

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.

**TENTH INTERIM OMNIBUS APPLICATION FOR ALLOWANCE AND
PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES
FOR JULY 1, 2023 – SEPTEMBER 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 July 1, 2023, through September 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 **\$55,364.88** to the Receiver and the professionals she engaged for fees incurred and reimbursement of **\$1,945.79** in expenses for a total payment of **\$57,310.67**. This Application includes time billed from July 1, 2023 through September 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:

- Filed Motion to Approve Claims Determination of Receiver and Pool Receivership Assets and Liabilities on September 26, 2023 (Doc. 117), including working closely with Receiver's professionals to finalize distribution claims recommendations on claimant investor specific basis;
- Worked with Receiver's CPA professionals to finalize claims determinations for presentation 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 investors who disputed calculations and reviewed supplemental information provided in support of claimed investment calculations with Receiver's CPA professionals in efforts to achieve consensual resolution of potentially disputed claims;
- 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;
- 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 Ninth Interim Report on August 15, 2023 (Doc. 115), 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 Tenth Interim Report, which was filed on October 31, 2023 (Doc. 120) (the "Tenth 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 Tenth Report and previous Reports are available at www.propertyireceivership.com. The Receiver incorporates the Tenth 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. On August

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:** July 1, 2023 – September 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.

31, 2023, Ms. Humphries went on maternity leave, and Christian Kohlsaas, an associate in the firm’s litigation department, has been handling Ms. Humphries’ responsibilities in her absence.

(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 **\$4,795,433.62**. 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 completed her review and analysis of the timely submitted claims and documentation and filed 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 on September 26, 2023 (Doc. 117) (“Claims Determination Motion”). Among other things, the Claims Determination Motion set forth the Receiver’s proposed determination of claims including proposed treatment of Equinox investments predating the formation of PII Entities, proposed method for distributing allowed claims, proposed objection procedure, and proposed plan of distribution, including an initial distribution. The Receiver timely provided instructions on how to access the Claims Determination Motion to all investors with allowed claims, and on October 9, 2023, the Receiver filed a Notice of Filing Proposed Order to the Claims Determination Motion (Doc. 118) and submitted the Order to the Court. The Court entered the Proposed Order Granting 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 on October 25, 2023 (“Claims Determination Order”) (Doc. 119).⁴ The Receiver will timely provide investors with notice of the Claims Determination Order and specific instructions regarding the Court-approved objection procedure in the coming weeks. In the interim, the Receiver and her counsel have received communications from investors with questions about the Claims Determination Motion and has worked to address those questions to enable the investors to assess the Claims Determination Motion and exercise any rights of objection.

⁴ The Claims Determination Motion and Claims Determination Order are available on the Receiver’s website at www.propertyireceivership.com.

(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 Tenth 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. Maglich⁵ to serve as her legal counsel (collectively, the Receiver's "Counsel").⁶ 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 **47.7** hours of legal services but seeks compensation for only **46.50** hours, which totals **\$13,717.50** in legal fees. The Receiver incurred expenses in the amount of **\$1,945.79**. A copy of the statement

⁵ 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. Ms. Humphries went on maternity leave on or about August 31, 2023, and Christian Kohlsaas, an attorney in the firm's Miami office, has assumed Ms. Humphries' role in the case during her leave.

⁶ The Receiver was subsequently authorized to utilize additional Buchanan Ingersoll professionals where necessary and at a similar rate discount. (Doc. 19.)

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 July 1, 2023, through September 30, 2023, in the amount of **\$15,663.29**.

During the period covered by this Application, Buchanan Ingersoll billed **123** hours in assisting the Receiver in fulfilling her duties under the Order Appointing Receiver but only seeks compensation for **103** of those hours, which totals **\$22,748.00** 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 (\$1,045.00 per hour), Lauren V. Humphries (\$450.00 per hour) and Christian Kohlsaat (\$465.00 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 July 1, 2023, through September 30, 2023, in the amount of **\$22,748.00**.

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 Tenth 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-1s due to investors for 2021 and 2022 as well as tax returns for each of the Receivership Entities for the tax years 2020 and 2021. Kaufman prepared amended K-1s for 2022.

During the period covered by this Application, Kaufman expended 15.35 hours in the sum of **\$18,899.38** 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 July 1, 2023, through September 30, 2023 for a total amount of **\$18,899.38**.

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	\$15,663.29
Buchanan Ingersoll & Rooney PC	\$22,748.00
Kaufman & Company	\$18,899.38
Total:	\$57,310.67

A proposed Order is attached as **Exhibit 7**.

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

LOCAL RULE 7.1(a)(3) CERTIFICATION

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

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/Raquel A. Rodriguez

Raquel A. Rodriguez

Florida Bar No.: 511439

Christian Kohlsaat

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

Attorneys for Receiver Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on November 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 November 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

Raquel A. Rodriguez
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 7/1/2023 to 09/30/2023

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 July 1, 2023 to September 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

October 13, 2023

1001 Brickell Bay Drive
Suite 2650
Miami, FL 33131

(305) 455-0314
Fax: (305) 455-0315
dkaufman@kaufmanpcpas.com

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 7/1/2023 to 9/30/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 07/1/2023):			\$ 4,858,138
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income			
Line 3	Cash and Securities			
Line 4	Interest/Dividend Income	Schedule 14a - 2	20,291	
Line 5	Business Asset Liquidation	Schedule 14a - 2 (sub 5 of 6)	6	
Line 6	Personal Asset Liquidation			
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other			
	Total Funds Available (Line 1 - 8):		20,297	4,878,435
	<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	(82,444)	
Line 10b	Business Asset Expenses	Schedule 14a - 1	(133)	
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	<i>Total Third-Party Litigation Expenses</i>			
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		(82,576)	(82,576)
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			
	<i>Total Plan Development Expenses</i>			
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			
	<i>Total Plan Implementation Expenses</i>			
	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)			(82,576)
Line 13	Ending Balance (As of 09/30/2023)			\$ 4,795,859

*

**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 7/1/2023 to 9/30/2023**

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	14a	\$ 1,607,699	
Line 14b	Investments	14b	3,188,160	
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$ 4,795,859
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 7/1/2023 to 9/30/2023
Disbursements to Receiver or Other Professionals**

Disbursements made from:

Receivership Money Market	<i>from Schedule 14a-2</i>	(82,444)
---------------------------	----------------------------	----------

Total Disbursements to Receiver or Other Professionals

\$ (82,444)
to Page 1 Line 10a

Schedule 14a

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
 Reporting Period 7/1/2023 to 9/30/2023

	<i>Reference</i>	
Receivership Operating account	<i>14a - 1</i>	\$ 24,463
Money Market account	<i>14a - 2</i>	3,188,160
1361 LLC Checking account	<i>14a - 1 (sub 1 of 6)</i>	1,083
Property Income Investors LLC Check	<i>14a - 1 (sub 2 of 6)</i>	11,946
4020 LLC Checking account	<i>14a - 1 (sub 3 of 6)</i>	844
3504 LLC Checking account	<i>14a - 1 (sub 4 of 6)</i>	123
201 LLC Checking account	<i>14a - 1 (sub 5 of 6)</i>	6
304 LLC Checking Account	<i>14a - 1 (sub 6 of 6)</i>	1,569,233
Total Cash and investments		<u>\$ 4,795,859</u>
Cash in receivership accounts		\$ 1,607,699 <i>to Page 2</i>
Investments		<u>3,188,160</u> <i>to Schedule 14b</i>
Total Cash and investments		<u>\$ 4,795,859</u>

Schedule 14b

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 7/1/2023 to 9/30/2023

Money Market account

14a - 2

\$ 3,188,160 *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 7/1/2023 to 9/30/2023

