfers for closings on 530 NE 34th St. and 1361 SE 4th St.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/14/2022	B110	Review Response and Objection to Receiver's Motion to Establish and Approve Claim Process filed by Investors Richard Bentley, Joseph	0.20	59.00
M. L. Soto	1/14/2022	B110	Alexander, and P&E Properties, LP. Correspondence to and from J. Maglich re: extension of time for closing on 4450 property.	0.20	59.00
M. L. Soto	1/14/2022	B110	Review executed inspection report for property 4020 NW 81st Ave., Coral Springs, FL.	0.10	29.50
M. L. Soto	1/14/2022	B110	Review Notices of Completion of Sale for properties 1361 and 530.	0.10	29.50
M. L. Soto	1/14/2022	B110	Emails to and from R. Rodriguez and J. Maglich re: Third Fee Application and Notices of Completion of Sale for properties 530 and 1361. (NO CHARGE)	0.20	N/C
M. L. Soto	1/15/2022	B110	Review email from KPM re: rent received for 3050 Coral Springs Drive, Unit 4.	0.10	29.50
M. L. Soto	1/17/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: Motion to Strike Opposition to the Receiver's Claims Motion.	0.10	29.50
M. L. Soto	1/18/2022	B110	Review emails to and from L. Pruneda with review of corresponding attachments re: insurance quote for 201 LLC property.	0.20	59.00
M. L. Soto	1/18/2022	B110	Review emails to and from E. Desimone re: rent checks for 1361 SE 4th Street, Deerfield Beach.	0.10	29.50
M. L. Soto	1/18/2022	B110	Emails to and from KPM re: status of inspection for 3050 property.	0.10	29.50
M. L. Soto	1/18/2022	B110	Review and execute cancellation of insurance policy for policy #G094054180.	0.10	29.50
M. L. Soto	1/18/2022	B110	Review email to A. Sum re: fee application. (NO CHARGE)	0.10	N/C
M. L. Soto	1/18/2022	B110	Emails to and from investors T.E. and A. E.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/18/2022	B110	Review emails to and from H. Zalman re: tenant status and rental income for January 2022 and rent checks.	0.30	88.50
M. L. Soto	1/18/2022	B110	Review and execute addendum for closing on 4450 Coral Springs Dr.	0.10	29.50
M. L. Soto	1/18/2022	B110	property. Emails to and from J. Maglich re: communication from investor, H.K., wire transfer for recent closings, and insurance documents.	0.20	59.00
M. L. Soto	1/18/2022	B110	Review and revise Third Fee Application. (NO CHARGE)	0.50	N/C
M. L. Soto	1/18/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: Fee Application. (NO CHARGE)	0.30	N/C
M. L. Soto	1/18/2022	B110	Review bank wire transfers to ServisFirst accounts.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review emails to and from E. Desimone re: past invoices, account numbers, and municipalities for utilities (gas, electric and water) for 1361 SE 4th Street, Deerfield Beach.	0.20	59.00
M. L. Soto	1/19/2022	B110	Emails to and from KMP re: post closing logistics for sold properties to transfer accounts.	0.20	59.00
M. L. Soto	1/19/2022	B110	Review email to investors, T. E. and A. E.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review KMP work order on 1361 SE 4th St. with email to KMP rejecting processing of bill.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review emails to and from R. Bentley re: Comments on Receiver's Distribution Plan.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review email to L. Brodman and C. Schoeppl providing Notices of Completion of Sale of properties 530 NE 34th St., Pompano Beach, FL 33064 and 1361 SE 4th St., Deerfield Beach, FL 33441.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review subpoena duces tecum.	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/19/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: Response to Objection to Motion to Approve Claims Process, Federal Court Grand Jury subpoena duces tecum, and preparation of document with important account information for subsequent buyers.	0.30	88.50
M. L. Soto	1/19/2022	B110	Review City of Coral Springs water bill for property 3775 NW 116 Terr.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review check from Modus for processing following up from closing.	0.10	29.50
M. L. Soto	1/19/2022	B110	Review Order vacating Order on Motion to Establish and Approve (i) Proof of Claim Form and Claim Bar Date; (ii) Procedure to Administer, Review and Determine Claims; and (iii) Notice Procedures.	0.10	29.50
M. L. Soto	1/20/2022	B110	Review emails to and from KPM re: 3050 inspection.	0.10	29.50
M. L. Soto	1/20/2022	B110	Review emails to and from E. Desimone re: cancellation of accounts and rent checks.	0.10	29.50
M. L. Soto	1/20/2022	B110	Review email from KPM re: rent collections for 1361 SE 4th St., Unit 2.	0.10	29.50
M. L. Soto	1/20/2022	B110	Review and execute Cancellation of Insurance Policy for 530 NE 34th St., Pompano, FL 33034.	0.10	29.50
M. L. Soto	1/20/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: communications about subpoena, communication with investor H.K., and draft reply in support of the claims motion.	0.20	59.00
M. L. Soto	1/21/2022	B110	Review emails to and from KPM re: possible remediation of property.	0.10	29.50
M. L. Soto	1/21/2022	B110	Review email to C. Schoeppl and L. Brodman re: Reply to Response to Motion To Establish and Approve Claims Process and Incorporated Memorandum of Law.	0.10	29.50
M. L. Soto	1/21/2022	B110	Review email from KPM re: rent collection for 201 E 30th St., Unit A.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/21/2022	B110	Review draft of Response to Objections to Motion to Approve Claims Process and subsequent edits.	0.30	88.50
M. L. Soto	1/21/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: 3050 report, counter offer on 201 E. 30th St., draft reply in support of the claims motion, subpoena, edits to draft of response to objections to claims process, and status report on claim loss numbers.	0.40	118.00
M. L. Soto	1/21/2022	B110	Review invoice for insurance payment for 530 NE 34th St.	0.10	29.50
M. L. Soto	1/23/2022	B110	Review email from L. Russell and corresponding addendum to the contract re: 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/24/2022	B110	Review FPL account closures for Account #s: 3278410208 and 4152932499.	0.10	29.50
M. L. Soto	1/24/2022	B110	Review emails to and from S. Hardy re: closing and extension fee for 4450 Coral Springs Dr.	0.10	29.50
M. L. Soto	1/24/2022	B110	Review emails to and from L. Russell, Reliance Title, and J. Maglich re: extension of time to close, cursory review of closing documents, and status of appraisal on 4020 Riverside Drive, Coral Springs, Florida 33065.	0.60	177.00
M. L. Soto	1/24/2022	B110	Review emails to and from KPM and J. Maglich re: Status of Inspection for 3050.	0.10	29.50
M. L. Soto	1/24/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: closing on 4020 Riverside Drive, Coral Springs, Florida 33065, status report on 4450 closing, FPL account closures, summary of calls with investors, and inspection for 3050.	0.50	147.50
M. L. Soto	1/24/2022	B110	Review Release of Lis Pendens for 4020 Riverside Dr., #1-4, Coral Springs, FL.	0.10	29.50
M. L. Soto	1/25/2022	B110	Email to M. Venereo re: status of inspection and remediation for 3050 property.	0.10	29.50

 ${\bf MIRANDA\ L.\ SOTO, RECEIVER}$

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/25/2022	B110	Emails to and from D. Otten and J. Maglich re: clarification on offer for 201 E. 30th.	0.10	29.50
M. L. Soto	1/25/2022	B110	Review emails to and from Reliance Title Services and J. Maglich re: closing and tenant estoppel documents, and tenant leases for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.60	177.00
M. L. Soto	1/25/2022	B110	Review FPL invoice for Account #: 71502-10016.	0.10	29.50
M. L. Soto	1/25/2022	B110	Review email from KPM re: new work order for 3050 Coral Springs Dr., Unit 1.	0.10	29.50
M. L. Soto	1/25/2022	B110	Review and execute addendum for extension of time to close on property 4020.	0.10	29.50
M. L. Soto	1/25/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: addendum for extension of time to close on 4020 property and contract on property 3050.	0.20	59.00
M. L. Soto	1/26/2022	B110	Emails to and from J. Maglich and H. Zalman re: extension of time and addendum.	0.20	59.00
M. L. Soto	1/26/2022	B110	Review email from KPM re: new work order for 3050 Coral Springs Dr., Unit 7.	0.10	29.50
M. L. Soto	1/26/2022	B110	Emails to and from Reliance and J. Maglich re: ALTA, status of tenant rent collection, assignment of lease, mortgage pay off amount, closing costs, and closing on 4020 Riverside Drive, Coral Springs, Florida 33065.	0.50	147.50
M. L. Soto	1/26/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: closing on property 4450, Third Interim Report, and wire transfers.	0.20	59.00
M. L. Soto	1/27/2022	B110	Review emails to and from Reliance Title Services re: closing documents on 4020 Riverside Drive, Coral Springs, Florida 33065.	1.00	295.00
M. L. Soto	1/27/2022	B110	Review email from FPL re: invoice for Account #: 82354-20406.	0.10	29.50
M. L. Soto	1/27/2022	B110	Review email from KPM re: 1099 form and tax information for income earned.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/27/2022	B110	Brief review of new offer on 201 E. 30th Street, Riviera Beach.	0.30	88.50
M. L. Soto	1/27/2022	B110	Review and execute closing documents for 4020 property.	0.50	147.50
M. L. Soto	1/27/2022	B110	Emails to and from J. Maglich and K. Ecker re: closing on property 4020, Third Interim Report, new offer on 201 E. 30th Street, Riviera Beach, wire transfers, and status of 3050 property.	0.50	147.50
M. L. Soto	1/27/2022	B110	Review and execute Receiver's deed for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	1/27/2022	B110	Review wire transfer for extension fee on 4450 Coral Springs property.	0.10	29.50
M. L. Soto	1/28/2022	B110	Review invoices for FPL re: Account #s: 66501-83517, 28681-22173, and 05810-09347.	0.10	29.50
M. L. Soto	1/28/2022	B110	Review notification in compliance with production pursuant to subpoena.	0.10	29.50
M. L. Soto	1/28/2022	B110	Emails to and from J. Maglich and Rodriguez re: wire transfers, contract on 201 E 30th, cancellation of insurance policy for 4020, and update on property 3050, and deadlines.	0.30	88.50
M. L. Soto	1/28/2022	B110	Emails to and from Reliance Title re: finalizing closing on 4020 Riverside Drive, Coral Springs, Florida 33065.	0.30	88.50
M. L. Soto	1/28/2022	B110	Review and execute cancellation of insurance policy for 4020 property.	0.10	29.50
M. L. Soto	1/28/2022	B110	Brief review and execution of contract for 201 E. 30th.	0.20	59.00
M. L. Soto	1/29/2022	B110	Review email from KPM re: rent collection for 201 E 30th St., Unit B.	0.10	29.50
M. L. Soto	1/31/2022	B110	Review emails to and from Reliance Title Services re: Order Approving Sale and copy of docket to show no objections to the Motion to sell.	0.10	29.50
M. L. Soto	1/31/2022	B110	Review new work order for 3050 Coral Springs Dr., Unit 7.	0.10	29.50

