

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 MOTION TO HOLD K.TEK SYSTEMS, INC. AND/OR KIMBERLY
DURING AND/OR RON DURING IN CONTEMPT AND FOR SANCTIONS**

Miranda L. Soto, solely in her capacity as Receiver (the “Receiver”) for Defendants¹, and pursuant to the Order Granting Plaintiff Securities and Exchange Commission’s Motion for Appointing Receiver, dated June 15, 2021 (Doc. 10), hereby moves this Court to enter an Order to show cause why the Respondents, K.Tek Information Systems, Inc. and/or Kimberly During and/or Ron During, should not be held in contempt of court and states as follows in support:

¹ The Receiver Entities include 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”).

1. On January 19, 2024, the Receiver learned that the PII Receivership website, <https://www.propertyireceivership.com/>, was no longer accessible to investors, the general public, or the Receiver and her Counsel. Upon learning this information, the Receiver's counsel immediately contacted the website hosting provider, K.Tek Systems Inc. ("K.Tek"), to determine the reason for the outage and inaccessibility of the website.

2. On January 22, 2024, it was reported to the Receiver's counsel by Kimberly During that the two managers of K.Tek system (Kimberly During and Ron During) are going through a contentious divorce according to Mrs. During.² According to Mrs. During, Ron During has allegedly taken control and sabotaged several websites hosted by K.Tek including the Receivership website.

3. Due to a lack of responsiveness from K.Tek, Mrs. and Mr. During, the Receiver was forced to hire a web consultant to assist in recovering the website. The web consultant, Emilio Yopez, immediately began working to get the website back up and running, but eventually found that certain access credentials were needed to continue progress in restoring the website. These credentials were only in the possession and control of K.Tek as Receiver's website host provider and vendor.

4. On January 29, 2024, the Receiver's counsel connected with Mrs. During, who advised that only her husband, Ron During, could provide the true credentials necessary to access the website host information, and advised that she was willing to work with us on getting the information to the Receiver. *See Exhibit A.* The Receiver has connected with Mr. During and he advised that he has had no involvement with K.Tek since June 16, 2023. *See Exhibit B.* The

² The Receiver reviewed the Hillsborough Clerk of Court records but was unable to locate any divorce proceedings for either Ronald During or Kimberly During.

Receiver is unable to discern which individual is providing truthful information and thus needs judicial intervention.

5. Since that time, and despite Mrs. During's offer to help, the Receiver's new web consultant, Emilio Yepez, has been troubleshooting to restore the website to no avail and has exhausted all resources on how to regain access to the website. Interestingly enough, Mrs. During will only correspond with the Receiver and her Counsel via email and for some unknown reason will not talk to the Receiver's Counsel telephonically so it's unclear whether the Receiver's Counsel is actually communicating with Mrs. During or someone else.

6. At bottom, K.Tek, with whom the Receiver has an agreement to host and manage the Receivership website, has done virtually nothing to aid the Receiver in getting the website back up and running which has resulted in the depletion of receivership assets.

7. Further, upon information and belief, Ron During, K.Tek and Mrs. During has willfully taken the Receivership website offline or failed to safeguard and prevent the website from being hacked.

8. Despite the Receiver's best efforts, the website remains offline as of the date of this motion. The Receiver has continued to communicate with investor claimants concerned about the status of the website which is also unnecessarily depleting receivership assets.

9. Given that the process of resolving this issue and/or finding a new website hosting provider is costing the Receivership funds, the Receiver seeks to hold K.Tek, Mrs. During, and Ron During—in contempt for interfering with the Receivership in contravention of paragraph 24(b) of the Order Appointing the Receiver (Doc. 10), which prevents the hinderance, obstruction or interference with the Receiver in the performance of her duties.³

³ See *Liberte Capital Group, LLC v. Capwill*, 462 F.3d 543, 552 (6th Cir. 2006) (“Because the court’s power of injunction in a receivership proceeding arises from its power over the assets in question, non-parties to the

10. In the meantime, the Receiver and her counsel are working diligently to get the Receivership website back up and running and will file another notice advising this Court when the website has been restored or recreated with a request for reimbursement of the funds unnecessarily depleted by the Durings and K.Tek.

