

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.

**NINTH INTERIM OMNIBUS APPLICATION FOR ALLOWANCE AND
PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES
FOR APRIL 1, 2023 – JUNE 30, 2023 PERIOD¹**

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 ¶ 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 April 1, 2023, through June 30, 2023 (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 continue 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 **\$79,857.00** to the Receiver and the professionals she engaged for fees incurred and reimbursement of **\$2,586.73** in expenses for a total payment of **\$82,443.73**. This Application includes time billed from April 1, 2023 through June 30, 2023. 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:

- Prepared Motion to Approve Claims Determination of Receiver and Pool Receivership Assets and Liabilities, including working closely with Receiver's professionals to finalize distribution claims recommendations on claimant investor specific basis;
- Worked with Receiver's CPA professionals to determine the extent of claims determinations to present a claims analysis to the Court, including an evaluation of the transfers of money between Equinox and PII entities, the calculations for investor claims, issues with tax returns for the PII Entities, K1s for the PII Entities, and addressing individual investor concerns regarding taxes;
- Continued to analyze and review documentation for claimant investor who disputed calculations and reviewed supplemental information provided in support of claimed investment calculations with Receiver's CPA professionals;
- Communicated with Receiver's CPA professionals regarding guidance on annual reports for Receivership entities, Department of Revenue letters, and tax documents related to the Receivership accounts;
- Updated Receiver's website and communicated regularly with investors regarding status of review of claimant documents and Receivership;
- Continued investigation into operation of Receivership Entities, including analysis of business operations, investor files and offering documents, and financial activity;
- Negotiated a tolling agreement with a third party related to potential malpractice claim;
- Continued review of potential third-party claims to recover investor assets wrongfully misappropriated and/or fraudulently transferred;
- Responded to phone calls and written communications from investors, other interested parties and/or their representatives; and,
- Prepared and filed the Receiver's Eighth Interim Report on May 15, 2023 (Doc. 111), which provided a comprehensive summary, analysis, and supporting documentation of the Receiver's observations, continuing investigation, and contemplated next steps.

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

The above activities are discussed in detail in the Receiver's Ninth Interim Report, which was filed on July 31, 2023 (Doc. 114) (the "Ninth Report"), and more fully describes 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 contemplated litigation involving Receivership Entities. The Ninth Report and previous Reports are available at www.propertyireceivership.com. The Receiver incorporates the Eighth 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.³ with the law firm of Buchanan Ingersoll &

³Lauren V. Humphries, Esq. of Buchanan Ingersoll & Rooney PC replaced Jordan D. Maglich as Receiver’s counsel when Mr. Maglich joined the litigation department of Raymond James Financial, Inc.

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:** April 1, 2023 – June 30, 2023.
- (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

Exhibit 4: Total compensation and expenses requested; any amounts previously requested; and total compensation and expenses previously awarded

Exhibit 5: 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)

Exhibit 5(b): 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. Case Status

(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 **\$4,865,011.46**. 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 (iv) proceeds of the sales of all real property including: (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; (iv) 4020 Riverside Drive, Coral Springs, Florida 33065; (v) 4450 Coral Springs Drive, Coral Springs, FL, 33065; (vi) 3050 Coral Springs Drive, Coral Springs, FL, 33065; and (vii) 201 East 30th Street, Riviera Beach, FL, 33404. 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, requesting and

obtaining Court approval for a claims process framework and sending out claims packets to 158 investors. At this time, 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 was posted on the Receiver's website at www.propertyreceivership.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. On April 14, 2022, the Court granted the Claims Motion. (Doc. 77).

On June 30, 2022, the Receiver sent out claims forms, together with instructions on submitting 158 claims. The bar date for submitting claims was September 28, 2022. The Receiver and her counsel received and responded to numerous calls and emails from investors with questions regarding the claims process, as well as new information regarding the investments in the Receivership Properties. The Receiver has already commenced review of all timely submitted claims and will 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 dissatisfied with the Court's approval of the Receiver's determination of their claim.

(d) Description of assets

In addition 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 Ninth Interim Report attached hereto as **Exhibit 2**.

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

The Receiver continues to evaluate the 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 Rooney PC

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. Maglich⁴ to serve as her legal counsel (collectively, the Receiver's "Counsel").⁵ 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 Application, these discounts resulted in a total reduction of at least \$50,000 from the rates customarily charged by Buchanan Ingersoll attorneys to clients.

During the applicable fee period, the standard hourly rate which the Receiver charges clients ranges from \$555 to \$750. 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 **53.1** hours of legal services⁶ but only seeks compensation for 53 hours, which totals **\$15,635.00** in legal fees. The Receiver incurred expenses in the amount of **\$2,586.73**. A copy of the statement

⁴ 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. Lauren V. Humphries, an attorney in the firm's Tampa office, has assumed Mr. Maglich's role in the case.

⁵ The Receiver was subsequently authorized to utilize additional Buchanan Ingersoll professionals where necessary and at a similar rate discount. (Doc. 19.)

⁶ Receiver's paralegal expended 3 hours of legal services on behalf of the Receiver, which is reflected on the invoice for Receiver's services.

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 from April 1, 2023, through June 30, 2023, in the amount of **\$18,221.73**.

During the period covered by this Application, Buchanan Ingersoll billed **172.50** hours in assisting the Receiver in fulfilling her duties under the Order Appointing Receiver but only seeks compensation for **165.8** of those hours, which totals **\$39,562.00** in legal fees. Each of the Receiver's primary Counsel agreed to reduce their hourly rate to \$295.00 per hour, which is significantly less than the hourly rate charged during the applicable period by Raquel A. Rodriguez (\$995.00 per hour) and Lauren V. Humphries (\$450.00 per hour). Whenever 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 April 1, 2023, through June 30, 2023, in the amount of **\$39,562**.

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 Ninth 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. Kaufman's work already has been materially helpful to the Receiver in providing the necessary calculations of net losses per

investor. Kaufman also prepared the K-1's due to investors for 2021 as well as tax returns for each of the Receivership Entities for the tax years 2020 and 2021. Kaufman is in the process of preparing amended K-1s for 2022.

During the period covered by this Application, Kaufman expended 85.9 hours in the sum of **\$24,660.00** in fees and \$0 in costs, for assisting the Receiver in fulfilling her duties under the Order Appointing Receiver. A copy of the full composite 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 April 1, 2023, through June 30, 2023 for a total amount of **\$24,660.00**.

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	\$18,221.73
Buchanan Ingersoll & Rooney PC	\$39,562.00
Kaufman & Company	\$24,660.00
Total:	\$82,443.73

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

A handwritten signature in blue ink that reads "Lauren Humphries". The signature is written in a cursive style and is positioned above a horizontal line.

Lauren Humphries
Florida Bar No.: 117517
Raquel A. Rodriguez
Florida Bar No.: 511439
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Attorneys for Receiver Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2023, 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 August 15, 2023, 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



Attorney

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 4/1/2023 to 06/30/2023

KAUFMAN & COMPANY P.A.
CERTIFIED PUBLIC ACCOUNTANTS
EXPERIENCE • INTEGRITY • TRUST

**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 April 1, 2023 to June 30, 2023 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.

Kaufman & Company P.A.

Kaufman & Company P.A.
Miami, FL
July 12, 2023

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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 4/1/2023 to 6/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 04/1/2023):			\$ 4,917,360
<i>Increases in Fund Balance:</i>				
Line 2	Business Income			
Line 3	Cash and Securities			
Line 4	Interest/Dividend Income	Schedule 14a - 2	20,561	
Line 5	Business Asset Liquidation	Schedule 14a - 2 (Sub 2 of 6)	300	
Line 6	Personal Asset Liquidation			
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other			
Total Funds Available (Line 1 - 8):			20,861	4,938,221
<i>Decreases in Fund Balance:</i>				
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	Schedule 10a	(79,871)	
Line 10b	Business Asset Expenses	Schedule 14a - 1	(212)	
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses			
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
Total Disbursements for Receivership Operations			(80,083)	(80,083)
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	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:			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses			
Total Disbursements for Distribution Expenses Paid by the Fund				
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees			
Line 12b	Federal Tax Payments			
Total Disbursements to Court/Other:				
Total Funds Disbursed (Lines 9 - 11)				(80,083)
Line 13	Ending Balance (As of 06/30/2023)			\$ 4,858,138

*

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 4/1/2023 to 6/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	14a	\$ 1,607,826	
Line 14b	Investments	14b	3,250,312	
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$ 4,858,138
OTHER SUPPLEMENTAL INFORMATION:		Detail	Subtotal	Grand Total
Line 15	Report of Items Not To Be Paid by the Fund			
	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 15a	Plan Development Expenses Not Paid by the Fund			
	1. 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			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. 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 Fund			
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 Fund			
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 19b	# of Claimants/Investors Paid Since Inception of Fund			

Receiver:
 By: _____
 Title _____
 Date _____

Schedule 10a

**Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023
Disbursements to Receiver or Other Professionals**

Disbursements made from:

Receivership Money Market *from Schedule 14a-2* (79,871)

Total Disbursements to Receiver or Other Professionals \$ (79,871)
to Page 1 Line 10a

Schedule 14a

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
 Reporting Period 4/1/2023 to 6/30/2023

	<i>Reference</i>	
Receivership Operating account	14a - 1	\$ 24,596
Money Market account	14a - 2	3,250,312
1361 LLC Checking account	14a - 1 (sub 1 of 6)	1,083
Property Income Investors LLC Check	14a - 1 (sub 2 of 6)	11,946
4020 LLC Checking account	14a - 1 (sub 3 of 6)	844
3504 LLC Checking account	14a - 1 (sub 4 of 6)	123
4450 LLC Checking account	14a - 1 (sub 5 of 6)	-
304 LLC Checking Account	14a - 1 (sub 6 of 6)	1,569,233
		-
Total Cash and investments		<u>\$ 4,858,138</u>
Cash in receivership accounts		\$ 1,607,826 <i>to Page 2</i>
Investments		<u>3,250,312</u> <i>to Schedule 14b</i>
Total Cash and investments		<u>\$ 4,858,138</u>

Schedule 14b

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Money Market account

14a - 2

\$ 3,250,312 *from Schedule 14a*

To Page 2

Schedule 14a -1

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
 Reporting Period 4/1/2023 to 6/30/2023

Activity in Receivership Operating Bank Account

Balance 4/1/2023		\$	24,738	
Deposit -				
6/7/2023 Transfer from Money Market Account			79,871	Schedule 14a - 2
Professional Fees -				
BIPC - Legal	\$	(52,620)		
Kaufman & Company - Accounting		<u>(27,251)</u>		
			(79,871)	to Schedule 10a
Quickbooks				
April	30			
May	30			
June	<u>30</u>			
	90		(90)	(a)
Bank Charges				
April	21			
May	11			
June	<u>21</u>			
	52		<u>(52)</u>	(a)
Balance 6/30/23		\$	<u>24,596</u>	to Schedule 14a

Business Expenses

(a) Business expenses for the quarter ended 6/30/2023 - above	(a)	\$	(142)	above
(b) Business expenses for the quarter ended 6/30/2023 (b)	<i>Schedule 14a-2</i>		<u>(70)</u>	
Total Business Expenses for the quarter ended June 30, 2023		\$	<u>(212)</u>	to Page 1, Line 10b

Schedule 14a - 2

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in Receivership Money Market Account

Balance 4/1/2023		\$	3,309,623	
Interest income				
April	6,807			
May	7,049			
June	6,704			
Interest for the quarter			20,561	<i>to Line 4 Interest/Dividend Income</i>
Transfer to Checking Account	6/7/2023		(79,871)	<i>to Schedule 14a-1</i>
Balance 6/30/23		\$	3,250,312	

Schedule 14a - 2 (Sub 1 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in 1361 LLC Checking Account ac 9029

Balance 4/1/2023 \$ 1,083

NO ACTIVITY FOR THE PERIOD

Balance 6/30/23 *to Sch 14a* \$ 1,083

Schedule 14a - 2 (Sub 2 of 6)

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in Property Income Investors LLC Checking Account ac 895:

Balance 4/1/2023			\$ 11,716	
6/16/2023	PII 9007 Refund of Water Deposit		300	to p 1, Line 5
6/22/2023	K-Tek Website Hosting		(70)	(b)
			<u>230</u>	
Balance 6/30/23			<u>\$ 11,946</u>	to Sch 14a

Business Expenses

(b) Business expenses for the quarter ended 6/30/2023 (b) \$ (70) to Schedule 14a-1

Schedule 14a - 2 (Sub 3 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in 4020 LLC Checking Account ac 9037

Balance 4/1/2023 \$ 844

NO ACTIVITY FOR THE PERIOD

Balance 6/30/23 *to Sch 14a* \$ 844

Schedule 14a - 2 (Sub 4 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in 3504 LLC Checking Account ac 9011

Balance 4/1/2023 \$ 123

NO ACTIVITY FOR THE PERIOD

Balance 6/30/23 *to Sch 14a* \$ 123

Schedule 14a - 2 (Sub 5 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in 4450 LLC Checking Account ac 9078

Balance 4/1/2023 \$ -

NO ACTIVITY FOR THE PERIOD

Balance 6/30/23 *to Sch 14a* \$ -

Schedule 14a - 2 (Sub 6 of 6)

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 4/1/2023 to 6/30/2023

Activity in 304 LLC Checking Account ac 8989

Balance 4/1/2023 \$ 1,569,232.89

NO ACTIVITY FOR THE PERIOD

Balance 6/30/23 *to Sch 14a* \$ 1,569,232.89

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 9007, LLC,
PROPERTY INCOME INVESTORS 417, LLC,
PROPERTY INCOME INVESTORS 4450, LLC,
PROPERTY INCOME INVESTORS 3050, LLC,
LARRY B. BRODMAN and ANTHONY
NICOLSI (f/k/a ANTHONY PELUSO),

Defendants.