Activity in Receivership Operating Bank Account

Balance 6/1/2023		\$	24,596	
Deposit -				
6/7/2023 Transfer from Money Market Account			82,444	<i>Schedule 14a - 2</i>
Professional Fees -				
BIPC - Legal	\$	(57,784)		
Kaufman & Company - Accounting		<u>(24,660)</u>		
			(82,444)	<i>to Schedule 10a</i>
Quickbooks				
July	30			
August	30			
September	<u>30</u>			
	90		(90)	<i>(a)</i>
Bank Charges				
July	11			
August	21			
September	<u>11</u>			
	43		<u>(43)</u>	<i>(a)</i>
Balance 9/30/23		\$	<u>24,463</u>	<i>to Schedule 14a</i>
Business Expenses				
(a) Business expenses for the quarter ended 9/30/2023 - above	(a)	\$	<u>(133)</u>	<i>above</i>
Total Business Expenses for the quarter ended September 30, 2023		\$	<u>(133)</u>	<i>to Page 1, Line 10b</i>

Schedule 14a - 2

Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 7/1/2023 to 9/30/2023

Activity in Receivership Money Market Account

Balance 7/1/2023		\$	3,250,312	
Interest income				
July			6,908	
August			6,838	
September			6,544	
			<u> </u>	
	Interest for the quarter		20,291	to Line 4 Interest/Dividend Income
Transfer to Checking Account	6/7/2023		<u>(82,444)</u>	to Schedule 14a-1
Balance 9/30/23		\$	<u>3,188,160</u>	

Schedule 14a - 2 (Sub 1 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 7/1/2023 to 9/30/2023

Activity in 1361 LLC Checking Account ac 9029

Balance 7/1/2023 \$ 1,083

NO ACTIVITY FOR THE PERIOD

Balance 9/30/23 *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 7/1/2023 to 9/30/2023

Activity in Property Income Investors LLC Checking Account ac 8955

Balance 7/1/2023 \$ 11,946

NO ACTIVITY FOR THE PERIOD

Balance 9/30/23 \$ 11,946 to Sch 14a

Schedule 14a - 2 (Sub 3 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 7/1/2023 to 9/30/2023

Activity in 4020 LLC Checking Account ac 9037

Balance 7/1/2023 \$ 844

NO ACTIVITY FOR THE PERIOD

Balance 9/30/23 *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 7/1/2023 to 9/30/2023

Activity in 3504 LLC Checking Account ac 9011

Balance 7/1/2023 \$ 123

NO ACTIVITY FOR THE PERIOD

Balance 9/30/23 *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 7/1/2023 to 9/30/2023

Activity in 201 LLC Checking Account ac 8997

Balance 7/1/2023		\$	-
Deposit	7/26/2023 FPL Refund		5.98 <i>to page 1 line 5</i>
Balance 9/30/23			
	<i>to Sch 14a</i>	\$	<u>5.98</u>

Schedule 14a - 2 (Sub 6 of 6)
Property Income Investors, LLC et al.
Civil Court Docket No. 21-61176-CIV-SINGHAL
Reporting Period 7/1/2023 to 9/30/2023

Activity in 304 LLC Checking Account ac 8989

Balance 7/1/2023 \$ 1,569,232.89

NO ACTIVITY FOR THE PERIOD

Balance 9/30/23 *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 TENTH INTERIM QUARTERLY REPORT

(Period Covered: July 1, 2023 – September 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 **July 1, 2023 to September 30, 2023 (the “Reporting Period”)**, as well as proposed courses of action moving forward.

TABLE OF CONTENTS

I. INTRODUCTION 1

 A. Overview of Significant Activities During Reporting Period.....1

II. BACKGROUND 2

 A. Procedure and Chronology2

 B. The Receiver’s Role and Responsibilities3

III. THE RECEIVER’S PROGRESS AND PRELIMINARY FINDINGS DURING THE RELEVANT PERIOD 4

 A. Actions Taken By the Receiver During Reporting Period.....4

 i. Filed Claim Determination Motion for Valid Investor Claimants to Request Court Approval for Distribution Process.4

 ii. Continued to Work with Receiver’s Professionals to Evaluate the Flow of Funds between Receivership Defendants and Address Tax Issues regarding the Entities.8

 iii. Securing Receivership Estate Personal Property9

 a. Bank Accounts and Cash Proceeds.....9

 b. Other Personal Property9

 iv. Securing and Maintaining Receivership Real Property10

 a. Managing and Maintaining Real Property Assets10

 v. Reviewed Receivership Documentation to Determine the Extent of Commingling and to Evaluate Treatment of Equinox and PII in this Receivership.....10

 vi. Continued Outreach with Investors and Interested Parties11

 vii. The Equinox and Property Income Investors Offerings12

 a. The Equinox Offering12

 b. The Property Income Investors Offerings.....14

 viii. The Promoters Used Equinox Investments, Inc. as Their Vehicle for Soliticing 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.16

 ix. Nearly \$2 Million Was Paid To Company Insiders Including Brodman.....20

x.	The Use of Sales Agents to Solicit Investors and Payment of Transaction-Based Compensation	22
xi.	Investor Funds Appear to Have Been Routinely Commingled and Used for Unauthorized Purposes for Several Years	25
xii.	Over \$50,000 of Investor Funds Were Lost When Brodman Forfeited a Real Estate Purchase Deposit	30
IV.	THE NEXT QUARTER	31
A.	Investigation.....	31
B.	Moving Forward with all Steps to Facilitate Interim Distribution to Investors.....	31
C.	Third Party Claims.....	32

I. INTRODUCTION

A. Overview of Significant Activities During Reporting Period

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

- The Receiver filed her Motion to (i) Approve Claims Determination of Receiver and Pool Receivership Assets and Liabilities; (ii) Pool Receivership Assets and Liabilities; (iii) Establish Objection Procedure; and (iv) Approve Plan of Distribution (Doc. 117) and obtained an order from this Court granting same (Doc. 119);
- 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;
- 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 Ninth Interim Report on July 31, 2023 (Doc. 114), 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 was 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 request 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. Filed Claims Determination Motion for Valid Investor Claimants to request Court Approval for Distribution Process and Obtained Order Granting Same.**

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, 116 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 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 completed her review and analysis of the claims and documentation and filed 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

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

Distribution on September 26, 2023 (Doc. 117) (“Claims Determination Motion”). Among other things, the Claims Determination Motion set forth the Receiver’s proposed determination of claims including proposed treatment of Equinox investments predating the formation of PII Entities, proposed method for distributing allowed claims, proposed objection procedure, and proposed plan of distribution, including an initial distribution. The Receiver timely provided instructions on how to access the Claims Determination Motion to all investors with allowed claims, and on October 9, 2023, the Receiver filed a Notice of Filing Proposed Order to the Claims Determination Motion (Doc. 118) and submitted the Order to the Court. The Court entered the Proposed Order Granting 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 on October 25, 2023 (“Claims Determination Order”) (Doc. 119).² The Receiver will timely provide investors with notice of the Claims Determination Order and specific instructions regarding the Court-approved objection procedure in the coming weeks. In the interim, the Receiver and her counsel have received communications from investors with questions about the Claims Determination Motion and has worked to address those questions to enable the investors to assess the Claims Determination Motion and exercise any rights of objection.

² The Claims Determination Motion and Claims Determination Order are available on the Receiver’s website at www.propertyireceivership.com.

ii. 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 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.

iii. 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 **\$4,795,859**.

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.

iv. 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.

v. 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 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 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 before the Receiver was 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 was reviewed by the Receiver. Ultimately, the Receiver determined the most appropriate and equitable distribution to the investors as set forth in the Claims Determination Motion, and the Court has approved same.

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 any such actions. In the meantime, the Receiver obtained tolling agreements from at least five potential defendants in order to allow the Receiver and her professionals time to further evaluate the actions of these third parties and the viability and cost-effectiveness of potential claims.

vi. 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.propertyreceivership.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.

vii. 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.³ Mr. Rosenfeld resigned from Equinox later in 2013,⁴ and Mr. Brodman is listed as the company’s CEO in its 2013 amended annual report.⁵ As of the February 2016 annual report, Mr. Brodman was the only listed officer and director for Equinox.⁶

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

³<http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2013%5C0906%5C00195349.Tif&documentNumber=P12000094600>

⁴<http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2013%5C1115%5C53565093.Tif&documentNumber=P12000094600>

⁵<http://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-p12000094600-0a7d4e41-25ed-485b-a8ff-a26d32f50db3&transactionId=p12000094600-464d4b95-cc3d-49f7-82a3-b7b539b9ab37&formatType=PDF>

⁶<http://search.sunbiz.org/Inquiry/CorporationSearch/GetDocument?aggregateId=domp-p12000094600-0a7d4e41-25ed-485b-a8ff-a26d32f50db3&transactionId=p12000094600-494ca438-0bf0-4b90-96a2-5f9d7fba3024&formatType=PDF>

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).⁷ 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 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

⁷ 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.