WHEREFORE, Miranda L. Soto, solely in her capacity as Receiver of the Receivership Entities, respectfully requests the entry of an order for K.Tek Information Systems, Inc., Kimberly During, and Ron During to show cause why they should not be held in contempt for interfering with the Receivership, and for such other and further relief as this Court deems just.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Raquel A. Rodriguez _____

Raquel A. Rodriguez, Esq.
Florida Bar No. 511439
Christian C. Kohlsaatt, Esq.
Florida Bar No. 117795
One Biscayne Tower
2 S. Biscayne Blvd, Suite 1500
Miami, FL 33131-1822
T: 305-347-4080
F: 305-347-4089
raquel.rodriguez@bipc.com

and

By: /s/ Lauren V. Humphries _____

Lauren V. Humphries, Esq.
Florida Bar No. 117517
lauren.humphries@bipc.com
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Tampa, FL 33602
T: 813-222-1141
F: 813-222-8189

underlying litigation may be bound by a blanket stay, so long as the non-parties have notice of the injunction.”); *see also S.E.C. v. Byers*, 609 F.3d 87, 91-91 (2d. Cir. 2010) (same). “Intentional interference with a receivership in contravention of a district court’s blanket stay is punishable by contempt.” *Liberte*, 462 F.3d at 552.

Attorneys for Receiver Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2024, 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*

/s/ Christian C. Kohlsaatt
Attorney

EXHIBIT “A”

From: [Accounting - K.Tek Systems](#)
To: [Emilio Yepez](#); [Accounting - K.Tek Systems](#)
Cc: [Kimberly During](#); [Miranda L. Soto](#); [Christian C. Kohlsaas](#); [Support](#); [Lauren V. Humphries](#); [Raquel A. Rodriguez](#)
Subject: RE: PII Receivership Website Down - Need Fixed ASAP
Date: Thursday, February 1, 2024 4:42:42 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)



Emilio,

I have access to Network Solutions, but they don't have what is needed. That is just your domain registration, and you are fine with that. Did you see my other email?

Kim

From: Emilio Yepez <emilio@lighthouseinternetmedia.com>
Sent: Thursday, February 1, 2024 4:27 PM
To: Accounting - K.Tek Systems <Accounting@ktek.com>
Cc: Kimberly During <Kimberly.During@ktek.com>; Miranda L. Soto <miranda.soto@bipc.com>; Christian C. Kohlsaas <christian.kohlsaas@bipc.com>; Support <support@ktek.com>; Lauren V. Humphries <lauren.humphries@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>
Subject: Re: PII Receivership Website Down - Need Fixed ASAP



External (emilio@lighthouseinternetmedia.com)



Hello again, we confirmed with host gator that hostmaster@ktek.com is not associated to the account, therefore we are ruling this out and going with Network Solutions.

On Thu, Feb 1, 2024 at 12:15 PM Emilio Yepez <emilio@lighthouseinternetmedia.com> wrote:

They are requiring -

To update the primary contact on an account, first collect **all 3 of the required documents:**

Valid Government Issued Photo ID (full color)

for the person requesting to become the Primary contact

PLUS, any 2 of the following recent organization documents (cannot be personal):

- Utility Bill (dated within 90 days of submission)
- Business License
- Letter of Incorporation
- A Tax Return or Tax ID Document

NOTE: The organization address **must** match the address on the supporting documentation provided.

On Thu, Feb 1, 2024 at 12:10 PM Emilio Yepez <emilio@lighthouseinternetmedia.com> wrote:

Good afternoon, we discovered another email Ron may have had - hostmaster@ktek.com (we think this may be it), we are now following up again with host gator.

In the meantime, we have since revisited network solutions and they are not admitting or denying - so this may be the way to go. They provided us another link to update our contact information. Who can help us with this?