RECEIVER'S NINTH INTERIM QUARTERLY REPORT

(Period Covered: April 1, 2023 – June 30, 2023)

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), hereby files her Ninth Interim Report to inform the Court, investors, and interested parties of the significant activities undertaken from **April 1, 2023 to June 30, 2023 (the “Reporting Period”)**, as well as proposed courses of action moving forward.

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I. INTRODUCTION

A. Overview of Significant Activities During Reporting Period

During the time period covered by this Report (April 1, 2023 through June 30, 2023), the Receiver and her counsel have engaged in significant activities including but not limited to:

- The Receiver anticipates filing her Motion to Approve Claims Determination of Receiver and Pool Receivership Assets and Liabilities in the next reporting period;
- Worked with Receiver's CPA professionals to determine the extent of claims determinations to present a claims analysis to the Court, including an evaluation of the transfers of money between Equinox and PII entities, the calculations for investor claims, issues with tax returns for the PII Entities, K1s for the PII Entities, and addressing individual investor concerns regarding taxes;
- Continued to analyze and review documentation for claimant investor who disputed calculations and reviewed supplemental information provided in support of claimed investment calculations with Receiver's CPA professionals;
- Communicated with Receiver's CPA professionals regarding guidance on annual reports for Receivership entities, Department of Revenue letters, and tax documents related to the Receivership accounts;
- Updated Receiver's website and communicated regularly with investors regarding status of review of claimant documents and Receivership;
- Continued investigation into operation of Receivership Entities, including analysis of business operations, investor files and offering documents, and financial activity;
- Negotiated a tolling agreement with a third party and continued correspondence with their insurance carrier related to potential legal malpractice claim(s) for firm involved in real estate transactions of Receivership Defendants prior to appointment of Receiver;
- Continued review of potential third-party claims to recover investor assets wrongfully misappropriated and/or fraudulently transferred;
- Responded to phone calls and written communications from investors, other interested parties and/or their representatives; and,
- Prepared and filed the Receiver's Eighth Interim Report on May 15, 2023 (Doc. 111), which provided a comprehensive summary, analysis, and supporting documentation of the Receiver's observations, continuing investigation, and contemplated next steps.

The above referenced activities are discussed in more detail in the pertinent sections of this 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 mediated this case on April 5, 2022, which resulted in an impasse. (Doc. 47.) Subsequently, on October 3, 2022, the Commission reached an agreement with each individual Defendant. Pursuant

to this settlement, the Court entered judgments against both individual Defendants as follows: (1) \$414,813.00 against Defendant Nicolosi and (2) \$1,594,265.00 against Defendant Brodman. (Doc. 104-105.) Pursuant to the Judgments, the Defendants were ordered to pay the above-stated amounts to the Receiver. Since these judgments have been entered, the Receiver and her staff have communicated with the Commission that the Receiver is willing assist in any requested to help enforce the judgments against the Defendants and collect for the Receivership Estate.

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. Finalized Claims Determination Motion for Valid Investor Claimants to request Court Approval for Distribution Process.

As detailed in previous Reports, the Receiver previously filed 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") on December 31, 2021. The Claims Motion is available on the Receiver's website at www.propertyreceivership.com. In this 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 approved and entered an Order granting the Claims Motion. (Doc. 77). Once the Receiver received approval from the Court, the Receiver took all action to effectuate the claims process including the mailing of 158 investor claims packets, which explained the claims process, provided a preliminary calculation of each investor's claim (for

investors with documentation in the Receivership’s possession), and requested that individual investors complete a questionnaire (the “Claims Form”) and provided documentation to establish their respective claims. The preparation of the claim amounts required having Receiver’s professionals sort through extensive and often incomplete company documents to reconcile invested sums with any dividends or other payouts recorded as having been sent to investors. The Receiver’s professionals also had to engage in open-source research to verify correct mailing addresses for about a half dozen investors whose addresses were not accepted by the UPS website for delivery labels, which required sending their packages for delivery by United States Post. As required in the Order, the Receiver also caused notices of the claims process to be published in two newspapers – the Sun Sentinel of Fort Lauderdale, Florida and the Wall Street Journal. The Receiver published announcements regarding the publication on the Receiver’s website.

The Receiver distributed 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.¹ The deadline to submit a claim occurred on the Claims Bar Date: September 28, 2022. During this process, there were several questions that investors raised, which required the Receiver and/or her attorneys to discuss with specific investors and resolve. Of the packets sent to Claimants, 117 packets were returned timely to the Receiver and her staff. While 82 investors agreed with the Proof of Claim Form determination that was put forward by the Kaufman Professionals, 35 investors disputed the Proof of Claim Amount that was contained in their Proof of Claim forms. Specifically, 9 investors from the Equinox pool of investors and 24 investors from the PII pool of investors disputed the claims amount. The Receiver and her professionals commenced review and analysis of the claims and documentation submitted to

¹ A sample claims packet is located on the Receiver’s website at www.propertyreceivership.com.

reconcile these claims with company records obtained by the Receiver. This review included follow up communications with investors regarding their claims submissions or responding to investor questions about the Receiver's plans for distributions.

The Receiver anticipates filing this Motion within the next Reporting Period.

ii. Negotiated Tolling Agreement with Third-Party to Recover Insurance Proceeds for Potential Malpractice related to Real Estate Transactions.

During the Reporting Period, the Receiver and her professionals continued to evaluate potential third-party actions against professionals who worked with Receivership Defendants prior to the appointment of the Receiver. To ensure that the Receivership maintains all ability to bring litigation against third parties, the Receiver has negotiated several tolling agreements to ensure that statute of limitations will not bar any legal action that may be brought by the Receiver. To date, the Receiver has negotiated and obtained fully executed Tolling Agreements with a third-party law firm and an accounting practice. The Receiver has been in communication with one of the legal malpractice insurance carriers for one of the third parties. While the Receiver continues her investigation as to whether litigation will become necessary to recover against these individuals, the Tolling Agreement allows the third parties to evaluate the potential claim against them in advance of any formal litigation.

iii. Continued to work with Receiver's Professionals to evaluate the Flow of Funds between Receivership Defendants and Address Tax Issues regarding the Entities.

During the Reporting Period, the Receiver and her professional worked diligently to continue their investigation to finalize the claims determination for valid investor claimants. This work involved continued reconciling of the disputed claims and analyzing copious documents that were sent by individual investors to support their individual claim amounts. The Receiver, after reviewing the supporting documents, provided these documents to the Kaufman Professionals to

reconcile the amounts owed and determine the flow of funds between the Receivership Defendants. In their review of investor documentation and the documents provided by the Receiver and Commission in the investigation that took place at the start of the Receivership, the Kaufman Professionals used their knowledge and expertise to reconcile differences between the Receiver's preliminary claims assessments and the claims submitted, for the Receiver's review. In addition to assisting with the analysis of the Final Claims Determination, the Kaufman Professional also prepared K1s (investor tax returns) for the Entities and individual claimants.

Further, the Receiver has worked with individual investors to address specific tax concerns in documents that were incorrectly prepared or contained incorrect information prior the Receiver taking control of the Receivership Entities. Due to the actions of the Receivership Defendants prior to the Receivership, the IRS had provided several tax penalties that totaled over \$200,000.00. The Receiver, through her work with the Kaufman Professionals, successfully abated all penalties to save the investor claimants these funds. The penalties were abated as follows:

PENALTIES ABATED:

PII LLC	\$63,000
PII 4450	\$37,800
PII 9007	\$25,200
PII 304	\$75,600
PII 3504	\$42,840

The services provided by the Kaufman Professionals have been instrumental to helping the Receiver understand and account for the flow of funds between the various entities and have assisted the Receiver in developing her recommendations to the Court. Additionally, the Kaufman Professionals have greatly aided the Receiver in achieving the tax abatements with the IRS for the Receivership Entities. The Receiver has received correspondence from the IRS related to activities

of the PII Entities prior to Receiver's appointment. The Receiver has worked diligently with the Kaufman Professionals to respond and address all issues raised by the IRS related to the entities in this Receivership.

iv. Securing Receivership Estate Personal Property

a. Bank Accounts and Cash Proceeds

As reported in detail in previous Reports, the Receiver opened 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 ServisFirst Accounts allow the pool of Receivership funds to continue to gain interest while the Receiver determines the appropriate method to distribute funds. As of the date of the filing of this Report, the total balance of the ServisFirst Accounts was **\$4,858,114.08.**

b. Other Personal Property

The Receiver continues to maintain and store the various company documents, collectible items, and computer hardware that were previously removed from the storage unit. The Receiver has been working to liquidate the remaining Personal Property in the most cost-effective manner to bring in funds to the Receivership Estate. The Receiver intends to list collectible property on a public forum that will bring in monetary funds to the Receivership pool of funds within this calendar year.

v. Securing and Maintaining Receivership Real Property

a. Managing and Maintaining Real Property Assets

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 discussed in previous Interim Status

Reports. (Doc. 63, 81, 99.) All of the Receivership properties have been sold and the money has been brought into the pool of funds in the Receivership.

vi. Reviewed Receivership Documentation to Determine the Extent of Commingling and to Evaluate Treatment of Equinox Investors.

The Receiver and her professionals continue 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 the Kaufman Professionals 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.

A main consideration currently before the Receiver is the transfer of funds between Equinox Holding Inc. and the Property Income Investor Entities. The inclusion of Equinox investments predating the formation of PII Entities has been considered by the Kaufman Professionals and is being reviewed by the Receiver. Ultimately, the Receiver will determine the appropriate and equitable distribution to the investors as per her Claims Analysis. In addition to reviewing the flow of funds, the Receiver 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. The Receiver continues to work with her professionals to identify third parties who may have assisted the Defendants in any nefarious

activities related to the Receivership Entities. If litigation is warranted against any third parties, the Receiver will request authority from the court to move forward with same.

vii. Continued Outreach with Investors and Interested Parties

The Receiver and her counsel have been in contact with a substantial number of investors during the post-claims process period. 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.propertyireceivership.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. The Receiver's staff spent a great deal of time speaking with investors regarding the completion of the Proof of Claims form and the information details in the Claims Process instructions. Throughout the Claims Process, the Receiver's counsel continues to speak regularly with investors regarding the status of the litigation and the ongoing work being completed by the Receiver's Professionals.

viii. The Equinox and Property Income Investors Offerings

a. The Equinox Offering

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.² Mr. Rosenfeld resigned from Equinox later in 2013,³ and Mr. Brodman is listed as the company’s CEO in its 2013 amended annual report.⁴ As of the February 2016 annual report, Mr. Brodman was the only listed officer and director for Equinox.⁵

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

²<http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2013%5C0906%5C00195349.Tif&documentNumber=P12000094600>

³<http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2013%5C1115%5C53565093.Tif&documentNumber=P12000094600>

⁴<http://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-p12000094600-0a7d4e41-25ed-485b-a8ff-a26d32f50db3&transactionId=p12000094600-464d4b95-cc3d-49f7-82a3-b7b539b9ab37&formatType=PDF>

⁵<http://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-p12000094600-0a7d4e41-25ed-485b-a8ff-a26d32f50db3&transactionId=p12000094600-494ca438-0bf0-4b90-96a2-5f9d7fba3024&formatType=PDF>

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 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 up to the Receiver’s appointment. The Receiver’s analysis of Equinox Holdings Inc.’s bank statements and corporate financial records establishes that Equinox Holdings, Inc. used investor funds to pay salaries to Brodman and all PII employees, expenses for many or all of the PII Entities, compensation to Nicolosi’s company, and personal expenses of Brodman.

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).⁶ 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 other sales

⁶ 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.

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 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").⁷ 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."

⁷ As discussed below in Section V.B., it does not appear that the PII PPM was provided to a significant number of investors.

- “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 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.

ix. The Promoters Used Equinox Investments, Inc. as Their Vehicle for Soliciting Investors in Property Income Investors, Paying Expenses of the PII Entities, Paying Themselves and Making “Distributions” All While Comingling Assets of the PII Entities Under the Guise of “Loans” Without Following Established Business Practice.

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.⁸ 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:

“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

⁸ Mr. Brodman is believed to be the sole Class A Member of all PII entities.

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 **over \$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.⁹

⁹ 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.

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 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.

x. 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 Equinox Holdings 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 year preceding the Receivership. Brodman also granted generous pay raises and bonuses to the Companies' primary administrative employee, Cindy Lieberman, amounting to nearly \$500,000 in salary during the same period – including a

salary of \$93,900 in 2019 and \$107,000 in 2020. Based on our review of records and Ms. Lieberman's deposition testimony, we do not believe her acceptance of this compensation was inappropriate. Her knowledge of the operations of the entities and the responsibilities placed upon her (for which she had no prior formal training) satisfied the Receiver that she provided the services for which she was being compensated but lacked sufficient knowledge and financial sophistication to understand that Mr. Brodman, Mr. Nicolosi and their sales agents were defrauding investors. This is reinforced by the fact that she relied on the accounting firm Coleman & Cohen, LLC, which routinely collected company records for reconciliation of company accounts.