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").⁸ 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."

⁸ 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).

viii. 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 were not documented and 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.⁹ 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:

[T]he 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.

Operating Agreement § I, pp. 5-6.

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

⁹ Mr. Brodman is believed to be the sole Class A Member of all PII entities.

entitled to 70% of this Net Cash From Operations which should have resulted in total annual distributions to Class B Members of \$3,296.37.

However, a review of PII 1361's bank statements show that a total of \$42,484.00 in distribution checks were made during 2019 to investors. Standing alone, this represented a nearly 100% distribution of all gross rental income received from tenants and was approximately 1,000% higher than the net cash from operations purportedly generated by PII 1361 during 2019. Additionally, the bank statements also suggest that PII 1361 may have significantly understated its repair and maintenance expenses based on \$49,120.00 in apparently-unreported payments that appear to be for the renovation of one of the units – approximately \$30,000 higher than the \$16,261.34 in repairs and maintenance reported in PII 1361's 2019 Profit and Loss Statement. In order to meet its ongoing expenses, including quarterly distributions paid to investors and other obligations including renovation expenses, PII 1361's bank account statements reflect **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.¹⁰

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.

¹⁰ 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.

ix. 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.

x. 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.¹¹ Of note, at least one of the sales agents affiliated with CMP appears 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

¹¹ See https://www.sec.gov/Archives/edgar/data/1140303/000135448811001230/mcth_10ka.htm

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.¹² None of this was disclosed in the PPMs 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 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 number of prospective investors received the PII PPM (and typically only when requested by a diligent prospective investor).

¹² See <https://asc.alabama.gov/Orders/2010/CD-2010-0062.PDF>

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.

xi. 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.

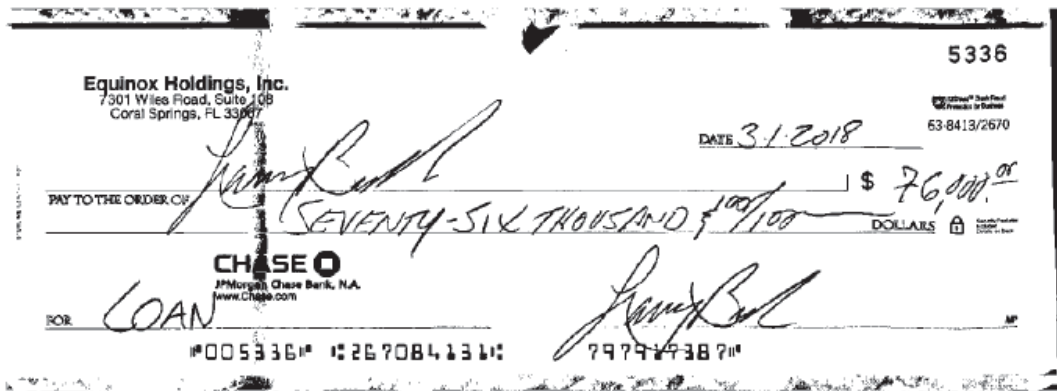
The Receiver has been informed that it would be significantly time-intensive (and costly) to attempt to reconcile material differences between the reported intercompany obligations owed among the companies, and that even after completing such a task it would still be uncertain whether the entities would 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 professionals 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 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 closed, several additional investor deposits totaling \$175,000

were deposited into PII 26's bank account (the "PII 26 Account") in June 2018.¹³ 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"). 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.

¹³ Indeed, at least one wire transfer in the amount of \$50,000 specifically includes the address for the 417 Property in the wire details.

In early August 2020, at the same time that the Commission issued a subpoena to Defendant Brodman and the Receivership Entities, Brodman apparently reached out to investor J.R. – the same investor that had made the \$501,000 investment referenced above – about an “opportunity that had come up” that required additional funds to close on a property. Based on those representations, J.R. agreed to make an additional \$400,000 investment (consisting of retirement funds) that were deposited into the Equinox Account on August 5, 2020.¹⁴ 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

¹⁴ 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.

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 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.

xii. 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, has served notices to some of those third parties and obtained tolling agreements from some of them.

B. Moving Forward with all Steps to Facilitate Interim Distribution to Investors.

In the next Reporting Period, the Receiver and her professionals intend to work to resolve any investor objections through the objection procedure set forth the in Claims

Determination Motion and approved by this Court and, following the resolution of all such objections make an interim distribution to valid claimants. At the same time, the Receiver is making her final determination as to whether to proceed with all or some of the potential third party claims she has identified and will engage in pursuit of same, if warranted as set forth below.

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 a 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.¹⁵ 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, the Receiver is in the final stages of her determination of whether to 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 continues 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 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: October 30, 2023

¹⁵ Shortly after the close of the reporting cycle for the Tenth Interim Report, the Receiver learned through a court filing in another case that one of the accountants, David Cohen, had passed away. In the coming quarter, the Receiver will determine whether an estate has been opened for probate and what steps should be taken to preserve any Receivership claims against the probate estate in the event the Receiver determines legal action against the late Mr. Cohen should be pursued.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/Christian C. Kohlsaat

Raquel A. Rodriguez

Florida Bar No.: 511439

Christian C. Kohlsaat

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.rodriquez@bipc.com

Attorneys for Receiver Miranda L. Soto

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 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 30, 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

Christian C. Kohlsaatt
Attorney

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 her 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 November, 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	46.50	\$13,717.50	\$1,945.79	\$15,663.29	\$153,893.75	\$23,228.69
Buchanan Ingersoll & Rooney PC	Attorneys	103.00	\$22,748.00	\$0.00	\$22,748.00	\$467,330.44	\$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		15.35	\$18,899.38	\$0.00	\$18,899.38	\$192,474.37	\$2,148.75
Total		164.85	\$55,364.88	\$1,945.79	\$57,310.67	\$821,539.06	\$29,420.05

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	46 50		\$ 13,717 50
Kimberly Ecker	Litigation	Paralegal		\$ 230 00	\$ 205 00	0 00		\$ -
Lit Tech Support					\$ 215 00	0 00		\$ -
								\$ 13,717 50
							\$ 1,945 79	\$ 1,945 79
Total						46 50		\$ 15,663 29

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	5 60		\$ 1,652 00
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	34 40		\$ 7,052 00
Joshua King	Litigation	Paralegal		\$ 235 00	\$ 205 00			\$ -
Kimberly Ecker	Litigation	Paralegal		\$ 230 00	\$ 205 00	10 60		\$ 2,173 00
Meghan Fleming		Summer Clerk		\$ 165 00	\$ 150 00	14 20		\$ 2,130 00
Sheada Madani	Real Estate	Senior Attorney	2004	\$ 520 00	\$ 295 00			\$ -
Christian Kohlsaatt	Litigation	Associate	2015	\$ 465 00	\$ 255 00	20 20		\$ 5,151 00
Lauren Humphries	Litigation	Associate	2015	\$ 450 00	\$ 255 00	18 00		\$ 4,590 00
								\$ -
Total						103 00		\$ 22,748 00

EXHIBIT "5c"

Name	Title	Standard Rate	Reduced Rate	Total Hours	Total Billed
Heike Funk		\$ 200.00	\$ 150.00	1.50	\$ 300.00
Iana Andonova		\$ 375.00	\$ 281.25	0.00	\$ -
Michael Orourke		\$ 400.00	\$ 300.00	0.00	\$ -
Michael Orourke		\$ 450.00	\$ 337.50	9.60	\$ 4,320.00
Dana Kaufman		\$ 400.00	\$ 300.00	0.00	\$ -
Dana Kaufman		\$ 450.00	\$ 337.50	4.25	\$ 1,912.50
AA		\$ 250.00	\$ 187.50	0.00	\$ -
Total Fees					\$ 20,532.50
Less Discount					\$ (1,633.13)
Total Expenses					\$ -
Previous Balance					\$ -
Total				15.35	\$ 18,899.37