 ${\bf MIRANDA\ L.\ SOTO, RECEIVER}$

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	1/31/2022	B110	Review emails to C. Schoeppl and L. Brodman re: Receiver's Notice of Completed Sale of Real Property Located at 4020 Riverside Drive, Coral Springs, FL 33065 and Third Interim Report.	0.10	29.50
M. L. Soto	1/31/2022	B110	Emails to and from D. Otten, S. Hardy, and J. Maglich re: closing on 4450.	0.20	59.00
M. L. Soto	1/31/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: wire transfers, Interim Status Report, 1099 form and expenses for Receivership, Third Interim Report, and executed PSA.	0.30	88.50
M. L. Soto	1/31/2022	B110	Review Receiver's Notice of Completed Sale of Real Property Located at 4020 Riverside Drive, Coral Springs, FL 33065.	0.10	29.50
M. L. Soto	1/31/2022	B110	Review Johnson & Johnson Preferred Financing Inc. invoice on account #4921839 in the amount of \$1,015.68 for insurance payment.	0.10	29.50
M. L. Soto	1/31/2022	B110	Review KPM 1099 form and expenses for Receivership.	0.10	29.50
M. L. Soto	1/31/2022	B110	Review wire transfers for closing on 4020 to Receivership account.	0.10	29.50
M. L. Soto	1/31/2022	B110	Review and approve final draft of Third Interim Status Report.	1.20	354.00
M. L. Soto	1/31/2022	B110	Review and execute purchase and sale agreement for 304 LLC property.	0.20	59.00
M. L. Soto	2/1/2022	B110	Emails to and from D. Otten re: status of First Amendment to PSA for 4450 LLC.	0.10	29.50
M. L. Soto	2/1/2022	B110	Review emails from KPM re: new work orders for 3050 Coral Springs Dr., Unit 7.	0.10	29.50
M. L. Soto	2/1/2022	B110	Emails to and from J. Maglich and K. Ecker re: First Amendment to PSA for 4450 property.	0.10	29.50
M. L. Soto	2/1/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: summary of conference call with A. Sum.	0.10	29.50
M. L. Soto	2/1/2022	B110	Review and execute lead paint disclosure for 201 E. 30th property.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/2/2022	B110	Review email from KPM re: rent collected for 3050 Coral Springs Drive, Unit 1.	0.10	29.50
M. L. Soto	2/2/2022	B110	Emails to and from D. Otten re: status of fully executed First Amendment to PSA and title for 4450 LLC.	0.20	59.00
M. L. Soto	2/2/2022	B110	Review emails to and from E. Castellanos with attached correspondence re: permit issues for 4450 Coral Springs Dr.	0.20	59.00
M. L. Soto	2/2/2022	B110	Review Aeris Indoor Environmental Assessment & Sampling Report.	0.70	206.50
M. L. Soto	2/2/2022	B110	Review and execute First Amendment to PSA for 4450 LLC.	0.20	59.00
M. L. Soto	2/2/2022	B110	Review email from KPM re: new work orders for 201 E. 30th St. and 3050 Coral Springs Dr., Unit 7.	0.20	59.00
M. L. Soto	2/2/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: inquiry into water bill for 201 E. 30th St.	0.20	59.00
M. L. Soto	2/3/2022	B110	Review email from KPM re: new work orders for 201 E. 30th St. Unit A.	0.10	29.50
M. L. Soto	2/3/2022	B110	Review email from K. Mejia re: insurance refund.	0.10	29.50
M. L. Soto	2/3/2022	B110	Review emails to and from D. Otten, J. Maglich, and G. Schilian re: closing on 3050 Coral Springs Dr.	0.20	59.00
M. L. Soto	2/3/2022	B110	Emails to and from D. Otten re: fully executed PSA for 4450 property and closing.	0.10	29.50
M. L. Soto	2/3/2022	B110	Review email to K. DeValerio, A. Sum, C. Schoeppl, L. Brodman, and M. Perry re: Motion to approve sale of 3050 Coral Springs Drive.	0.10	29.50
M. L. Soto	2/3/2022	B110	Review emails to and from L. Pruneda re: refund for the cancellation of the policy and mandatory insurance recommendations for property 304.	0.20	59.00
M. L. Soto	2/4/2022	B110	Emails to and from D. Otten and S. Mossini re: insurance policy on 4450 Coral Springs Dr.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/4/2022	B110	Review emails to and from G. Schilian re: title and municipal lien for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	2/4/2022	B110	Review emails to and from K. DeValerio, A. Sum, C. Schoeppl, L. Brodman, and M. Perry re: no position to Receiver's Motion to approve sale of 3050 Coral Springs Drive.	0.10	29.50
M. L. Soto	2/4/2022	B110	Emails to and from M. Venereo with corresponding attachments for remediation and renovations on 3050 property.	0.30	88.50
M. L. Soto	2/4/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: insurance on 4450 Coral Springs, remediation and renovations on 3050 property, and sale motion for property 3050.	0.20	59.00
M. L. Soto	2/4/2022	B110	Review email from D. Otten re: 201 E 30th Lead Paint Disclosure.	0.10	29.50
M. L. Soto	2/6/2022	B110	Review email from KPM re: rent collected for 3050 Coral Springs Drive, Unit 7.	0.10	29.50
M. L. Soto	2/6/2022	B110	Review emails to and from K. Kennedy and J. Maglich re: competing offer for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	2/7/2022	B110	Review emails to and from H. Zalman closing, lender questions, and status of permit for 4450 Coral Springs Dr.	0.40	118.00
M. L. Soto	2/7/2022	B110	Emails to and from K. Kennedy and J. Maglich re: competing offer for 3050 Coral Springs Dr.	0.20	59.00
M. L. Soto	2/7/2022	B110	Emails to and from M. Venereo and B. Gene re: insurance claim for property 3050.	0.20	59.00
M. L. Soto	2/7/2022	B110	Review email to K. Kohan re: motion to approve sale for 3050 Coral Springs Dr, Coral Springs, FL 33065.	0.10	29.50
M. L. Soto	2/7/2022	B110	Review Release and Cancellation for 201 E. 30th St., Riviera Beach.	0.10	29.50
M. L. Soto	2/7/2022	B110	Review and approve final draft of motion to approve sale of 3050 Coral Springs Dr, Coral Springs, FL 33065.	1.00	295.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/7/2022	B110	Emails to and from M. Venereo and J. Maglich re: remediation and renovations for property 3050.	0.20	59.00
M. L. Soto	2/7/2022	B110	Review D. Kaufman's January 2022 for fee application.(NO CHARGE)	0.10	N/C
M. L. Soto	2/7/2022	B110	Emails to and from J. Maglich and D. Kaufman re: invoices for professional services. (NO CHARGE)	0.10	N/C
M. L. Soto	2/7/2022	B110	Review and execute 201 E. 30th Lead Paint Disclosure.	0.10	29.50
M. L. Soto	2/7/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: insurance on 4450 Coral Springs, 201 E 30th Lead Paint Disclosure, insurance refund, remediation and renovations to 3050, Release and Cancellation for 201 E. 30th St., Riviera Beach, motion to approve sale for 3050, and possible insurance claim.	0.60	177.00
M. L. Soto	2/8/2022	B110	Review letter from investor, W. A.	0.10	29.50
M. L. Soto	2/8/2022	B110	Review email from KPM re: rent payment for 4450 Coral Springs Drive, Unit N.	0.10	29.50
M. L. Soto	2/8/2022	B110	Review email to L. Pruneda re: new parking lot pavement project completed.	0.10	29.50
M. L. Soto	2/8/2022	B110	Review email to D. Kaufman re: January invoice.	0.10	N/C
M. L. Soto	2/8/2022	B110	Review email to A. Ripple re: pro rata share of rent for 530 NE 34th St. property.	0.10	29.50
M. L. Soto	2/8/2022	B110	Review email from KPM re: new work order for 4450 Coral Springs Drive.	0.10	29.50
M. L. Soto	2/8/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: communications with investor W.A.	0.10	29.50
M. L. Soto	2/8/2022	B110	Emails to and from K. Ecker and J. Maglich re: executed seller closing documents for 4450.	0.10	N/C
M. L. Soto	2/8/2022	B110	Review emails to and from J. Maglich and H. Zalman re: status of permit, closing, and lease discrepancy for 4450 Coral Springs Dr.	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/9/2022	B110	Review email from FPL re: payment for Account #: 71502-10016.	0.10	29.50
M. L. Soto	2/9/2022	B110	Review email from KPM re: rent payments for 530 NE 34th St., Unit A and 3050 Coral Springs Drive, Unit 8.	0.10	29.50
M. L. Soto	2/9/2022	B110	Review emails to and from D. Otten, J. Maglich, and H. Zalman re: rent roll and closing on 4450 Coral Springs Dr.	0.20	59.00
M. L. Soto	2/9/2022	B110	Review emails to and from L. Pruneda with corresponding documents re: insurance issues for property 3050 Coral Springs Dr.	0.20	59.00
M. L. Soto	2/9/2022	B110	Emails to and from J. Maglich re: 530 NE 34th St. tenant payment issue.	0.10	29.50
M. L. Soto	2/9/2022	B110	Review email to A. Sum re: third fee application. (NO CHARGE)	0.10	N/C
M. L. Soto	2/10/2022	B110	Review emails to and from H. Zalman and J. Maglich re: notice to vacate for Unit N, 4450 Coral Springs Dr., and tenant letter terminating month to month rent.	0.30	88.50
M. L. Soto	2/10/2022	B110	Review emails to and from A. Sum re: D. Kaufman.	0.10	N/C
M. L. Soto	2/10/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: tenant issues with 530 NE 34th St. and recent offers, closing on 4450 Coral Springs Dr., and conference call with D. Kaufman.	0.40	118.00
M. L. Soto	2/10/2022	B110	Review email to D. Kaufman re: 3rd Fee Application billing issues. (NO CHARGE)	0.10	N/C
M. L. Soto	2/11/2022	B110	Review email from KPM re: insufficient funds for 4450 Coral Springs Drive, Unit N.	0.10	29.50
M. L. Soto	2/11/2022	B110	Review emails to and from M. Venereo, B. Gene and J. Maglich re: remediation of 3050 property and insurance coverage/claim.	0.20	59.00
M. L. Soto	2/11/2022	B110	Review email from L. Pruneda with corresponding attachments re: Rescission of Cancellation of insurance for 304 LLC.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/11/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: recent offers on 530 NE 34th St. and status of 3050 property.	0.40	118.00
M. L. Soto	2/11/2022	B110	Attend zoom meeting to discuss accounting spreadsheets and issues with property 3050.	0.50	147.50
M. L. Soto	2/11/2022	B110	Emails to and from J. Maglich, D. Otten, S. Mossini, and R. Rodriguez re: closing on 4450 Coral Springs Dr. Coral Springs, FL.	0.20	59.00
M. L. Soto	2/11/2022	B110	Review FPL bill for Account #: 82354-20406.	0.10	29.50
M. L. Soto	2/11/2022	B110	Attend zoom meeting with J. Maglich and R. Rodriguez to discuss strategy for 3050 property remediation and tenant displacement, and 4450 closing.	1.00	295.00
M. L. Soto	2/12/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: cancellation on 530 NE 34th St.	0.10	29.50
M. L. Soto	2/12/2022	B110	Review and execute cancellation on 530 NE 34th St.	0.10	29.50
M. L. Soto	2/14/2022	B110	Review various FPL emails confirming payment for account #s: 82354-20406, 28681-22173, 05810-09347, 71502-10016, and 66501-83517.	0.20	59.00
M. L. Soto	2/14/2022	B110	Review service of Third Fee Applications upon C. Schoeppl and L. Brodman. (NO CHARGE)	0.10	N/C
M. L. Soto	2/14/2022	B110	Review email to D. Kaufman re: letter from Florida Department of Revenue.	0.10	29.50
M. L. Soto	2/14/2022	B110	Review emails to and from G. Schilian with corresponding attachments re: possible code enforcement violations for 3050 Coral Springs Dr. and status of approval and closing.	0.30	88.50
M. L. Soto	2/14/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: 4450 Coral Springs Dr. property and 3050 property.	0.20	59.00
M. L. Soto	2/14/2022	B110	Review emails to and from K. DeValerio, C. Schoeppl, L. Brodman, and J. Maglich re: Receiver's Third Fee Application. (NO CHARGE)	0.10	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/15/2022	B110	Review email from KPM re: new work orders for 3050 Coral Springs Dr., Units 7 and 3, J & J Lawn Service, Inc.	0.30	88.50
M. L. Soto	2/15/2022	B110	Review email to S. Hardy re: extension of time to close on property 4050.	0.10	29.50
M. L. Soto	2/15/2022	B110	Review email from KPM re: rent payments for 3050 Coral Springs Drive, Units 5 and 6.	0.10	29.50
M. L. Soto	2/15/2022	B110	Review email from KPM re: electronic deposit of receivership funds.	0.10	29.50
M. L. Soto	2/15/2022	B110	Review emails to and from G. Schilian re: closing on 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	2/15/2022	B110	Review emails to and from B. Gene and J. Maglich re: cancellation of J & J Lawn Service, Inc. for sold properties, and updated on insurance claim for property 3050.	0.20	59.00
M. L. Soto	2/15/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: 4450 Coral Springs Dr. property and 3050 Coral Springs Dr. work order.	0.10	29.50
M. L. Soto	2/15/2022	B110	Review email from L. Pruneda with insurance policy proposal documents for 201 E. 30th St.	0.40	118.00
M. L. Soto	2/15/2022	B110	Review and execute 201 E. 30th St. property contract.	0.20	59.00
M. L. Soto	2/16/2022	B110	Review emails to and from B. Gene, J. Maglich, and M. Venereo re: cancellation of landscaping for sold properties, and claims adjuster letters for 3050 property.	0.20	59.00
M. L. Soto	2/16/2022	B110	Review email from KPM re: rent collection for 3050 Coral Springs Drive, Unit 3.	0.10	29.50
M. L. Soto	2/16/2022	B110	Emails to and from J. Maglich re: closing on 4450, insurance policy proposal documents for 201 E. 30th St., communications with investor, R.L.	0.20	59.00
M. L. Soto	2/16/2022	B110	Review letters from Claims Adjuster for property 3050 units 1 and 2.	0.10	29.50
M. L. Soto	2/17/2022	B110	Review emails to and from D. Otten, B. Gene, M. Venereo, and J. Maglich re: closing on 4450 property.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/17/2022	B110	Review emails to and from A. Ostrega, H. Zalman, and J. Maglich re: change of	0.10	29.50
M. L. Soto	2/17/2022	B110	deed for 4450 property. Review emails to and from J. Maglich and L. Pruneda re: comments on	0.10	29.50
M. L. Soto	2/17/2022	B110	insurance proposal for 201 property. Review emails to and from B. Jardin with corresponding attachment re: closing on 201 E. 30th Street Riviera	0.30	88.50
M. L. Soto	2/17/2022	B110	Beach property. Emails to and from J. Maglich and R. Rodriguez re: 4450 Updated Closing Statement and bank wire transfer.	0.10	29.50
M. L. Soto	2/17/2022	B110	Review and execute closing document for 4450 Coral Springs Dr.	0.20	59.00
M. L. Soto	2/17/2022	B110	Review updated deed for 4450 property.	0.20	59.00
M. L. Soto	2/18/2022	B110	Review email from KPM re: rent collection for 3050 Coral Springs Drive., Unit 4.	0.10	29.50
M. L. Soto	2/18/2022	B110	Review emails to and from D. Otten and J. Maglich re: post-closing procedures for property 4450.	0.20	59.00
M. L. Soto	2/18/2022	B110	Review email to C. Schoeppl and L. Brodman re: Notice of Completed Sale Of Real Property Located At 4450 Coral Springs Drive, Coral Springs, FL 33065.	0.10	29.50
M. L. Soto	2/18/2022	B110	Review Notice of Completed Sale Of Real Property Located At 4450 Coral Springs Drive, Coral Springs, FL, 33065.	0.10	29.50
M. L. Soto	2/18/2022	B110	Review bank wire transfer for 4450 property.	0.10	29.50
M. L. Soto	2/18/2022	B110	Emails to and from J. Maglich re: bank wire transfer.	0.10	29.50
M. L. Soto	2/21/2022	B110	Review email from C. Rubio re: closing on 201 E. 30th Street Riviera Beach, FL 33404.	0.10	29.50
M. L. Soto	2/21/2022	B110	Review new work order for 201 E. 30th St., Unit A.	0.10	29.50
M. L. Soto	2/21/2022	B110	Review invoice from IPFS Corporation for account # FLT-321458.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/22/2022	B110	Review email to C. Rubio re: closing on 201 E. 30th Street Riviera Beach, FL 33404.	0.10	29.50
M. L. Soto	2/22/2022	B110	Review new work order for 3050 Coral Springs Dr., Unit 7.	0.10	29.50
M. L. Soto	2/22/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: new work order for 3050 Coral Springs Dr., Unit 7.	0.10	29.50
M. L. Soto	2/23/2022	B110	Review emails to and from C. Rubio re: inspection and closing on 201 E. 30th Street Riviera Beach, FL 33404.	0.10	29.50
M. L. Soto	2/23/2022	B110	Emails to and from J. Maglich, B. Gene, and K. Ecker re: Lien Reduction Request for property 3050 and letter from insurance adjuster.	0.20	59.00
M. L. Soto	2/23/2022	B110	Review and execute insurance documents for 201 LLC.	0.20	59.00
M. L. Soto	2/23/2022	B110	Review and execute Cancellation for policy #350OR108703.	0.10	29.50
M. L. Soto	2/23/2022	B110	Emails to and from R. Rodriguez and J. Maglich re: lease terminations, claims process, status of 3050 property and excel spreadsheet with investor's investment information.	0.70	206.50
M. L. Soto	2/23/2022	B110	Emails to and from insurance adjuster for property damage to 3050 insurance claim.	0.10	29.50
M. L. Soto	2/23/2022	B110	Email from KPM re: rent collection from 201 E. 30th St., Unit A.	0.10	29.50
M. L. Soto	2/23/2022	B110	Review various emails to and from L. Pruneda and J. Maglich re: insurance for 201 E. 30th Street property.	0.20	59.00
M. L. Soto	2/23/2022	B110	Emails to and from J. Maglich re: tenant rent issue with 1361 SE 4th Street, Deerfield Beach property, insurance documents for 201 LLC, and notary for lien reduction.	0.30	88.50
M. L. Soto	2/23/2022	B110	Review insurance letter from adjuster for 3050 property damage claim.	0.20	59.00
M. L. Soto	2/23/2022	B110	Review and execute Lien Reduction Request for property 3050.	0.30	88.50
M. L. Soto	2/24/2022	B110	Review new work order for 3050 property Unit 7.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/24/2022	B110	Review email to K. DeValerio, A. Sum, C. Schoeppl, L. Brodman, and M. Perry re: Motion to approve sale of 201 E. 30th St property.	0.10	29.50
M. L. Soto	2/24/2022	B110	Emails to and from J. Maglich, B. Gene, and R. Rodriguez re: Lien Reduction Request for property 3050 and letter from insurance adjuster.	0.10	29.50
M. L. Soto	2/24/2022	B110	Review FPL invoice for account # 71502-10016.	0.10	29.50
M. L. Soto	2/24/2022	B110	Review property insurance binder for 201 E. 30th Street Riviera Beach, FL 33404.	0.20	59.00
M. L. Soto	2/24/2022	B110	Review memorandum on claims process with notations and questions and review of corresponding spreadsheets in preparation and anticipation of conference call with J. Maglich and R. Rodriguez.	2.00	590.00
M. L. Soto	2/24/2022	B110	Emails to and from R. Rodriguez and J. Maglich re: claims process and status of 3050 property.	0.10	29.50
M. L. Soto	2/25/2022	B110	Review proposed order for sale of 201 E. 30 Street.	0.10	29.50
M. L. Soto	2/25/2022	B110	Emails to and from J. Maglich re: new work order on 3050 property Unit 7.	0.30	88.50
M. L. Soto	2/25/2022	B110	Review and process reimbursement check from Johnson & Johnson Preferred Financing Inc.	0.10	29.50
M. L. Soto	2/25/2022	B110	Review Motion to Approve Sale of 201 E. 30 Street.	1.00	295.00
M. L. Soto	2/25/2022	B110	Review preliminary Residential Broker Price Opinion.	0.10	29.50
M. L. Soto	2/25/2022	B110	Review Notice of Sale for 201 E. 30 Street.	0.10	29.50
M. L. Soto	2/25/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: team meeting to discuss claims process and motion to approve sale of 201 E. 30 Street and corresponding documents.	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/26/2022	B110	Review emails from K. DeValerio and M. Perry re: position on Receiver's motion to approve sale of 201 E. 30th St property.	0.10	29.50
M. L. Soto	2/26/2022	B110	Review emails to and from A. Coleman and J. Maglich re: claims process for third party fees.	0.10	29.50
M. L. Soto	2/26/2022	B110	Emails to and from M. Venereo and J. Maglich re: work order on 3050 property Unit 7.	0.10	29.50
M. L. Soto	2/27/2022	B110	Review FPL invoices for Account #s: 05810-09347, 28681-22173, and credit for Account #: 66501-83517.	0.10	29.50
M. L. Soto	2/28/2022	B110	Review emails to and from G. Schilian and J. Maglich re: Order granting Unopposed Motion to Approve Private Sale of Real Property Located at 3050 Coral Springs Drive, Coral Springs, Florida 33065 and publication, and deadlines.	0.10	29.50
M. L. Soto	2/28/2022	B110	Review email to C. Schoeppl and L. Brodman re: Unopposed Motion to Approve Private Sale of Real Property Located At 201 E. 30th Street, Riviera Beach, FL 33404.	0.10	29.50
M. L. Soto	2/28/2022	B110	Emails to and from A. Sum re: no objection to Motion to approve sale of 201 E. 30th St property.	0.10	29.50
M. L. Soto	2/28/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: finalizing motion to approve sale of 201 E. 30 Street, Order granting Unopposed Motion to Approve Private Sale of Real Property Located at 3050 Coral Springs Drive, Coral Springs, Florida 33065, and publication in Sun Sentinel.	0.30	88.50
M. L. Soto	2/28/2022	B110	Review Order granting Unopposed Motion to Approve Private Sale of Real Property Located at 3050 Coral Springs Drive, Coral Springs, Florida 33065.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	2/28/2022	B110	Review Order granting Third Interim Omnibus Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for October 1, 2021 through December 31,	0.10	N/C
M. L. Soto	3/1/2022	B110	2021. (NO CHARGE) Emails to and from B. Gene re: status report from insurance adjuster inspection of 3050 property.	0.10	29.50
M. L. Soto	3/1/2022	B110	Review rent payments for 201 E 30th St. Unit B.	0.10	29.50
M. L. Soto	3/1/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: deadline for bid expiration, Notice of Sale in Sun Sentinel, and wire transfers.	0.20	59.00
M. L. Soto	3/2/2022	B110	Emails to and from B. Gene re: status report from insurance adjuster inspection of 3050 property, public adjuster if claim is denied, and status of closing on 3050 property.	0.10	29.50
M. L. Soto	3/2/2022	B110	Review emails from SEC serving first set of discovery requests to Anthony Nicolosi and Larry Brodman.	0.10	29.50
M. L. Soto	3/2/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: team meeting to discuss claims process, insurance adjuster inspection of 3050 and next steps.	0.20	59.00
M. L. Soto	3/2/2022	B110	Review first set of discovery requests to Larry Brodman propounded by the SEC.	0.20	59.00
M. L. Soto	3/2/2022	B110	Review first set of discovery requests to Anthony Nicolosi propounded by the SEC.	0.50	147.50
M. L. Soto	3/3/2022	B110	Review email from KMP re: rent collection for 3050 Coral Springs Drive, Unit 7.	0.10	29.50
M. L. Soto	3/3/2022	B110	Review Property Income Investors Receivership Registration and Investment information for investor C.W.	0.10	29.50
M. L. Soto	3/3/2022	B110	Review emails to and from investor C.B. re: claims form and process.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/3/2022	B110	Review updated memorandum and excel spreadsheet on claims process in anticipation and preparation for zoom meeting with J. Maglich and R. Rodriguez.	0.50	147.50
M. L. Soto	3/3/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: unidentified check.	0.10	29.50
M. L. Soto	3/4/2022	B110	Review email D. Kaufman with attached correspondence discussing possible clawback of C. Lieberman's unemployment filing.	0.10	29.50
M. L. Soto	3/4/2022	B110	Review emails to and from investor J.W. re: updates on receivership.	0.10	29.50
M. L. Soto	3/4/2022	B110	Attend zoom meeting with J. Maglich and R. Rodriguez to discuss 3050 property and claims process.	1.30	383.50
M. L. Soto	3/4/2022	B110	Review Sun Sentinel publication affidavit.	0.10	29.50
M. L. Soto	3/4/2022	B110	Review of revised claims memorandum and spreadsheet.	0.50	147.50
M. L. Soto	3/5/2022	B110	Review email from KPM re: rent collections for 3050 Coral Springs Drive, Units 1 and 2.	0.10	29.50
M. L. Soto	3/7/2022	B110	Review SEC's responses to Nicolosi's First Set of Interrogatories.	0.20	59.00
M. L. Soto	3/7/2022	B110	Review SEC's responses to Nicolosi's First Request for Production.	0.20	59.00
M. L. Soto	3/7/2022	B110	Review D. Kaufman's statement of charges for accounting work.	0.10	29.50
M. L. Soto	3/8/2022	B110	Review email from KPM re: rent collection for 3050 Coral Springs Drive, Unit 6.	0.10	29.50
M. L. Soto	3/8/2022	B110	Review emails to and from J. Maglich, D. Otten, S. Mossini, and R. Rodriguez re: publication of Notice of Sale, insurance claim, public adjuster, bids, closing documents, and deed for 3050 property.	0.10	29.50
M. L. Soto	3/9/2022	B110	Emails to and from insurance adjuster re: letter denying coverage for 3050 property for mold exclusion and public adjuster.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/9/2022	B110	Review email from KPM re: rent collection from 3050 Coral Springs Drive, Unit 8.	0.10	29.50
M. L. Soto	3/9/2022	B110	Email emails from FPL confirming payments for account #s: 28681-22173, 05810-09347, and 71502-10016.	0.10	29.50
M. L. Soto	3/9/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: insurance adjuster's letter denying coverage for 3050 for mold exclusion.	0.10	29.50
M. L. Soto	3/9/2022	B110	Review insurance adjuster's letter denying coverage for 3050 for mold exclusion.	0.20	59.00
M. L. Soto	3/10/2022	B110	Review emails to and from A. Sum and K. DeValerio re: SEC's production in response to the Nicolosi documents requests.	0.10	29.50
M. L. Soto	3/10/2022	B110	Review email from KPM re: rent collected for 3050 Coral Springs Drive Unit 5.	0.10	29.50
M. L. Soto	3/10/2022	B110	Review email from KPM re: new work order for 3050 Coral Springs Dr., Unit 7.	0.10	29.50
M. L. Soto	3/11/2022	B110	Review emails to and from M. Perry re: SEC documents received by the Receiver.	0.10	29.50
M. L. Soto	3/12/2022	B110	Review email from FPL re: invoice for Account #: 82354-20406.	0.10	29.50
M. L. Soto	3/14/2022	B110	Review email from KPM re: new work order for 3050 Coral Springs Drive.	0.10	29.50
M. L. Soto	3/14/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: K-1's for investors, closing on 3050.	0.10	29.50
M. L. Soto	3/14/2022	B110	Review emails to and from J. Maglich and Reliance Title Services re: reimbursement to Receivership for items paid by the seller to City of Coral Springs and hold back on utilities.	0.20	59.00