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.

xi. 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 the Receiver believes to be Mr. Brodman’s nephew, Defendant Nicolosi, and several other individuals that were apparently affiliated with Nicolosi’s company, CMP. CMP received regular payments from Equinox throughout a substantial portion of the existence of the PII Entities. CMP in turn paid funds out to Nicolosi and the sales agents who procured PII investors. In a previous filing with the Commission, CMP was

described as “a brokerage firm” and listed Nicolosi as its CEO.¹⁰ 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. Mr. Nicolosi testified in his deposition Peluso was the surname of his adoptive family and Nicolosi was his birth name. 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.¹¹ None of this was disclosed in the PPM’s the Receiver and her professionals have been able to obtain.

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

¹⁰ See https://www.sec.gov/Archives/edgar/data/1140303/000135448811001230/mcth_10ka.htm

¹¹ See <https://asc.alabama.gov/Orders/2010/CD-2010-0062.PDF>

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.

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

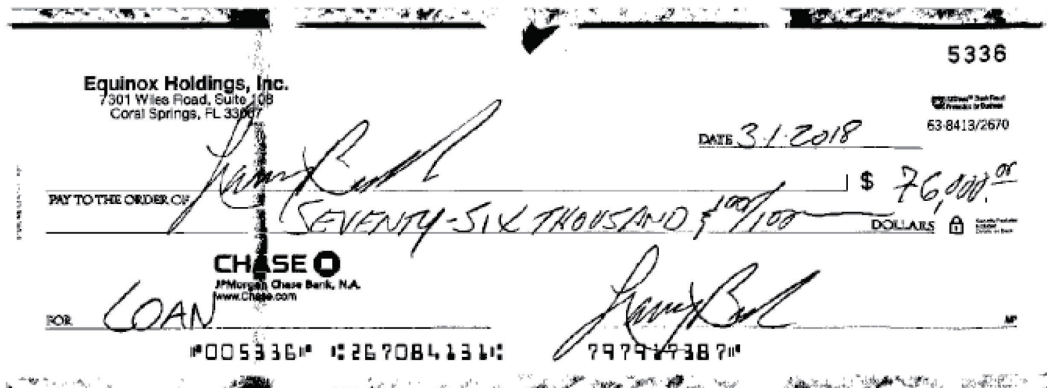
A preliminary analysis conducted by the Receiver's forensic accountants indicates that approximately \$9 million was raised from at least 150 investors during the relevant time period. The Receiver has seen significant evidence that investor funds were routinely commingled between the Receivership Entities' 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 also seen bank statements showing how an investor's funds would be wired into one entity and would, almost immediately or shortly thereafter, be wired to another entity. Bank records also demonstrate how funds were transferred to entities whose bank funds were running low to the point of insolvency from other entities. No formal loan documentation, company resolutions or meeting minutes were produced, despite the accounting firm's subsequent characterization of these transfers as "inter-company" loans. Nor do

the financial statements or tax returns evidence payment of any actual or imputed interest from one entity to another for these “loans”. 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. 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. After reviewing Ms. Lieberman’s deposition along with the investigation already completed by the Kaufman Professionals, the Receiver does not believe that it is a good use of time and resources to continue to task her accounting professional with unwinding the transactions. Moreover, based on the financial records reviewed and the Receiver’s analysis of the way in which Brodman managed the Receivership Entities, it is apparent that corporate formalities were ignored and misused, transfers were made between companies without valid consideration, these transfers rendered the transferor company insolvent on either a balance sheet or going concern basis, and that the entities were part of a coordinated scheme to defraud.

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 2018.¹² 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.

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

¹² Indeed, at least one wire transfer in the amount of \$50,000 specifically includes the address for the 417 Property in the wire details.

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, 2020.¹³ 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 **none of the funds were used to purchase any real estate.** 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 distribution checks to investors. **In other words, money from new investors was used to pay purported distributions to existing investors that was represented to be income from**

¹³ 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 any attorney hired by Mr. Brodman for himself.

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.

xiii. 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. We have since learned Mr. Brodman sought to buy this property for his wife, who had two horses. 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. The Receiver is looking into whether there is a cost-effective way to attempt to claw back these funds without investing considerable Receivership resources to accomplish this goal. Based upon information obtained at Ms. Lieberman's deposition, the Receiver and her Counsel are conducting further investigation surrounding the real estate transactions.

IV. THE NEXT QUARTER

A. Investigation

The Properties (along with the \$1.15 million in sale proceeds that were being held in trust at the time of the Receiver's appointment) represented the largest material asset that are attributable to investor funds. With the assistance of retained professionals, the Receiver will continue to gather and review relevant documents from the Receivership Entities and third parties to determine if there are other viable claims. The Receiver is currently moving forward with third-party claims and has served notices to some of those third parties.

The Receiver continues to work diligently on reviewing the transfer of funds between entities with her professionals and determine, in her discretion, the most equitable recommendation to the Court for compensating defrauded investors. Part of this investigation involves allowing her forensic accountants complete their analysis of all investor transactions and the flow of funds, a necessary task to assess and administer the Court-approved claims process and to receive final approval for the Claims Determinations for individual investors. In reviewing, analyzing, and compiling this information, the Receiver has requested that investors provide copies of relevant documentation evidencing their relationship with the Receivership Entities, which went into evaluating the reconciled claims amount for investors.

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 may conduct additional depositions of parties, third parties, or non-parties who may have knowledge of the fraudulent scheme.

B. The Status of “Claims Determination Motion” and anticipated filing with the Court regarding Approved Claims Amounts, Seeking Court Approval of Claim Determinations, and Moving Forward with all Steps to Facilitate Interim Distribution to Investors.

In the next Reporting Period, the Receiver and her professionals intend to file Receiver’s Motion for a Court Order to: (1) approve her determination of claims as set forth in this Motion, (2) pool all assets and liabilities of the Receivership Entities into one consolidated Receivership estate; (3) establish a procedure for objections to the Receiver’s determination of claims and plan of distribution; and (4) approve a Plan of Distribution. (the “Claims Determination Motion.”) The Claims Determination Motion will represent the Receiver’s ongoing efforts to return recovered receivership assets to those claimants with allowed claims. As discussed above, this Motion allows the Receiver to establish an objection procedure regarding disputed claims, allows for the pooling of all Receivership assets, and sets the course for an eventual plan of distribution to valid claimants.

C. Third Party Claims

The Receiver continues to analyze the 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. The Receiver has aggressively worked to hold those accountable who worked with the Receivership Entities and mismanaged funds in such a manner that perpetuated the fraud. Specifically, the Receiver has negotiated and executed a Tolling Agreement of the Statute of Limitations for accounting malpractice with the accountants (Anthony Coleman and David Cohen) who were the accountants for the Receivership Entities as well as Mr. Brodman,

personally. This agreement preserved the Receiver's ability to litigation against the accountants if it is determined that malpractice existed. The information provided at the depositions in the prior Reporting Period validated the Receiver's suspicion that the accountants were involved in the accounting of the Receivership Defendants beyond the mere preparation of tax returns. While securing the tolling agreements for Accountants Coleman and Cohen, it was discovered that neither accountant had malpractice insurance. The Receiver has also negotiated a Tolling Agreement of the Statute of Limitations for legal malpractice for the attorneys involved in the real estate transactions of Receivership Defendants prior to Receiver's appointment. The Receiver continues her investigation into the actions of these professionals.

At present, the Receiver is evaluating other potential agreements with professionals who worked with the Receivership Defendants to ensure that all claims against them are properly preserved. At this time, it is too early to estimate whether the Receiver will bring formal litigation claims against these parties or whether any claims will result in any recovery to the Receivership Estate especially in light of the recently discovered information of some of the third parties not having any insurance coverage.

In proceeding with making the determination whether to proceed with litigation against third parties, the Receiver intends to consider several 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 to avoid costly litigation for all involved. The Receiver intends to seek Court approval before instituting any such third-party actions.

Date: July 31, 2023

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

Truist Financial Place
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/s/ Raquel A. Rodriguez

Raquel A. Rodriguez, Esq.
Florida Bar No. 511439

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2023, 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 July 31, 2023, 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



Lauren V. Humphries, Esq.
Florida Bar No. 117517

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 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 15th day of August, 2023.

/s/ Miranda L. Soto

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 Awarded	Expenses Previously Awarded
Receiver	Receiver	53.00	\$15,635.00	\$2,586.73	\$18,221.73	\$138,258.75	\$20,641.96
Buchanan Ingersoll & Rooney PC	Attorneys	165.80	\$39,562.00	\$0.00	\$40,485.00	\$427,768.44	\$3,192.61
E-Hounds		0.00	\$0.00	\$0.00	\$0.00	\$3,540.50	\$0.00
K-Tek		0.00	\$0.00	\$0.00	\$0.00	\$4,300.00	\$850.00
Kaufman		85.90	\$24,660.00	\$0.00	\$0.00	\$159,594.37	\$2,148.75
Total		304.70	\$79,857.00	\$2,586.73	\$82,443.73	\$733,462.06	\$26,833.32

EXHIBIT "5a"

Name	Practice Area	Title	Year Licensed	Standard Rate	Reduced Rate	Total Hours	Expenses	Billable Amount
Miranda L. Soto	Litigation	Shareholder	2003	\$ 650.00	\$ 295.00	53.00		\$ 15,635.00
Kimberly Ecker	Litigation	Paralegal		\$ 230.00	\$ 205.00	0.00		\$ -
Lit Tech Support					\$ 215.00	0.00		\$ -
								\$ 15,635.00
							\$ 2,586.73	\$ 2,586.73
Total						53.00		\$ 18,221.73

EXHIBIT "5b"

Name	Practice Area	Title	Year Licensed	Standard Rate	Reduced Rate	Total Hours	Expenses	Billable Amount
Raquel A. Rodriguez	Litigation	Shareholder	1985	\$ 995.00	\$ 295.00	20.90		\$ 6,165.50
Jordan D. Maglich	Litigation	Counsel	2010	\$ 490.00	\$ 295.00			\$ -
Dan Lazaro	Litigation	Associate	2012	\$ 495.00	\$ 255.00			\$ -
Eileen Murphy	Litigation	Paralegal		\$ 270.00	\$ 205.00	39.20		\$ 8,036.00
Joshua King	Litigation	Paralegal		\$ 235.00	\$ 205.00			\$ -
Kimberly Ecker	Litigation	Paralegal		\$ 230.00	\$ 205.00	1.20		\$ 246.00
Meghan Fleming		Summer Clerk		\$ 165.00	\$ 150.00	14.60		\$ 2,190.00
Sheada Madani	Real Estate	Senior Attorney	2004	\$ 520.00	\$ 295.00			\$ -
Lauren Humphries	Litigation	Associate	2015	\$ 450.00	\$ 255.00	89.90		\$ 22,924.50
								\$ -
Total						165.80		\$ 39,562.00

EXHIBIT "5c"

Name	Title	Standard Rate	Reduced Rate	Total Hours	Total Billed
Heike Funk		\$ 200.00	\$ 150.00	23.10	\$ 4,620.00
Iana Andonova		\$ 375.00	\$ 281.25	0.00	\$ -
Michael Orourke		\$ 400.00	\$ 300.00	0.00	\$ -
Michael Orourke		\$ 450.00	\$ 337.50	51.80	\$ 23,310.00
Dana Kaufman		\$ 400.00	\$ 300.00	0.00	\$ -
Dana Kaufman		\$ 450.00	\$ 337.50	11.00	\$ 4,950.00
AA		\$ 250.00	\$ 187.50	0.00	\$ -
Total Fees					\$ 32,880.00
Less 25% Discount					\$ (8,220.00)
Total Expenses					\$ -
Previous Balance					\$ -
Total				85.9	\$ 24,660.00

EXHIBIT “6a”



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MIAMI, FL 33131

July 17, 2023
Invoice No. 12245976

INVOICE SUMMARY

For Professional Services Rendered:

RE: SEC RECEIVERSHIP
Our Reference: 0104027-000001

Fees:	\$15,635.00
Disbursements:	<u>\$2,586.73</u>

Total Current Invoice:	\$18,221.73
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MIAMI, FL 33131

July 17, 2023
Invoice No. 12245976

For Professional Services Rendered:

RE: SEC RECEIVERSHIP
Our Reference: 0104027-000001

SERVICES AND COSTS INCLUDING

Timekeeper	Date	Task	Narrative	Hours	Amount
Case Administration					
M. L. Soto	04/03/23	B110	Review emails to and from investor R.W. re: status of the distributions.	0.10	29.50
M. L. Soto	04/04/23	B110	Review email from investor R.B. re: status of FBI investigation.	0.10	29.50
M. L. Soto	04/06/23	B110	Emails to and from E. Edelman, R. Rodriguez, L. Humphries re: probate issue.	0.10	29.50
M. L. Soto	04/07/23	B110	Email to R. Edelman re: probate issue.	0.10	29.50
M. L. Soto	04/10/23	B110	Review email from investor re: status of distributions and K1-forms.	0.10	29.50
M. L. Soto	04/10/23	B110	Email to CPAs re: IRS letters.	0.10	29.50
M. L. Soto	04/10/23	B110	Review IRS letters.	0.20	59.00
M. L. Soto	04/11/23	B110	Review emails to and from investor C.S. re: K1-forms and distributions.	0.10	29.50
M. L. Soto	04/11/23	B110	Emails to and from R. Rodriguez and L. Humphries re: investor C.S.	0.10	29.50
M. L. Soto	04/12/23	B110	Review communication from representative for investor S.G.	0.10	29.50
M. L. Soto	04/12/23	B110	Review emails to and from investor with corresponding documents re: National Millwork sale.	0.30	88.50
M. L. Soto	04/12/23	B110	Emails to and from R. Rodriguez and L. Humphries re: subpoenas.	0.10	29.50
M. L. Soto	04/13/23	B110	Emails to and from R. Rodriguez and L. Humphries re: subpoenas, communications with investors, and accountant malpractice claims.	0.20	59.00

