

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

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

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**PROPERTY INCOME INVESTORS LLC, et al.**

**Defendants.**

**PLAINTIFF'S NOTICE OF PROPOSED SETTLEMENT WITH  
DEFENDANT ANTHONY NICOLOSI AND  
UNOPPOSED MOTION TO STAY CASE AGAINST HIM FOR 90 DAYS TO  
ALLOW SEC COMMISSIONERS TO CONSIDER THE PROPOSED SETTLEMENT**

Plaintiff Securities and Exchange Commission notifies the Court that the Commission staff and Defendant Anthony Nicolosi have agreed on a proposed settlement of all claims and relief the Commission seeks against Nicolosi. The proposed settlement now requires approval by the five SEC Commissioners. If the Commissioners approve the proposed settlement, it will resolve the Commission's litigation against Nicolosi in this action.

Accordingly, the Commission moves for entry of an order staying deadlines in this matter for 90 days as to Nicolosi to allow the undersigned to seek Commission approval. Once the Commissioners consider the proposed settlement, we will notify the Court of the result. If the Commissioners approve the settlement, we will promptly file the appropriate paperwork requesting the Court to enter a Final Judgment against Nicolosi. This stay is not intended to apply to the other Defendants or to the Receiver and the work she is performing. Accordingly, the

Commission respectfully requests that the Court grant the requested relief. A proposed order is submitted herewith.

**RULE 7.1.A.3 CERTIFICATE OF CONFERRAL**

Pursuant to Southern District of Florida Local Rule 7.1.A.3, undersigned counsel has conferred with counsel for Defendant Anthony Nicolosi, Defendant Larry Brodman, and Receiver Miranda L. Soto, who do not oppose this motion.

Respectfully submitted,

Alice Sum\_\_\_\_\_

Alice Sum, Esq.

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*Attorney for Plaintiff*

**SECURITIES AND EXCHANGE COMMISSION**

801 Brickell Avenue, Suite 1950

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on July 11, 2022, I electronically filed the foregoing document using CM/ECF. I also certify that the foregoing document is being served this day on all counsel and parties of record in the manner denoted below.

Alice Sum\_\_\_\_\_

Alice Sum, Esq.

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