[Network Solutions | My Account](#)

On Thu, Feb 1, 2024 at 11:02 AM Emilio Yepez <emilio@lighthouseinternetmedia.com> wrote:

Good morning, neither of our emails (Ron.during@gmail.com and/or ron.during@radtechconsulting.com) have an existing network solutions correlation - we are now working with Amazon services

The screenshot displays the Network Solutions website interface. At the top left is the 'network solutions' logo. A prominent banner reads 'Need a tech expert on hand? ACTIVATE YOUR FREE MyTime Support™ TODAY' with an 'Activate MyTime' button. Below this is the 'Help & Support' section, which includes a 'Customer Support' area with contact information for phone, in the U.S. and Canada, and outside the U.S., along with a 'Login' button. To the right of the help section is a 'Get a New Domain' form with a 'Search Now' button. Further right is a 'FREE Domain Name with Web Hosting' offer with a 'Learn more' link. At the bottom of the help section is an 'FAQs' section with a 'Search FAQs' button. On the right side of the page is a 'Message Us' chat window. The chat history shows a user message: 'name is Mahindra, and I'll be your Web Advisor for the day.' followed by a support response: 'We are calling on behalf of law firm and need to email your support desk, our current web admin has gone missing and we need someone to help us'. The user then replies: 'I apologize for the inconvenience this has caused you. I'll certainly assist you with this. To proceed, please help me with your registered email address to quickly locate your account.' The support agent responds: 'That's the problem we are not sure of the email'. The user then says: 'our current web person is dispaired'. The support agent concludes: 'We have a copy of order to investigate and find out where our website is and'. The chat window ends with a 'Send a message...' input field and a send button.

The screenshot shows the Network Solutions website's help and support page. At the top, there is a banner for 'Need a tech expert on hand?' with a 'MyTime Support' logo and an 'Activate MyTime' button. Below the banner, the 'Help & Support' section includes a 'Customer Support' area with contact information for phone support (7 a.m. ET to midnight, 7 days a week) and a 'Login' button. To the right of the login area, there are promotional banners for 'Get a New Domain' and 'FREE Domain Name with Web Hosting'. Below these, there is an 'FAQs' section with a 'Search FAQs' button. On the far right, a 'Message Us' chat window is open, displaying a conversation. The chat messages include: 'Here are the emails I have', 'ron@ktek.com', 'Ron.during@gmail.com and/or ron.during@radtechconsulting.com', 'Hope that helps', 'Thank you for the information.', 'I apologize for the delay. I apologize, I was unable to locate the account using either of the email addresses.', and 'Thank you'. The chat window also shows a 'Send a message...' input field and a 'CHAT' button at the bottom right.

On Wed, Jan 31, 2024 at 9:35 PM Emilio Yopez <emilio@lighthouseinternetmedia.com> wrote:

We've spent most of the day trying to connect the dots on this matter. We've made some progress and confirmed history that he may have made a switch on the domain to another host. It is not on Hostgator at this time or at least not under the emails Kim provided Ron.during@gmail.com and/or ron.during@radtechconsulting.com, what we did confirm is that these emails are registered under another hosting account provider: Network Solutions, so we need to begin an inquiry with them. However we dug into this even further today and used an email we created and tested under Ron@ktek.com and that email does in fact exist and was registered under Amazon Web services, another hosting company. Therefore we need to start investigating Network Solutions and Amazon Web Services and see if the website was moved over to either company. It may very well be on HostGator under another email unbeknownst to us, so we can't rule that out.

Kim do you have access to Ron@ktek.com?

Do you have access to any other employee and their email addresses?

We've got to keep digging with your help and try to get this to move forward. We are spending a lot of time figuring out this puzzle. Have you called his family, does anyone know about Ron's whereabouts?

Miranda and Christian, we have completed our back up files of the website and were only able to retrieve a superficial copy and some back links and pages, it is not anywhere near complete. Our only option is to start another inquiry with Network Solutions and Amazon. I will have more to report tomorrow morning.

On Wed, Jan 31, 2024 at 5:24 PM Emilio Yopez <emilio@lighthouseinternetmedia.com> wrote:

Host Gator would host the files.

Host gator has chat and live support, let me see what I can do.