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/14/2022	B110	Review emails to and from G. Schilian, J. Maglich, and S. Mossini re: no 3rd party offers, closing on 3050 property and corresponding documents, certified copies of documents, lis pendens, and title commitment.	0.30	88.50
M. L. Soto	3/14/2022	B110	Review email to C. Schoeppl and L. Brodman re: Notice of Release of Lis Pendens for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	3/14/2022	B110	Review Notice of Release of Lis Pendens for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	3/15/2022	B110	Review email to C. Schoeppl and L. Brodman re: Receiver's Notice Regarding the Sale of Real Property Located at 3050 Coral Springs Drive, FL 33065.	0.10	29.50
M. L. Soto	3/15/2022	B110	Review email from J. Maglich to Reliance Title Services re: Closing and Escrow Instruction Letter (4020 Riverside Drive, Coral Springs, Florida 33065).	0.10	29.50
M. L. Soto	3/15/2022	B110	Review voice mail of investor for further action.	0.10	29.50
M. L. Soto	3/15/2022	B110	Review rent payments received for 201 E 30th St. Unit B and 3050 Coral Springs Drive, Unit 6.	0.10	29.50
M. L. Soto	3/15/2022	B110	Review Receiver's Notice Regarding the Sale of Real Property Located at 3050 Coral Springs Drive, FL 33065.	0.10	29.50
M. L. Soto	3/15/2022	B110	Review emails to and from investor M.S. and J. Maglich re: summary of receivership.	0.20	59.00
M. L. Soto	3/15/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: investor call.	0.10	29.50
M. L. Soto	3/16/2022	B110	Review emails to and from Reliance Title Service and J. Maglich re: 4020 Riverside Drive, Coral Springs, Florida 33065 property.	0.20	59.00
M. L. Soto	3/16/2022	B110	Review email to M. Perry re: transmission of SEC/Receiver documents requested.	0.10	29.50

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/16/2022	B110	Review email from KPM re: rent payments and pre-payments received for 3050 Coral Springs Drive, Units 3 and 4.	0.10	29.50
M. L. Soto	3/16/2022	B110	Emails to and from J. Maglich re: authorization for check deposits and summary of call with investor (E.W.).	0.10	29.50
M. L. Soto	3/17/2022	B110	Review email from KPM re: insufficient funds for 3050 Coral Springs Drive., Unit 6.	0.10	29.50
M. L. Soto	3/18/2022	B110	Emails to and from J. Maglich re: docusign for Horizon Trust (believed to be an investor communication).	0.10	29.50
M. L. Soto	3/18/2022	B110	Review emails to and from G. Schilian and J. Maglich re: closing, rent roll, tenant advanced rent payments, security deposits, form of tenant estoppels, and affidavit of status of leases on 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	3/18/2022	B110	Review emails to and from Reliance Title Service and J. Maglich re: water bill and release of escrow funds for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	3/18/2022	B110	Review hard copy of insurance adjuster letters for 3050 Coral Springs Dr. water damage claim.	0.10	29.50
M. L. Soto	3/18/2022	B110	Review docu-sign from Horizon Trust (believed to be an investor email).	0.10	29.50
M. L. Soto	3/18/2022	B110	Review emails to and from D. Otten re: following up with tenants estoppel letters for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	3/18/2022	B110	Review new work order for 201 E 30th St., Unit A.	0.10	29.50
M. L. Soto	3/21/2022	B110	Review new work order for 3050 Coral Springs Drive, Unit 4.	0.10	29.50
M. L. Soto	3/21/2022	B110	Review emails to and from G. Schilian and D. Otten re: tenant estoppels prior to the receivership and status of current tenant estoppels.	0.30	88.50

MIRANDA L. SOTO, RECEIVER RE: SEC RECEIVERSHIP

0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/21/2022	B110	Review emails to and from Reliance Title Services and J. Maglich re: release of escrowed funds for 4020 Riverside	0.10	29.50
M. L. Soto	3/21/2022	B110	Drive, Coral Springs, Florida 33065. Emails to and from J. Maglich re: docusign for Horizon Trust.	0.10	29.50
M. L. Soto	3/21/2022	B110	Brief review of insurance policy documents for 201 LLC.	0.30	88.50
M. L. Soto	3/22/2022	B110	Review email from H. Schafer re: mediation in SEC case.	0.10	29.50
M. L. Soto	3/22/2022	B110	Review email from Reliance Title Services and copy of refund check for 4020 Riverside Drive, Coral Springs, Florida 33065.	0.10	29.50
M. L. Soto	3/23/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: meeting to discuss pending tasks and SEC mediation.	0.10	29.50
M. L. Soto	3/24/2022	B110	Review emails to and from J. Maglich and G. Schilian re: closing on 3050 Coral Springs Dr. use of proper deed.	0.10	29.50
M. L. Soto	3/24/2022	B110	Review emails to and from the mediator, SEC, and M. Perry re: SEC mediation.	0.20	59.00
M. L. Soto	3/25/2022	B110	Conference call with the SEC.	0.60	177.00
M. L. Soto	3/25/2022	B110	Review emails to and from J. Maglich, D. Otten, and G. Schilian re: closing on 3050 Coral Springs Dr., use of proper deed, rent roll, written leases, additional fees and charges, tenant estoppels, city lien, and utilities.	0.30	88.50
M. L. Soto	3/25/2022	B110	Review email from FPL re: invoice for Account #: 71502-10016.	0.10	29.50
M. L. Soto	3/25/2022	B110	Review emails to and from L. Brodman, SEC, M. Perry, and mediator re: lack of funds for SEC mediation.	0.20	59.00
M. L. Soto	3/25/2022	B110	Review SEC's Amended Responses to Nicolosi's First Request for Production.	0.20	59.00
M. L. Soto	3/25/2022	B110	Emails to and from R. Rodriguez and J. Maglich re: SEC mediation and summary of conference call with SEC.	0.60	177.00

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/25/2022	B110	Review emails from A. Sum re: deposition dates for Nicolosi and Brodman, SEC's Amended Responses to Nicolosi's First Request for Production, and conference call with Receiver.	0.20	59.00
M. L. Soto	3/28/2022	B110	Review emails to and from J. Maglich, D. Otten, and G. Schilian re: closing on 3050 Coral Springs Dr.	0.20	59.00
M. L. Soto	3/28/2022	B110	Emails to and from A. Sum re: conference call.	0.10	29.50
M. L. Soto	3/28/2022	B110	Review emails from L. Pruneda re: refunds for Property Income Investors 4450, LLC and Property Income Investors 1361, LLC.	0.10	29.50
M. L. Soto	3/28/2022	B110	Emails to and from J. Maglich re: checks for deposit and closing documents for 3050 Coral Springs Dr.	0.30	88.50
M. L. Soto	3/28/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: edits to closing documents for 3050 property and conference call with SEC.	0.10	29.50
M. L. Soto	3/29/2022	B110	Review emails to and from J. Maglich and L. Pruneda re: refunds for insurance policies.	0.10	29.50
M. L. Soto	3/29/2022	B110	Review emails from KPM re: new work orders for 3050 Coral Springs Dr., Units 1 and 6 and lawn service.	0.20	59.00
M. L. Soto	3/29/2022	B110	Review email from M. Perry to SEC re: deposition dates for Nicolosi and Brodman.	0.10	29.50
M. L. Soto	3/29/2022	B110	Review emails to and from G. Schilian and J. Maglich re: proof of payment for the 2021 real estate taxes, recordable copy of the Release of Lis Pendens, Certificate of Status for PII 304, escrow agreement and revised HUD, and completed tenant letter.	0.40	118.00
M. L. Soto	3/29/2022	B110	Review emails to and from J. Jackson and D. Murphy for follow up requests.	0.10	29.50

 ${\bf MIRANDA~L.~SOTO, RECEIVER}$

RE: SEC RECEIVERSHIP 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/29/2022	B110	Review emails to and from SEC, Receiver's counsel, and M. Perry re: SEC's motion for partial relief from	0.10	29.50
M. L. Soto	3/29/2022	B110	mediation order and proposed order. Attend zoom meeting with J. Maglich and R. Rodriguez to discuss strategy for claims process.	0.80	236.00
M. L. Soto	3/29/2022	B110	Review email from FPL re: payment for Account #: 82354-20406.	0.10	29.50
M. L. Soto	3/29/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: closing for 3050 Coral Springs Dr., escrow of funds for lien reduction and 3050 Closing Instruction Letter.	0.20	59.00
M. L. Soto	3/30/2022	B110	Review emails to and from J. Maglich and G. Schilian re: closing on 3050 Coral Springs Dr. and draft closing instruction letter.	0.20	59.00
M. L. Soto	3/30/2022	B110	Emails to and from government agency.	0.10	29.50
M. L. Soto	3/30/2022	B110	Emails to and from J. Maglich and R. Rodriguez re: closing for 3050 Coral Springs Dr., indemnification provision for escrow of funds for lien reduction, and closing instruction letter.	0.30	88.50
M. L. Soto	3/30/2022	B110	Attend meeting with SEC, J. Maglich, and R. Rodriguez.	1.20	354.00
M. L. Soto	3/30/2022	B110	Review emails to and from D. Watarz re: revised closing statement for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	3/30/2022	B110	Review and revise instructions letter to buyer's closing agent.	0.40	118.00
M. L. Soto	3/31/2022	B110	Emails to and from government agency.	0.10	29.50
M. L. Soto	3/31/2022	B110	Review emails to and from SEC and Defendants' counsel re: return date for SEC's subpoena to Receiver.	0.10	29.50
M. L. Soto	3/31/2022	B110	Emails to and from SEC re: subpoena duce tecum.	0.10	29.50
M. L. Soto	3/31/2022	B110	Review emails to and from SEC re: proposed deposition date for A. Nicolosi's deposition.	0.10	29.50
M. L. Soto	3/31/2022	B110	Review emails from FPL re: invoice for Account #s: 28681-22173 and 05810-09347.	0.10	29.50

RE: SEC RECEIVERSHIP 0104027-000001

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Invoice No. 12156508

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	3/31/2022	B110	Emails to and from R. Rodriguez, L. Humphries, and E. Murphy re: summary from the Florida Office of Financial Regulation (OFR) regarding Equinox investors, for inclusion in our claims	0.10	29.50
M. L. Soto	3/31/2022	B110	process. Review email to D. Kaufman re: invoices for fee application [No Charge].	0.10	29.50
M. L. Soto	3/31/2022	B110	Review email from FPL re: credit balance for Account #: 66501-83517.	0.10	29.50
M. L. Soto	3/31/2022	B110	Review emails to and from J. Maglich, K. Ecker, and R. Rodriguez re: closing documents for 3050 Coral Springs Dr.	0.10	29.50
M. L. Soto	3/31/2022	B110	Review email from mediator re: SEC mediation for April 5, 2022.	0.10	29.50
M. L. Soto	3/31/2022	B110	Review SEC's subpoena duces tecum to Receiver.	0.20	59.00
M. L. Soto	3/31/2022	B110	Review and execute closing documents to 3050 Coral Springs Dr.	1.00	295.00
Subtotal Case A	Administration			84.50	23,954.00
			Total Hours	84.50	

Total Fees \$23,954.00

DESCRIPTION OF COSTS

	Description	Amount
12/29/21	Outside Delivery Services / Messengers, Courier	70.00
01/01/22	Outside Delivery Services / Messengers, Courier	100.00
01/06/22	Certified Copies - Receivership	165.00
01/06/22	Miscellaneous Jordan D. Maglich SEC/PII - Filing Fee_530	5.00
01/06/22	Miscellaneous Jordan D. Maglich SEC/PII - Filing Fee_4450	5.00
01/07/22	Outside Delivery Services / Messengers, Courier	71.50
01/13/22	Miscellaneous Jordan D. Maglich Remote Notary Fee	314.95
01/15/22	Filing Fees Miranda L. Soto Receivership - Hostgator fees	42.00
01/25/22	Certified Copies	25.00

RE: SEC I	A L. SOTO, RECEIVER RECEIVERSHIP 027-000001	Page 35 April 13, 2022 Invoice No. 12156508
01/31/22	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
02/15/22	Express Mail - UPS Tracking #1ZF2263A0194077008	39.30
02/16/22	Miscellaneous Miranda L. Soto Receivership - Hostgator.com	42.00
02/28/22	Miscellaneous Jordan D. Maglich Publishing Notice of Sale	88.95
02/28/22	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
03/03/22	Consultant Expense, Broker Opinion	400.00
03/29/22	Certified copies of court documents	25.00
03/31/22	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
	Total Costs	\$1,698.53

Amount Due This Invoice:

\$25,652.53

 ${\bf MIRANDA~L.~SOTO, RECEIVER}$

RE: SEC RECEIVERSHIP 0104027-000001

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TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
M. L. Soto	Partner	81.20	295.00	23,954.00
M. L. Soto	Partner	3.30	N/C	N/C
	Total	84.50		23,954.00

EXHIBIT "6b"



T 305 347 4080 F 305 347 4089 www.bipc.com

One Biscayne Tower

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ANDREW O. SCHIFF, REGIONAL TRIAL COUNSEL ALICE K. SUM, TRIAL COUNSEL SECURITIES AND EXCHANGE COMMISSION MIAMI REGIONAL OFFICE 801 BRICKELL AVENUE, SUITE 1950 SCHIFFA@SEC.GOV; SUMAL@SEC.GOV MIAMI, FL 33131

April 13, 2022 Invoice No. 12156476

INVOICE SUMMARY

For Professional Services Rendered:

RE: SEC V PROPERTY INCOME INVESTORS LLC

Our Reference: 0104027-000002

Fees: \$65,878.00 Disbursements: \$183.92

Total Current Invoice: \$66,061.92

INCORPORATED IN PENNSYLVANIA :: TAX ID. 25-1381032



One Biscayne Tower Two South Biscayne Blvd., Suite 1500 Miami, FL 33131-1822

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ANDREW O. SCHIFF, REGIONAL TRIAL COUNSEL ALICE K. SUM, TRIAL COUNSEL SECURITIES AND EXCHANGE COMMISSION MIAMI REGIONAL OFFICE 801 BRICKELL AVENUE, SUITE 1950 SCHIFFA@SEC.GOV; SUMAL@SEC.GOV MIAMI, FL 33131

April 13, 2022 Invoice No. 12156476

For Professional Services Rendered:

