

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

CASE NO.: 21-61176-CIV-SINGHAL

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.

/

**RECEIVER'S NOTICE OF FILING PROPOSED ORDER GRANTING RECEIVER'S
MOTION TO (i) APPROVE DETERMINATION OF CLAIMS; (ii) POOL
RECEIVERSHIP ASSETS AND LIABILITIES; (iii) ESTABLISH OBJECTION
PROCEDURE; AND (iv) APPROVE PLAN OF DISTRIBUTION**

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, by and through undersigned counsel, gives notice of filing the Proposed Order Granting Receiver's Motion to (i) Approve Determination of Claims; (ii) Pool Receivership Assets and Liabilities; (iii) Establish Objection Procedure; and (iv) Approve Plan of Distribution. A true and correct copy of the proposed order is attached hereto as **Exhibit A**.

Respectfully submitted,

**BUCHANAN INGERSOLL & ROONEY PC,
Attorneys for Miranda L. Soto, Receiver**

/s/ Raquel A. Rodriguez

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Attorneys for Receiver Miranda L. Soto

lauren.humphries@bipc.com

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 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 October 9, 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

/s/ Raquel A. Rodriguez
Attorney

SEC vs. Kinetic Investment Group, LLC, et al
CASE NO.: 8:20-cv-394

EXHIBIT “”A

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

CASE NO.: 21-61176-CIV-SINGHAL

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

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LARRY B. BRODMAN and ANTHONY
NICOLOSI (f/k/a ANTHONY PELUSO),

Defendants.

**PROPOSED ORDER GRANTING RECEIVER'S MOTION TO (i) APPROVE
DETERMINATION OF CLAIMS; (ii) POOL RECEIVERSHIP ASSETS AND
LIABILITIES; (iii) ESTABLISH OBJECTION PROCEDURE; AND (iv) APPROVE
PLAN OF DISTRIBUTION**

THIS CAUSE came before the Court on the Motion of Miranda L. Soto, as Receiver (the "Receiver"), to (i) Approve Determination of Claims; (ii) Pool Receivership Assets and Liabilities; (iii) Establish Objection Procedure; and (iv) Approve Plan of Distribution ("Motion"). With the Court having considered the Motion, reviewed the file, and finding that good cause exists to grant the Motion, it is hereby ORDERED as follows:

1. The Receiver's Motion to (i) Approve Determination of Claims; (ii) Pool Receivership Assets and Liabilities; (iii) Establish Objection Procedure; and (iv) Approve Plan of Distribution is **GRANTED**.

2. The Receiver's determination of claims set forth in the Motion and its Exhibits A-D is approved.

3. The Receiver is authorized to consolidate all the assets and liabilities of all Receivership Entities as set forth in the Motion for all purposes, including for payment of administrative costs, for receipt of third-party recoveries, and for making distributions to claimants with allowed claims.

4. The Receiver's Plan of Distribution set forth in the Motion is approved.

5. The Receiver's Proposed Objection Procedure for objections to the Plan of Distribution and the Receiver's claim determinations set forth in the Motion and its Exhibits A-D is approved.

6. Except as provided in this Order, all other claims against Receivership Entities, Receivership property, the Receivership Estate, or the Receiver by any claimant, taxing authority, or any other public or private person or entity are precluded.

DONE and ORDERED in Chambers, Fort Lauderdale, Florida, this ____ day of _____, 2023.

RAAG SINGHAL
UNITED STATES DISTRICT JUDGE

SEC vs. Kinetic Investment Group, LLC, et al
CASE NO.: 8:20-cv-394

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6. Except as provided in this Order, all other claims against Receivership Entities, Receivership property, the Receivership Estate, or the Receiver by any claimant, taxing authority, or any other public or private person or entity are precluded.

DONE and ORDERED in Chambers, Fort Lauderdale, Florida, this ____ day of _____, 2023.

RAAG SINGHAL
UNITED STATES DISTRICT JUDGE