On Wed, Jan 31, 2024 at 5:12 PM Accounting - K.Tek Systems <Accounting@ktek.com> wrote:

Emilio,

Having his last name or owning the company didn't stop Mr. During from acting without consent, so I don't have the information to answer your questions. I do have a file server of backup data files, but they are not web files. Ron destroyed his emails and files and took the computer and cell phone. I need a court order to get them back because he took them to his residence. I can do a keyword search on my records, but the client would have those emails before I could recover them.

Why or how would HostGator have the cPanel or WP credentials to your website that were on a K.Tek server? What does HostGator have to do with this account, what am I calling them to ask for?

Those files could have been set up at HostGator by Ron, but I have no record of that, in files, emails, or financial transactions.

Kim

We can schedule a call for tomorrow, but you would need to put everything in an email, regardless because it is the only way to keep track.

Please put HostGator and me on an email chain and start to coordinate whatever it is that they have that I can help with, I don't have anything about your account that I can share with them that I wouldn't just send to you. I must restore to find out more information and I can't restore without the passwords.

And YES, this is VERY serious.

From: Emilio Yopez <emilio@lighthouseinternetmedia.com>
Sent: Wednesday, January 31, 2024 4:41 PM
To: Kimberly During <Kimberly.During@ktek.com>
Cc: Accounting - K.Tek Systems <Accounting@ktek.com>; Miranda L. Soto <miranda.soto@bipc.com>; Christian C. Kohlsaar <christian.kohlsaar@bipc.com>; Support <support@ktek.com>; Lauren V. Humphries <lauren.humphries@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>
Subject: Re: PII Receivership Website Down - Need Fixed ASAP



External (emilio@lighthouseinternetmedia.com)



Hello Kimberly,

To be clear. I cannot help you as if I had this information then your services wouldn't be interrupted. (Help me understand something important please. Did Mr. During develop the website? Is there anyone else on his team? Someone has them, there are emails that were relayed from one person to another. Who else would have worked on the website?)

Having this information and/or backup passwords from Ron During is the only way to restore the site. (It is not the only way to restore the website - we are not certain there are any files at all on that server by now. You carry his last name, you have a ktek email. I believe if you inquire with HostGator, provide your email and identification they can help you. Can we get your commitment to do so? Could we do it together on a scheduled call?)

We are all at his mercy, and I apologize but this is what the below message means. (I understand but this is a serious matter - any help you extend could be perceived as assisting us and avoiding any further serious consequences - you are communicating with us via email, which means you can communicate - let's work together and contact the hosting platform)

You will have to get this information from Ron During and I can then help you. He didn't leave that information for me to have that was accurate and he has refused to supply it to me. He may give it to you directly. If you have that, then I can help you relocate or get restored.

On Wed, Jan 31, 2024 at 4:07 PM Kimberly During <Kimberly.During@ktek.com> wrote:

Emilio,

To be clear. I cannot help you as if I had this information then your services

wouldn't be interrupted. Having this information and/or backup passwords from Ron During is the only way to restore the site. We are all at his mercy, and I apologize but this is what the below message means.

You will have to get this information from Ron During and I can then help you. He didn't leave that information for me to have that was accurate and he has refused to supply it to me. He may give it to you directly. If you have that, then I can help you relocate or get restored.

Kim During

From: Emilio Yopez <emilio@lighthouseinternetmedia.com>

Sent: Wednesday, January 31, 2024 3:51 PM

To: Accounting - K.Tek Systems <Accounting@ktek.com>

Cc: Miranda L. Soto <miranda.soto@bipc.com>; Kimberly During <Kimberly.During@ktek.com>; Christian C. Kohlsaar <christian.kohlsaar@bipc.com>; Support <support@ktek.com>; Lauren V. Humphries <lauren.humphries@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>

Subject: Re: PII Receivership Website Down - Need Fixed ASAP

Caution: External



(emilio@lighthouseinternetmedia.com)



First-Time Sender

Good afternoon, I may have missed this email - my apologies.

We need access to the c panel of the server, where the page is hosted and files were uploaded. It's a username and pw with a login area. Hostgator can retrieve and help you get access to that.