RE: SEC V PROPERTY INCOME INVESTORS LLC

Our Reference: 0104027-000002

SERVICES AND COSTS INCLUDING

Timekeeper	Date	Task	Narrative	Hours	Amount
Fee/Employment A	Applications				
R. Rodriguez	01/18/22	B160	Revise motion for fees (NO CHARGE)	0.60	N/C
Subtotal Fee/Emp Applications	oloyment			0.60	0.00
Business Operation	ns				
J. D. Maglich	1/6/2022	B210	Review recent inspections and compliance notifications and confer with M. Venereo regarding same	0.30	88.50
J. D. Maglich	1/6/2022	B210	Exchange correspondence with L. Pruneda and M. Venereo regarding repairs to 3050 property and compliance with insurance inspection	0.40	118.00
J. D. Maglich	1/10/2022	B210	Confer with B. Gene regarding status of 1361 unit	0.30	88.50
J. D. Maglich	1/10/2022	B210	Confer with L. Pruneda and B. Gene regarding notice of cancellation of insurance for 3050 property and steps needed to rescind cancellation	0.40	118.00
J. D. Maglich	1/10/2022	B210	Review commercial renewal policy for 4020 Riverside Drive	0.20	59.00
J. D. Maglich	1/11/2022	B210	Review incoming utility and tax mail for PII and correspondence with D. Kaufman and B. Gene regarding same	0.30	88.50
J. D. Maglich	1/12/2022	B210	Confer with B. Gene regarding ledgers for tenants at 530 NE 34th St property	0.30	88.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/12/2022	B210	Confer with M. O'Rourke regarding preparation of Standardized Fund Accounting Report and review bank charges	0.30	88.50
J. D. Maglich	1/12/2022	B210	Confer with B. Gene regarding status of January 2022 rent payments for tenants at 1361 SE 4th St property	0.20	59.00
J. D. Maglich	1/14/2022	B210	Confer with B. Gene regarding cessation of property management services for 530 NE 34th St and 1361 SE 4th Street properties and inquire regarding any rent collection	0.40	118.00
J. D. Maglich	1/14/2022	B210	Confer with L. Pruneda, B. Gene regarding loss recommendation requests for 4450 and 4020 properties	0.50	147.50
J. D. Maglich	1/20/2022	B210	Email correspondence with new owners of 3775 and 1361 buildings regarding transition of outstanding invoices	0.40	118.00
J. D. Maglich	1/20/2022	B210	Coordinate cancellation of insurance for 530 property and confer with Receiver regarding same	0.20	59.00
J. D. Maglich	1/21/2022	B210	Confer with new owner of 3775 property regarding January rental income and confer with B. Gene regarding same	0.20	59.00
J. D. Maglich	1/21/2022	B210	Review inspection report for 3050 property and confer with B. Gene and M. Soto regarding same	0.60	177.00
J. D. Maglich	1/21/2022	B210	Review work product prepared by Kaufman regarding entity financial performance and compare with bank statements	1.40	413.00
J. D. Maglich	1/24/2022	B210	Review annual report notices and draft correspondence to Dana Kaufman regarding same	0.20	59.00
J. D. Maglich	1/25/2022	B210	Confer with B. Gene regarding status of past-due rent for several tenants	0.20	59.00
J. D. Maglich	1/25/2022	B210	Confer with R. Rodriguez regarding status and inspection of 3050 property and necessary language and addendum to prospective contract. (NO CHARGE)	0.5	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/28/2022	B210	Draft status update to M. Soto and R. Rodriguez regarding status of 201 and 3050 properties	0.20	59.00
J. D. Maglich	1/28/2022	B210	Confer with L. Pruneda regarding cancellation of insurance policy for 4020 property	0.30	88.50
J. D. Maglich	1/28/2022	B210	Review correspondence from M. O'Rourke regarding transfers to non-investors	0.30	88.50
J. D. Maglich	1/28/2022	B210	Review and finalize 201 contract and participate in telephone correspondence with D. Otten regarding same	0.40	118.00
J. D. Maglich	2/1/2022	B210	Review correspondence from Florida Department of Revenue, confer with D. Kaufman, and coordinate payment of outstanding taxes	0.40	118.00
J. D. Maglich	2/2/2022	B210	Review work order for 201 property and confer with B. Gene and M. Venereo regarding bill amount	0.30	88.50
J. D. Maglich	2/4/2022	B210	Email correspondence with M. Venereo, M. Soto, and R. Rodriguez regarding status of inspection and remediation process for 3050 property	0.60	177.00
J. D. Maglich	2/7/2022	B210	Exchange correspondence and confer with M. Soto, B. Gene, R. Rodriguez, and M. Venereo regarding status of 3050 property and potential next steps	1.00	295.00
J. D. Maglich	2/7/2022	B210	Exchange correspondence with insurance agent regarding cancellation of insurance for PII 3504 and refund status	0.30	88.50
J. D. Maglich	2/8/2022	B210	Confer with M. Venereo regarding status of re-paving 3050 property and confer with L. Pruneda regarding status	0.40	118.00
J. D. Maglich	2/11/2022	B210	of insurance compliance Telephone and email correspondence with M. Venereo, M. Soto, and R. Rodriguez regarding status of 3050 inspection and remediation. (NO CHARGE)	0.80	N/C
J. D. Maglich	2/11/2022	B210	Telephone and email correspondence with M. Venereo regarding status of 3050 inspection and remediation	0.70	206.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/14/2022	B210	Review correspondence from L. Gilley regarding policy cancellation for 530 property	0.20	59.00
J. D. Maglich	2/16/2022	B210	Confer with B. Gene and M. Venereo regarding closing out of permit and lien on 3050 Coral Springs	0.30	88.50
J. D. Maglich	2/22/2022	B210	Review status of cancellation of insurance for policy FLT-321458 and confer with L. Gilley and S. Walter regarding same	0.30	88.50
J. D. Maglich	2/22/2022	B210	Review correspondence from owner of 1361 SE 4th St. property and historical rent roll and bank documents and exchange correspondence with B. Gene regarding resolution of previous advance rent payments issue	0.60	177.00
J. D. Maglich	2/22/2022	B210	Confer with M. Venereo regarding status of work order at 3050 Coral Springs property	0.40	118.00
J. D. Maglich	2/23/2022	B210	Review insurance quote and finalize renewal application for 201 E. 30th St, prepare no-loss/new venture letter, and confer with M. Soto and L. Pruneda regarding same	0.90	265.50
J. D. Maglich	2/23/2022	B210	Review and complete lien reduction request for 3050 Coral Springs Property, confer with B. Gene regarding same, and exchange correspondence with M. Soto regarding status and completion	1.00	295.00
J. D. Maglich	2/23/2022	B210	Review insurance cancellation request for 4450 property and confer with M. Soto regarding same	0.20	59.00
J. D. Maglich	2/23/2022	B210	Confer with B. Gene regarding holdback charges from 4450 property sale and exchange correspondence regarding same	0.40	118.00
J. D. Maglich	2/24/2022	B210	Confer with L. Gilley regarding status of refund of FLT-321458 policy	0.20	59.00
J. D. Maglich	2/24/2022	B210	Review insurance coverage binder for submitted renewal policy for 201 E. 30th St property	0.20	59.00
J. D. Maglich	2/25/2022	B210	Confer with C.L. regarding preparation and issuance of K-1 to investors	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/25/2022	B210	Confer with M. Soto and Keyes team regarding resolution of work order for 3050 Coral Springs Dr.	0.50	147.50
J. D. Maglich	3/1/2022	B210	Review and exchange correspondence with B. Gene regarding status of 3050	0.40	118.00
J. D. Maglich	3/2/2022	B210	inspection and next steps Confer with B. Gene regarding status of delinquent rent for 4450 unit	0.10	29.50
J. D. Maglich	3/4/2022	B210	Confer with M. Venereo regarding status of unpaid rents for 4450 property	0.20	59.00
J. D. Maglich	3/4/2022	B210	Review notice from Florida Department of Revenue and confer with D. Kaufman regarding same	0.50	147.50
J. D. Maglich	3/4/2022	B210	Confer with B. Gene and M. Venereo regarding status of 3050 property	0.20	59.00
J. D. Maglich	3/7/2022	B210	Confer with M. Venereo regarding status of outstanding liens/permits on 3050 property	0.30	88.50
J. D. Maglich	3/10/2022	B210	Review work order for 3050 property	0.10	29.50
J. D. Maglich	3/15/2022	B210	Analyze Keyes monthly reports and exchange correspondence with B. Gene regarding outstanding questions	0.50	147.50
J. D. Maglich	3/15/2022	B210	Review tenant payments and work orders	0.20	59.00
J. D. Maglich	3/16/2022	B210	Review incoming checks from property closings and coordinate deposit into receivership accounts	0.50	147.50
J. D. Maglich	3/17/2022	B210	Confer with M. Venereo regarding status of lien reduction request for 3050 property	0.20	59.00
Subtotal Busine	ss Operations			21.60	5,988.50
Claims Administ Objections	ration and				
J. D. Maglich	1/10/2022	B310	Review Court's Order granting Receiver's Claim Process Motion and exchange correspondence with M. Soto and R. Rodriguez regarding preparation of Proof of Claim Forms and next steps	0.50	147.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/11/2022	B310	Confer with D. Kaufman and team regarding entry of Order granting Claims Process motion and timetable for preparation of Proof of Claim Forms	0.30	88.50
J. D. Maglich	1/11/2022	B310	Review Order granting Claims Process Motion and revise Receivership website to update Claims Process section	0.40	118.00
J. D. Maglich	1/12/2022	B310	Prepare and revise Claims Process instructions and letter to potential claimants and strategize regarding structure and timing for letter mailing to potential claimants and establishment of claim bar date, and revise website regarding claims process updates and next steps	2.70	796.50
J. D. Maglich	1/19/2022	B310	Exchange correspondence with R.B. regarding Claims Motion and associated timetable	0.30	88.50
J. D. Maglich	1/19/2022	B310	Review Court's Order vacating and resetting deadlines on motion to establish and approve claims process, confer with M. Soto, and begin drafting Reply in support of claims motion	2.40	708.00
J. D. Maglich	1/21/2022	B310	Revise and finalize Receiver's Reply in support of Motion to Approve Claims Process and finalize Reply for filing	1.30	383.50
J. D. Maglich	1/21/2022	B310	Confer with M. Soto and R. Rodriguez regarding Receiver's Reply in support of Motion to Approve Claims Process and finalize Reply for filing. (NO CHARGE)	0.50	N/C
J. D. Maglich	1/21/2022	B310	Review work product from Kaufman regarding investor analyses and confer with M. O'Rourke regarding same	1.50	442.50
J. D. Maglich	1/25/2022	B310	Review analyses provided by Kaufman and engage in telephone and email correspondence regarding claims framework, investor analyses, and other considerations	1.60	472.00
J. D. Maglich	2/2/2022	B310	Exchange correspondence with D. Kaufman and strategize regarding preparation of individual investor analyses for claims process	0.40	118.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/10/2022	B310	Telephone and email correspondence with M. O'Rourke regarding outstanding claims issues and questions and confer with M. Soto recording some	1.20	354.00
J. D. Maglich	2/10/2022	B310	and confer with M. Soto regarding same Begin analyzing work product from Kaufman and determination of proper net investment amount for claimants	1.00	295.00
J. D. Maglich	2/11/2022	B310	Review, revised work product from Kaufman and exchange correspondence regarding same	1.00	295.00
J. D. Maglich	2/15/2022	B310	Continue analysis of Kaufman work product and determination of claimant information for forthcoming claims process	2.00	590.00
J. D. Maglich	2/16/2022	B310	Continue analysis of Kaufman work product and determination of claimant investment information for forthcoming claims process	2.00	590.00
J. D. Maglich	2/17/2022	B310	Continue analysis of Kaufman work product and determination of claimant investment information for forthcoming claims process and draft memorandum to M. Soto and R. Rodriguez regarding potential strategy and claim treatment proposals	1.50	442.50
J. D. Maglich	2/18/2022	B310	Continue reviewing claims information prepared by Kaufman and draft memorandum to Receiver regarding next steps	1.50	442.50
J. D. Maglich	2/24/2022	B310	Confer with M. Soto and R. Rodriguez regarding memorandum on claims process status and next steps	0.20	59.00
J. D. Maglich	2/28/2022	B310	Exchange correspondence with A.C. regarding status of claims process and prepare and strategize regarding universe of parties to receive proof of claim package upon Court approval	0.50	147.50
J. D. Maglich	3/2/2022	B310	Review, revise, and finalize investor information for completion of proof of claim forms	1.50	442.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	3/3/2022	B310	Continue reviewing and finalizing investor information for completion of proof of claim forms and revise memorandum to Receiver regarding same	2	590
J. D. Maglich	3/7/2022	B310	Confer with B.G. regarding status of case and claims process	0.30	88.50
J. D. Maglich	3/7/2022	B310	Review SEC responses to Nicolosi First Request for Production and First Set of Interrogatories	0.50	147.50
J. D. Maglich	3/7/2022	B310	Review and revise Notice of Release of Lis Pendens for 3050 property and confer with K. Ecker regarding status	0.40	118.00
J. D. Maglich	3/7/2022	B310	Review and revise invoices for January and February time (NO CHARGE)	2.00	N/C
Subtotal Claims and Objections	Administration	1		29.50	7,965.00
Meetings of and C with Creditors	Communications	S			
R. Rodriguez	03/11/22	B150	Email K. Ecker regarding request for information by claimant investor D.M.	0.30	88.50
Subtotal Meeting Communications		s		0.30	88.50
Real Estate					
K. L. Ecker	1/4/2022	B250	E-mail exchange with 530 lender regarding overbid deadline and proposed closing date	0.10	20.50
K. L. Ecker	1/4/2022	B250	Review e-mail and proposed addendum to contract for 4020 from L. Russell	0.10	20.50
K. L. Ecker	1/4/2022	B250	Review e-mail from M. Soto with notes for future closings (NO CHARGE)	0.10	N/C
K. L. Ecker	1/4/2022	B250	Review and reply to e-mail from J. Maglich with draft closing and escrow instruction letters for 530 and 4450	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/4/2022	B250	E-mails with J. Maglich and S. Madani regarding handling of closings going forward in S. Madani's absence. (NO CHARGE)	0.20	N/C
K. L. Ecker	1/6/2022	B250	Telephone conference with J. Maglich regarding coordination of efforts to complete 530 and 4450 closings	0.40	82.00
S. M. Enwright	3/28/2022	B250	Review closing documents for the property located at 3050 Coral Springs Drive.	0.40	82.00
Subtotal Real Est	tate			1.50	246.00
Asset Analysis and	d Recovery				
R. Rodriguez	1/4/2022	B120	Call with J. Maglich regarding several closings and issues related to same.	0.30	88.50
R. Rodriguez	1/4/2022	B120	1361 LLC - Review and respond to emails from H. Zalman (closing agent) regarding scheduling of closing.	0.20	59.00
J. D. Maglich	1/4/2022	B120	Confer with D. Otten regarding status of offers for 3050 property and review existing and new offers.	0.40	118.00
J. D. Maglich	1/4/2022	B120	Telephone and email correspondence with D. Otten regarding status of 4020 closing, existing offers for 3050 property, and next steps for 201 property	0.70	206.50
J. D. Maglich	1/4/2022	B120	Review insurance cancellation notice for 3775 property and exchange correspondence with L. Pruneda regarding same	0.30	88.50
J. D. Maglich	1/4/2022	B120	Review KPM notification regarding rent payment for 3775 property and exchange correspondence with B. Gene and new owner regarding transfer of rent payment	0.30	88.50
J. D. Maglich	1/4/2022	B120	Strategize with R. Rodriguez and M. Soto regarding scheduling of closing for 530 and 4450 sales and confer with K. Ecker and S. Madani regarding timeline. (NO CHARGE)	0.60	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/4/2022	B120	Coordinate transfer of net proceeds from 3775 sale to Receivership fiduciary accounts (.3); Review and revise updated ALTA for 1361 sale, confer with R. Rodriguez, S. Madani, and M. Soto regarding same, and exchange correspondence with H. Zalman regarding proposed revisions to ALTA.	1.30	383.50
J. D. Maglich	1/4/2022	B120	Confer with K. Ecker regarding 4450 closing.	0.30	88.50
J. D. Maglich	1/4/2022	B120	Confer with K. Ecker regarding 4450 closing.	0.30	88.50
J. D. Maglich	1/4/2022	B120	Confer with H. Zalman and B. Gene regarding status of utility payments for 1361 property in anticipation of estimating holdback for closing	0.30	88.50
J. D. Maglich	1/4/2022	B120	Numerous correspondence with broker and closing agent for 530 NE 34th Street property regarding timetable for closing process and review draft closing instructions letter regarding same	0.80	236.00
J. D. Maglich	1/4/2022	B120	Review owner statement published for December 2021	0.30	88.50
J. D. Maglich	1/4/2022	B120	Review draft closing instructions letter for 4450 Coral Springs Property and draft correspondence to closing agent for 4450 Coral Springs property.	0.20	59.00
R. Rodriguez	1/5/2022	B120	Review draft notices of completed sale (0.1) and expiration of response time to 2 published notices and comment on same (0.3).	0.40	118.00
J. D. Maglich	1/5/2022	B120	Draft, revise, and finalize notices regarding expiration of overbid deadline for 4450, 530, and 4020 properties.	0.70	206.50
J. D. Maglich	1/5/2022	B120	Review closing documents for 3775 sale, draft notice of completed sale, and prepare for filing	0.50	147.50
J. D. Maglich	1/6/2022	B120	Review draft Release of Lis Pendens and correspond with K. Ecker regarding revisions and filing	0.40	118.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/6/2022	B120	Telephone conference with clerk to confirm amounts required for certified copies of court documents for 4450 and 530 closings	0.20	41.00
K. L. Ecker	1/6/2022	B120	E-mail recorded Order Appointing Receiver to 4450 closing agent (NO CHARGE)	0.10	N/C
K. L. Ecker	1/6/2022	B120	E-mail Certificate of Status for Property Income Investors 4450 to A. Ostrega for satisfaction of #8 in commitment	0.10	20.50
R. Rodriguez	1/6/2022	B120	Email with J. Maglich regarding instructions to closing agent.	0.10	29.50
J. D. Maglich	1/6/2022	B120	Exchange correspondence with A. Ostrega regarding review and revisions to title commitment for closing of 4450 Coral Springs property	1.00	295.00
J. D. Maglich	1/6/2022	B120	Numerous correspondence with closing agent for 530 NE 34th St property regarding closing date and timetable for closing	0.60	177.00
J. D. Maglich	1/6/2022	B120	Revise and finalize notice of no offers for 4020, 530, and 4450 properties and notice of completed sale of 3775 property and prepare for filing	0.50	147.50
K. L. Ecker	1/6/2022	B120	Receive and review 4450 buyer signed addendum to contract	0.10	N/C
K. L. Ecker	1/6/2022	B120	E-mail M. Soto regarding notary reservation (NO CHARGE	0.10	N/C
K. L. Ecker	1/6/2022	B120	Research remote online notary services and e-mail exchanges with provider to obtain details/fees	0.30	N/C
K. L. Ecker	1/6/2022	B120	Order and obtain Sunbiz Certificates of Status for Property Income Investors and Property Income Investors 4450	0.20	41.00
K. L. Ecker	1/6/2022	B120	E-mail detailed instructions to office services for courier to obtain certified copies (NO CHARGE)	0.20	N/C
J. D. Maglich	1/6/2022	B120	Review account ledgers for 4450 Coral Springs Property and draft correspondence to A. Ostrega enclosing tenant rent balances and deposits	0.60	177.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/6/2022	B120	Review e-mail from J. Maglich with instructions to get zero balance statement from lender for 4450 property	0.10	20.50
K. L. Ecker	1/6/2022	B120	E-mail list of tasks completed for 530 and 4450 closings and outstanding items	0.20	41.00
J. D. Maglich	1/6/2022	B120	Numerous correspondence with A. Ostrega regarding review and revisions to seller closing documents for closing of 4450 Coral Springs property	1.40	413.00
K. L. Ecker	1/6/2022	B120	E-mail from J. Maglich to 1361 closing agent regarding status of funding and pending title commitment (NO CHARGE)	0.10	N/C
J. D. Maglich	1/6/2022	B120	Telephone and email correspondence with previous mortgage lender for 4450 Coral Springs property and exchange correspondence with A. Ostrega regarding updated account statement showing zero balance	0.60	177.00
K. L. Ecker	1/6/2022	B120	Receive and review receipts for utility payments for 4450 and 530	0.20	N/C
K. L. Ecker	1/6/2022	B120	Read and review title commitment received for 530 property for items needing attention/resolution	0.20	41.00
K. L. Ecker	1/6/2022	B120	Read and review revised title commitment for 4450	0.10	20.50
K. L. Ecker	1/6/2022	B120	Read and review title commitment received for 4450 property for items needing attention/resolution	0.20	41.00
K. L. Ecker	1/6/2022	B120	E-mail exchanges with 4450 title agent regarding J. Maglich comments on outstanding items and resolution of same	0.40	82.00
K. L. Ecker	1/6/2022	B120	E-mail S. Hamilton to request check for certified copies (NO CHARGE)	0.10	N/C
K. L. Ecker	1/6/2022	B120	Read and review J. Maglich comments to 530 title agent on commitment received (NO CHARGE)	0.10	N/C
J. D. Maglich	1/6/2022	B120	Review and revise closing instruction letters for 4450 and 530 closings	0.70	206.50
J. D. Maglich	1/7/2022	B120	Exchange correspondence with H. Zalman regarding status of tenants for 4450 Coral Springs property	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/7/2022	B120	E-mail exchanges with 530 closing agent regarding timeline for providing final closing documents and revisions to seller closing documents	0.50	102.50
J. D. Maglich	1/7/2022	B120	Review, revise, and finalize closing instruction letters for 530 NE 34th St and 4450 Coral Springs properties (1.0)	1.00	295.00
J. D. Maglich	1/7/2022	B120	Numerous email and telephone correspondence with A. Ripple regarding closing of 530 NE 34th St property, including review and revision of closing documents and title commitment and timetable for closing	1.20	354.00
J. D. Maglich	1/7/2022	B120	Numerous correspondence with A. Ostrega regarding closing of 4450 Coral Springs property, including revisions to closing documents and commitment to reflect new closing date	1.20	354.00
J. D. Maglich	1/7/2022	B120	Review tenant leases and ledgers for 530 NE 34th St property and exchange correspondence with A. Ripple regarding accounting for each tenant	0.40	118.00
K. L. Ecker	1/7/2022	B120	E-mail exchanges with S. Mossini regarding purchase of 1361 property in LLC and addendum to contract	0.20	41.00
J. D. Maglich	1/7/2022	B120	Review new offers for 3050 Coral Springs and 201 E 30th. Properties and confer with D. Otten regarding same	0.40	118.00
K. L. Ecker	1/7/2022	B120	E-mail exchanges with A. Ostrega regarding timeline for providing final documents and receipt of revised seller closing documents for 4450 property	0.40	82.00