MIRANDA L. SOTO, RECEIVER
 RE: SEC RECEIVERSHIP
 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	04/13/23	B110	Review subpoena to National Millwork, Notice, and Schedule A.	0.20	59.00
M. L. Soto	04/14/23	B110	Review communication from representative for investor R.H. re: update on distributions.	0.10	29.50
M. L. Soto	04/14/23	B110	Review emails to and from investor R.H. re: update on distributions.	0.10	29.50
M. L. Soto	04/14/23	B110	Emails to and from CPAs re: 2022 K1-forms.	0.10	29.50
M. L. Soto	04/14/23	B110	Review email to investor C.S. re: K1 form.	0.10	29.50
M. L. Soto	04/14/23	B110	Emails to and from L. Humphries and R. Rodriguez re: communications from investors.	0.10	29.50
M. L. Soto	04/17/23	B110	Emails to and from R. Rodriguez and L. Humphries re: actions against professionals.	0.20	59.00
M. L. Soto	04/18/23	B110	Review email from investor C.M. re: status of distributions.	0.10	29.50
M. L. Soto	04/19/23	B110	Review email to investor C.M. re: status of distribution.	0.10	29.50
M. L. Soto	04/19/23	B110	(No Charge) Review email to A. Sum re: Eighth Interim Fee Application.	0.10	N/C
M. L. Soto	04/19/23	B110	Review letter to IRS prepared by accountants to abate tax penalties.	0.20	59.00
M. L. Soto	04/19/23	B110	Emails to and from R. Rodriguez and L. Humphries re: investor C.M.	0.20	59.00
M. L. Soto	04/20/23	B110	Emails to and from CPAs re: letter to IRS for tax abatement.	0.10	29.50
M. L. Soto	04/21/23	B110	Emails to and from R. Rodriguez and L. Humphries re: pending tasks to distribution motion.	0.60	177.00
M. L. Soto	04/24/23	B110	Review communication from investor J.H. re: K-1 form.	0.10	29.50
M. L. Soto	04/24/23	B110	Review of A. Nicolosi deposition in preparation for conference call with R. Rodriguez, L. Humphries, and CPAs to discuss distribution motion.	0.50	147.50
M. L. Soto	04/24/23	B110	Review of L. Brodman deposition in preparation for conference call with R. Rodriguez, L. Humphries, and CPAs to discuss distribution motion.	0.40	118.00

MIRANDA L. SOTO, RECEIVER
 RE: SEC RECEIVERSHIP
 0104027-000001

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	04/24/23	B110	Review of C. Lieberman deposition in preparation for conference call with R. Rodriguez, L. Humphries, and CPAs to discuss distribution motion.	2.90	855.50
M. L. Soto	04/25/23	B110	Emails to and from CPAs re: IRS letters and notices.	0.20	59.00
M. L. Soto	04/25/23	B110	Review letter from the IRS re: PII 3504 LLC.	0.10	29.50
M. L. Soto	04/25/23	B110	Review Notice from the IRS re: PII 304 LLC.	0.10	29.50
M. L. Soto	04/25/23	B110	Preparation in anticipation of meeting with forensic accountants to discuss next steps for distribution motion.	1.00	295.00
M. L. Soto	04/25/23	B110	Review emails to and from R. Rodriguez and L. Humphries re: documents to review in preparation for meeting with CPAs and Eighth Interim Report.	0.10	29.50
M. L. Soto	04/25/23	B110	Review Waste Pro invoice.	0.10	29.50
M. L. Soto	04/25/23	B110	Review Letter from the IRS re: PII 304 LLC.	0.10	29.50
M. L. Soto	04/25/23	B110	Phone conference with professionals on next steps for distribution motion.	0.90	265.50
M. L. Soto	04/26/23	B110	Attend meeting with CPAs in preparation for distribution motion.	1.60	472.00
M. L. Soto	04/26/23	B110	Emails to and form R. Rodriguez and L. Humphries re: edits to 8th Interim Report.	0.10	29.50
M. L. Soto	04/28/23	B110	Begin to review and revise Receiver's 8th Interim Quarterly Report.	1.20	354.00
M. L. Soto	04/28/23	B110	Emails to and from R. Rodriguez and L. Humphries re: revisions to 8th Interim Status Report.	0.10	29.50
M. L. Soto	04/29/23	B110	Continue to review and revise Receiver's 8th Interim Quarterly Report.	1.30	383.50
M. L. Soto	04/29/23	B110	Emails to and from R. Rodriguez and L. Humphries re: edits to 8th Interim Status Report.	0.10	29.50
M. L. Soto	04/30/23	B110	Review R. Rodriguez's edits and comments to 8th Interim Status Report.	0.50	147.50
M. L. Soto	04/30/23	B110	Emails to and from R. Rodriguez and L. Humphries re: edits to 8th Interim Status Report.	0.10	29.50

MIRANDA L. SOTO, RECEIVER
 RE: SEC RECEIVERSHIP
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	05/01/23	B110	Review email to L. Brodman re: service of 8th Interim Status Report.	0.10	29.50
M. L. Soto	05/01/23	B110	Conference call with A. Sum to discuss depositions and recent developments.	0.40	118.00
M. L. Soto	05/01/23	B110	Emails to and from R. Rodriguez and L. Humphries re: edits to 8th Interim Status Report and conference call with SEC.	0.40	118.00
M. L. Soto	05/01/23	B110	Review final changes to 8th Interim Status Report.	0.50	147.50
M. L. Soto	05/02/23	B110	Review email to A. Sum providing deposition transcripts following up from conference call with SEC.	0.10	29.50
M. L. Soto	05/03/23	B110	Emails to and from L. Humphries, E. Murphy, and R. Rodriguez re: representative for investor D.P.	0.10	29.50
M. L. Soto	05/03/23	B110	Email to representative to investor D.P. re: status of receivership and confirmation of receipt of updated information.	0.20	59.00
M. L. Soto	05/04/23	B110	Emails to and from investor re: various questions about the 8th Interim Status Report.	0.30	88.50
M. L. Soto	05/04/23	B110	Emails to and from R. Rodriguez and L. Humphries re: various questions from investor about the 8th Interim Status Report and meeting to discuss.	0.20	59.00
M. L. Soto	05/05/23	B110	Emails to and from R. Rodriguez and L. Humphries to discuss investor questions and preparation for meeting with Kaufman professionals.	0.10	29.50
M. L. Soto	05/08/23	B110	Review correspondence to and from investor B.C.	0.10	29.50
M. L. Soto	05/08/23	B110	Emails from E. Murphy re: status of updates to the investor information chart.	0.10	29.50
M. L. Soto	05/08/23	B110	Brief preparation in anticipation of meeting with R. Rodriguez and L. Humphries on May 9, 2023.	1.00	295.00
M. L. Soto	05/08/23	B110	Emails to and from R. Rodriguez and L. Humphries re: investor B.C. and claims distribution motion.	0.20	59.00

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	05/09/23	B110	Emails to and from R. Rodriguez and L. Humphries in preparation for meeting with Kaufman professionals.	0.10	29.50
M. L. Soto	05/09/23	B110	Attend meeting with R. Rodriguez and L. Humphries in preparation for meeting with accounting professionals.	0.90	265.50
M. L. Soto	05/09/23	B110	Review Waste Pro invoice for future termination.	0.10	29.50
M. L. Soto	05/10/23	B110	Attend meeting with Kaufman professionals and R. Rodriguez to discuss various issues for distribution motion.	2.00	590.00
M. L. Soto	05/10/23	B110	Review and execute SFAR report.	0.20	59.00
M. L. Soto	05/10/23	B110	Review email with corresponding spreadsheet from Kaufman professionals re: investor withdrawals from 2017-2021.	0.10	29.50
M. L. Soto	05/12/23	B110	Review Bank United check for processing.	0.10	29.50
M. L. Soto	05/12/23	B110	Emails to and from E. Murphy following up on status of updates to the investor information chart.	0.10	29.50
M. L. Soto	05/15/23	B110	Emails to and from R. Rodriguez and L. Humphries re: Bank United check and Servis1st Bank dormant letter.	0.10	29.50
M. L. Soto	05/15/23	B110	Review Servis1st Bank dormant letter.	0.10	29.50
M. L. Soto	05/16/23	B110	Review communication to and from investor H.K.	0.10	29.50
M. L. Soto	05/16/23	B110	Emails to and from L. Humphries and R. Rodriguez re: Servis1st accounts and investor H.K.	0.10	29.50
M. L. Soto	05/22/23	B110	Emails to and from R. Rodriguez and L. Humphries re: conference call with Kaufman professionals and follow up from meeting.	0.20	59.00
M. L. Soto	05/23/23	B110	Review email from investor R.B.	0.10	29.50
M. L. Soto	05/23/23	B110	Review communication from investor R.L.	0.10	29.50
M. L. Soto	05/23/23	B110	Emails to and from R. Rodriguez and L. Humphries re: meeting to discuss distribution motion, and investor R.L.	0.20	59.00
M. L. Soto	05/30/23	B110	Review R. Rodriguez's response to investor R.B.'s questions.	0.20	59.00

MIRANDA L. SOTO, RECEIVER
 RE: SEC RECEIVERSHIP
 0104027-000001

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 July 17, 2023
 Invoice No. 12245976

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	05/30/23	B110	Review communication from investor R.L.	0.10	29.50
M. L. Soto	05/30/23	B110	Attend Teams Meeting with E. Murphy, R. Rodriguez, and L. Humphries to discuss claims distribution motion.	0.90	265.50
M. L. Soto	05/30/23	B110	Brief conference with R. Rodriguez to discuss response to investor R.B.'s questions.	0.20	59.00
M. L. Soto	05/30/23	B110	Emails to and from R. Rodriguez and L. Humphries re: demand letter to law firm, call with investor R.L., and Coleman and Cohen.	0.20	59.00
M. L. Soto	05/31/23	B110	Review IRS letter for 304 LLC property.	0.10	29.50
M. L. Soto	05/31/23	B110	Emails to Kaufman professionals re: recent report and IRS letter for 304 LLC property.	0.10	29.50
M. L. Soto	05/31/23	B110	Review and revise demand letter to Kelley & Grant.	0.20	59.00
M. L. Soto	05/31/23	B110	Emails to and from R. Rodriguez and L. Humphries re: Coleman and Cohen, demand letter to Kelley & Grant, and tolling agreement.	0.20	59.00
M. L. Soto	06/01/23	B110	Review email from investor R.B. re: follow up questions.	0.10	29.50
M. L. Soto	06/01/23	B110	Review communication from investor K.T.	0.10	29.50
M. L. Soto	06/01/23	B110	Emails to and from R. Rodriguez and L. Humphries re: conference call to discuss research needed for claims distribution motion, and investor K.T.	0.30	88.50
M. L. Soto	06/02/23	B110	Review documents pursuant to a subpoena duces tecum for AMEX records.	0.20	59.00
M. L. Soto	06/05/23	B110	Review emails to and from investor S.C.	0.10	29.50
M. L. Soto	06/05/23	B110	Review and approve tolling agreement for real estate attorneys.	0.10	29.50
M. L. Soto	06/05/23	B110	Emails to and from R. Rodriguez and L. Humphries re: tolling agreement to real estate attorneys.	0.10	29.50
M. L. Soto	06/06/23	B110	Review email from investor J.R. re: status of receivership.	0.10	29.50

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	06/07/23	B110	Emails to and from R. Rodriguez, L. Humphries, and M. Fleming re: claw back memorandum and research.	0.20	59.00
M. L. Soto	06/08/23	B110	Emails to and from R. Rodriguez, L. Humphries, and M. Fleming re: claw back research.	0.10	29.50
M. L. Soto	06/08/23	B110	Emails to and from L. Humphries re: processing of KTek payment.	0.10	29.50
M. L. Soto	06/09/23	B110	Emails to and from L. Humphries and R. Rodriguez re: meeting to discuss claims distribution motion and clawback issues, and payment of vendors.	0.20	59.00
M. L. Soto	06/09/23	B110	Email to the SEC with question about notice to L. Brodman of SEC investigation.	0.10	29.50
M. L. Soto	06/12/23	B110	Review email from investor M.S. re: status of receivership.	0.10	29.50
M. L. Soto	06/12/23	B110	Emails to and from L. Humphries and R. Rodriguez re: communication from investor M.S.	0.10	29.50
M. L. Soto	06/13/23	B110	Began reviewing fraudulent transfer case law in preparation for claims distribution motion.	1.10	324.50
M. L. Soto	06/13/23	B110	Emails to and from R. Rodriguez and L. Humphries re: communication from the SEC.	0.10	29.50
M. L. Soto	06/14/23	B110	Review email from A. Sum including corresponding attachment.	0.80	236.00
M. L. Soto	06/14/23	B110	Review email from investor B.G. discussing request for information on settlement checks and percentage.	0.10	29.50
M. L. Soto	06/14/23	B110	Review email to investor M.S. discussing status of receivership.	0.10	29.50
M. L. Soto	06/14/23	B110	Follow up from receivership meeting including revisions to email to CPAs with instructions for Claims Distribution Motion.	1.00	295.00
M. L. Soto	06/14/23	B110	Attend meeting with R. Rodriguez, L. Humphries, and M. Fleming to discuss claims distribution motion.	1.00	295.00
M. L. Soto	06/15/23	B110	Review emails to and from CPAs re: additional information for claims distribution motion.	0.10	29.50