On Mon, Jan 29, 2024 at 10:01 PM Accounting - K.Tek Systems <Accounting@ktek.com> wrote:

Yes, please do reach out to me and, I will do all that I can, and I have others available for help if out of my knowledge area. I am remote from the hours of 11-2 tomorrow and then in the office and online all day.

From: Miranda L. Soto <miranda.soto@bipc.com>

Sent: Monday, January 29, 2024 9:50 PM

To: Kimberly During <Kimberly.During@ktek.com>; Christian C. Kohlsaar

<christian.kohlsaat@bipc.com>; Support <support@ktek.com>

Cc: Lauren V. Humphries <lauren.humphries@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>; Emilio Yepez <emilio@lighthouseinternetmedia.com>

Subject: RE: PII Receivership Website Down - Need Fixed ASAP

Importance: High



External (miranda.soto@bipc.com)



Thank you, Ms. During. I am very sorry that you are going through a difficult time right now and we certainly do not want to make things worse for you. We understand that Ktek is not HostGator, however, it's my understanding that we need your assistance to restore our account through HostGator as an alternative and that HostGator may have our website backed up on its server.

Our website is: <https://www.propertyreceivership.com/>

Emilio: can you please advise Ms. During exactly what we need assistance with to access our account?

Thank you,

Miranda

Miranda L. Soto

Shareholder and Board Certified Specialist in Civil Trial Law
Chair of Product Liability Practice Group

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Miami, FL 33131-1822
305 347 4086 (o)
miranda.soto@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)



From: Kimberly During <Kimberly.During@ktek.com>
Sent: Monday, January 29, 2024 9:37 PM
To: Miranda L. Soto <miranda.soto@bipc.com>; Christian C. Kohlsaad <christian.kohlsaad@bipc.com>; Support <support@ktek.com>
Cc: Lauren V. Humphries <lauren.humphries@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>; Emilio Yepez <emilio@lighthouseinternetmedia.com>
Subject: RE: PII Receivership Website Down - Need Fixed ASAP

Hello,

I am not "Host Gator" that is another company. I wouldn't be able to give you that information for the credentials to another organization. Do you know how or why they are involved in the K.Tek Systems services?

We just need to get Mr. During to help us by supplying the credentials and setup information that he had configured for your digital assets as he didn't leave the account documented.

I am not represented by an attorney for this matter, and I had hoped that Mr. During would simply comply. I would be happy to speak to your judge if you need me to.

I have been trapped under a very violent and long-term relationship of domestic violence with Mr. During and unfortunately, the same behaviors of control, coercion, threat, and personal harm that have befallen me; are being extended to my business and its clients that I founded 30 years ago.

This is an escape for life (for me) and not just a divorce or marital dispute and my legal, financial, and medical records for the last decade will support that. I have acted to the best of my professional abilities with what I have been left to work with and the behavior has been irrational depending on the client.

I would be happy to speak to your judge or any judge that would like to free me, your website credentials, and everyone's credentials and be able to enforce the action. This isn't how I do business, but I am feeling powerless. Just let me know how you would like to proceed. OR how you would like me to help you expedite getting the site back online for you.

Kim During

From: Miranda L. Soto <miranda.soto@bipc.com>

Sent: Monday, January 29, 2024 9:05 PM
To: Kimberly During <Kimberly.During@ktek.com>; Christian C. Kohlsaat <christian.kohlsaat@bipc.com>; Support <support@ktek.com>
Cc: Lauren V. Humphries <lauren.humphries@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>; Emilio Yepez <emilio@lighthouseinternetmedia.com>
Subject: RE: PII Receivership Website Down - Need Fixed ASAP
Importance: High



Caution: External (miranda.soto@bipc.com)



First-Time Sender

Dear Ms. During,

If you are represented by Counsel, please have your counsel reach out to Christian Kohlsaat immediately.

I am the Receiver appointed by the United States District Court Judge Raag Singhal to protect and marshal assets for defrauded investor for the PII Receivership. To date, it has been *almost 2 weeks* since our website has been disrupted by some sort of unknown personal, domestic dispute. We have spent considerable time and resources attempting to resolve one simple issue which is: to obtain the HostGator credentials for our website. The below generic response is unacceptable and we need clarity on “what happened” to our GatorHost credentials to inform Judge Singhal. Ignoring us and/or providing cryptic messages like the ones we have received repeatedly from Ktek is unproductive, unprofessional, and counterintuitive.