R. Rodriguez	1/7/2022	B120	Call with J. Maglich re logistics of two closings.	0.30	88.50
R. Rodriguez	1/7/2022	B120	Review closing statement for 1361 (0.1); review numerous emails among closing agents, real estate agents and BIR re two closings (0.4); review and comment on draft closing instructions (0.5).	1.00	295.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/7/2022	B120	Numerous correspondence with H. Zalman and A. Ostrega regarding closing procedures for 1361 SE 4th St property, including review and revisions to commitment and closing documents	1.40	413.00
S. M. Enwright	1/7/2022	B120	Review and edit Closing and Escrow Instruction Letter for 4450 and 530.	0.50	102.50
S. M. Enwright	1/7/2022	B120	Review 1361 closing documents. (NO CHARGE)	0.60	N/C
J. D. Maglich	1/7/2022	B120	Draft summary memorandum to R. Rodriguez and M. Soto regarding status of upcoming property closings and necessary next steps	0.40	118.00
J. D. Maglich	1/7/2022	B120	Confer with S. Enwright regarding review of seller closing documents for 1361 SE 4th St and 4450 Coral Springs properties	0.30	88.50
J. D. Maglich	1/7/2022	B120	Exchange correspondence with S. Mossini and D. Otten regarding buyer's use of LLC to purchase 1361 SE 4th property.	0.30	88.50
K. L. Ecker	1/7/2022	B120	E-mail from L. Russell regarding status of new lender and appraisal for 4020	0.10	20.50
J. D. Maglich	1/7/2022	B120	Correspondence with D. Kaufman regarding scheduling closings of real estate assets	0.20	59.00
J. D. Maglich	1/7/2022	B120	Preparation of necessary documents, and timetable for closings	0.50	147.50
K. L. Ecker	1/7/2022	B120	Compile documents requiring notarization for 4450 property closing (0.2); e-mail same to remote online notary (0.1) (NO CHARGE)	0.30	N/C
K. L. Ecker	1/7/2022	B120	Review detailed e-mail from J. Maglich regarding specific instructions to follow for 1361, 4450, and 530 closings	0.10	20.50
J. D. Maglich	1/7/2022	B120	Internal communication. (NO CHARGE)	0.40	N/C
S. M. Enwright	1/7/2022	B120	Review and provide comments on the 4450 closing documents.	0.50	102.50
K. L. Ecker	1/7/2022	B120	Read and review revised seller documents from A. Ostrega for 1361 property	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/7/2022	B120	Receive and review certified copies obtained by courier for 530 and 4450 properties	0.20	41.00
K. L. Ecker	1/7/2022	B120	E-mail detailed instructions for 1/12/22 closing and to provide cost for courier for same	0.20	41.00
K. L. Ecker	1/7/2022	B120	Read and review initial draft of seller documents received from M. Ortiz for 530 property	0.20	41.00
K. L. Ecker	1/8/2022	B120	E-mail additional revisions to proposed seller documents to 530 closing agent	0.30	61.50
K. L. Ecker	1/8/2022	B120	Final revisions to 530 closing and escrow instruction letter and prepare letter/attachments for mailing (0.4); E-mail closing letter and wire instructions to closing agent (0.2)	0.60	123.00
K. L. Ecker	1/8/2022	B120	Final revisions to 4450 closing and escrow instruction letter and prepare letter/attachments for mailing (0.4); E-mail closing letter and wire instructions to closing agent (0.2)	0.60	123.00
J. D. Maglich	1/8/2022	B120	Numerous correspondence with K. Ecker and R. Rodriguez regarding revising and finalizing seller closing instruction letters for 530 NE 34th St and 4450 Coral Springs properties	0.80	236.00
K. L. Ecker	1/8/2022	B120	Exchange correspondence with J. Maglich regarding revisions and approval to send 530 and 4450 Closing and Escrow Instructions Letters	0.20	41.00
K. L. Ecker	1/10/2022	B120	E-mail H. Zalman to add courier and certified copies costs to settlement statement	0.10	20.50
K. L. Ecker	1/10/2022	B120	E-mail exchanges with remote online notary regarding payment of invoice and procedures on day of notarization. (NO CHARGE)	0.20	N/C
K. L. Ecker	1/10/2022	B120	Multiple e-mail exchanges with A. Ostrega and H. Zalman regarding revisions to proposed seller documents for 4450	0.50	102.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/10/2022	B120	Confer with M. Soto regarding new offer for 3050 Coral Springs Drive property	0.20	59.00
J. D. Maglich	1/10/2022	B120	Review, revise, and work to finalize seller closing and associated documents for closing of 1361 SE 4th St property scheduled for 1/12/22.	0.70	206.50
J. D. Maglich	1/10/2022	B120	Review, revise, and work to finalize seller closing and associated documents for closing of 530 NE 34th St property scheduled for 1/12/22	1.00	295.00
J. D. Maglich	1/10/2022	B120	Review, revise, and work to finalize seller closing and associated documents for closing of 4450 Coral Springs drive property scheduled for 1/12/22, and exchange numerous correspondence with closing agents regarding same	0.60	177.00
J. D. Maglich	1/10/2022	B120	Confer with M. Soto regarding necessary addendum to sign for 1361 SE 4th St closing	0.20	59.00
K. L. Ecker	1/10/2022	B120	Compile final closing documents for execution for 4450	0.30	61.50
K. L. Ecker	1/10/2022	B120	Draft e-mail to 530 closing agent with revisions to closing documents	0.20	41.00
K. L. Ecker	1/10/2022	B120	E-mail exchange with 4020 closing agent regarding addendum to contract	0.10	20.50
K. L. Ecker	1/10/2022	B120	Compile final closing documents for execution for 1361	0.30	61.50
K. L. Ecker	1/10/2022	B120	E-mail exchanges with J. Maglich and S. Enwright regarding revisions to 530 seller documents and confirmation of notary/witness needed	0.30	61.50
K. L. Ecker	1/10/2022	B120	Pay remote online notary invoice; send to S. Storno to process reimbursement for J. Maglich (NO CHARGE)	0.20	N/C
K. L. Ecker	1/10/2022	B120	Communications with office service regarding courier costs and procedures for packages to M. Soto (NO CHARGE)	0.50	N/C
K. L. Ecker	1/10/2022	B120	Receive and review final closing documents for 530; compile final folder for execution	0.60	123.00
K. L. Ecker	1/10/2022	B120	Read and review 530 closing documents and compile revisions	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
S. M. Enwright	1/10/2022	B120	Review and provide comments on the 530 closing documents. (NO CHARGE)	0.40	N/C
R. Rodriguez	1/11/2022	B120	Review and approve two closing statements.	0.40	118.00
R. Rodriguez	1/11/2022	B120	Emails with J. Maglich regarding how to deal with rental payments received during closing process; call with J. Maglich regarding final review of closing statements; call with J. Maglich approving same.	0.30	88.50
J. D. Maglich	1/11/2022	B120	Numerous email correspondence with closing agent for 4450 Coral Springs Drive property regarding revising and finalizing closing documents for closing scheduled for 1/12/22	0.90	265.50
K. L. Ecker	1/11/2022	B120	Review and reply to e-mail from A. Ostrega with 4450 certified copies for recording	0.10	20.50
K. L. Ecker	1/11/2022	B120	E-mail exchange with remote online notary confirming procedures for document execution and receipt of document packages. (NO CHARGE)	0.30	N/C
J. D. Maglich	1/11/2022	B120	Numerous email correspondence with closing agent for 530 NE 34th St property regarding revising and finalizing closing documents for closing scheduled for 1/12/22	1.30	383.50
K. L. Ecker	1/11/2022	B120	Multiple e-mail exchanges with Modus Title regarding draft seller closing documents for 530 property	0.30	61.50
J. D. Maglich	1/11/2022	B120	Numerous email correspondence with closing agent for 1361 SE 4th St property regarding revising and finalizing closing documents for closing scheduled for 1/12/22	1.00	295.00
R. Rodriguez	1/11/2022	B120	Review emails with closing agents regarding closings this week and finalization of closing statements.	0.30	88.50
K. L. Ecker	1/11/2022	B120	Compile 4450 closing package for M. Soto execution	0.40	82.00
K. L. Ecker	1/11/2022	B120	Compile 530 closing package for M. Soto execution	0.40	82.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/11/2022	B120	Communicate with J. Maglich regarding incorporation of revisions to 530 closing documents	0.20	41.00
K. L. Ecker	1/11/2022	B120	Communicate with J. Maglich regarding additional charges to be included in 530 and 4450 settlement statements	0.20	41.00
K. L. Ecker	1/11/2022	B120	Communication with H. Zalman regarding revised HUD for 4450	0.20	41.00
K. L. Ecker	1/11/2022	B120	E-mail from J. Maglich confirming approval of 530 closing documents	0.10	20.50
K. L. Ecker	1/11/2022	B120	Draft and send detailed e-mail to office services with specific instructions regarding process for delivery and receipt of 530, 1361, and 4450 closing packages (NO CHARGE)	0.30	N/C
K. L. Ecker	1/11/2022	B120	E-mail exchange with M. Soto regarding timeline and procedures for closing	0.20	41.00
K. L. Ecker	1/11/2022	B120	Receive and review signed 530 closing and escrow instruction letter from Modus Title, add to closing package for M. Soto execution	0.10	20.50
J. D. Maglich	1/11/2022	B120	Confer with R. Rodriguez regarding rent paid for 1361 property and preparation of side letter to closing documents (NO CHARGE)	0.40	N/C
K. L. Ecker	1/11/2022	B120	Review confirmation from A. Ostrega that item 7 in commitment is satisfied for 4450	0.10	20.50
J. D. Maglich	1/11/2022	B120	Review final closing packets and instructions to M. Soto regarding closing on 1/12/22 and coordinate process to deliver original signed documents to closing agents	0.40	118.00
K. L. Ecker	1/11/2022	B120	E-mail exchange with J. Maglich regarding final version of 4450 HUD Settlement Statement	0.10	20.50
K. L. Ecker	1/11/2022	B120	E-mail office service confirming request for courier to pick up 530, 4450, and 1361 closing packages (NO CHARGE)	0.10	N/C
K. L. Ecker	1/11/2022	B120	Receive and review receipts for payment to code enforcement for 4450; save to file	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/11/2022	B120	Receive and review revised seller documents from Modus Title for 530	0.20	41.00
K. L. Ecker	1/12/2022	B120	E-mail exchanges with Florida Virtual Notary regarding satisfaction of all items required to proceed with 530, 1361, and 4450 closings and confirmation once completed	0.50	102.50
J. D. Maglich	1/12/2022	B120	Numerous correspondence with closing agents and brokers for 530 NE 34th St., 1361 SE 4th St., and 4450 Coral Springs Drive properties regarding preparation of final closing packages, coordinate with Receiver regarding scheduled signing of closing packages, and coordinate and direct scheduling of tasks to complete closings	2.50	737.50
K. L. Ecker	1/12/2022	B120	Receive and review executed closing documents from Florida Virtual Notary	0.30	61.50
K. L. Ecker	1/12/2022	B120	Review executed closing documents and compile final packages to be sent to closing agents	0.60	123.00
K. L. Ecker	1/12/2022	B120	E-mails with J. Maglich, M. Soto, and R. Rodriguez regarding 4450 lender issues and request for extension to close. (NO CHARGE)	0.20	N/C
J. D. Maglich	1/13/2022	B120	Numerous correspondence with closing agents and broker for 4450 Coral Springs Drive property regarding requested closing extension and confer with R. Rodriguez and M. Soto regarding request	1.00	295.00
J. D. Maglich	1/13/2022	B120	Numerous correspondence with closing agents and brokers for 530 NE 34th St and 1361 SE 4th St regarding completed closings, submission of necessary documents and closing packages, and status of funding of transactions	1.00	295.00
J. D. Maglich	1/13/2022	B120	Review proposed addendum to 4020 contract and revisions to draft contract with prospective new 3050 buyer	0.40	118.00
K. L. Ecker	1/13/2022	B120	Assemble final executed seller closing documents for 1361	0.30	61.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/13/2022	B120	Assemble final executed seller closing documents for 530	0.30	61.50
K. L. Ecker	1/13/2022	B120	Read and review signed Addendum to 4020 and confirm new deadlines	0.10	20.50
K. L. Ecker	1/13/2022	B120	Communication with J. Maglich regarding missing signature for 1361 Settlement Statement	0.20	41.00
K. L. Ecker	1/13/2022	B120	E-mails with J. Maglich and M. Soto regarding 4450 closing extension	0.10	20.50
K. L. Ecker	1/13/2022	B120	Receive and review wire confirmation for 530 seller proceeds	0.10	20.50
K. L. Ecker	1/14/2022	B120	E-mails back and forth with 530 closing agent confirming approval to disburse	0.20	41.00
J. D. Maglich	1/14/2022	B120	Confer with brokers regarding extension to close 4020 property	0.20	59.00
J. D. Maglich	1/14/2022	B120	Confer with broker and closing agent for 530 and 1361 properties regarding disbursement instructions, confirm receipt of funds, and direct disbursement to receivership accounts	0.60	177.00
J. D. Maglich	1/14/2022	B120	Draft and revise notices of completed sale for 530 NE 34th St and 1361 SE 4th St properties	0.80	236.00
K. L. Ecker	1/14/2022	B120	Communicate with J. Maglich regarding extension for 4450 closing	0.10	20.50
K. L. Ecker	1/14/2022	B120	Receive and review counter-signed closing documents and update file	0.10	20.50
K. L. Ecker	1/14/2022	B120	Receive and review PII Certificate of Status	0.10	20.50
J. D. Maglich	1/14/2022	B120	Numerous correspondence with BIPC, D. Otten, and buyer's agent for 4450 Coral Springs Drive property regarding closing extension and terms	0.70	206.50
K. L. Ecker	1/18/2022	B120	E-mail executed 1361 Bill of Sale to L. Pruneda for processing of policy cancellation	0.10	20.50
J. D. Maglich	1/18/2022	B120	Confer with buyer and buyer's agent regarding 1361 closing and division of January 2022 rent proceeds	0.60	177.00
K. L. Ecker	1/18/2022	B120	Multiple e-mail exchanges with H. Zalman, E. Desimone, B. Gene, and J. Maglich regarding 1361 rent payments	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	1/18/2022	B120	Confer with D. Otten regarding extension to 4450 closing, review and revise addendum language, and confer with M. Soto regarding same	0.60	177.00
J. D. Maglich	1/18/2022	B120	Coordinate transmittal of sale documents for 1361 and 530 properties to insurance agencies to process cancellation of insurance policies	0.40	118.00
K. L. Ecker	1/18/2022	B120	Research case file for Foundation Risk contact for 530 policy cancellation	0.20	41.00
K. L. Ecker	1/18/2022	B120	E-mail exchange with J. Maglich regarding policyholder for 530	0.10	20.50
K. L. Ecker	1/18/2022	B120	Review and reply to e-mail from J. Maglich regarding executed Bills of Sale for 530 and 1361 for policy cancellation	0.10	20.50
K. L. Ecker	1/18/2022	B120	Receive and review 1361 policy cancellation request for M. Soto	0.10	20.50
K. L. Ecker	1/19/2022	B120	E-mails with S. Walter regarding 530 policy cancellation request and information required for same	0.20	41.00
J. D. Maglich	1/19/2022	B120	Exchange correspondence with D. Otten and buyer's agent for 4450 property regarding status of closing	0.30	88.50
K. L. Ecker	1/19/2022	B120	E-mail exchanges with E. Desimone, B. Gene, and J. Maglich regarding outstanding invoices for 1361	0.20	41.00
J. D. Maglich	1/19/2022	B120	Exchange correspondence with buyer for 1361 property and B. Gene regarding transfer of utilities for sold property and procedures for transitioning utility information to new buyers	0.40	118.00
J. D. Maglich	1/19/2022	B120	Revise and finalize notices of completed sale for 1361 and 530 property and prepare for filing	0.50	147.50
J. D. Maglich	1/20/2022	B120	Telephone call with D. Otten and S. Mossini regarding status of property sales and strategize regarding next steps	0.70	206.50
K. L. Ecker	1/20/2022	B120	E-mail from B. Gene regarding 1361 landscaper cancellation and rent checks (NO CHARGE)	0.10	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/21/2022	B120	E-mails with S. Walter regarding 530 policy cancellation confirmation	0.10	20.50
K. L. Ecker	1/24/2022	B120	Multiple e-mail exchanges with closing agent regarding extension to close, appraisal issues, and tenant estoppel	0.20	41.00
K. L. Ecker	1/24/2022	B120	E-mail 4020 closing documents revisions to closing agent	0.10	20.50
J. D. Maglich	1/24/2022	B120	Numerous correspondence with broker and closing agents for 4020 transaction regarding appraisal and closing status and review of proposed seller closing documents, confer with D. Otten and S. Mossini regarding status, and confer with K. Ecker and M. Soto regarding scheduling closing	1.30	383.50
J. D. Maglich	1/24/2022	B120	Confer with BIPC attorneys regarding inspection of 3050 property and considerations in sale of property to potential buyer and exchange correspondence with R. Rodriguez and M. Soto regarding same. (NO CHARGE)	0.40	N/C
J. D. Maglich	1/24/2022	B120	Review and revise draft contract for 3050 property	1.10	324.50
K. L. Ecker	1/24/2022	B120	E-mail exchange with M. Soto regarding coordination of 4020 closing document execution	0.10	20.50
K. L. Ecker	1/24/2022	B120	E-mails with J. Maglich regarding coordination of 4020 closing and Release of Lis Pendens	0.20	41.00
J. D. Maglich	1/24/2022	B120	Confer with counsel for mortgage lender regarding 4020 mortgage balance payoff	0.20	59.00
J. D. Maglich	1/24/2022	B120	Exchange correspondence with R. Rodriguez and M. Soto regarding next steps with prospective buyer. (NO CHARGE)	0.30	N/C
K. L. Ecker	1/24/2022	B120	Review draft 4020 closing documents for correct notary blocks	0.20	41.00
R. Rodriguez	1/25/2022	B120	Numerous emails with closing agent, realtors and property managers regarding status of various closings and related issues.	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/25/2022	B120	Telephone conference with clerk's office to order certified copies for 4020 closing. (NO CHARGE)	0.20	N/C
J. D. Maglich	1/25/2022	B120	Telephone and email correspondence with closing agent and brokers regarding closing issues with 4450 transaction and confer with M. Soto regarding next steps	0.40	118.00
J. D. Maglich	1/25/2022	B120	Exchange correspondence with closing agent and lender for 4020 property regarding outstanding tenant leases, rent obligations, and deposits	0.40	118.00
R. Rodriguez	1/25/2022	B120	Review draft contract for 3050 for clauses regarding condition of property.	0.30	88.50
R. Rodriguez	1/25/2022	B120	Call with J. Maglich regarding 3050 contract language and condition of property.	0.50	147.50
K. L. Ecker	1/25/2022	B120	E-mails with B. Camacho regarding revisions to draft CD	0.20	41.00
J. D. Maglich	1/25/2022	B120	Review and revise newest set of closing documents and closing statement for 4020 transaction, exchange correspondence with closing agent and broker regarding same, and confer regarding closing	0.80	236.00
K. L. Ecker	1/25/2022	B120	Receive and review revised seller documents to confirm revisions incorporated	0.20	41.00
K. L. Ecker	1/25/2022	B120	Communications with office services regarding coordination of courier and charges to obtain certified copies from courthouse (NO CHARGE)	0.50	N/C
K. L. Ecker	1/25/2022	B120	Receive and review certified copies from courier for 4020 closing	0.20	41.00
J. D. Maglich	1/25/2022	B120	Review new offer for 201 property and confer with D. Otten regarding terms of offer	0.40	118.00
K. L. Ecker	1/26/2022	B120	E-mails with B. Camacho regarding Closing Disclosure revisions, Assignment of Leases, and addition of certified copies and courier charges	0.30	61.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/26/2022	B120	E-mails with J. Maglich and M. Soto coordinating details for execution of 4020 closing documents. (NO CHARGE)	0.20	N/C
J. D. Maglich	1/26/2022	B120	Review current offers for 201 property and exchange correspondence with D. Otten and S. Mossini regarding same	0.50	147.50
K. L. Ecker	1/26/2022	B120	Receive and review final seller closing documents and confirm Assignment of Leases included	0.20	41.00
J. D. Maglich	1/26/2022	B120	Review status of 4450 closing and draft amendment to Purchase and Sale Agreement, confer with Receiver regarding extension, and exchange numerous telephone and email correspondence with buyer's agent regarding extension fee and closing rescheduling	1.30	383.50
J. D. Maglich	1/26/2022	B120	Review and revise closing documents for closing of 4020 property in preparation of January 27, 2022 closing, and exchange numerous correspondence with Receiver, K. Ecker, and buyer's broker and closing agent regarding same	1.50	442.50
J. D. Maglich	1/27/2022	B120	Review status of offer for 3050 property	0.10	29.50
K. L. Ecker	1/27/2022	B120	E-mail exchanges with B. Camacho regarding Receiver's Deed, payoff, and coordination of Receiver's Deed dropoff	0.30	61.50
J. D. Maglich	1/27/2022	B120	Numerous emails regarding finalizing closing documents for 4020 transaction, attend to closing and review Receiver's Deed, and confer with closing agent regarding status	1.00	295.00
K. L. Ecker	1/27/2022	B120	4020 closing, assemble final package for M. Soto execution	0.50	102.50
K. L. Ecker	1/27/2022	B120	Draft Receiver's Deed	0.20	41.00
K. L. Ecker	1/27/2022	B120	Revise Receiver's Deed per J. Maglich and B. Camacho revisions	0.10	20.50
K. L. Ecker	1/27/2022	B120	E-mail from B. Camacho confirming 4020 closed and funded	0.10	20.50
K. L. Ecker	1/27/2022	B120	E-mails with J. Maglich and M. Soto coordinating final details of 4020 closing	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/27/2022	B120	Meet with M. Soto to sign and notarize 4020 closing documents (NO CHARGE)	0.50	N/C
K. L. Ecker	1/27/2022	B120	Travel to and from Reliance Title Services to drop off executed seller closing documents for 4020 (NO CHARGE)	2.50	N/C
K. L. Ecker	1/27/2022	B120	Telephone conference with E. Miller regarding confirmation of Suntrust Bank address for 4020 closing agent's wire instructions	0.20	41.00
J. D. Maglich	1/27/2022	B120	Confer with M. Soto and R. Rodriguez regarding status of offer for 3050 property. (NO CHARGE)	0.20	N/C
J. D. Maglich	1/27/2022	B120	Confer with M. Soto and R. Rodriguez regarding new offer for 201 property and discuss next steps	0.30	88.50
J. D. Maglich	1/27/2022	B120	Numerous correspondence with buyer's agent for 4450 transaction regarding extension fee and amendment to PSA	0.50	147.50
K. L. Ecker	1/27/2022	B120	Communicate with J. Maglich regarding review of executed 4020 closing documents	0.10	20.50
K. L. Ecker	1/27/2022	B120	Read and review scan of executed 4020 closing documents to confirm all pages signed and notarized	0.10	20.50
K. L. Ecker	1/28/2022	B120	E-mail L. Pruneda for 4020 policy cancellation	0.10	20.50
K. L. Ecker	1/28/2022	B120	E-mail exchange with B. Camacho regarding 4020 funds confirmation, revised CD	0.20	41.00
K. L. Ecker	1/28/2022	B120	Communicate with J. Maglich regarding 4020 policy cancellation	0.20	41.00