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	06/16/23	B110	Review email from investor J.H. re: status of receivership.	0.10	29.50
M. L. Soto	06/16/23	B110	Emails to and from CPAs re: spreadsheet for claims distribution motion.	0.10	29.50
M. L. Soto	06/17/23	B110	Review email from CPAs re: revisions to spreadsheet for claims distribution motion.	0.20	59.00
M. L. Soto	06/18/23	B110	Emails to and from L. Humphries and R. Rodriguez re: investor J.H.	0.10	29.50
M. L. Soto	06/19/23	B110	Emails to and from L. Humphries and R. Rodriguez re: email from investor B.G. and proof of claims forms for internal review.	0.20	59.00
M. L. Soto	06/19/23	B110	Emails to and from CPAs re: updates to spreadsheet in preparation for claims distribution motion.	0.20	59.00
M. L. Soto	06/19/23	B110	Review emails to and from investor B.G.	0.10	29.50
M. L. Soto	06/20/23	B110	Review emails to and from representative for investor re: updates on receivership.	0.10	29.50
M. L. Soto	06/20/23	B110	Emails to and from L. Humphries and R. Rodriguez re: conference call with Kelley firm.	0.20	59.00
M. L. Soto	06/20/23	B110	Emails to and from CPAs re: false profit claimants in preparation for distribution motion.	0.10	29.50
M. L. Soto	06/21/23	B110	Emails to and from CPAs re: false profits investors and revisions to spreadsheet for claims distribution motion.	0.30	88.50
M. L. Soto	06/21/23	B110	Conference call with J. Kelley and R. Rodriguez to discuss insurance letter and tolling agreement.	1.10	324.50
M. L. Soto	06/21/23	B110	Review email from J. Kelley following up from conference call.	0.10	29.50
M. L. Soto	06/21/23	B110	Emails to and from L. Humphries and R. Rodriguez re: call from investor D.B.	0.10	29.50
M. L. Soto	06/22/23	B110	Review email to investor D.B. re: amended K1-form and claimed amount.	0.10	29.50

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	06/22/23	B110	Review emails to and from J. Kelley including corresponding attachments on transactions by Kelley Grant law firm, wire confirmations for residential properties, residential contracts, executed tolling agreement, insurance coverage information, and confirmation of potential liability period.	0.40	118.00
M. L. Soto	06/22/23	B110	Emails to and from L. Humphries and R. Rodriguez re: conference call with CPAs, documents to J. Kelley, and original proof of claim forms.	0.30	88.50
M. L. Soto	06/22/23	B110	Review emails to CPAs re: updated excel spreadsheet.	0.10	29.50
M. L. Soto	06/23/23	B110	Emails to and from J. Kelley re: fully executed tolling agreement with Kelley Grant and response to research request.	0.20	59.00
M. L. Soto	06/23/23	B110	Attend conference call with CPA, L. Humphries, R. Rodriguez, and E. Murphy to discuss reconciling numbers for claims distribution motion.	1.00	295.00
M. L. Soto	06/23/23	B110	Emails to and from CPAs re: updated spreadsheet and conference call to discuss finalizing amounts for claims distribution motion.	0.20	59.00
M. L. Soto	06/23/23	B110	Review Kelley & Grant Axis Pro Lawyers Professional Liability Insurance Policy from December 2018-December 2019.	0.80	236.00
M. L. Soto	06/23/23	B110	Brief review of Review Kelley & Grant U.S. Specialty Insurance Company Lawyers Professional Liability Insurance Policy Declaration from December 2022-December 2023.	1.00	295.00
M. L. Soto	06/23/23	B110	Review Kelley & Grant Axis Pro Lawyers Professional Liability Insurance Policy Declaration for December 2017- December 2018.	0.10	29.50
M. L. Soto	06/23/23	B110	Review Kelley & Grant Crime Policy of Insurance.	0.50	147.50

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	06/23/23	B110	Review Kelley & Grant Axis Pro Lawyers Professional Liability Insurance Policy Declaration for December 2016- December 2017.	0.10	29.50
M. L. Soto	06/23/23	B110	Brief review of Review Kelley & Grant Axis Pro Lawyers Professional Liability Insurance Policy Declaration from December 2019-December 2020.	0.40	118.00
M. L. Soto	06/23/23	B110	Review and execute tolling agreement with Kelley Grant.	0.10	29.50
M. L. Soto	06/23/23	B110	Brief review of Review Kelley & Grant Axis Pro Lawyers Professional Liability Insurance Policy Declaration from December 2021-December 2022.	0.20	59.00
M. L. Soto	06/23/23	B110	Emails to and from L. Humphries and R. Rodriguez re: research of case law professional liability question.	0.20	59.00
M. L. Soto	06/23/23	B110	Brief review of Review Kelley & Grant Axis Pro Lawyers Professional Liability Insurance Policy Declaration from December 2020-December 2021.	0.40	118.00
M. L. Soto	06/26/23	B110	Emails to and from CPAs re: proof of claim forms.	0.20	59.00
M. L. Soto	06/26/23	B110	Emails to and from J. Kelley re: notice to insurance carriers.	0.10	29.50
M. L. Soto	06/26/23	B110	Attend meeting with E. Murphy, L. Humphries, R. Rodriguez and CPAs to discuss amounts for claims distribution motion with subsequent conference with L. Humphries.	1.90	560.50
M. L. Soto	06/26/23	B110	Emails to and from R. Rodriguez and L. Humphries re: revisions to language for CPA's chart.	0.10	29.50
M. L. Soto	06/27/23	B110	Review emails to and from CPAs re: final exhibits for claims distribution motion.	0.10	29.50
M. L. Soto	06/27/23	B110	Review emails to and from investor R.B.	0.20	59.00
M. L. Soto	06/27/23	B110	Emails to and from R. Rodriguez re: response to investor R.B.	0.10	29.50
M. L. Soto	06/28/23	B110	Review emails to and from CPAs re: Schedules for Claims Motion.	0.20	59.00

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	06/28/23	B110	Emails to and from L. Humphries, R. Rodriguez, and M. Fleming re: draft of Motion to Approve Claims Determination, and legal research on malpractice issues.	0.10	29.50
M. L. Soto	06/29/23	B110	Review emails to and from CPAs re: revisions to Schedules.	0.30	88.50
M. L. Soto	06/29/23	B110	Review email from investor R.B.	0.10	29.50
M. L. Soto	06/29/23	B110	Continue review of claw back and fraudulent transfer research in preparation for Claims Distribution Motion.	3.60	1,062.00
M. L. Soto	06/29/23	B110	Review emails to and from L. Humphries, M. Fleming, and R. Rodriguez re: edits to draft of Claims Motion, and legal research on malpractice issues.	0.20	59.00
M. L. Soto	06/29/23	B110	Review FPL refund check for 201 LLC.	0.10	29.50
M. L. Soto	06/30/23	B110	Brief conference call with the SEC to discuss Claims Motion.	0.30	88.50
M. L. Soto	06/30/23	B110	Emails to and from L. Humphries and R. Rodriguez re: edits to draft of Motion to Approve Determination of Claims, water mitigation invoice, and legal research conference call.	0.90	265.50
M. L. Soto	06/30/23	B110	Emails to and from CPAs re: possible revisions to Schedule.	0.20	59.00
M. L. Soto	06/30/23	B110	Emails to and from investor R.B. re: claims motion.	0.10	29.50
M. L. Soto	06/30/23	B110	Emails to and from Brodman and Nicolosi's counsel re: Claims Motion.	0.10	29.50
M. L. Soto	06/30/23	B110	Communications to and from the SEC re: Motion to Approve Claims Determination.	0.20	59.00
M. L. Soto	06/30/23	B110	Conference call with R. Rodriguez (with subsequent call to L. Humphries) re: Claims Distribution Motion.	0.40	118.00
M. L. Soto	06/30/23	B110	Review and revise Motion to Approve Receiver's Claims Determination.	2.10	619.50

Subtotal Case Administration **53.10** **15,635.00**

MIRANDA L. SOTO, RECEIVER
 RE: SEC RECEIVERSHIP
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Timekeeper	Date	Task	Narrative	Hours	Amount
Total Hours				53.10	
Total Fees					\$15,635.00

DESCRIPTION OF COSTS

Description		Amount
03/21/23	Binder	32.10
04/01/23	Miscellaneous Miranda L. Soto Hostgator Online Fees	42.00
04/07/23	Video Deposition Of: Cindy Lieberman	2,056.60
04/30/23	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
05/12/23	Miscellaneous Miranda L. Soto online fee	50.40
05/15/23	Miscellaneous Miranda L. Soto online fee	50.40
05/31/23	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
06/15/23	Miscellaneous Miranda L. Soto Hotsgator monthly fee	50.40
06/30/23	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
Total Costs		\$2,586.73

Amount Due This Invoice:	\$18,221.73
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MIRANDA L. SOTO, RECEIVER
RE: SEC RECEIVERSHIP
0104027-000001

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Invoice No. 12245976

TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
M. L. Soto	Partner	53.00	295.00	15,635.00
M. L. Soto	Partner	0.10	N/C	N/C
	Total	53.10		15,635.00



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

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

REMITTANCE STATEMENT

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

July 17, 2023
Invoice No. 12245976

Our Reference: 0104027-000001
Client Name: MIRANDA L. SOTO, RECEIVER
Invoice Date: July 17, 2023
Invoice Number: 12245976
Total Due This Invoice: \$18,221.73

Total Due All Invoices For this Matter:	\$18,221.73
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**PLEASE RETURN THIS REMITTANCE STATEMENT WITH YOUR PAYMENT
THANK YOU**

Make checks payable to: Buchanan Ingersoll & Rooney
Union Trust Building
Attn: Accounting Department
501 Grant Street – Suite 200
Pittsburgh, PA 15219-4413
Tax ID: 25-1381032

Wire / ACH Information
PNC Bank, N.A.
Buchanan Ingersoll & Rooney Operating Account
Account #: 1133081072
Routing#: 043000096
SWIFT CODE: PNCCUS33

Please Reference 0104027-000001 Invoice: 12245976

Amount remitted this payment: \$ _____

**RECENT FEES AND DISBURSEMENTS MAY NOT
YET BE ENTERED ON YOUR ACCOUNT AND
IF NOT, WILL BE SUBSEQUENTLY BILLED**

EXHIBIT “6b”



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

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

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

July 17, 2023
Invoice No. 12245975

INVOICE SUMMARY

For Professional Services Rendered:

RE: SEC V PROPERTY INCOME INVESTORS LLC
Our Reference: 0104027-000002

Fees:	\$39,562.00
Disbursements:	<u>\$0.00</u>

Total Current Invoice:	\$39,562.00
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One Biscayne Tower
Two South Biscayne Blvd., Suite 1500
Miami, FL 33131-1822

T 305 347 4080
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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

July 17, 2023
Invoice No. 12245975

For Professional Services Rendered:

RE: SEC V PROPERTY INCOME INVESTORS LLC
Our Reference: 0104027-000002

SERVICES INCLUDING

Timekeeper	Date	Task	Narrative	Hours	Amount
Case Administration					
L. Humphries	04/03/23	B110	Communicated with investor R.W. regarding distribution time line and upcoming reports.	0.30	76.50
L. Humphries	04/06/23	B110	Communicated with accountants regarding SFAR issue.	0.30	76.50
L. Humphries	04/10/23	B110	Receipt and review of correspondence from investor claimant CS.	0.20	51.00
L. Humphries	04/10/23	B110	Review of tax correspondence from IRS.	0.20	51.00
K. L. Ecker	04/12/23	B110	Draft Notice of Intent to Issue Subpoena, Subpoena, and Schedule A to Subpoena	0.60	123.00
K. L. Ecker	04/12/23	B110	E-mail exchange with L. Humphries regarding Subpoena to National Millwork, Inc.	0.20	41.00
L. Humphries	04/12/23	B110	Drafted non-party Subpoena and Exhibit A directed to National Millwork, Inc.	0.40	102.00
L. Humphries	04/14/23	B110	Draft correspondence to investor claimant CS on tax issues.	0.20	51.00
L. Humphries	04/14/23	B110	Attendance at phone conference from investor claimants SG and RH.	0.60	153.00
L. Humphries	04/14/23	B110	Kaufman professionals communication regarding K1 issue.	0.40	102.00
L. Humphries	04/17/23	B110	(No Charge) Fee Application preparation.	2.50	N/C
K. L. Ecker	04/19/23	B110	E-mail exchange regarding action items and case status	0.20	41.00