We have already retained Mr. Yepez from Lighthouse Internet Media, in copy, to attempt to restore our website, however, we need the HostGator credentials ***immediately*** so Mr. Yepez can try restore our website.

To be clear: this website provides valuable information to mostly elderly, defrauded investors about the status of our Receivership and it is imperative that it is restored as soon as possible.

We are in the process of preparing an Emergency Motion to file with the Court **tomorrow** to seek judicial intervention to compel Ktek and HostGator to provide us with immediate access to our website irrespective of any personal disputes.

Respectfully,

Miranda Soto, Receiver

Miranda L. Soto

Shareholder and Board Certified Specialist in Civil Trial Law
Chair of Product Liability Practice Group

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Buchanan

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From: Kimberly During <Kimberly.During@ktek.com>

Sent: Monday, January 29, 2024 6:01 PM

To: Christian C. Kohlsaat <christian.kohlsaat@bipc.com>; Support <support@ktek.com>

Cc: Lauren V. Humphries <lauren.humphries@bipc.com>; Miranda L. Soto <miranda.soto@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>

Subject: RE: PII Receivership Website Down - Need Fixed ASAP

Dear client,

Without a copy of your files and/or the passwords to the backup system from Ron During to secure them for you, we are unable to help you restore them on another host, here or elsewhere.

If your account access or backup files are being withheld from you upon request or you have been coerced to sign a new agreement before gaining access to the files, then please contact the FBI at www.ic3.gov and make a report.

**See attached, claim by other clients.

Unfortunately, this is by design, and many clients are being held hostage and left without many options to restore what they had, here at K.Tek Systems or anywhere else.

Others and I are here to help you when anything that I can do.

Kim During

From: Christian C. Kohlsaad <christian.kohlsaad@bipc.com>
Sent: Monday, January 29, 2024 3:03 PM
To: Kimberly During <Kimberly.During@ktek.com>; Support <support@ktek.com>
Cc: Lauren V. Humphries <lauren.humphries@bipc.com>; Miranda L. Soto <miranda.soto@bipc.com>; Raquel A. Rodriguez <raquel.rodriguez@bipc.com>
Subject: RE: PII Receivership Website Down - Need Fixed ASAP



Caution: External (christian.kohlsaad@bipc.com)
First-Time Sender



Hello Kim/K.Tek,

I'm just following up on Lauren's email below. We have an urgent need for the HostGator credentials associated with the Receivership website. We're having a web consultant recover the website, and he can go no further without them. Please provide the credentials by 5 pm today (or earlier if you can) because we have to get the website back up and running as soon as possible. This is interfering with the Receiver's administration of the Receivership, and we've hearing nothing from you regarding the repair or status of the website aside from the attached. At this point, we are going to have to seek judicial assistance/intervention unless we receive satisfactory answers and information from you. Please contact me as soon as possible. Thanks.

Best,

Christian C. Kohlsaad
Associate

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305 347 5720 (o)
christian.kohlsaad@bipc.com

Buchanan

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From: Lauren V. Humphries <lauren.humphries@bipc.com>
Sent: Tuesday, January 23, 2024 8:49 AM
To: Kimberly During <Kimberly.During@ktek.com>; Support <support@ktek.com>
Cc: Sabrina Storno <Sabrina.Storno@bipc.com>; Christian C. Kohlsaatt <christian.kohlsaatt@bipc.com>
Subject: RE: PII Receivership Website Down - Need Fixed ASAP

Hi Kim,

Following up on our website still being down. We need it up by today.