J. D. Maglich	1/28/2022	B120	Review claimant analyses prepared by Kaufman, compare and spot-check compared to bank statements, and draft correspondence to M. O'Rourke regarding updates and revisions	2.40	708.00
J. D. Maglich	1/28/2022	B120	Review claimant analyses, strategize and analyze regarding potential claim process issues and priorities, and begin drafting memorandum to BIPC team regarding same	2.50	737.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/31/2022	B120	Review and reply to e-mails from B. Camacho regarding Order Approving	0.20	41.00
J. D. Maglich	1/31/2022	B120	Sale and docket showing no objections Correspondence with BIPC regarding disbursement of proceeds from 4020 sale and 4450 extension	0.30	88.50
J. D. Maglich	1/31/2022	B120	Exchange correspondence with R.B. regarding status of 3050 contract and sale of other properties	0.30	88.50
J. D. Maglich	1/31/2022	B120	Draft Notice of Completed Sale of 4020 property and prepare for filing	0.40	118.00
J. D. Maglich	1/31/2022	B120	Begin drafting motion to approve sale of 3050 property and associated exhibits and confer with T. Tremblay regarding outstanding broker price opinion	1.10	324.50
J. D. Maglich	1/31/2022	B120	Confer with D. Otten and agent for buyer of 4450 buyer regarding status of closing	0.40	118.00
J. D. Maglich	1/31/2022	B120	Review and approve contract for sale of 3050 property and confer with D. Otten and M. Soto regarding same	0.40	118.00
J. D. Maglich	2/1/2022	B120	Continued correspondence with broker and title agent for 4450 property regarding execution of amendment to purchase agreement and closing status	0.50	147.50
J. D. Maglich	2/1/2022	B120	Review and coordinate execution of disclosure for 201 sale, and exchange correspondence with S. Mossini regarding escrow deposit confirmation	0.30	88.50
J. D. Maglich	2/1/2022	B120	Continue drafting motion to approve sale of 3050 property and associated proposed order and notice of sale	1.30	383.50
K. L. Ecker	2/1/2022	B120	E-mail exchanges with J. Maglich and M. Soto to coordinate signing of Amendment to Purchase and Sale Agreement for 4450	0.10	20.50
K. L. Ecker	2/1/2022	B120	Read and review executed Purchase and Sale Agreement for 3050	0.20	41.00
K. L. Ecker	2/2/2022	B120	Emails with 4450 closing agent regarding outstanding unpaid permits	0.10	20.50
K. L. Ecker	2/2/2022	B120	E-mail signed Amendment to 4450 Purchase and Sale Agreement to D. Otten. (NO CHARGE)	0.10	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/2/2022	B120	Exchange correspondence with broker and title agent regarding closing documents for 4450 property and confer with M. Venereo regarding outstanding permit	0.70	206.50
J. D. Maglich	2/2/2022	B120	Draft motion for approval of sale of 201 property along with corresponding proposed order and notice of sale	2.00	590.00
K. L. Ecker	2/2/2022	B120	Meet with M. Soto regarding signature of Amendment to 4450 Purchase and Sale Agreement (NO CHARGE)	0.20	N/C
J. D. Maglich	2/2/2022	B120	Review checks sent from closing agents for 530 and 3775 sales and confer with S. Storno and K. Ecker regarding same	0.20	59.00
K. L. Ecker	2/3/2022	B120	E-mail exchange with G. Schilian regarding potential closing date for 3050 property and outstanding issues for same (NO CHARGE)	0.20	N/C
K. L. Ecker	2/3/2022	B120	Communicate with J. Maglich and S. Storno regarding reimbursement for courier/certified copy costs to receivership account (NO CHARGE)	0.20	N/C
J. D. Maglich	2/3/2022	B120	Review confirmation of deposit for 3050 property and exchange correspondence with D. Otten regarding same	0.20	59.00
K. L. Ecker	2/3/2022	B120	Read and review refund for overpayment of 3504 insurance	0.10	20.50
K. L. Ecker	2/4/2022	B120	E-mail J. Maglich to confirm possession of certified copies of Release of Lis Pendens and Order Approving Sale for 4450	0.10	20.50
J. D. Maglich	2/4/2022	B120	Exchange correspondence with agent for 3050 property regarding timeline and preparation of closing documents	0.40	118.00
J. D. Maglich	2/4/2022	B120	Telephone and email correspondence with agent for 4450 transaction regarding insurance policy and closing questions	0.40	118.00
J. D. Maglich	2/7/2022	B120	Telephone and email correspondence with third-party regarding status of 3050 transaction	0.50	147.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/7/2022	B120	Exchange correspondence with title agent and brokers for 4450 transaction	0.60	177.00
K. L. Ecker	2/7/2022	B120	regarding status of leases and closing E-mail exchange with H. Zalman regarding outstanding permit issue (NO CHARGE)	0.10	N/C
J. D. Maglich	2/7/2022	B120	Revise and finalize motion to sell 3050 property and prepare for filing	1.40	413.00
J. D. Maglich	2/7/2022	B120	Exchange correspondence with D. Otten and M. Soto regarding status of 201 transaction	0.30	88.50
K. L. Ecker	2/7/2022	B120	Review and reply to e-mail from M. Soto regarding 4450 closing and execution of updated ALTA	0.10	20.50
K. L. Ecker	2/7/2022	B120	E-mails with M. Soto and J. Maglich regarding coordination of submitting 4450 closing documents to closing agent. (NO CHARGE)	0.10	N/C
K. L. Ecker	2/8/2022	B120	Compile final executed closing package for 4450 to be sent to closing agent	0.60	123.00
K. L. Ecker	2/8/2022	B120	E-mails with closing agent regarding status of outstanding permit (NO CHARGE)	0.20	N/C
J. D. Maglich	2/8/2022	B120	Numerous correspondence with closing agent and B. Gene regarding rent roll, outstanding permit, and utility bills for 4450 transaction and confer regarding status of closing	1.00	295.00
K. L. Ecker	2/8/2022	B120	Communicate with J. Maglich regarding instructions to send 4450 closing package	0.10	20.50
K. L. Ecker	2/9/2022	B120	Communicate with H. Zalman confirming shipping address for executed closing documents (NO CHARGE)	0.10	N/C
J. D. Maglich	2/9/2022	B120	Review signed closing documents and exchange correspondence with BIPC team and closing agent regarding status of closing and transmittal of closing documents.	0.80	236.00
K. L. Ecker	2/9/2022	B120	Review and confirm final scan of executed 4450 closing documents prior to sending to closing agent	0.10	20.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/9/2022	B120	Review two new offers for 210 E. 30th St property and confer with D. Otten and S. Mossini regarding same.	0.50	147.50
R. Rodriguez	2/10/2022	B120	Review and respond to emails from J. Maglich regarding buyer post-closing claims about rent allocations for sale of 530 NE 34th Street.	0.30	88.50
K. L. Ecker	2/10/2022	B120	Review and reply to e-mail from J. Maglich regarding status of delivery of 4450 closing documents to closing agent	0.10	20.50
K. L. Ecker	2/10/2022	B120	Receive and review letter of intent to vacate from tenant at 4450 (NO CHARGE)	0.10	N/C
K. L. Ecker	2/10/2022	B120	Review e-mail from J. Maglich with instructions to confirm all policies canceled for closed properties	0.10	20.50
K. L. Ecker	2/10/2022	B120	Review FedEx tracking information for 4450 closing documents (NO CHARGE)	0.10	N/C
J. D. Maglich	2/10/2022	B120	Telephone and email correspondence with new owner of 530 property regarding recent rent received and questions regarding tenants and confer with Receiver regarding same	0.40	118.00
J. D. Maglich	2/10/2022	B120	Numerous email correspondence with lender, broker, and closing agent for 4450 transaction regarding tenant questions and closing status	0.50	147.50
J. D. Maglich	2/10/2022	B120	Review and revise contract for 201 E 30th St per new offer and confer with Receiver regarding same	1.00	295.00
R. Rodriguez	2/11/2022	B120	Review and respond to email from B. Gene regarding insurance claim for water and 3050 remediation in 2 units at 3050 property.	0.20	59.00
R. Rodriguez	2/11/2022	B120	Review and respond to email from M. Soto regarding 3050 remediation and insurance claim for 3050 units.	0.10	29.50
J. D. Maglich	2/11/2022	B120	Numerous correspondence with brokers and Receiver regarding status of 4450 closing	1.00	295.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/11/2022	B120	Confer with Receiver regarding offers for 201 property, revise and finalize contract, and confer with S. Mossini regarding moving forward	0.50	147.50
R. Rodriguez	2/11/2022	B120	Zoom meeting with M. Soto and J. Maglich to address 3050 issues and develop plan of action.	0.80	236.00
R. Rodriguez	2/11/2022	B120	Call with M. Soto and J. Maglich to discuss 3050 inspection and remediation to discuss solutions.	0.50	147.50
R. Rodriguez	2/11/2022	B120	Review materials regarding 3050 inspection and remediation in preparation for team call to discuss solutions.	0.70	206.50
R. Rodriguez	2/11/2022	B120	Review emails regarding delays in closing on 4450 and address questions regarding same	0.20	59.00
J. D. Maglich	2/14/2022	B120	Telephone and email correspondence with D. Otten and S. Mossini regarding outstanding status of 4450 transaction and 3050 property and confer with Receiver and R. Rodriguez regarding same	1.00	295.00
R. Rodriguez	2/14/2022	B120	Review of email from J. Maglich regarding 4450 leases and buyer questions about rent allocations at closing.	0.10	29.50
J. D. Maglich	2/14/2022	B120	Exchange correspondence with agent for 3050 transaction regarding closing status and timeline	0.30	88.50
J. D. Maglich	2/14/2022	B120	Telephone and email correspondence with brokers and agents for 4450 transaction and confer with Receiver regarding closing date and status	0.80	236.00
K. L. Ecker	2/14/2022	B120	E-mail exchange with G. Schilian regarding code enforcement liens outstanding (NO CHARGE)	0.10	N/C
K. L. Ecker	2/14/2022	B120	Receive and review 3050 policy cancellation and save to file	0.10	20.50
R. Rodriguez	2/15/2022	B120	Review email from Property Manager confirming submission of insurance claim regarding water damage and remediation.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/15/2022	B120	Confer with Receiver and R. Rodriguez regarding closing status and timeline for 4450 transaction. (NO CHARGE)	0.30	N/C
J. D. Maglich	2/15/2022	B120	Correspondence with brokers and agents for 4450 transaction regarding closing status and timeline and confer with Receiver and R. Rodriguez regarding same	0.30	88.50
J. D. Maglich	2/15/2022	B120	Confer with agent for 3050 transaction regarding closing documents and timeline	0.30	88.50
J. D. Maglich	2/15/2022	B120	Confer with D. Otten and S. Mossini regarding fully-executed contract for 201 property and next steps	0.40	118.00
J. D. Maglich	2/16/2022	B120	Review rent roll for 4450 Coral Springs property and confer with M. Venereo and B. Gene regarding status of rent roll and delinquent rent at 4450 Coral Springs property	0.40	118.00
J. D. Maglich	2/16/2022	B120	Exchange correspondence with closing agents for 4450 Coral Springs property and begin review of initial closing statement	0.40	118.00
J. D. Maglich	2/16/2022	B120	Confer with R. Rodriguez, M. Soto, and B. Gene regarding correspondence from insurance company for 3050 Coral Springs	0.30	88.50
J. D. Maglich	2/17/2022	B120	Confer with closing agent for 201 E. 30th St property and provide seller information, and confer with S. Mossini and D. Otten regarding current status of inspection deadline	0.60	177.00
R. Rodriguez	2/17/2022	B120	Review and comment on draft closing disclosure.	0.30	88.50
J. D. Maglich	2/17/2022	B120	Telephone and email correspondence with brokers, sales agents, and closing agents regarding closing of 4450 Coral Springs sale, review and finalize closing statement, and confer with R. Rodriguez and M. Soto regarding same	1.50	442.50
J. D. Maglich	2/18/2022	B120	Analyze potential third-party claims and prepare summary of potential actions	1.50	442.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/18/2022	B120	Review final closing statement for 4450 Coral Springs transaction and confirm disbursement of proceeds, draft and file notice of completed sale, and exchange correspondence with team regarding exchange of keys	0.80	236.00
J. D. Maglich	2/22/2022	B120	Confer with agents and broker for buyer of 201 E. 30th St. property regarding inspection deadline and preparation of closing documents	0.40	118.00
J. D. Maglich	2/22/2022	B120	Confer with S. Mossini regarding exchange of current leases for 201 E. 30th St. property	0.30	88.50
J. D. Maglich	2/22/2022	B120	Review and revise motion to approve sale of 201 E. 30th St. Property and corresponding exhibits	1.50	442.50
K. L. Ecker	2/23/2022	B120	E-mails with C. Rubio confirming inspection period expiration and next steps for Motion to Approve Sale of 201 (NO CHARGE)	0.10	N/C
K. L. Ecker	2/23/2022	B120	Communicate with J. Maglich and M. Soto regarding notarization of lien reduction request. (NO CHARGE)	0.20	N/C
J. D. Maglich	2/23/2022	B120	Analyze and strategize regarding potential third party claims and claims process strategy and draft comprehensive memorandum to M. Soto and R. Rodriguez regarding same	2.50	737.50
J. D. Maglich	2/23/2022	B120	Review status of items from office and storage unit and disposition strategy	0.50	147.50
K. L. Ecker	2/23/2022	B120	Review e-mail from J. Maglich regarding lien reduction request for 3050	0.10	20.50
R. Rodriguez	2/24/2022	B120	Review and respond to email from B. Gene regarding scheduled meeting with insurance adjuster.	0.10	29.50
R. Rodriguez	2/24/2022	B120	Review of email from J. Maglich regarding discussions with broker regarding 3050 property issues	0.10	29.50
R. Rodriguez	2/24/2022	B120	Initial review of email from J. Maglich regarding plan for claims management.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/24/2022	B120	Exchange correspondence with Keyes and BIPC team regarding claim submission for 3050 Coral Springs	0.40	118.00
J. D. Maglich	2/24/2022	B120	property Analyze and strategize regarding potential third party claims	0.50	147.50
J. D. Maglich	2/25/2022	B120	Draft correspondence to SEC and Defendants' counsel regarding position on motion to approve sale of 201 E. 30th St. property	0.20	59.00
J. D. Maglich	2/25/2022	B120	Revise and finalize motion to approve sale of 201 E. 30th St. property and associated exhibits, confer with D. Otten and S. Mossini regarding buyer going forward, and exchange correspondence with R. Rodriguez and M. Soto regarding same	2.00	590.00
J. D. Maglich	2/28/2022	B120	Review BPO from T. Tromblay, meet and confer with other parties pursuant to Local Rule 7.1, and revise and finalize motion to approve sale of 201 E. 30th St. and prepare for filing	1.50	442.50
R. Rodriguez	2/28/2022	B120	Review of email from J. Maglich regarding closing on sale.	0.10	29.50
K. L. Ecker	2/28/2022	B120	Review e-mail to G. Schillian confirming receipt of Order Approving 3050 Sale and next steps (NO CHARGE)	0.10	N/C
J. D. Maglich	2/28/2022	B120	Review Order on motion to approve sale of 3050 property, complete sale notice and prepare for publication, and draft correspondence to broker and agents regarding status	1.00	295.00
J. D. Maglich	3/1/2022	B120	Continue drafting motion to expand receivership	1.00	295.00
J. D. Maglich	3/1/2022	B120	Review and finalize publication of sale notice for 3050 Coral Springs property	0.20	59.00
J. D. Maglich	3/3/2022	B120	Review check received from sale of 4450 property and coordinate deposit of same	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
R. Rodriguez	3/4/2022	B120	Conference call with M. Soto and J. Maglich regarding property management and sale issues and potential third party claims.	1.00	295.00
J. D. Maglich	3/4/2022	B120	Call with Receiver and R. Rodriguez regarding status of 3050 inspection, claims process status and issues, potential third-party actions, and other current items. (NO CHARGE)	1.00	N/C
J. D. Maglich	3/4/2022	B120	Exchange correspondence with S. Mossini regarding status of 3050 and 201 properties	0.20	59.00
J. D. Maglich	3/4/2022	B120	Review claims analysis and memorandum	0.50	147.50
J. D. Maglich	3/4/2022	B120	Review Sun Sentinel affidavit of publication	0.10	29.50
J. D. Maglich	3/8/2022	B120	Telephone and email correspondence with D. Otten regarding status of 3050 property sale and filing of motion to approve 201 sale, draft correspondence with buyer's agent regarding 3050 sale, and confer with Receiver regarding same	1.00	295.00
R. Rodriguez	3/9/2022	B120	Review denial of coverage letter from insurance company.	0.20	59.00
J. D. Maglich	3/9/2022	B120	Review refunds for insurance policy and utilities, process deposit into Receivership accounts, and send to Dana Kaufman	0.30	88.50
J. D. Maglich	3/9/2022	B120	Review correspondence from S. Marcellino regarding inspection of 3050	0.30	88.50
K. L. Ecker	3/14/2022	B120	property E-mail exchanges with G. Schilian regarding potential closing date, status of title commitment	0.20	41.00
K. L. Ecker	3/14/2022	B120	E-mail filed Release of Lis Pendens to G. Schilian to confirm if certified copy should be obtained	0.10	20.50
K. L. Ecker	3/14/2022	B120	E-mail exchange with 4020 closing agent regarding outstanding items requiring payment prior to closing	0.10	20.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	3/14/2022	B120	Receive and review e-mail and correspondence from City of Coral Springs regarding licenses to be paid by seller	0.20	41.00
J. D. Maglich	3/14/2022	B120	Review status of overbid process on 3050 property and exchange multiple correspondence with broker and agents regarding timeline and procedure to close	1.00	295.00
K. L. Ecker	3/18/2022	B120	E-mail exchange with G. Schilian regarding 3050 tenant estoppel	0.10	20.50
K. L. Ecker	3/18/2022	B120	Receive and review copy of check to City of Coral Springs for 4020 from closing agent	0.10	20.50
J. D. Maglich	3/22/2022	B120	Exchange correspondence with S. Mossini regarding status of 3050 and 201 properties	0.20	59.00
K. L. Ecker	3/24/2022	B120	E-mail exchange with G. Schilian and J. Maglich regarding confirmation of scheduled closing date and status of seller closing documents	0.10	20.50
K. L. Ecker	3/25/2022	B120	E-mail exchanges with G. Schilian regarding certified copies recording of court documents	0.20	41.00
J. D. Maglich	3/25/2022	B120	Confer with brokers and agents for sale of 3050 Coral Springs property regarding closing schedule and seller closing documents	0.50	147.50
J. D. Maglich	3/28/2022	B120	Review seller closing documents and confer with Receiver and others involved in sale of 3050 Coral Springs property regarding proposed revisions	1.50	442.50
K. L. Ecker	3/28/2022	B120	E-mail exchanges with G. Schilian regarding closing documents revisions, tenant utilities, abatement of fines, and confirmation of closing date	0.30	61.50
K. L. Ecker	3/28/2022	B120	Review and reply to J. Maglich's e-mail regarding TIN for PII 304	0.20	41.00
K. L. Ecker	3/28/2022	B120	Communicate with J. Maglich regarding requirement to obtain Certificate of Good Standing from Sunbiz. (NO CHARGE)	0.10	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	3/29/2022	B120	Numerous communications regarding status of closing of sale of 3050 Coral Springs property	1.00	295.00
R. Rodriguez	3/29/2022	B120	Respond to email from J. Maglich regarding closing of sale of the 3050 property, including lien and escrow documents.	0.10	29.50
K. L. Ecker	3/29/2022	B120	Telephone conference with G. Schilian regarding address confirmation for delivery of closing package, escrow agreement, and Certificate of Status for PII 304. (NO CHARGE)	0.20	N/C
R. Rodriguez	3/29/2022	B120	Review status of pending items and prepare for next steps.	0.50	147.50
R. Rodriguez	3/29/2022	B120	Review materials related to closing of sale of the 3050 property, including lien and escrow documents.	0.40	118.00
K. L. Ecker	3/29/2022	B120	Telephone conference with J. Maglich regarding final instructions for 3050 closing and remaining properties	0.20	41.00
L. Humphries	3/29/2022	B120	Review and analysis of Third Interim Report, Motions regarding property sale, and various correspondence regarding approval of sale. (NO CHARGE)	1.80	N/C
K. L. Ecker	3/29/2022	B120	Receive and review tenant letter to include in seller closing package for 3050	0.10	20.50
K. L. Ecker	3/29/2022	B120	Review and reply to e-mail from J. Maglich confirming certified copies of court documents ordered and obtained	0.10	20.50
K. L. Ecker	3/29/2022	B120	Receive and review revised HUD and Escrow Agreement for seller closing package for 3050	0.20	41.00
K. L. Ecker	3/29/2022	B120	E-mails with J. Maglich regarding title commitment and requirements Schedule B-1 to obtain Certificate of Good Standing for PII 304, instructions to obtain courier and pending documents needed	0.40	82.00
K. L. Ecker	3/30/2022	B120	Calculate additional costs to add to HUD and e-mail to G. Schilian	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	3/30/2022	B120	Attend to and oversee finalizing of closing documents and instruction letter for sale of 3050 Property and exchange correspondence with agents and Receiver regarding same	2.00	590.00
K. L. Ecker	3/30/2022	B120	Receive and review revised HUD with included court and courier costs and update closing package	0.20	41.00
R. Rodriguez	3/30/2022	B120	Review email from J. Maglich regarding escrow of funds on 3050 property.	0.10	29.50
K. L. Ecker	3/30/2022	B120	Telephone conference with G. Schilian regarding revisions to HUD and instructions for delivery of closing package	0.20	41.00
R. Rodriguez	3/30/2022	B120	Further review of 3050 lien and escrow issue; review and approve closing instruction letter and final closing statement.	0.50	147.50
R. Rodriguez	3/30/2022	B120	Call with A. Sum, M. Soto and J. Maglich regarding status of case.	1.00	295.00
R. Rodriguez	3/30/2022	B120	Review and approve revision to escrow letter for retainage on 3050 property with respect to lien.	0.20	59.00
R. Rodriguez	3/30/2022	B120	Emails with D. Murphy (FBI) and J. Jackson (OFR) regarding new contact information. (NO CHARGE)	0.10	N/C
K. L. Ecker	3/30/2022	B120	E-mails with M. Soto, J. Maglich, and R. Rodriguez regarding indemnification of unpaid liens. (NO CHARGE)	0.20	N/C
K. L. Ecker	3/30/2022	B120	Review e-mail from J. Maglich with additional language to include in	0.10	20.50
K. L. Ecker	3/30/2022	B120	Escrow Agreement Communicate with J. Maglich regarding revisions to HUD to include court and courier costs	0.10	20.50
K. L. Ecker	3/30/2022	B120	Assemble final 3050 seller closing documents package	0.60	123.00
L. Humphries	3/31/2022	B120	Assessed and reviewed subpoena and preparation of strategy regarding next steps. (NO CHARGE)	0.60	N/C