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	04/20/23	B110	Review report analysis from accountants.	1.20	306.00
L. Humphries	04/21/23	B110	Emails with Dana Kaufman and Michal O'Rourke.	0.30	76.50
L. Humphries	04/24/23	B110	Preparation of Eighth Interim Report.	2.00	510.00
L. Humphries	04/25/23	B110	Draft Eighth Interim Report.	1.00	255.00
R. Rodriguez	04/30/23	B110	Revise and comment on draft 8th interim report.	2.00	590.00
L. Humphries	05/02/23	B110	Case law research regarding analysis of distribution of Claims Determination Motion.	2.20	561.00
L. Humphries	05/04/23	B110	Drafted claims determination motion objection procedure and pro rata distribution analysis.	1.50	382.50
L. Humphries	05/09/23	B110	Phone conference with Receiver regarding Claims Determination Motion.	1.00	255.00
L. Humphries	05/16/23	B110	Review voicemail of investor H.K.	0.10	25.50
L. Humphries	05/19/23	B110	Phone conference with investor HK.	0.30	76.50
L. Humphries	05/22/23	B110	Emails regarding claims process.	0.20	51.00
L. Humphries	05/29/23	B110	Drafted Tolling Agreement for legal professionals as attachment to Demand Letter.	0.40	102.00
L. Humphries	05/29/23	B110	Assessed documents and claims form for R.L.	0.40	102.00
M. E. Fleming	06/02/23	B110	Research on the element of knowledge on the fraudulent transfer analysis to evaluate which transfers are subject to claw backs.	3.00	450.00
M. E. Fleming	06/02/23	B110	Research on the elements necessary to establish fraudulent transfer to evaluate which transfers are subject to claw backs.	3.00	450.00
L. Humphries	06/02/23	B110	Assessed report on claims issue with equinox.	2.00	510.00
M. E. Fleming	06/05/23	B110	Researched and summarized Florida law regarding the alter ego doctrine and piercing the corporate veil to add to the Motion to Approve Claim Determinations.	1.00	150.00

MIRANDA L. SOTO, RECEIVER
 RE: SEC V PROPERTY INCOME INVESTORS LLC
 0104027-000002

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Timekeeper	Date	Task	Narrative	Hours	Amount
M. E. Fleming	06/05/23	B110	Researched Florida law regarding commingling of assets and analyzed whether investor funds commingled with alter ego corporation funds could be subject to a claw back to add to the Motion to Approve Claim Determinations.	1.00	150.00
L. Humphries	06/05/23	B110	Review and analysis of Judge Singhal Order.	0.20	51.00
L. Humphries	06/06/23	B110	Phone conference with investor claimant T.M.	0.30	76.50
M. E. Fleming	06/07/23	B110	Analyzed case law regarding the ability to claw back false profits in preparation to complete a memorandum compiling such research.	2.80	420.00
M. E. Fleming	06/07/23	B110	Analyzed case law regarding commingling of receivership assets and the ability to claw back investments rolled over which were not a direct subject of an SEC Complaint in preparation to complete a memorandum compiling such research.	2.80	420.00
M. E. Fleming	06/08/23	B110	Additional clarifying research regarding principal investments, clarifying case law, and compiling copies of pertinent authorities in correspondence with Raquel Rodriguez.	1.00	150.00
L. Humphries	06/16/23	B110	Review and analyzed claims determination by Kaufman professionals.	2.40	612.00
L. Humphries	06/19/23	B110	Communicated with Receiver's professionals regarding POC form amounts and reconciliations.	0.50	127.50
L. Humphries	06/22/23	B110	Review and analysis of documents regarding third party demands.	0.40	102.00
L. Humphries	06/22/23	B110	Phone conference with investor DB regarding amended K1 issue.	0.40	102.00
L. Humphries	06/26/23	B110	Drafted Claims Determination Motion.	2.00	510.00
K. L. Ecker	06/30/23	B110	Teleconference and e-mail exchanges regarding finalization of exhibits and filing of Motion to Approve Determination of Claims	0.20	41.00

MIRANDA L. SOTO, RECEIVER
 RE: SEC V PROPERTY INCOME INVESTORS LLC
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Timekeeper	Date	Task	Narrative	Hours	Amount
Subtotal Case Administration				41.70	8,483.00
Asset Analysis and Recovery					
L. Humphries	04/10/23	B120	Assessed documentation for investor claimant CS prior to follow up call.	0.40	102.00
L. Humphries	04/12/23	B120	Communicated with Kaufman professionals regarding SFAR.	0.30	76.50
L. Humphries	04/13/23	B120	Preparation of edits to draft non-party subpoenas.	0.40	102.00
L. Humphries	04/14/23	B120	Review of documentation for claimant investor WH.	0.30	76.50
L. Humphries	04/14/23	B120	Assessed investor files in preparation for calls with investor claimants.	0.50	127.50
L. Humphries	04/18/23	B120	(No Charge) Preparation of Eighth Fee Application.	1.80	N/C
L. Humphries	04/19/23	B120	Outlined steps to prepare Claims Determination analysis.	0.50	127.50
L. Humphries	04/20/23	B120	Emails with Receiver regarding distribution.	0.20	51.00
L. Humphries	04/20/23	B120	Emails regarding testimony of Cindy Lieberman.	0.20	51.00
R. Rodriguez	04/25/23	B120	Conference call with M. Soto, L. Humphries and forensic accountant report, claims determination process and next steps, including review of draft report and Lieberman deposition.	1.00	295.00
L. Humphries	04/25/23	B120	(No Charge) Meeting with Receiver regarding Claims Determination Motion.	1.00	N/C
R. Rodriguez	04/26/23	B120	Zoom meeting with forensic accountants, Receiver and L. Humphries regarding draft report and decisions regarding claims recognition.	1.80	531.00
E. M. Murphy	04/27/23	B120	Review files and prepare folders of documents to provide to CPA and transmittal of same.	0.90	184.50
L. Humphries	04/28/23	B120	Drafted updates to third-party subpoenas.	0.40	102.00
L. Humphries	04/30/23	B120	Drafted Interim Report.	0.80	204.00
L. Humphries	05/01/23	B120	Review of deposition testimony.	0.50	127.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	05/01/23	B120	Drafted edits to Eighth Interim Report to Investors and Court.	1.50	382.50
L. Humphries	05/03/23	B120	Phone conference with investor claimant JS.	0.20	51.00
L. Humphries	05/05/23	B120	(No Charge) Fee Application edits.	0.40	N/C
L. Humphries	05/08/23	B120	Draft analysis for Claims Determination.	1.00	255.00
L. Humphries	05/09/23	B120	Phone conference with investor claimant JH.	0.40	102.00
L. Humphries	05/09/23	B120	Review correspondent from investor claimant LD.	0.20	51.00
R. Rodriguez	05/10/23	B120	Attend meeting at CPA firm office with Receiver to meet with D. Kaufman and M. O'Rourke regarding claims analysis and potential clawbacks for Receiver's claims motion.	2.00	590.00
R. Rodriguez	05/10/23	B120	(No Charge) Travel to/from CPA firm office to meet with D. Kaufman and M. O'Rourke and Receiver regarding claims analysis and potential clawbacks for Receiver's claims motion.	1.00	N/C
L. Humphries	05/16/23	B120	Review of investor file for claimant H.K. prior to phone conference.	0.20	51.00
L. Humphries	05/16/23	B120	Email correspondence with investor claimant H.K.	0.20	51.00
L. Humphries	05/18/23	B120	Assessed investigation information regarding professionals to Brodman and Nicolosi for Third Party claim demands.	0.50	127.50
L. Humphries	05/18/23	B120	Receipt and review of correspondence from investor claimant.	0.10	25.50
L. Humphries	05/19/23	B120	Draft email correspondence to claimant investor HK.	0.10	25.50
L. Humphries	05/19/23	B120	Review of information regarding equinox split and transfer of funds.	0.40	102.00
R. Rodriguez	05/22/23	B120	Draft analysis of theories for recognition of claims, distribution of claims and potential assertion of clawbacks.	0.60	177.00
R. Rodriguez	05/23/23	B120	Prepare for meeting with Receiver regarding claims determination motion.	1.00	295.00
L. Humphries	05/25/23	B120	Drafted edits to Kaufman report regarding investor specific allocations.	1.50	382.50
L. Humphries	05/25/23	B120	Review correspondence from investor claimant J.J.	0.20	51.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	05/26/23	B120	Assessed report and notes from meeting with Kaufman Professionals regarding Claims distribution.	1.00	255.00
L. Humphries	05/26/23	B120	Review and analysis of various correspondence from Claimant Investor R.L.	0.20	51.00
L. Humphries	05/29/23	B120	Review of documents concerning third party malpractice claim.	0.50	127.50
R. Rodriguez	05/30/23	B120	Review and respond to extensive questions via email from Investor RB.	0.60	177.00
R. Rodriguez	05/30/23	B120	Strategy call with Receiver and L. Humphries regarding claims decisions and clawbacks.	1.10	324.50
L. Humphries	05/30/23	B120	Review of communication regarding insurance.	0.30	76.50
L. Humphries	05/30/23	B120	Phone conference with Claimant Investor R.L.	0.30	76.50
L. Humphries	05/30/23	B120	Conference with Eileen Murphy regarding exhibit for report.	0.30	76.50
L. Humphries	05/30/23	B120	Meeting with Receiver regarding claw back of funds and Kaufman analysis.	1.00	255.00
R. Rodriguez	05/30/23	B120	Research regarding clawbacks.	0.30	88.50
L. Humphries	05/30/23	B120	Draft demand third party correspondence regarding attorney fund transfer.	0.50	127.50
L. Humphries	05/31/23	B120	Emails with Receiver regarding third party insurance information.	0.20	51.00
L. Humphries	05/31/23	B120	Review of Receivership mail.	0.20	51.00
L. Humphries	05/31/23	B120	Assessed PII Operating Agreements regarding indemnification issues and officer fiduciary duty.	1.20	306.00
L. Humphries	05/31/23	B120	Emails with Kaufman regarding claims determination.	0.20	51.00
L. Humphries	06/01/23	B120	Research regarding alter ego doctrine.	0.50	127.50
L. Humphries	06/01/23	B120	Assessed Kaufman analysis in report and recommendation on Claims Analysis.	1.50	382.50
L. Humphries	06/01/23	B120	Preparation of edits to draft Tolling Agreement.	0.20	51.00
R. Rodriguez	06/02/23	B120	Review of provisions of Florida Uniform Fraudulent Transfer Act.	0.20	59.00
L. Humphries	06/02/23	B120	Preparation of Demand Letter to Third Party on professional malpractice.	0.70	178.50

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	06/05/23	B120	Review of documents for investor claimant T.M.	0.40	102.00
L. Humphries	06/05/23	B120	Phone conference with counsel regarding claims analysis.	0.40	102.00
L. Humphries	06/05/23	B120	Preparation of argument regarding Objection Procedure for individual claimant disputes.	0.80	204.00
L. Humphries	06/05/23	B120	Phone conference with claimant investor J.T.	0.30	76.50
L. Humphries	06/05/23	B120	Phone conference with vendor regarding disbursement of physical property of receivership.	0.40	102.00
L. Humphries	06/06/23	B120	Phone conference with claimant regarding distribution timeline.	0.30	76.50
R. Rodriguez	06/07/23	B120	Review and comment on memo of law by M. Fleming on clawbacks.	0.40	118.00
L. Humphries	06/07/23	B120	Preparation of payment to vendors and Receiver.	0.50	127.50
L. Humphries	06/07/23	B120	Preparation of edits to Tolling Agreement.	0.40	102.00
R. Rodriguez	06/08/23	B120	Review responses from M. Fleming to my follow up questions regarding research conclusions on clawback claims relating to investors.	0.20	59.00
L. Humphries	06/08/23	B120	Reviewed case law provided regarding equity distributions, commingling, and alter ego corporate issues.	1.40	357.00
L. Humphries	06/09/23	B120	Preparation of check regarding payment for vendor and communication with Servis regarding same.	0.40	102.00
L. Humphries	06/09/23	B120	Draft legal research regarding equitable distribution and plan of distribution for Court approval.	2.40	612.00
R. Rodriguez	06/13/23	B120	Review SEC subpoena to PII entities to determine when promoters became aware of SEC investigation for fraudulent transfer analysis.	0.10	29.50
R. Rodriguez	06/14/23	B120	Teams meeting with M. Soto and L. Humphries regarding claims determination motion and final decisions regarding same.	0.70	206.50
L. Humphries	06/14/23	B120	Draft legal argument on distribution to claimants.	3.20	816.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	06/14/23	B120	Assessed documents regarding false profit investors for clawback from Receiver.	0.80	204.00
L. Humphries	06/15/23	B120	Preparation of research regarding clawback issue.	0.50	127.50
L. Humphries	06/19/23	B120	Addressed issues with disputed claims determination amounts for claimant investors.	2.80	714.00
R. Rodriguez	06/20/23	B120	Prepare for call with J. K. (potential defendant) by reviewing receiver's letter to J. K. (potential defendant) and exhibits and deposition testimony regarding his services provided in possible facilitation of fraud by Brodman.	1.00	295.00
L. Humphries	06/20/23	B120	Assessed documents for claimant investor DB prior to phone conference with same.	0.40	102.00
L. Humphries	06/20/23	B120	Drafted Plan of Distribution briefing for Court approval of Claims Determination, Pooling of Receivership assets and liabilities, and objection procedure.	3.40	867.00
L. Humphries	06/20/23	B120	Review of subpoenaed information regarding J.K. and Grant Law and receivership entities.	1.00	255.00
L. Humphries	06/21/23	B120	Emails with J.K. regarding real estate transactions.	0.30	76.50
L. Humphries	06/21/23	B120	Draft emails to Kaufman Professionals.	0.20	51.00
R. Rodriguez	06/21/23	B120	Call with J. K. (PII real estate settlement agent) and Receiver regarding Receiver's letter and proposed tolling agreement while Receiver reviews documents being requested from law firm in order to assess whether Receivership has any claims to make against firm and potential settlement thereof.	0.90	265.50
L. Humphries	06/21/23	B120	Review and assessment of final claims determination amounts for Motion to Approve Determination of Claims, Pool Receivership Assets, and Approve Final Plan of Distribution.	3.50	892.50