Lauren

Lauren V. Humphries
Attorney at Law

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401 E. Jackson Street, Suite 2400
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813 222 1141 (o)
lauren.humphries@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Kimberly During <Kimberly.During@ktek.com>
Sent: Monday, January 22, 2024 1:29 PM
To: Lauren V. Humphries <lauren.humphries@bipc.com>; Support <support@ktek.com>
Cc: Sabrina Storno <Sabrina.Storno@bipc.com>; Christian C. Kohlsaatt <christian.kohlsaatt@bipc.com>
Subject: RE: PII Receivership Website Down - Need Fixed ASAP

— — — —

From: Lauren V. Humphries <lauren.humphries@bipc.com>
Sent: Monday, January 22, 2024 8:46 AM
To: Info at kTek <info@ktek.com>; Support <support@ktek.com>
Cc: Sabrina Storno <Sabrina.Storno@bipc.com>; Christian C. Kohlsaatt

<christian.kohlsaat@bipc.com>

Subject: PII Receivership Website Down - Need Fixed ASAP



External (lauren.humphries@bipc.com)



Good morning,

Our Receivership website <https://www.propertyreceivership.com/> has been down since Thursday. We need it back up to facilitate our customer review of filings. If we cannot get it up by this afternoon at 5PM, the Receiver will take court action. Please call me at 813-380-1400 to provide an update.

Lauren

Lauren V. Humphries
Attorney at Law

Buchanan Ingersoll & Rooney PC
Truist Place
401 E. Jackson Street, Suite 2400
Tampa, FL 33602-5236
813 222 1141 (o)
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Buchanan

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To your success,



Emilio Yepez

Founder and President
Lighthouse Internet Media
www.lighthouseinternetmedia.com
2525 Ponce De Leon,
Suite 300
Coral Gables, Florida 33134
Cell: (305) 987-2506
AIM: emilioyepez
Skype: Emilio Yepez

--

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Emilio Yopez

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Skype: Emilio Yopez

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To your success,

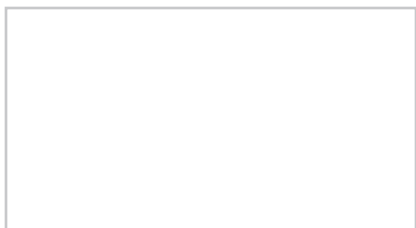


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AIM: emilioyepez
Skype: Emilio Yepez

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To your success,

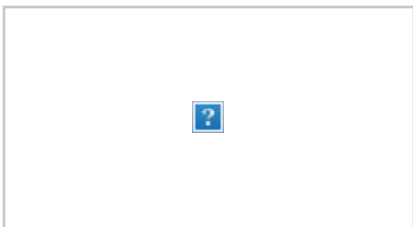


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Skype: Emilio Yopez

EXHIBIT “B”

From: [Miranda L. Soto](#)
To: [Ron During](#); [Emilio Yopez](#); [Christian C. Kohlsaas](#)
Cc: [Raquel A. Rodriguez](#); [Lauren V. Humphries](#)
Subject: RE: Website File Request - 02-02-24
Date: Monday, February 5, 2024 6:33:28 PM
Attachments: [image001.png](#)

Thank you for your email, Mr. During. We are in the process of filing Contempt Motion in Federal Court due to the time, expense, and inconvenience the situation has caused to the Receivership and will provide you, Ms. During, and Ktek a copy of the Motion. I have already approved Mr. Yopez to recreate the website and any assistance you can provide him to conserve receivership assets will be reported to Judge Singhal.

Please provide us any and supporting documentation of your departure from Ktek as discussed below so that I may also provide this information to Judge Singhal.

Regards,

Miranda L. Soto
Shareholder and Board Certified Specialist in Civil Trial Law
Chair of Product Liability Practice Group

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miranda.soto@bipc.com

Buchanan

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From: Ron During <Ron.During@radtechconsulting.com>
Sent: Monday, February 5, 2024 4:07 PM
To: Miranda L. Soto <miranda.soto@bipc.com>; Emilio Yopez <emilio@lighthouseinternetmedia.com>; Christian C. Kohlsaas <christian.kohlsaas@bipc.com>
Subject: RE: Website File Request - 02-02-24
Importance: High



Miranda,

I wanted to confirm with you that I received this email as well as the email from Emilio requesting some information, assistance and or help for the site propertyireceivership.com. There are some things that need to be cleared up as it pertains to the site for propertyireceivership.com.

propertyireceivership.com was a web site developed by K.Tek Systems, Inc.
propertyireceivership.com is hosted on the network of K.Tek Systems, Inc.
The domain name, propertyireceivership.com, is a domain name managed by K.Tek Systems but owned by Property Income Investors Receivership.