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Timekeeper	Date	Task	Narrative	Hours	Amount
R. Rodriguez	3/31/2022	B120	Review email and spreadsheet of Equinox investments prepared by J. Jackson (OFR) and follow up regarding	0.30	88.50
J. D. Maglich	3/31/2022	B120	potential additional documentation. Attend to and oversee finalizing of closing documents for sale of 3050 Property and exchange correspondence with agents and Receiver regarding same	1.00	295.00
K. L. Ecker	3/31/2022	B120	E-mails with G. Schilian regarding status of funding and insurance issues	0.20	41.00
K. L. Ecker	3/31/2022	B120	Review and finalize seller closing package to prepare for M. Soto to execute	0.40	82.00
K. L. Ecker	3/31/2022	B120	Receive and review Closing and Escrow Instructions Letter and add to seller closing package	0.20	41.00
K. L. Ecker	3/31/2022	B120	Receive and review revised Escrow Agreement and update seller closing package	0.20	41.00
K. L. Ecker	3/31/2022	B120	E-mails with J. Maglich and R. Rodriguez regarding pending closing and instruction letter, revised escrow agreement. (NO CHARGE)	0.20	N/C
K. L. Ecker	3/31/2022	B120	Meet with M. Soto to witness and notarize execution of 3050 closing documents (NO CHARGE)	0.10	N/C
K. L. Ecker	3/31/2022	B120	Review seller executed closing package, finalize, and confirm all pages signed and notarized	0.50	102.50
K. L. Ecker	3/31/2022	B120	Receive and review G. Schilian's revisions to closing and escrow instruction letter	0.10	20.50
K. L. Ecker	3/31/2022	B120	Communicate with J. Maglich regarding final executed seller closing package and final instructions	0.20	41.00
Subtotal Asset A Recovery	Analysis and			157.80	38,930.00