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Timekeeper	Date	Task	Narrative	Hours	Amount
R. Rodriguez	06/22/23	B120	Conference call with accountants to finalize claims determinations.	0.30	88.50
R. Rodriguez	06/22/23	B120	Review and respond to email from J. K. regarding his execution of the tolling agreement and insurance information.	0.30	88.50
L. Humphries	06/22/23	B120	Preparation of Claims Determination Motion.	2.50	637.50
L. Humphries	06/22/23	B120	Communicated with the Receiver's CPA Professionals regarding claims determination amounts and issues with disputed investor sums.	0.50	127.50
R. Rodriguez	06/22/23	B120	Review claims analysis from forensic accountants in preparation for call regarding same.	0.40	118.00
R. Rodriguez	06/22/23	B120	Prepare and send copies of questioned transactions to J. K. and request back up documentation regarding same.	0.30	88.50
E. M. Murphy	06/22/23	B120	Review Broward Clerk records for R. B. case filings and Non-Party documents to provide to J. K. and transmittal of same.	0.60	123.00
L. Humphries	06/22/23	B120	Review of claimant issues.	0.40	102.00
L. Humphries	06/22/23	B120	Draft emails to Kaufman professionals.	0.20	51.00
R. Rodriguez	06/23/23	B120	Teams conference call with M. O'Rourke, M. Soto, L. Humphries and E. Murphy regarding claims chart and final revisions required to reflect Receiver's claims determinations.	1.00	295.00
R. Rodriguez	06/23/23	B120	Draft categories for claims chart to be prepared by forensic accountants and incorporated into Receiver's claims determination motion.	0.40	118.00
L. Humphries	06/23/23	B120	Draft Motion to determine claims and pool assets of Receivership.	3.20	816.00
R. Rodriguez	06/23/23	B120	Formulate legal issue for research regarding impact of investor claims of receiver entering into court-approved settlement with potentially responsible third parties and whether release from receiver releases all claims by investors against such persons.	0.20	59.00
L. Humphries	06/25/23	B120	Preparation of exhibits for draft Motion to Approve Claims Determination and Pool Assets.	1.00	255.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	06/26/23	B120	Conference with forensic accountants regarding claims determination and issues with individual investors.	1.40	357.00
R. Rodriguez	06/26/23	B120	Review accounting firm revised schedules of allowed/disallowed claims in preparation for call with forensic accountants regarding claims determination motion.	0.30	88.50
R. Rodriguez	06/27/23	B120	Emails to/from investor RB regarding claims determination and third party actions.	0.50	147.50
L. Humphries	06/27/23	B120	Draft brief for Claims Determination Motion and Motion to Pool Assets and Liabilities of Receivership estate.	3.50	892.50
R. Rodriguez	06/28/23	B120	Review further email from investor RB.	0.10	29.50
L. Humphries	06/28/23	B120	Worked with Receiver's CPA professionals regarding schedules for claimants.	1.50	382.50
L. Humphries	06/28/23	B120	Preparation of analysis and argument for Motion to Approve Receiver's Determination of Claims.	2.00	510.00
L. Humphries	06/29/23	B120	Review and analysis of updated Schedules for Claimants.	0.40	102.00
L. Humphries	06/29/23	B120	Review of IRS filing document related to Property Income Investors LLC	0.20	51.00
L. Humphries	06/29/23	B120	Emails with Michale O'Rourke.	0.20	51.00
L. Humphries	06/29/23	B120	Phone conference with Kaufman professionals.	0.30	76.50
R. Rodriguez	06/29/23	B120	Begin reviewing and revising Claims Determination Motion.	0.80	236.00
L. Humphries	06/29/23	B120	Preparation of analysis and research for Motion on final claims for allowed claimants.	3.40	867.00
L. Humphries	06/30/23	B120	Communicate with SEC regarding claims determination.	0.20	51.00
R. Rodriguez	06/30/23	B120	Emails with investor RB regarding timing of Claims Determination Motion.	0.20	59.00
L. Humphries	06/30/23	B120	Review and analysis of documents regarding lien on property sold in Receivership.	0.40	102.00
L. Humphries	06/30/23	B120	Preparation of draft Receiver's Motion to Determine Claims Amounts and Pool Receivership Assets.	3.00	765.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
R. Rodriguez	06/30/23	B120	Continue revising Receiver's Claims Determination Motion.	1.70	501.50
L. Humphries	06/30/23	B120	Draft Interim Report for second Quarter.	0.60	153.00
Subtotal Asset Analysis and Recovery				92.60	23,203.00
Other Contested Matters					
R. Rodriguez	06/30/23	B190	Review and respond to email from C. Lieberman forwarding 3 year old invoice from property remediation company with respect to a Lake Worth property supposedly belonging to one of the receivership.	0.30	88.50
R. Rodriguez	06/30/23	B190	Email discussion with Receiver regarding 2020 invoice provided by C. Lieberman by property remediation company for supposed work done on a supposed receivership entity and potential options regarding same.	0.20	59.00
Subtotal Other Contested Matters				0.50	147.50
Claims and Plan					
E. M. Murphy	04/10/23	B300	Review investor communications and provide investor information needed for follow-up.	0.20	41.00
E. M. Murphy	04/12/23	B300	Receive and review communications from investor, SG as power of attorney for M/M RH and follow-up for same.	0.20	41.00
E. M. Murphy	04/19/23	B300	Update investor spreadsheet for current information and for payout amounts.	0.50	102.50
E. M. Murphy	04/25/23	B300	Review investor inquiry regarding H. F. Trust and forward claims information for return call.	0.30	61.50
E. M. Murphy	04/25/23	B300	Receive Receiver line message for Investor R.A. regarding late submission of claim and review and forward claim information for same.	0.20	41.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	05/08/23	B300	Review and update investor information submitted (Estate of D.P.) and for requested follow-up for several investors (T.M., FM C., R. A.)	0.60	123.00
E. M. Murphy	05/16/23	B300	Review for and provide information for investor inquiry follow-up (Investor H.K.)	0.20	41.00
E. M. Murphy	05/23/23	B300	Review claim and CPA analysis for information for attorney follow-up for call from Investor (R.L and S. Partnership) for update	0.40	82.00
E. M. Murphy	05/30/23	B300	Attend and participate in conference call regarding status of court filings/motions, CPA analysis, and other issues.	1.90	389.50
E. M. Murphy	05/31/23	B300	Review files in search of Equinox and PII entities' Operating Agreements and follow-up with L. Humphries for same.	0.40	82.00
E. M. Murphy	06/01/23	B300	Review information request from investor and follow-up for same (K.T.)	0.10	20.50
E. M. Murphy	06/19/23	B300	Meet with L. Humphries for review of tasks and procedure for completing Receiver's Motion for Claims Distribution.	0.40	82.00
E. M. Murphy	06/19/23	B300	Review updated claims memorandum and spreadsheet prepared by accounting consultant to compare and verify allowed claims	0.40	82.00
E. M. Murphy	06/20/23	B300	Work on review of accounting consultant's claims allowances for confirmation with claims submitted in preparation for Schedules for Motion for Claims Determination.	4.20	861.00
E. M. Murphy	06/21/23	B300	Work on template for Exhibit A to Motion for Distribution	0.70	143.50
E. M. Murphy	06/21/23	B300	Work on review/confirmation of accounting consultant's claims allowances for confirmation with claims submitted and follow-up with accountant regarding same;	2.80	574.00
E. M. Murphy	06/21/23	B300	Update Investor data in preparation for mailings of court filings.	0.60	123.00

MIRANDA L. SOTO, RECEIVER
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Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	06/22/23	B300	Continued work on claims review in preparation for Motion for Claims Determination and Exhibit A.	0.40	82.00
E. M. Murphy	06/23/23	B300	Attend and participate in call with accountant consultant in preparation for Claims Determination Motion.	0.80	164.00
E. M. Murphy	06/23/23	B300	Receive and review updated claims data from accounting consultant and edit Claims spreadsheets with same	0.30	61.50
E. M. Murphy	06/23/23	B300	Review Proof of Claims forms to verify receipts in preparation for Distribution Motion.	2.30	471.50
E. M. Murphy	06/25/23	B300	Review files and create spreadsheet for future communications with investors (for mail merge documents)	3.70	758.50
E. M. Murphy	06/26/23	B300	Continue updating Claimant information in preparation for Exhibits to Motion for Claims Determination.	2.80	574.00
E. M. Murphy	06/26/23	B300	Continue review of submitted (paper) copies of Proof of Claims files to verify proper receipt in preparation for Exhibits to Motion to Claims Determination.	0.80	164.00
E. M. Murphy	06/26/23	B300	Conference call with attorney team and accountants for finalizing claims analysis for Exhibits to Motion for Claims Determination.	1.70	348.50
E. M. Murphy	06/27/23	B300	Review files and confirm number of claimants for inclusion in Motion for Claims Determination.	0.30	61.50
E. M. Murphy	06/27/23	B300	Continue updating of investor/claims information to be incorporated into the Motion for Claims Determination	2.30	471.50
E. M. Murphy	06/28/23	B300	Review communications forwarding the updated set of Schedules forwarded by the CPA for Exhibits to the Motion for Claims Determination and update Claims chart with new information.	0.80	164.00
E. M. Murphy	06/29/23	B300	Review draft Motion and fill in sections with details from Schedules 1 -4.	1.80	369.00
E. M. Murphy	06/29/23	B300	Work with L. Humphries and CPA to update and finalize Exhibits A-D for Claims Determination Motion.	2.60	533.00

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Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	06/29/23	B300	Review the updated Schedules information regarding Investors failing to submit a claim and verify same (for Schedule 4 to Claims Determination Motion).	1.00	205.00
E. M. Murphy	06/30/23	B300	Review communications regarding finalizing Motion for Claims determination and follow-up for same.	0.20	41.00
E. M. Murphy	06/30/23	B300	Review communications regarding editing required for Exhibit C and edit same.	1.40	287.00
E. M. Murphy	06/30/23	B300	Review for corporate documents to verify organization date for PII, LLC and follow-up regarding same (Sunbiz-Div of Corp)	0.40	82.00
Subtotal Claims and Plan				37.70	7,728.50
Total Hours				172.50	

Total Fees \$39,562.00

Amount Due This Invoice:	\$39,562.00
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MIRANDA L. SOTO, RECEIVER
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TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
K. L. Ecker	Paralegal	1.20	205.00	246.00
E. M. Murphy	Paralegal	39.20	205.00	8,036.00
M. E. Fleming	Summer Clerk	14.60	150.00	2,190.00
L. Humphries	Associate	89.90	255.00	22,924.50
L. Humphries	Associate	5.70	N/C	N/C
R. Rodriguez	Partner	20.90	295.00	6,165.50
R. Rodriguez	Partner	1.00	N/C	N/C
	Total	172.50		39,562.00



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

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

REMITTANCE STATEMENT

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

July 17, 2023
Invoice No. 12245975

Our Reference: 0104027-000002
Client Name: MIRANDA L. SOTO, RECEIVER
Invoice Date: July 17, 2023
Invoice Number: 12245975
Total Due This Invoice: \$39,562.00

Total Due All Invoices For this Matter:	\$39,562.00
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**PLEASE RETURN THIS REMITTANCE STATEMENT WITH YOUR PAYMENT
THANK YOU**

Make checks payable to: Buchanan Ingersoll & Rooney
Union Trust Building
Attn: Accounting Department
501 Grant Street – Suite 200
Pittsburgh, PA 15219-4413
Tax ID: 25-1381032

Wire / ACH Information
PNC Bank, N.A.
Buchanan Ingersoll & Rooney Operating Account
Account #: 1133081072
Routing#: 043000096
SWIFT CODE: PNCCUS33

Please Reference 0104027-000002 Invoice: 12245975

Amount remitted this payment: \$ _____

**RECENT FEES AND DISBURSEMENTS MAY NOT
YET BE ENTERED ON YOUR ACCOUNT AND
IF NOT, WILL BE SUBSEQUENTLY BILLED**

EXHIBIT “6c”

Property Income Investors LLC
 Billings for Q2 2023 - ADJUSTED

April				
Net hours billed		Hours	Rate	Billed
	MO	10.3	450	4,635.00
	DMK	1.0	450	450.00
		<u>11.3</u>		<u>5,085.00</u>
May				
	HF	17.6	200	3,520.0
	MO	3.2	450	1,440.00
	DMK	8.0	450	3,600.00
		<u>28.8</u>		<u>8,560.00</u>
June				
	HF	5.5	200	1,100.0
	MO	38.3	450	17,235.00
	DMK	2.0	450	900.00
		<u>45.8</u>		<u>19,235.00</u>
		Billed	Discount	Net
	Apr-23	5,085.00	(1,271.25)	3,813.75
	May-23	8,560.00	(2,140.00)	6,420.00
	Jun-23	19,235.00	(4,808.75)	14,426.25
		<u>32,880.00</u>	<u>(8,220.00)</u>	<u>24,660.00</u>
Balance due for Q2 2023				<u><u>24,660.00</u></u>

Kaufman & Company, PA

1001 Brickell Bay Drive ■ Suite 2650 ■ Miami, FL 33131

Phone: (305) 455-0314 E-mail: dkaufman@kaufmancpas.com Web: www.kaufmancpas.com

Property Income Investors Invoice: 12594

Property Income Investors Date: 04/30/2023
 Buchanan Ingersoll & Rooney Due Date: 05/30/2023
 One Biscayne Tower, Suite 1500
 Miami, FL 33131-1822

For professional service rendered as follows:
 Litigation Support services for April 2023 5,085.00

See attached time & expense journal

Billed Time & Expenses	\$5,085.00
Discount	(1,271.25)
Invoice Total	<u>\$3,813.75</u>
Beginning Balance	\$27,251.25
Invoices	3,813.75
Receipts	0.00
Adjustments	0.00
Service Charges	0.00
Amount Due	<u>\$31,065.00</u>

<u>04/30/2023</u>	<u>03/31/2023</u>	<u>02/28/2023</u>	<u>01/31/2023</u>	<u>12/31/2022+</u>	<u>Total</u>
3,813.75	6,007.50	8,100.00	13,143.75	0.00	\$31,065.00

Please return this portion with payment.