For my involvement with the site and any support of it, that ended on June 16, 2023 when I was terminated from K.Tek Systems. I'm not an owner of the company in any way, and I wasn't a employee. Just a 1099 contractor. From that date until now, I don't have any access to the network or files for K. Tek Systems network or backups.

The full responsibility of the site domain name, hosting of the site, including backup files are all with K.Tek Systems. All agreements were with K.Tek Systems, not me personally or my new company.

I do maintain several receiverships sites and understand how important the site is to have online. I would love to assist in any way possible, to give you guidance on what is needed and how to achieve get the site back online the quickest. I can even offer a rebuild of the site myself since I was the original person who did it.

In all, if we move quickly on this a domain name transfer would need to be done first to get the domain updated to the Receivership/Firm, and then at that point, the domain name could be pointed to a hosting setup that has the site. If you started the forms today, the site could be online as soon as Friday of this week or Monday. The domain name transfer does take 3 to 5 business days. I have been helping companies with this type of update on a weekly basis.

Contact me back as soon as possible, or we can setup a call.

Respectfully,
Ron During.

From: Miranda L. Soto <miranda.soto@bipc.com>

Sent: Friday, February 2, 2024 2:09 PM

To: Emilio Yopez <emilio@lighthouseinternetmedia.com>; Ron.during@gmail.com; Ron During <Ron.During@radtechconsulting.com>; Ron@ktek.com; Christian C. Kohlsaar <christian.kohlsaar@bipc.com>

Subject: RE: Website File Request - 02-02-24

Importance: High

Dear Mr. During,

I am the Receiver appointed by the United States District Court Judge Raag Singhal to protect and marshal assets for defrauded investor for the PII Receivership. To date, it has been *almost 3 weeks* since our website has been disrupted by some sort of unknown personal, domestic dispute according to Ms. During. We have spent considerable time and resources attempting to resolve one simple issue which is: to obtain the HostGator credentials for our website and/or get our website back online immediately. ***We need to inform Judge Singhal as soon as possible.***

We have already retained Mr. Yepez from Lighthouse Internet Media to attempt to restore our website, however, we need the HostGator and/or any other credentials necessary ***immediately*** so Mr. Yepez can try restore our website.

To be clear: this website provides valuable information to mostly elderly, defrauded investors about the status of our Receivership and it is imperative that it is restored as soon as possible.

We are in the process of preparing an Emergency Motion to file with the Court to seek judicial intervention to compel whomever is responsible to provide us with immediate access to our website irrespective of any personal disputes and potential other remedies.

Respectfully submitted,

Miranda Soto, Receiver

Miranda L. Soto

**Shareholder and Board Certified Specialist in Civil Trial Law
Chair of Product Liability Practice Group**

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Buchanan

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From: Emilio Yepez <emilio@lighthouseinternetmedia.com>

Sent: Friday, February 2, 2024 2:00 PM

To: Ron.during@gmail.com; ron.during@radtechconsulting.com; Ron@ktek.com; Christian C. Kohlsaat <christian.kohlsaat@bipc.com>; Miranda L. Soto <miranda.soto@bipc.com>; Emilio Yepez <emilio@lighthouseinternetmedia.com>

Subject: Website File Request - 02-02-24

Hello Ron, I have copied Miranda L Soto and Christian Kohlsaat, they are lawyers at Buchanan Ingersoll & Rooney PC, they represent the law firm in this situation and have full ownership of propertyreceivership.com, you've been managing this domain and we need your assistance.

I'd like to preface that this is a very serious matter and this website is important, it involves defrauded investors, the law firm, a judge and the courts. All we want to acquire are the website files. We don't have them at the present time and not having them will force us to have to create the website again. We need you to please send us the files and the database.

At this time Miranda and Christian are involving a federal judge, your company is responsible for this issue with the website and I am asking that you please release all files before we escalate this further. Can you help us?

To your success,

Emilio Yepez

Founder and President
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