Case Administration

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/5/2022	B110	E-mail exchanges with L. Pruneda and M. Soto regarding policy cancellation request for 4450	0.20	41.00
J. D. Maglich	1/5/2022	B110	Begin drafting third interim fee application and review quarterly invoices (NO CHARGE)	1.50	N/C
K. L. Ecker	1/6/2022	B110	Release of Lis Pendens for 4450 and 530 per J. Maglich revisions	0.30	61.50
K. L. Ecker	1/6/2022	B110	Serve Release of Lis Pendens to L. Brodman and counsel via e-mail	0.10	20.50
K. L. Ecker	1/6/2022	B110	E-file Release of Lis Pendens for 530	0.10	20.50
K. L. Ecker	1/6/2022	B110	E-file Release of Lis Pendens for 4450	0.10	20.50
J. D. Maglich	1/10/2022	B110	Exchange correspondence with B. Mittelberg regarding status of mediation	0.20	59.00
K. L. Ecker	1/10/2022	B110	Review and reply to e-mail from M. Soto regarding e-service e-mails to M. Perry	0.10	20.50
J. D. Maglich	1/10/2022	B110	Telephone call with M. Perry regarding Order granting claims process	0.30	88.50
J. D. Maglich	1/11/2022	B110	Telephone correspondence with J.S., C.L., and C.J. regarding case status, claims process timetable, and next steps and draft memorandum to file	0.30	88.50
J. D. Maglich	1/14/2022	B110	Review oppositions to Claims Motion filed by investors and A. Nicolosi, draft correspondence to B. Mittelberg,	1.10	324.50
J. D. Maglich	1/18/2022	B110	Review billing invoices, review and revise fee application, and confer with R. Rodriguez and M. Soto regarding same (NO CHARGE)	2.50	N/C
J. D. Maglich	1/20/2022	B110	Exchange email correspondence with J.B. regarding subpoena	0.30	88.50
J. D. Maglich	1/21/2022	B110	Telephone call with J.B. regarding compliance with subpoena and confer with M. Soto regarding same	0.50	147.50
J. D. Maglich	1/24/2022	B110	Begin drafting Third Interim Report and review necessary case documents, filings, and bank statements	3.50	1032.50
J. D. Maglich	1/24/2022	B110	Telephone correspondence with D.M. and A.E. and draft memorandum to file regarding same	0.40	118.00
K. L. Ecker	1/24/2022	B110	Draft Release of Lis Pendens for 4020	0.20	41.00
K. L. Ecker	1/24/2022	B110	E-file Release of Lis Pendens for 4020	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	1/25/2022	B110	Telephone conference with FLSD clerk's office to order certified copies for 4020 closing (NO CHARGE)	0.20	N/C
J. D. Maglich	1/25/2022	B110	Continue drafting Third Interim Report and review pertinent case documents and financial statements	2.30	678.50
J. D. Maglich	1/25/2022	B110	Confer with J.B. regarding subpoena production	0.20	59.00
J. D. Maglich	1/26/2022	B110	Continue drafting Third Interim Report and draft correspondence to M. Soto and R. Rodriguez regarding draft report and deadline	1.80	531.00
J. D. Maglich	1/26/2022	B110	Prepare documents in response to subpoena	1.50	442.50
J. D. Maglich	1/28/2022	B110	Finalize documents for subpoena production	0.30	88.50
J. D. Maglich	1/31/2022	B110	Revise and finalize Third Interim Report and prepare for filing	1.50	442.50
J. D. Maglich	1/31/2022	B110	Telephone call with J.O. regarding case status and timeline for claims process	0.30	88.50
J. D. Maglich	2/1/2022	B110	Telephone call with A. Sum regarding case status and discovery, and confer with Receiver regarding same	0.50	147.50
J. D. Maglich	2/3/2022	B110	Review discovery requests from A. Nicolosi to SEC	0.40	118.00
K. L. Ecker	2/3/2022	B110	E-mails with J. Maglich regarding drafting of 3050 Motion to Approve Sale	0.10	20.50
J. D. Maglich	2/8/2022	B110	Review correspondence from W.A. and draft correspondence to W.A. regarding same	0.20	59.00
J. D. Maglich	2/10/2022	B110	Telephone and email correspondence with J.H., L.D., and R.B. regarding case status, claims process, and asset liquidation and draft memorandum to file regarding same	1.50	442.50
J. D. Maglich	2/10/2022	B110	Exchange correspondence with J.B. regarding status of production	0.20	59.00
J. D. Maglich	2/10/2022	B110	Review request for copies from A. Sum and exchange correspondence regarding same	0.30	88.50
J. D. Maglich	2/11/2022	B110	Telephone call with A. Sum regarding compliance with request for copies	0.20	59.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	2/14/2022	B110	Revise and finalize fee application and prepare for filing (NO CHARGE)	2.50	N/C
J. D. Maglich	2/15/2022	B110	Finalize response to subpoena and review transmittal letter	0.20	59.00
J. D. Maglich	2/16/2022	B110	Telephone call with R.L. regarding case status and claims process and draft memorandum to file regarding same	0.30	88.50
J. D. Maglich	2/22/2022	B110	Review incoming subpoena directed to Equinox Holdings and draft correspondence to issuing attorney regarding status	0.30	88.50
J. D. Maglich	2/23/2022	B110	Analyze expansion of receivership over certain entities and draft memorandum to M. Soto and R. Rodriguez regarding same	1.00	295.00
J. D. Maglich	2/24/2022	B110	Prepare third-party productions for transmittal to SEC pursuant to request for copies	1.50	442.50
K. L. Ecker	2/24/2022	B110	E-mail exchange with S. Storno confirming submission of proposed Orders to Judge Singhal (NO CHARGE)	0.10	N/C
K. L. Ecker	2/28/2022	B110	Draft Release of Lis Pendens for 3050 Coral Springs Dr	0.30	61.50
K. L. Ecker	2/28/2022	B110	Receive and review Order Granting Unopposed Motion to Approve 3050 Sale (NO CHARGE)	0.20	N/C
K. L. Ecker	2/28/2022	B110	Research Broward Property Appraiser for 3050 and pull/review recorded Lis Pendens to confirm recording and title information	0.20	41.00
K. L. Ecker	2/28/2022	B110	Receive and review Order Granting Third Interim Omnibus Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses (NO CHARGE)	0.10	N/C
J. D. Maglich	2/28/2022	B110	Continue strategizing regarding motion to expand receivership and continue to draft motion	1.50	442.50
K. L. Ecker	2/28/2022	B110	E-mail draft Release of Lis Pendens and recorded Lis Pendens to J. Maglich for approval	0.10	20.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	3/1/2022	B110	Review Court's Order granting fee application and distribute pursuant to Order (NO CHARGE)	0.50	N/C
J. D. Maglich	3/2/2022	B110	Exchange correspondence with B. Gene regarding status of 3050 inspection and Court's entry of Order approving sale of 3050 property	0.20	59.00
J. D. Maglich	3/2/2022	B110	Confer with R. Rodriguez and M. Soto regarding 3050 status and claims process	0.20	59.00
J. D. Maglich	3/3/2022	B110	Telephone and email correspondence with G.D. and C.B. regarding case information and status of claims process and draft memorandum to file regarding same	0.40	118.00
J. D. Maglich	3/3/2022	B110	Review SEC's discovery requests to Nicolosi and Brodman and confer with Receiver regarding same	0.40	118.00
J. D. Maglich	3/3/2022	B110	Review January and February invoices for upcoming Fee Application. (NO CHARGE)	1.00	N/C
J. D. Maglich	3/4/2022	B110	Exchange correspondence with J.W. regarding status of claims process	0.20	59.00
K. L. Ecker	3/7/2022	B110	E-mail exchange with J. Maglich regarding status of filing Release of Lis Pendens for 3050 (NO CHARGE)	0.10	N/C
J. D. Maglich	3/9/2022	B110	Review pertinent case documents and begin drafting Third Interim Report	2.00	590.00
K. L. Ecker	3/11/2022	B110	Review PII site and registration information and draft e-mail to D. M. with investor registration instructions	0.30	61.50
K. L. Ecker	3/11/2022	B110	Update investor contact list with D. M. information	0.20	41.00
J. D. Maglich	3/11/2022	B110	Exchange correspondence with counsel for Nicolosi regarding production of third-party documents	0.30	88.50
J. D. Maglich	3/11/2022	B110	Review correspondence from R. Rodriguez regarding investor contact. (NO CHARGE)	0.10	N/C
K. L. Ecker	3/11/2022	B110	Review instructions from R. Rodriguez to send registration link to investor, D. M.	0.10	20.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	3/14/2022	B110	Continue reviewing relevant documents and drafting Fourth Interim Report	2.50	737.50
J. D. Maglich	3/14/2022	B110	Finalize release of lis pendens and coordinate with K. Ecker to file same. Review new work orders and documents published to Keyes portal	0.30	88.50
K. L. Ecker	3/14/2022	B110	E-mail filed Release of Lis Pendens to L. Brodman and counsel	0.10	20.50
J. D. Maglich	3/14/2022	B110	Telephone call with D.M. regarding case status and claims process and draft memorandum to file regarding same	0.30	88.50
J. D. Maglich	3/14/2022	B110	Attend to and review incoming mail and draft multiple correspondence regarding outstanding items	0.70	206.50
J. D. Maglich	3/14/2022	B110	Confer with Receiver regarding issuance of K-1's and draft correspondence to D. Kaufman regarding same	0.40	118.00
K. L. Ecker	3/14/2022	B110	E-file Release of Lis Pendens for 3050	0.20	41.00
J. D. Maglich	3/15/2022	B110	Telephone and email correspondence with E.W. regarding case status	0.10	29.50
J. D. Maglich	3/15/2022	B110	Continue drafting Fourth Interim Report	2.00	590.00
J. D. Maglich	3/15/2022	B110	Draft and finalize notice regarding sale of 3050 property and prepare for filing	0.80	236.00
J. D. Maglich	3/15/2022	B110	Multiple correspondence with M.Soto regarding case status, claims process, and next steps	0.30	88.50
J. D. Maglich	3/15/2022	B110	Arrange documents for production to counsel for Nicolosi and coordinate with S. Storno regarding same	0.50	147.50
J. D. Maglich	3/15/2022	B110	Exchange correspondence with R.B. regarding issuance of K-1's	0.20	59.00
J. D. Maglich	3/15/2022	B110	Review correspondence from B. Gene regarding closing instructions for 4020 property and payment of utility bills and confer with closing agent regarding same	0.50	147.50
J. D. Maglich	3/16/2022	B110	Exchange correspondence with M. Venereo regarding outstanding questions on monthly reports and status of 3050 lien reduction request	0.50	147.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
J. D. Maglich	3/16/2022	B110	Telephone call with E.W. regarding case status, claims process, and next steps and draft memorandum to file regarding same	0.30	88.50
J. D. Maglich	3/16/2022	B110	Exchange correspondence with closing agent for 4450 property regarding holdback reimbursement and confer with B. Gene regarding same	0.40	118.00
J. D. Maglich	3/21/2022	B110	Review correspondence from H.K, confer with M. Soto regarding same, and prepare voicemail and email correspondence to H.K. regarding same	0.50	147.50
J. D. Maglich	3/22/2022	B110	Review correspondence from mediator regarding 4/5 mediation.	0.20	59.00
J. D. Maglich	3/23/2022	B110	Confer with Receiver and R. Rodriguez regarding upcoming mediation	0.20	59.00
J. D. Maglich	3/24/2022	B110	Review correspondence regarding mediation on 4/5	0.20	59.00
J. D. Maglich	3/25/2022	B110	Confer with H.K. regarding issues with transitioning IRA	0.20	59.00
J. D. Maglich	3/25/2022	B110	Confer with Receiver regarding party defendants' discussions about payment for mediation	0.30	88.50
K. L. Ecker	3/29/2022	B110	Submit check request in preparation to order certified copies of court documents (NO CHARGE)	0.30	N/C
K. L. Ecker	3/29/2022	B110	Telephone conference with clerk of court regarding ordering of certified copies of court documents (NO CHARGE)	0.20	N/C
R. Rodriguez	3/29/2022	B110	Review SEC motion for partial relief from order directing mediation and consent to same.	0.20	59.00
K. L. Ecker	3/29/2022	B110	E-mail to office services with specific instructions for courier to obtain certified copies of court documents. (NO CHARGE)	0.20	N/C
J. D. Maglich	3/30/2022	B110	Telephone call with A. Sum regarding case status. (NO CHARGE)	0.80	N/C
R. Rodriguez	3/31/2022	B110	Email SEC subpoena to E. Murphy and L. Humphries for preparation of response and documentation.	0.10	29.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
R. Rodriguez	3/31/2022	B110	Review and respond to email from J. Maglich regarding response to SEC subpoena.	0.10	29.50
J. D. Maglich	3/31/2022	B110	Continue revising Fourth Interim Report	1.00	295.00
J. D. Maglich	3/31/2022	B110	Begin drafting Fee Application (NO CHARGE)	1.00	N/C
R. Rodriguez	3/31/2022	B110	Maglich motion to withdraw. (NO CHARGE)	0.10	N/C
R. Rodriguez	3/31/2022	B110	Review SEC subpoena.	0.20	59.00
R. Rodriguez	3/31/2022	B110	Review and respond to email from mediator (H. Schaffer) advising that Receiver will not be attending the mediation.	0.10	29.50
J. D. Maglich	3/31/2022	B110	Review subpoena from SEC, gather documents, and confer with Receiver regarding same	1.50	442.50
Subtotal Case A	dministration			55.20	12,660.00
			Total Hours	266.50	

Total Fees \$65,878.00

DESCRIPTION OF COSTS

	Description	Amount
11/27/21	Outside Delivery Services / Messengers, Courier	17.00
01/27/22	Outside Delivery Services / Messengers, Courier	121.50
02/09/22	Express Mail - FedEx - Miranda L. Soto - Tracking #776002057819	45.42
	Total Costs	\$183.92

Amount Due This Invoice:	\$66,061.92
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TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
K. L. Ecker	Paralegal	31.00	205.00	6,355.00
K. L. Ecker	Paralegal	11.80	N/C	N/C
S. M. Enwright	Paralegal	1.40	205.00	287.00
S. M. Enwright	Paralegal	1.00	N/C	N/C
L. Humphries	Associate	2.40	N/C	N/C
J. D. Maglich	Counsel	187.50	295.00	55,312.50
J. D. Maglich	Counsel	17.30	N/C	N/C
R. Rodriguez	Partner	13.30	295.00	3,923.50
R. Rodriguez	Partner	0.80	N/C	N/C
	Total	266.50		65,878.00

EXHIBIT "6c"

Case 0:21-cv-61176-AHS Document 83-10 Entered on FLSD Docket 05/16/2022 Page 2 of 6 Kaufman & Company, PA

1001 Brid	ckell Bay Drive	g Suite 265	50	_g Miami, FL	33131	
Phone: ((305) 455-0314	E-mail:	dkaufman@kaufma	incpas.com	Web: www.	kaufmancpas.com
	Property Income	Investors, LLC		Invoice:	11266	
E	Property Income Ir Buchanan Ingersoll One Biscayne Tow Miami, FL 33131-1	& Rooney PC er, Suite 1500		Date: Due Date:	01/31/2022 03/02/2022	
Litiga	essional service relation Support servi	ces for January 2	2022			31,960.00
ried	se see attached Ti	тье ани ехренѕе	Journal	Billed Time Discount	& Expenses	\$31,960.00 (8,015.00)
				Invoice Tot	al	\$23,945.00
				Beginning Invoices Receipts Adjustmen Service C	ıts	\$13,601.25 23,945.00 0.00 0.00 0.00
				Amount D	•	\$37,546.25
<u>(</u>	<u>01/31/2022</u> 23,945.00	12/31/2021 2,088.75	11/30/2021 4,642.50	<u>10/31/2021</u> 6,870.00	<u>09/30/202</u> 0.	<u>1+</u> <u>Tota</u> 00 \$37,546.25
Please ı	return this portion	with payment.			Invoice:	11266
F	D: J507800 Property Income Ir (305) 347-4086	nvestors, LLC			Date: Due Date:	01/31/2022 03/02/2022
C	Card Type:	CSV:	Exp Date:	Amo	ount Due:	\$37,546.25
C	Card #:			Amo	ount Enclosed:	\$
5	Signature:					

Time & Expense Journal January 2022

		Hours	Rate	
HF	1/6/2022	0.50	\$ 200	\$ 100.00
HF	1/17/2022	2.50	200	500.00
HF	1/18/2022	0.30	200	60.00
DMK	1/24/2022	6.00	400	2,400.00
HF	1/25/2022	0.70	200	140.00
HF	1/25/2022	1.20	200	240.00
HF	1/25/2022	2.50	200	500.00
HF	1/25/2022	0.50	200	100.00
HF	1/26/2022	1.30	200	260.00
HF	1/27/2022	0.70	200	140.00
HF	1/28/2022	2.20	200	440.00
MO	1/5/2022	0.50	400	200.00
MO	1/6/2022	2.00	400	800.00
MO	1/7/2022	3.00	400	1,200.00
MO	1/8/2022	2.00	400	800.00
MO	1/8/2022	2.00	400	800.00
MO	1/8/2022	5.30	400	2,120.00
MO	1/10/2022	6.00	400	2,400.00
MO	1/11/2002	4.80	400	1,920.00
MO	1/11/2022	3.60	400	1,440.00
MO	1/12/2022	1.30	400	520.00
MO	1/13/2022	3.00	400	1,200.00
MO	1/14/2022	2.80	400	1,120.00
MO	1/15/2022	6.80	400	2,720.00
MO	1/16/2022	5.80	400	2,320.00
MO	1/17/2022	5.00	400	2,000.00
MO	1/17/2022	4.30	400	1,720.00
MO	1/18/2022	2.70	400	1,080.00
MO	1/18/2022	2.30	400	920.00
MO	1/19/2022	0.20	400	80.00
MO	1/19/2022	2.10	400	840.00
MO	1/19/2022	0.20	400	80.00
MO	1/20/2022	0.30	400	120.00
MO	1/25/2022	0.80	400	320.00
HF	1/31/2022	1.80	200	360.00
		87.00		31,960.00
			Discount	(8,015.00)
			Balance	\$23,945.00

Kaufman & Company, PA

Time & Expense Journal January 1, 2022 - January 31, 2022

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate Description	Hrs/Units	Comments
January 6,		<u> </u>			,	7,1 -		,	,	
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/06/22	1	0.50	Downloading the bank statements for Q4 SFAR
January 6, 2	.022								0.50	
January 17	, 2022									
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/17/22	1	2.50	Reviewing PII with Mike and Dana and preparing PII 417 investor statements
January 17,	2022								2.50	
January 18	3, 2022									
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/18/22	1	0.30	Updating 417 PII records
January 18,	2022								0.30	
January 24	l, 2022									
DMK	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/24/22	1	6.00	update report review investor statements reconcile between bank stmts; files and tax returns
January 24,	2022								6.00	
January 25	5, 2022									
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/25/22	1	0.70	Zoom meeting with Jordan
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/25/22	1	1.20	Setting up 9 PII entities in UT to prepare extensions for 2021 1065 returns and savings all HUDs to each PII client fodler in FCS
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/25/22	1	2.50	Going through bank statements for all entities to make list of all other vendors who were paid through PII that were not investors, per request by Jordan
DMK	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/25/22	1	0.50	conf call
January 25,	2022								4.90	
January 26	5, 2022									

Kaufman & Company, PA

Time & Expense Journal January 1, 2022 - January 31, 2022

Staff	Client	Description	Engagement	Project	Activity	Туре	Date	Rate Description	Hrs/Units	Comments
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/26/22	1	1.30	Continuing going through bank statements to identify all vendors for payments not classed as investors
January 26	5, 2022								1.30	
January 2	27, 2022									
HF	J507800	Property Income Investors, LLC	LIT		1100	Time	01/27/22	1	0.70	Finishing summary of non-investor payments as requested by Jordan
January 27	7, 2022								0.70	
January 2	28, 2022									
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/28/22	1	2.20	Updating list of non investors for Equinox since 2013 as requested by Jordan
January 28	3, 2022								2.20	
January 3	31, 2022									
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/05/22	1	0.50	block out Q4 SFAR
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/06/22	1	2.00	Investor statements for claims register - 201
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/07/22	1	3.00	Investor statment for claims register - 304
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/08/22	1	2.00	Analyze quarterly documents to prepare standard financial accounting report. emai to Benji to get additional reports and clarification of certain amounts reflected in the reports
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/08/22	1	2.00	Continue Investor statment for claims register - 304
40	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/08/22	1	5.30	Investor files for claims register
10	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/10/22	1	6.00	Investor files for claims register
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/11/22	1	4.80	Prepare SFAR
10	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/11/22	1	3.60	Investor files for claims register
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/12/22	1	1.30	Edit SFAR for comments by Mr. Maglich
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/13/22	1	3.00	Investor files for claim register
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/14/22	1	2.80	Investor files for claim register
OP	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/15/22	1	6.80	Investor files for claim register
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/16/22	1	5.80	Investor files for claim register

Kaufman & Company, PA

Time & Expense Journal January 1, 2022 - January 31, 2022

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate Description	Hrs/Units	Comments
МО	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/17/22	1	5.00	Review and reconciliation with DMK
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/17/22	1	4.30	Prepare Equinox statements
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/18/22	1	2.70	Math check statements for previously prepared statements
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/18/22	1	2.30	Edit statements
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/19/22	1	0.20	email workproduct
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/19/22	1	2.10	Finish making edits to word documents
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/19/22	1	0.20	Review Equinox file with DMK
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	01/20/22	1	0.30	emails re draft reports sent
MO	J507800	Property Income Investors, LLC	DEFAULT		LIT	Time	01/25/22	1	0.80	call re claims and other matters
HF	J507800	Property Income Investors, LLC	LIT		LIT	Time	01/31/22	1	1.80	Updating non-investor withdrawal list for Equinox
January 31, 2022									68.60	
	Report Totals								87.00	

EXHIBIT "7"

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 21-61176-CIV-SINGHAL

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.

ORDER GRANTING RECEIVER'S UNOPPOSED FOURTH INTERIM OMNIBUS APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR JANUARY 1, 2022 – MARCH 31, 2022

THIS CAUSE came before the Court on Miranda L. Soto, as Receiver's (the "Receiver") Unopposed Fourth Interim Omnibus Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for January 1, 2022 through March 31, 2022 (Doc. __) (the "Application"). With the Court having considered the Application, reviewed the file, and finding that cause exists to grant the Application, it is hereby **ORDERED** as follows:

1.	The An	plication	is	GRANTED.
1.	THE TIP	piication	10	GIUITI LD.

2. The Court awards the following sums and directs that payment be made from Receivership assets:

Miranda L. Soto, as Receiver	\$25,652.53
Buchanan Ingersoll & Rooney PC	\$66,061.92
Kaufman & Company PA	\$23,945.00

DONE and ORDERED this _____ day of ______, 2022 in the Southern District of Florida.

UNITED STATES DISTRICT COURT JUDGE

4854-0715-4972, v. 1