EXHIBIT “6a”



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

October 27, 2023
Invoice No. 12266114

INVOICE SUMMARY

For Professional Services Rendered:

RE: SEC RECEIVERSHIP
Our Reference: 0104027-000001

Fees:	\$13,658.50
Disbursements:	<u>\$1,945.79</u>

Total Current Invoice:	\$15,604.29
-------------------------------	--------------------



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

October 27, 2023
Invoice No. 12266114

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	07/05/23	B110	Research on real estate properties and professionals with emails to and from R. Rodriguez and M. Fleming following up from Teams Meeting on legal malpractice issues.	1.70	501.50
M. L. Soto	07/05/23	B110	Attend Teams Meeting with R. Rodriguez and M. Fleming to discuss research project for legal malpractice issue.	0.60	177.00
M. L. Soto	07/06/23	B110	Emails to and from M. Fleming and R. Rodriguez re: research on legal malpractice settlement issue.	0.20	59.00
M. L. Soto	07/06/23	B110	Review emails to and from C. Lieberman re: water remediation bill.	0.10	29.50
M. L. Soto	07/07/23	B110	Emails to and from M. Fleming and R. Rodriguez re: release issue for legal malpractice settlement.	0.10	29.50
M. L. Soto	07/10/23	B110	Emails to and from CPAs re: K-1 forms and tax returns.	0.10	29.50
M. L. Soto	07/12/23	B110	Emails to and from J. Kelley following up on legal malpractice insurance carrier and release issue.	0.10	29.50
M. L. Soto	07/12/23	B110	Review memorandum and begin case law on legal malpractice action and release of third parties.	0.50	147.50
M. L. Soto	07/12/23	B110	Review email from investor J.H. re: status of receivership.	0.10	29.50

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

Page 3
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	07/12/23	B110	Conference with R. Rodriguez re: legal malpractice claim.	0.50	147.50
M. L. Soto	07/12/23	B110	Brief conference call with M. Fleming to discuss legal malpractice research project.	0.20	59.00
M. L. Soto	07/12/23	B110	Emails to and from R. Rodriguez and L. Humphries re: email from investor J.H.	0.10	29.50
M. L. Soto	07/12/23	B110	Emails to and from M. Fleming following up from legal malpractice research project.	0.10	29.50
M. L. Soto	07/13/23	B110	Review email from T. Doyle with brief review of attached letter and insurance coverage.	0.40	118.00
M. L. Soto	07/13/23	B110	Emails to and from M. Fleming and R. Rodriguez re: legal malpractice issue.	0.10	29.50
M. L. Soto	07/14/23	B110	Review communication from investor J.H.	0.10	29.50
M. L. Soto	07/14/23	B110	Continue review of case law on legal malpractice action and release of third parties.	2.80	826.00
M. L. Soto	07/14/23	B110	Emails to and from R. Rodriguez and M. Fleming re: Receivership Research conference call,	0.10	29.50
M. L. Soto	07/17/23	B110	Review email to investor J.H. re: status of receivership.	0.10	29.50
M. L. Soto	07/17/23	B110	Email to T. Doyle re: insurance letter and coverage.	0.10	29.50
M. L. Soto	07/17/23	B110	Attend Teams Meeting with R. Rodriguez and M. Fleming to discuss legal malpractice matter.	0.40	118.00
M. L. Soto	07/17/23	B110	Emails to and from R. Rodriguez, L. Humphries, E. Murphy and M. Fleming re: Kelly & Grant documents, and investor communications.	0.30	88.50
M. L. Soto	07/18/23	B110	[NO CHARGE] Review and revise Fee Application.	1.00	N/C
M. L. Soto	07/18/23	B110	Emails to and from R. Rodriguez and M. Fleming re: legal malpractice matter.	0.10	29.50
M. L. Soto	07/19/23	B110	Review communications to and from investor J.H.	0.10	29.50
M. L. Soto	07/19/23	B110	Attend Teams Meeting to discuss legal malpractice case.	0.40	118.00

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

Page 4
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	07/19/23	B110	Emails to and from L. Humphries and R. Rodriguez re: investor calls to CPAs, new registration, and review or D.M. and L.M. proof of claims.	0.30	88.50
M. L. Soto	07/19/23	B110	Emails to and from CPAs re: investor calls.	0.20	59.00
M. L. Soto	07/19/23	B110	Review registration email from and responsive email to investor D.M. and L.M.	0.10	29.50
M. L. Soto	07/20/23	B110	Emails to and from R. Rodriguez and M. Fleming re: management of Defendants' emails.	0.10	29.50
M. L. Soto	07/21/23	B110	Emails to and from R. Rodriguez and M. Fleming re: management of Defendants' emails.	0.20	59.00
M. L. Soto	07/21/23	B110	[NO CHARGE] Review email to A. Sum re: Ninth Interim Fee Application with referenced exhibits for the PII Receivership.	0.10	N/C
M. L. Soto	07/24/23	B110	Emails to and from CPAs re: letter from IRS and submitting documents to the IRS.	0.20	59.00
M. L. Soto	07/24/23	B110	Review letter from IRS.	0.10	29.50
M. L. Soto	07/25/23	B110	Review emails from investor K.T. re: status of distributions.	0.10	29.50
M. L. Soto	07/25/23	B110	Review emails to and from investor M.S. re: status of distributions.	0.10	29.50
M. L. Soto	07/25/23	B110	Review communication from investor R.W.	0.10	29.50
M. L. Soto	07/25/23	B110	Emails to and from R. Rodriguez and L. Humphries re: communications with investors.	0.10	29.50
M. L. Soto	07/26/23	B110	Review state report letter from the IRS.	0.10	29.50
M. L. Soto	07/26/23	B110	Review email to personal representative for investor R.B. re: updated information.	0.10	29.50
M. L. Soto	07/27/23	B110	Emails to and from R. Rodriguez and M. Fleming re: PII email extractions and search terms.	0.10	29.50
M. L. Soto	07/28/23	B110	Emails to and from L. Humphries and R. Rodriguez re: 9th Interim Status Report.	0.10	29.50

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

Page 5
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	07/28/23	B110	Emails to and from R. Rodriguez and M. Fleming re: PII email extractions and search terms.	0.10	29.50
M. L. Soto	07/29/23	B110	Emails to and from CPAs re: update letter from the IRS.	0.10	29.50
M. L. Soto	07/29/23	B110	Emails to and from L. Humphries and R. Rodriguez re: 9th Interim Status Report.	0.10	29.50
M. L. Soto	07/30/23	B110	Email to CPAs re: IRS letters and outstanding issues with IRS.	0.10	29.50
M. L. Soto	07/31/23	B110	Review and revise Ninth Interim Status Report.	1.80	531.00
M. L. Soto	07/31/23	B110	Emails to and from R. Rodriguez and L. Humphries re: edits to Ninth Interim Status Report and communication with investor K.T.	0.50	147.50
M. L. Soto	07/31/23	B110	Emails to and from M. Fleming and R. Rodriguez re: email extraction project.	0.10	29.50
M. L. Soto	07/31/23	B110	Review communication from investor K.T.	0.10	29.50
M. L. Soto	07/31/23	B110	Review service of process of 9th Interim Report on C. Schoeppl and L. Brodman.	0.10	29.50
M. L. Soto	08/02/23	B110	Emails to and from M. Apostol re: document retention project.	0.20	59.00
M. L. Soto	08/02/23	B110	Review letters from Florida Department of Revenue's Notice of Final Assessment for Equinox.	0.10	29.50
M. L. Soto	08/02/23	B110	Review emails to and from investor C.S. re: status of K1 forms.	0.10	29.50
M. L. Soto	08/02/23	B110	Review emails to CPAs re: status of k-1 forms and Department of Revenue letters for Equinox.	0.20	59.00
M. L. Soto	08/03/23	B110	Emails to and from R. Rodriguez and L. Humphries re: communications with investors.	0.10	29.50
M. L. Soto	08/03/23	B110	Review letter from the IRS discussing 3404 LLC property.	0.10	29.50
M. L. Soto	08/03/23	B110	Email to SEC re: status of Claims Distribution Motion.	0.10	29.50
M. L. Soto	08/03/23	B110	Email to CPAs re: status of k-1 forms and Department of Revenue letters for Equinox.	0.30	88.50