Invoice: 12594

ID: J507800
 Property Income Investors
 (305) 347-4086

Date: 04/30/2023
 Due Date: 05/30/2023

Card Type: _____ CSV: _____ Exp Date: _____

Amount Due: \$31,065.00

Card #: _____

Amount Enclosed: \$ _____

Signature: _____

Time & Expense Journal

April 1, 2023 - April 30, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
April 26, 2023											
DMK	J507800	Property Income Investors, LLC	LIT		LIT	Time	04/26/23	LIT		1.00	tele call
										1.00	
April 30, 2023											
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/11/23	LIT			n/c billing for 1Q 2023
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/12/23	LIT	0.20		Send latest version of report
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/12/23	LIT			n/c billing for 1Q 2023
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/13/23	LIT			n/c finalize and send billing to Receiver
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/13/23	LIT	3.10		SFAR - prepare draft of Q1 SFAR
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/14/23	LIT	0.20		Correspondence re dealing with investor K-1 inquiries
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/18/23	LIT	0.40		Finalize and issue SFAR for Q1 2023
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/19/23	LIT	2.20		Letter to IRS for PII 3501 which penalty was not abated but, based on all the other entities against which penalties were assessed, should have been. Include references to prior correspondence and to similarly situated entities which were abated.
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/21/23	LIT			Scheduling for meeting
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/21/23	LIT	3.20		Read Lieberman depo in anticipation of phone call with Receiver
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	04/26/23	LIT	1.00		Call with receiver and attorneys

April 30, 2023

10.30

Report Totals

11.30

Kaufman & Company, PA

1001 Brickell Bay Drive ■ Suite 2650 ■ Miami, FL 33131

Phone: (305) 455-0314 E-mail: dkaufman@kaufmancpas.com Web: www.kaufmancpas.com

Property Income Investors Invoice: 12649

Property Income Investors
 Buchanan Ingersoll & Rooney
 One Biscayne Tower, Suite 1500
 Miami, FL 33131-1822

Date: 05/31/2023
 Due Date: 06/30/2023

For professional service rendered as follows:
 See attached Time and Expense Journal

	8,560.00
Billed Time & Expenses	\$8,560.00
Discount	(2,140.00)
Invoice Total	<u>\$6,420.00</u>
Beginning Balance	\$31,065.00
Invoices	6,420.00
Receipts	0.00
Adjustments	0.00
Service Charges	0.00
Amount Due	<u>\$37,485.00</u>

<u>05/31/2023</u>	<u>04/30/2023</u>	<u>03/31/2023</u>	<u>02/28/2023</u>	<u>01/31/2023+</u>	<u>Total</u>
6,420.00	3,813.75	6,007.50	8,100.00	13,143.75	\$37,485.00

Please return this portion with payment.

ID: J507800
 Property Income Investors
 (305) 347-4086

Invoice: 12649
 Date: 05/31/2023
 Due Date: 06/30/2023

Card Type: _____ CSV: _____ Exp Date: _____

Amount Due: \$37,485.00

Card #: _____

Amount Enclosed: \$ _____

Signature: _____

Kaufman & Company, PA

Time & Expense Journal
May 1, 2023 - May 31, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
May 2, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2101	Time	05/02/23	1		0.40	2022 prep for returns
										0.40	
May 2, 2023											
May 3, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2101	Time	05/03/23	1		1.00	2022 workpapers for TR
										1.00	
May 3, 2023											
May 5, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2101	Time	05/05/23	1		0.25	2022 bookkeeping for TR
										0.25	
May 5, 2023											
May 8, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2101	Time	05/08/23	1		1.00	PII 1361 bookkeeping for TR
										1.00	
May 8, 2023											
May 10, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2101	Time	05/10/23	1		2.75	PII 1361 bookkeeping for TR and reviewng with Mike and Dana for how to proceed for 2022 tax returns (allocations etc) and preparing tax return for PII 1361
DMK	J507800	Property Income Investors, LLC	GEN		5100	Time	05/10/23	1		2.00	meeting w/ atty
										4.75	
May 10, 2023											
May 11, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/11/23	1		1.75	PII 4020 bookkeeping for TR
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/11/23	1		1.00	PII 201 bookkeeping for 2022 TR and preparing TR
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/11/23	1		0.30	PII 4450 2022 bookkeeping for TR
										3.05	
May 11, 2023											
May 12, 2023											

Kaufman & Company, PA

Time & Expense Journal
May 1, 2023 - May 31, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/12/23	1		1.25	PII 4450 bookkeeping and 2022 TR
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/12/23	1		0.55	2022 tax return and bookkeeping
May 12, 2023										1.80	
May 15, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/15/23	1		0.50	2022 bookkeeping and TR for PII 26
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/15/23	1		0.50	2022 bookkeeping and TR for PII 3504 0.50
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/15/23	1			PII 304 bookkeeping and TR
May 15, 2023										1.50	
May 16, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/16/23	1		1.75	PII 304 - 2022 TR
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/16/23	1		0.40	2022 tax return
May 16, 2023										2.15	
May 17, 2023											
DMK	J507800	Property Income Investors, LLC	GEN		2201	Time	05/17/23	1		3.00	PII LLCI; PII 26; PII 304 tax returns
HF	J507800		GEN		2201					3.00	PII 3504; PII 4020; PII 4450; 9007
										3.00	PII LLC bookkeeping and TR and reviewing with Dana
May 17, 2023										9.00	
May 18, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/18/23	1		0.40	PII 4020 updating financials for TR
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	05/18/23	1		0.30	PII 1361 updating financials for TR
May 18, 2023										0.70	
May 31, 2023											
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	05/10/23	LIT		1.60	Meet with Receiver and counsel re drawback issues

Kaufman & Company, PA

Time & Expense Journal
 May 1, 2023 - May 31, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	05/10/23	LIT		1.10	Review information to be entered in PII 1360 final return, assess entry of gain and loss, allocation of receiver expenses to individual companies and reporting of write-off of intercompany gains and losses for allocation
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	05/15/23	LIT			Download depositions and exhibits from Nicoles, Brodman and Lieberman for analysis requested at 5/10 meeting
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	05/31/23	LIT		0.10	IRS letter re PII 304
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	05/31/23	LIT		0.40	Research and send report to Lauren
May 31, 2023											
Report Totals											3.20
											<u>28.80</u>

Kaufman & Company, PA

1001 Brickell Bay Drive ■ Suite 2650 ■ Miami, FL 33131

Phone: (305) 455-0314 E-mail: dkaufman@kaufmancpas.com Web: www.kaufmancpas.com

Property Income Investors Invoice: 12774

Property Income Investors Date: 06/30/2023
 Buchanan Ingersoll & Rooney Due Date: 07/30/2023
 One Biscayne Tower, Suite 1500
 Miami, FL 33131-1822

For professional service rendered as follows:

Litigation Support services for June 2023 19,235.00

See attached time & expense journal

Billed Time & Expenses	\$19,235.00
Discount	(4,808.75)
Invoice Total	<u>\$14,426.25</u>
Beginning Balance	\$37,485.00
Invoices	14,426.25
Receipts	(27,251.25)
Adjustments	0.00
Service Charges	<u>0.00</u>
Amount Due	<u>\$24,660.00</u>

<u>06/30/2023</u>	<u>05/31/2023</u>	<u>04/30/2023</u>	<u>03/31/2023</u>	<u>02/28/2023+</u>	<u>Total</u>
14,426.25	6,420.00	3,813.75	0.00	0.00	\$24,660.00

Please return this portion with payment.

Invoice: 12774

ID: J507800
 Property Income Investors
 (305) 347-4086

Date: 06/30/2023
 Due Date: 07/30/2023

Card Type: _____ CSV: _____ Exp Date: _____

Amount Due: \$24,660.00

Card #: _____

Amount Enclosed: \$ _____

Signature: _____

Kaufman & Company, PA

Time & Expense Journal
June 1, 2023 - June 30, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
June 15, 2023											
HF	J507800	Property Income Investors, LLC	DEFAULT		2500	Time	06/15/23	1		6.00	Preparing list of investors and claim amounts for memo for Miranda to for court
										-2.50	
										6.00	
										Adjusted	3.5
HF	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/16/23	1		2.00	PII and Equinox worksheet for June 2023 court
										2.00	
June 16, 2023											
June 26, 2023											
DMK	J507800	Property Income Investors, LLC	GEN		5100	Time	06/26/23	1		1.50	conf call attys
DMK	J507800	Property Income Investors, LLC	GEN		1100	Time	06/26/23	1		0.50	review schedules for meeting
										2.00	
June 30, 2023											
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/15/23	LIT		1.00	Assess work to be done on numbering claims and summarizing Exhibits A, B, etc.
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/15/23	LIT		0.20	Emails with Lauren to clarify memo
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/15/23	LIT		0.30	Set up process for accumulating data to be included in schedules
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/16/23	LIT		2.70	Analyze Equinox investors to eliminate claims for investments made prior to August 1, 2016 for purposes of eliminating those investors from the Receivership
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/17/23	LIT		2.60	Clean up Equinox analysis, update schedule to agree to memo and send off to Ms Humphries for consideration
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/19/23	LIT		1.60	Revise schedule to prepare a separate analysis of the investors who returned POC forms which were disqualified due to the date cutoff.
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/20/23	LIT		1.80	Listing of investors who received more cash from the receivership than they invested
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/21/23	LIT		0.80	Alphabetize investor list per Ms. Humphries request

Kaufman & Company, PA

Time & Expense Journal
June 1, 2023 - June 30, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/21/23	LIT		2.70	Respond to identified inquiries among investor claims
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/23/23	LIT		1.60	Update investor list to incorporate investor who provided two POC forms, only one of which was previously included in the POC documents
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/23/23	LIT		1.00	Conference call to resolve that investors who returned POC forms that are not explicit as to the amount owed are nonetheless entitled to the amount PII sent them on the request for POC
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/24/23	LIT		3.50	Categorize investor accounts by classifications assigned by Ms. Rodriguez
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/26/23	LIT		2.50	Continue categorization
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/26/23	LIT		1.30	Conference call to rearrange categories for investors and to further refine the definition of each category
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/27/23	LIT		0.80	Understand additional Proof of Claim forms received, incorporate into analysis and email to team to communicate resolution
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/27/23	LIT		2.50	Begin preparation of final four schedules
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/27/23	LIT		2.30	Continue preparation of final four schedules
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/28/23	LIT		3.50	Continue analysis of POC forms - categorize them among the various descriptions of the schedules
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/28/23	LIT		1.00	prepare email together with the schedules
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/28/23	LIT		1.00	answer questions from Ms. Humphries
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/29/23	LIT		0.20	Question about investors appearing on more than one schedule
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/29/23	LIT		0.40	Telephone conversation with Eileen to understand the difficulty of having an investor on schedule 2 (disputed and allowed) and also on schedule 3 (disallowed due to Equinox date cutoff). Rerun schedule 3 assigning investor numbers and eliminating parentheses from the loss amounts.
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/29/23	LIT		0.70	Revise schedule 3 to eliminate equinox investors which have disallowed claims but which also have allowed claims on schedule 2, pursuant to discussion with attorney. Rerun previous schedules

Kaufman & Company, PA

Time & Expense Journal
June 1, 2023 - June 30, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	06/30/23	LIT		2.30	Review the Equinox allowed and disallowed claims to determine the impact of the change of cutoff date to begin the Receivership claims from the previously determined August 1, 2016 cutoff to the newly determined cutoff of March 11, 2016
June 30, 2023										<u>38.30</u>	
Report Totals										<u>48.30</u>	

Total hours incurred for June 2023	48.30
Credit for hours exceeding daily limit - HF 6/15/2023	- 2.50
Net hours charged for June 2023	45.80

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 NINTH INTERIM
OMNIBUS APPLICATION FOR ALLOWANCE AND PAYMENT
OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES
FOR APRIL 1, 2023 – JUNE 30, 2023**

THIS CAUSE came before the Court on Miranda L. Soto, as Receiver's (the "Receiver") Unopposed Seventh Interim Omnibus Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for April 1, 2023 through June 30, 2023 (Doc. 106) (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 Application is **GRANTED**.
2. The Court awards the following sums and directs that payment be made from

Receivership assets:

Miranda L. Soto, as Receiver	\$ 18,221.73
Buchanan Ingersoll & Rooney PC	\$ 39,562.00
Kaufman & Company PA	\$ 24,660.00

DONE and ORDERED this ____ day of _____, 2023 in the Southern District of Florida.

UNITED STATES DISTRICT COURT JUDGE

4886-6128-2080, v. 1