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

Page 6
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	08/03/23	B110	[NO CHARGE] Review email to SEC re: status of fee application.	0.10	N/C
M. L. Soto	08/04/23	B110	Emails to and from R. Rodriguez and L. Humphries re: communications with investor K.T.	0.10	29.50
M. L. Soto	08/04/23	B110	Review email to investor K.T.	0.10	29.50
M. L. Soto	08/07/23	B110	Review letter from third party administrator re: potential legal malpractice claim and coverage.	0.20	59.00
M. L. Soto	08/07/23	B110	Emails to and from L. Humphries and R. Rodriguez re: follow up on Claims Distribution Motion and communication from investor J.S.	0.10	29.50
M. L. Soto	08/07/23	B110	Review communication from investor J.S.	0.10	29.50
M. L. Soto	08/08/23	B110	Emails to and from L. Humphries and R. Rodriguez re: communication with investor J.S., status of tax return review, and team meeting.	0.20	59.00
M. L. Soto	08/08/23	B110	Review email to investor K.T.	0.10	29.50
M. L. Soto	08/10/23	B110	Email to SEC requesting status of comments/edits to Claims Distribution Motion and investor objection.	0.10	29.50
M. L. Soto	08/11/23	B110	Review recent Madoff article and August 10, 2023 Order clawback of funds from investor that was treated differently than other defrauded investors who lost money in the Ponzi scheme.	0.50	147.50
M. L. Soto	08/11/23	B110	Emails to and from L. Humphries and R. Rodriguez re: Madoff article and August 10, 2023 Order.	0.10	29.50
M. L. Soto	08/14/23	B110	Emails to and from L. Humphries and R. Rodriguez re: meeting with the SEC to discuss Claims Distribution Motion.	0.10	29.50
M. L. Soto	08/15/23	B110	Review communication from investor R.B.	0.10	29.50
M. L. Soto	08/15/23	B110	Attend team meeting with L. Humphries, E. Murphy and R. Rodriguez to discuss pending task and Claims Distribution motion.	1.20	354.00

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

Page 7
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	08/15/23	B110	Review communication to investors T.M. and C.M. re: status of claim distributions and receivership.	0.10	29.50
M. L. Soto	08/15/23	B110	Emails to and from L. Humphries and R. Rodriguez re: preparation for conference call with SEC and investor communications.	0.20	59.00
M. L. Soto	08/15/23	B110	Review communications to and from investor J.H.	0.10	29.50
M. L. Soto	08/16/23	B110	Emails to and from L. Humphries and R. Rodriguez re: investor communications.	0.10	29.50
M. L. Soto	08/16/23	B110	Review emails to and from investor R.B.	0.10	29.50
M. L. Soto	08/16/23	B110	Review email to investor B.H.	0.10	29.50
M. L. Soto	08/17/23	B110	Review emails to and from investor R.B.	0.10	29.50
M. L. Soto	08/17/23	B110	Emails to and from L. Humphries and R. Rodriguez re: investor communications and legal malpractice project.	0.20	59.00
M. L. Soto	08/18/23	B110	Emails to and from R. Rodriguez and L. Humphries in preparation for meeting with SEC and Claims Distribution Motion.	0.10	29.50
M. L. Soto	08/18/23	B110	Review email to investor C.W. re: status of receivership.	0.10	29.50
M. L. Soto	08/21/23	B110	Emails to and from L. Humphries and R. Rodriguez re: notes following up from conference call with investor R.B.	0.20	59.00
M. L. Soto	08/22/23	B110	Attend conference call with A. Sum, R. Rodriguez, and L. Humphries to discuss Claims Distribution Motion.	0.70	206.50
M. L. Soto	08/22/23	B110	Emails to and from R. Rodriguez and L. Humphries to discuss Claims Distribution Motion.	0.10	29.50
M. L. Soto	08/23/23	B110	Review communication from investor W.T. re: status of receivership.	0.10	29.50
M. L. Soto	08/24/23	B110	Emails to and from R. Rodriguez, C. Kohlsaas and L. Humphries re: investor communications.	0.40	118.00
M. L. Soto	08/24/23	B110	Review communications to and from investor E.W. re: status of receivership.	0.10	29.50

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

Page 8
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	08/24/23	B110	Review communication from investor J.H. re: status of receivership.	0.10	29.50
M. L. Soto	08/24/23	B110	Review communications to and from investor W.T. re: status of receivership.	0.10	29.50
M. L. Soto	08/24/23	B110	Emails to and from CPAs re: status of executed tax returns.	0.10	29.50
M. L. Soto	08/25/23	B110	Emails to and from L. Humphries, C. Kohlsaas and R. Rodriguez re: status of filing of Claims Distribution Motion.	0.10	29.50
M. L. Soto	08/28/23	B110	Review communication to investor J.D. re: status of receivership.	0.10	29.50
M. L. Soto	08/29/23	B110	Emails to and from L. Humphries, R. Rodriguez, and C. Kohlsaas re: filing of claims distribution motion, letters to investors, communications to investors, status of K-1 forms, conference call, and draft of claims determination letter.	0.60	177.00
M. L. Soto	08/29/23	B110	Review letter from IRS requesting 60 days extension of time on 3504 LLC.	0.10	29.50
M. L. Soto	08/29/23	B110	Review email to A. Sum re: draft Claims Determination Motion with updated Exhibits A-D.	0.10	29.50
M. L. Soto	08/29/23	B110	Review communication from investor W.T. re: K-1 forms.	0.10	29.50
M. L. Soto	08/29/23	B110	Email to CPAs re: letter from IRS requesting 60 days extension of time on 3504 LLC.	0.10	29.50
M. L. Soto	08/30/23	B110	Review and execute 2021 Tax Returns.	3.90	1,150.50
M. L. Soto	08/31/23	B110	Review and execute 2022 Tax Returns.	3.70	1,091.50
M. L. Soto	08/31/23	B110	Emails to and from R. Rodriguez and C. Kohlsaas re: filing of claims distribution motion and team meeting to discuss.	0.20	59.00
M. L. Soto	08/31/23	B110	Emails to and from K. Ecker re: handling of tax returns for 2021 and 2022.	0.10	29.50
M. L. Soto	09/01/23	B110	Emails to and from CPAs re: executed tax returns and authorization forms.	0.10	29.50
M. L. Soto	09/03/23	B110	Review email from investor M.S. re: status of receivership.	0.10	29.50
M. L. Soto	09/05/23	B110	Emails to and from C. Kohlsaas, E. Murphy, and R. Rodriguez re: follow up with investors M.S. and D.C.	0.20	59.00

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

Page 9
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	09/05/23	B110	Review communication from investor D.C.	0.10	29.50
M. L. Soto	09/06/23	B110	Review email to investor M.S.	0.10	29.50
M. L. Soto	09/08/23	B110	Emails to and from R. Rodriguez and C. Kohlsaas re: investor calls and K-1 forms.	0.20	59.00
M. L. Soto	09/08/23	B110	Review call from investor D.C.	0.10	29.50
M. L. Soto	09/10/23	B110	Emails to and from CPAs re: tax penalty for Equinox.	0.10	29.50
M. L. Soto	09/10/23	B110	Emails to and from R. Rodriguez, C. Kohlsaas, E. Murphy, and K. Ecker re: investor calls, and K-1 forms.	0.20	59.00
M. L. Soto	09/10/23	B110	Review letter from Florida Department of Revenue re: penalty for Equinox.	0.10	29.50
M. L. Soto	09/11/23	B110	Review email to investor D.C.	0.10	29.50
M. L. Soto	09/11/23	B110	Review email from investor C.M. re: status of claims distribution motion.	0.10	29.50
M. L. Soto	09/11/23	B110	Emails to and from C. Kohlsaas and R. Rodriguez re: follow up with investors D.C. and C.M.	0.20	59.00
M. L. Soto	09/12/23	B110	Review 2022 K-1 forms.	2.40	708.00
M. L. Soto	09/12/23	B110	Emails to and from C. Kohlsaas, R. Rodriguez, E. Murphy, and K. Ecker re: issuing 2022 K-1 forms.	0.20	59.00
M. L. Soto	09/12/23	B110	Emails to and from CPAs re: 2022 K-1 forms.	0.20	59.00
M. L. Soto	09/13/23	B110	Review IRS letter removing penalties and interest for PII 3504 LLC.	0.10	29.50
M. L. Soto	09/13/23	B110	Emails to and from CPAs re: IRS letter removing penalties and interest for PII 3504 LLC.	0.10	29.50
M. L. Soto	09/13/23	B110	Emails to and from C. Kohlsaas, R. Rodriguez, E. Murphy, and K. Ecker re: processing Equinox fine payment, 2022 K-1 form, and finalizing claims distribution motion.	0.30	88.50
M. L. Soto	09/14/23	B110	Review email to SEC re: finalizing Claims Distribution Motion.	0.10	29.50
M. L. Soto	09/14/23	B110	Email from CPAs re: IRS Letter for 3405 LLC.	0.10	29.50

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

Page 10
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	09/14/23	B110	Emails to and from C. Kohlsaas, K. Ecker, R. Rodriguez, and E. Murphy re: claims distribution motion, 2022 K-1 forms, and investor C.S.	0.20	59.00
M. L. Soto	09/14/23	B110	Review emails to and from investor C.S. re: 2022 K-1 forms.	0.10	29.50
M. L. Soto	09/15/23	B110	Emails to and from C. Kohlsaas re: communications with the SEC.	0.10	29.50
M. L. Soto	09/18/23	B110	Review email to A. Sum re: approval of minor changes to Claims Distribution Motion.	0.10	29.50
M. L. Soto	09/18/23	B110	Review communications from investor D.M. re: status of receivership.	0.10	29.50
M. L. Soto	09/18/23	B110	Emails to and from C. Kohlsaas re: status of 2022 K-1 forms, communications with the SEC, status of filing claims distribution motion, and investor D.M.	0.20	59.00
M. L. Soto	09/19/23	B110	Emails to and from C. Kohlsaas, R. Rodriguez, and E. Murphy re: 2022 K-1 forms and investor R.B.	0.20	59.00
M. L. Soto	09/19/23	B110	Review email from investor R.B. re: 2022 K-1 Form.	0.10	29.50
M. L. Soto	09/20/23	B110	Review emails to and from R. Bentley re: K-1 forms.	0.10	29.50
M. L. Soto	09/20/23	B110	Review email to investor J.O. re: K-1 form.	0.10	29.50
M. L. Soto	09/20/23	B110	Emails to and from CPAs re: questions from investors on K-1 forms.	0.10	29.50
M. L. Soto	09/20/23	B110	Emails to and from C. Kohlsaas and R. Rodriguez re: K-1 forms and updates to PII website.	0.40	118.00
M. L. Soto	09/20/23	B110	Review email to investor C.L. re: K-1 forms.	0.10	29.50
M. L. Soto	09/21/23	B110	Begin preparation for filing of Claims Distribution Motion.	1.00	295.00
M. L. Soto	09/21/23	B110	Conference call with C. Kohlsaas to discuss K-1 forms and Claims Distribution Motion.	0.30	88.50
M. L. Soto	09/21/23	B110	Review email to investor J. Stange re: K-1 form.	0.10	29.50
M. L. Soto	09/21/23	B110	Review email from investor C.S. re: K-1 forms.	0.10	29.50

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

Page 11
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	09/21/23	B110	Emails to and from C. Kohlsaas and R. Rodriguez re: investor calls, claims distribution motion, and investor R.B.	0.20	59.00
M. L. Soto	09/22/23	B110	Review emails to and from investor R.B. re: K-1 forms.	0.10	29.50
M. L. Soto	09/22/23	B110	Email to Defendants' counsel re: filing of Claims Distribution Motion.	0.20	59.00
M. L. Soto	09/22/23	B110	Review and finalize Claims Distribution Motion and Exhibits for filing.	2.10	619.50
M. L. Soto	09/22/23	B110	Review email to investor J.H. re: K-1 forms.	0.10	29.50
M. L. Soto	09/22/23	B110	Review email to investor C.S. re: status of receivership.	0.10	29.50
M. L. Soto	09/22/23	B110	Review communications to and from investor A.E. re: K-1 forms.	0.10	29.50
M. L. Soto	09/22/23	B110	Emails to and from A. Sum re: SEC's position on Claims Distribution Motion.	0.10	29.50
M. L. Soto	09/22/23	B110	Review emails to and from investor P.Z. re: K-1 forms.	0.10	29.50
M. L. Soto	09/22/23	B110	Emails to and from CPAs re: investor R.B.	0.20	59.00
M. L. Soto	09/22/23	B110	Emails to and from C. Kohlsaas and R. Rodriguez re: investor communications.	0.20	59.00
M. L. Soto	09/23/23	B110	Review email from investor J.R. re: status of receivership.	0.10	29.50
M. L. Soto	09/23/23	B110	Emails to and from C. Kohlsaas and R. Rodriguez re: investor communications.	0.10	29.50
M. L. Soto	09/25/23	B110	Review communication from representative for investor T.E.	0.10	29.50
M. L. Soto	09/25/23	B110	Emails to and from C. Kohlsaas, E. Murphy, and R. Rodriguez re: investor communications, filing of claims motion.	0.20	59.00
M. L. Soto	09/26/23	B110	Review emails to and from investor R.B.	0.10	29.50
M. L. Soto	09/26/23	B110	Emails to and from C. Kohlsaas, E. Murphy, and R. Rodriguez re: investors R.B., W.A., T.E., and A.E., filing and posting on website claims distribution motion, and preparation for Claim Distribution letter.	0.80	236.00

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

Page 12
 October 27, 2023
 Invoice No. 12266114

Timekeeper	Date	Task	Narrative	Hours	Amount
M. L. Soto	09/26/23	B110	Review email to Nicolosi and Brodman's counsel re: claims distribution motion.	0.10	29.50
M. L. Soto	09/26/23	B110	Review file for communications with investors W.A., T.E., and A.E.	0.50	147.50
M. L. Soto	09/26/23	B110	Conference call with C. Kohlsaat to discuss investor calls and filing of claims distribution motion.	0.40	118.00
M. L. Soto	09/28/23	B110	Emails to and from C. Kohlsaat, E. Murphy, and R. Rodriguez re: investor numbers, deadlines, claims distribution letter, and filing of proposed order.	0.60	177.00
M. L. Soto	09/28/23	B110	Review email from investor J.H. re: investor number.	0.10	29.50
M. L. Soto	09/29/23	B110	Review and revise Notice and Order granting Claims Distribution Motion.	0.20	59.00
M. L. Soto	09/29/23	B110	Emails to and from C. Kohlsaat and R. Rodriguez re: revisions to Notice and Order granting Claims Distribution Motion.	0.10	29.50
Subtotal Case Administration				47.50	13,658.50
Total Hours				47.50	
Total Fees					\$13,658.50

DESCRIPTION OF COSTS

	Description	Amount
07/15/23	Miscellaneous Miranda L. Soto HostGator online service Fee - Receivership	50.40
07/31/23	E-Discovery Data Services - Monthly RelativityOne hosting.	101.61
07/31/23	E-Discovery Data Services - Forensic Data Collection.	275.00
07/31/23	Florida Department of Revenue - Corporate Income Tax Estimated Delinquency	300.00
08/15/23	Miscellaneous Miranda L. Soto Hostgator - Receivership	50.40
08/31/23	E-Discovery Data Services - Monthly RelativityOne hosting.	558.99
09/15/23	Miscellaneous Miranda L. Soto Attend Board Meeting	50.40
09/30/23	E-Discovery Data Services - Monthly RelativityOne hosting.	558.99

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

Page 13
October 27, 2023
Invoice No. 12266114

Total Costs \$1,945.79

Amount Due This Invoice:	\$15,604.29
---------------------------------	--------------------

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

Page 14
October 27, 2023
Invoice No. 12266114

TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
M. L. Soto	Partner	46.30	295.00	13,658.50
M. L. Soto	Partner	1.20	N/C	N/C
	Total	47.50		13,658.50



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

October 27, 2023
Invoice No. 12266114

Our Reference: 0104027-000001
Client Name: MIRANDA L. SOTO, RECEIVER
Invoice Date: October 27, 2023
Invoice Number: 12266114
Total Due This Invoice: \$15,604.29

Total Due All Invoices For this Matter: \$15,604.29

**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: 12266114

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

October 30, 2023
Invoice No. 12266115

INVOICE SUMMARY

For Professional Services Rendered:

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

Fees:	\$22,748.00
Disbursements:	<u>\$0.00</u>

Total Current Invoice:	\$22,748.00
-------------------------------	--------------------



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

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

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

October 30, 2023
Invoice No. 12266115

For Professional Services Rendered:

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

SERVICES INCLUDING

Timekeeper	Date	Task	Narrative	Hours	Amount
Administration					
R. Rodriguez	07/31/23	B100	Review, revise and comment on draft Ninth Interim Report of Receiver.	0.80	236.00
R. Rodriguez	08/02/23	B100	Email M. O' Rourke and D. Kaufman regarding notice of assessment from Florida Department of Revenue.	0.10	29.50
R. Rodriguez	08/02/23	B100	Email M. O' Rourke regarding notice from IRS.	0.10	29.50
Subtotal Administration				1.00	295.00
Case Administration					
L. Humphries	07/11/23	B110	Phone conference with claimant O.A.I. (LLC).	0.30	76.50
L. Humphries	07/19/23	B110	Communicated with Kaufman professionals on claims investors distribution status.	0.30	76.50
Lit Tech Support	07/25/23	B110	(No Charge) Forensic remote collection of (3) Gmail accounts for processing to Relativity for review. ^AJR^	0.80	N/C
Lit Tech Support	07/26/23	B110	(No Charge) Validate and prepare forensically collected data for processing to Relativity. ^AJR^	0.60	N/C
L. Humphries	07/26/23	B110	Review of documentation regarding claimant RB.	0.20	51.00
Lit Tech Support	07/27/23	B110	(No Charge) Access and analyze data received from client. ^HP^	0.40	N/C

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

Page 3
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
Lit Tech Support	07/28/23	B110	(No Charge) Forensic remote collection of (3) Gmail accounts for processing to Relativity for review. ^AJR^	1.40	N/C
L. Humphries	07/28/23	B110	Drafted Ninth Interim Report.	1.50	382.50
Lit Tech Support	07/31/23	B110	(No Charge) Access and analyze data received from client; prepare and import data/image records to document review database for review by legal team. ^HP^	0.80	N/C
Lit Tech Support	08/01/23	B110	(No Charge) Prepare and import data/image records to document review database for review by legal team; audit data/image records hosted in document review database. ^HP^	1.00	N/C
Lit Tech Support	08/02/23	B110	(No Charge) Audit data/image records hosted in document review database and prepare summary of contents for legal team; prepare and execute search queries for identification of select documents in document review database. ^HP^	1.20	N/C
Lit Tech Support	08/03/23	B110	(No Charge) Audit data/image records hosted in document review database; prepare and execute search queries for identification of select documents in document review database. ^HP^	0.50	N/C
L. Humphries	08/08/23	B110	Emails with claimant investor KT.	0.20	51.00
L. Humphries	08/11/23	B110	Assessed Claims Determination Motion procedure and analysis prior to conference with SEC.	0.50	127.50
L. Humphries	08/15/23	B110	Emails to claimant investor TM.	0.20	51.00
L. Humphries	08/15/23	B110	Phone conference with claimant investor J.H.	0.30	76.50
L. Humphries	08/16/23	B110	Review of documentation and correspondence regarding Nicolosi investments.	0.20	51.00
L. Humphries	08/17/23	B110	(No Charge) Effectuated fee application wires and vendor payments.	0.50	N/C
L. Humphries	08/17/23	B110	(No Charge) Addressed fee application payment.	0.40	N/C
L. Humphries	08/17/23	B110	Communicated with KTek Systems.	0.20	51.00
L. Humphries	08/18/23	B110	Emails with claimant investor CW regarding status of Receivership and claim.	0.20	51.00

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

Page 4
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	08/21/23	B110	Preparation of updated letter regarding notice of claims determination.	0.40	102.00
L. Humphries	08/22/23	B110	Preparation of update to Claims Determination Motion.	2.00	510.00
L. Humphries	08/22/23	B110	(No Charge) Conference with SEC and Receiver regarding distribution method.	0.50	N/C
L. Humphries	08/25/23	B110	Review and analysis of correspondence and documentation for claimant investor DM.	0.20	51.00
L. Humphries	08/28/23	B110	Review and analysis of claimant information regarding TS.	0.20	51.00
K. L. Ecker	08/31/23	B110	E-mail exchange with M. Soto regarding instructions for submission of entity tax returns to CPA.	0.20	41.00
K. L. Ecker	09/01/23	B110	Review and assemble signed authorization forms for all PII entities and send to M. O'Rourke.	0.90	184.50
K. L. Ecker	09/05/23	B110	Receive and review K-1's for PII entities, assemble package for M. Soto to review.	0.70	143.50
K. L. Ecker	09/05/23	B110	E-mail exchanges with M. O'Rourke regarding links for investor K-1 forms.	0.20	41.00
K. L. Ecker	09/11/23	B110	E-mail exchange regarding status of PII entity K-1 documents.	0.10	20.50
K. L. Ecker	09/12/23	B110	E-mail exchanges with M. Soto and E. Murphy regarding finalization of K-1 documents to provide to CPA.	0.20	41.00
K. L. Ecker	09/13/23	B110	Communications with M. Soto and C. Kohlsaas regarding preparation of K-1 mailings to entity investors and instructions for same.	0.30	61.50
K. L. Ecker	09/14/23	B110	Communications with C. Kohlsaas regarding mailing method of K-1 documents to investors.	0.30	61.50
K. L. Ecker	09/14/23	B110	Review K-1 documents and begin preparations for separating and sending to investors and draft spreadsheet for updated investor addresses.	2.50	512.50
K. L. Ecker	09/15/23	B110	Finalize and confirm investor K-1 mailings and send via USPS Priority Mail.	3.50	717.50

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

Page 5
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
K. L. Ecker	09/15/23	B110	(No Charge) Teleconference with S. Williams regarding instructions for investor K-1 mailings and postage fees.	0.20	N/C
K. L. Ecker	09/18/23	B110	E-mail exchanges and communications confirming K-1 mailings complete.	0.20	41.00
K. L. Ecker	09/19/23	B110	E-mail exchanges with C. Kohlsaas and E. Murphy regarding finalization of K-1 mailing spreadsheet for tracking purposes.	0.20	41.00
K. L. Ecker	09/20/23	B110	E-mails and communications with C. Kohlsaas and M. Soto regarding website publication for K-1 updates and returned mail for investor K-1 documents.	0.50	102.50
C. C. Kohlsaas	09/20/23	B110	Telephone conference with Kaufman Professionals regarding K-1s.	0.40	102.00
K. L. Ecker	09/21/23	B110	E-mails and communications with C. Kohlsaas regarding K-1 mailing issues and next steps.	0.30	61.50
K. L. Ecker	09/21/23	B110	Receive and review mailing list from RICOH detailing investor tracking numbers and addresses.	0.20	41.00
K. L. Ecker	09/22/23	B110	E-mail exchanges with C. Kohlsaas and E. Murphy regarding updated addresses for investors.	0.30	61.50
C. C. Kohlsaas	09/22/23	B110	Preparations for final K-1-related tasks and issues; revise letter to investor claimants regarding claims determination motion.	0.40	102.00
Subtotal Case Administration				26.60	4,136.50
Petitions, Schedules, Statement of Affairs					
C. C. Kohlsaas	09/14/23	B115	Organization of K-1 forms and procedure for distribution of same to claimant investors.	0.30	76.50
C. C. Kohlsaas	09/28/23	B115	Draft proposed order granting receiver's claims determination motion and notice of filing same.	0.60	153.00

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

Page 6
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
Subtotal Petitions, Schedules, Statement of Affairs				0.90	229.50
Asset Analysis and Recovery					
L. Humphries	07/03/23	B120	Preparation of correspondence to claimants regarding claims determination process.	0.40	102.00
M. E. Fleming	07/05/23	B120	Research third party liability release for potential settlement of claims.	4.00	600.00
R. Rodriguez	07/05/23	B120	(No Charge) Teams meeting with Receiver and M. Fleming regarding research on extent of general release given by receiver to potentially liable parties.	0.50	N/C
M. E. Fleming	07/06/23	B120	Researched case law regarding the authority of the receivership to release third parties from liability in a settlement.	3.20	480.00
L. Humphries	07/10/23	B120	Communication with Receiver's professionals regarding K1s and preparation of tax returns.	0.40	102.00
L. Humphries	07/10/23	B120	Preparation of Interim Report for filing with Court.	1.20	306.00
R. Rodriguez	07/12/23	B120	Emails with M. Soto and M. Fleming regarding investigation into potential claims against lawyer.	0.10	29.50
L. Humphries	07/12/23	B120	Review of draft SFAR.	0.30	76.50
L. Humphries	07/12/23	B120	Review of investor information for RH.	0.20	51.00
R. Rodriguez	07/13/23	B120	Teams meeting with M. Fleming and M. Soto re M. Fleming findings from the Brodman emails with attorney JK and next steps to analyze information to assess potential claims against JK.	0.50	147.50
L. Humphries	07/14/23	B120	(No Charge) Preparation of draft Fee Application (including invoice review).	2.80	N/C
E. M. Murphy	07/17/23	B120	Review regarding defendants' E-mail files (production sets) and follow-up regarding same.	0.40	82.00
R. Rodriguez	07/17/23	B120	Review and select critical documents for investigation into potential third party claims.	0.20	59.00
L. Humphries	07/17/23	B120	Phone conference with claimant investor RH.	0.40	102.00

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

Page 7
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
R. Rodriguez	07/17/23	B120	Review and respond to email from E. Murphy regarding PII email review for potential third party claims.	0.10	29.50
R. Rodriguez	07/17/23	B120	Emails with M. Fleming and E. Murphy re PII email accounts and research for information therein.	0.20	59.00
R. Rodriguez	07/17/23	B120	Teams meeting with M. Fleming and M. Soto re discussion of potential third party actions.	0.30	88.50
M. E. Fleming	07/17/23	B120	Accessed and reviewed PII email accounts of Larry Brodman and Cindy Lieberman to analyze emails from law firm to determine potential role in the PII ponzi scheme.	2.00	300.00
L. Humphries	07/18/23	B120	(No Charge) Edits to Fee Application.	0.70	N/C
M. E. Fleming	07/18/23	B120	Accessed and reviewed PII email account of Larry Brodman to analyze emails from law firm to determine potential role in the PII ponzi scheme.	5.00	750.00
R. Rodriguez	07/18/23	B120	Emails with M. Fleming and M. Soto re discussion of potential third party actions.	0.10	29.50
L. Humphries	07/19/23	B120	Assessed investor correspondence regarding status of distribution.	0.40	102.00
L. Humphries	07/19/23	B120	Phone conference with investor JH.	0.40	102.00
L. Humphries	07/19/23	B120	(No Charge) Preparation of email to SEC.	0.10	N/C
L. Humphries	07/19/23	B120	Email to claimant investor BH.	0.10	25.50
M. E. Fleming	07/19/23	B120	(No Charge) Accessed and reviewed PII email accounts of Larry Brodman and Cindy Lieberman to analyze emails from law firm to determine their role in the PII ponzi scheme.	2.00	N/C
R. Rodriguez	07/19/23	B120	Teams meeting with M. Soto and M. Fleming regarding PII emails for further investigation into claims against lawyer.	0.10	29.50
L. Humphries	07/24/23	B120	Phone conference with claimant investor RW.	0.30	76.50
L. Humphries	07/24/23	B120	Attendance at phone conference with claimant investor DM.	0.30	76.50
L. Humphries	07/24/23	B120	Review of documents for investor claimant DM.	0.30	76.50

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

Page 8
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	07/25/23	B120	Communicate with claimant investor MS.	0.30	76.50
M. E. Fleming	07/25/23	B120	(No Charge) Met with Consilio Team to extract all files on three PII email accounts.	1.00	N/C
L. Humphries	07/26/23	B120	Phone conference with claimant investor RB.	0.30	76.50
L. Humphries	07/26/23	B120	Draft email correspondence to claimant RB.	0.20	51.00
R. Rodriguez	07/27/23	B120	Review update from M. Fleming on progress regarding downloading of PII emails for further investigation into claims against lawyer.	0.10	29.50
L. Humphries	07/31/23	B120	Preparation of edits to interim report.	0.50	127.50
L. Humphries	08/02/23	B120	Communication with tax accountants regarding K1 issue.	0.40	102.00
L. Humphries	08/03/23	B120	Review of investor claimant documents for KT.	0.20	51.00
L. Humphries	08/03/23	B120	Emails with Kaufman professionals regarding tax returns.	0.30	76.50
L. Humphries	08/04/23	B120	Communicated with investor claimant KT.	0.30	76.50
L. Humphries	08/07/23	B120	Review of claimant information for JS.	0.20	51.00
L. Humphries	08/08/23	B120	Communicated with claimant investor JS.	0.20	51.00
L. Humphries	08/08/23	B120	Phone conference with claimant investor KT.	0.30	76.50
L. Humphries	08/09/23	B120	Review of correspondence regarding Third Party Claims.	0.30	76.50
L. Humphries	08/11/23	B120	Email review of Nicolosi and Brodman emails related to third party claims analysis.	0.40	102.00
L. Humphries	08/14/23	B120	(No charge) Preparation of Fee Application.	0.50	N/C
L. Humphries	08/15/23	B120	Emails with claimant investor TM.	0.20	51.00
L. Humphries	08/15/23	B120	(No charge) Preparation of edits to Fee Application.	1.00	N/C
C. C. Kohlsaas	08/17/23	B120	Analyze documents received from PII related parties in preparation for potential professional liability claims against attorney.	2.30	586.50
L. Humphries	08/17/23	B120	(No Charge) Assessed Order from Judge Singhal on application.	0.20	N/C

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

Page 9
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
L. Humphries	08/18/23	B120	Draft various investor correspondence to claimant investor CM.	0.20	51.00
C. C. Kohlsaat	08/18/23	B120	Analyze PII documents and emails related to work performed for PII and Larry Brodman by attorney with respect to potential professional negligence suit.	2.90	739.50
L. Humphries	08/21/23	B120	Preparation of analysis regarding early stage equinox funds.	0.60	153.00
R. Rodriguez	08/22/23	B120	Prepare for Zoom meeting with A. Sum, M. Soto and L. Humphries to review draft claims determination motion.	0.40	118.00
R. Rodriguez	08/22/23	B120	Zoom meeting with A. Sum, M. Soto and L. Humphries to review draft claims determination motion.	0.70	206.50
C. C. Kohlsaat	08/22/23	B120	Analyze emails related to L. Brodman property acquisitions.	1.60	408.00
L. Humphries	08/25/23	B120	Drafted edits to Claims Determination Motion and exhibits.	1.00	255.00
C. C. Kohlsaat	08/25/23	B120	Analyze communications and documents related to PII accountant and potential professional liability claims.	0.30	76.50
L. Humphries	08/28/23	B120	Communication with claimant investor TE.	0.30	76.50
L. Humphries	08/29/23	B120	Review and analysis of letter to IRS.	0.20	51.00
Subtotal Asset Analysis and Recovery				44.40	7,679.00

Meetings of and Communications with Creditors

R. Rodriguez	08/15/23	B150	Review email from investor RB	1.00	295.00
R. Rodriguez	08/16/23	B150	Review and respond to email from Investor RB re document received and comments on latest fee petition.	0.10	29.50
R. Rodriguez	08/21/23	B150	Zoom meeting with investor regarding information about potential claims recovery.	0.50	147.50
R. Rodriguez	08/21/23	B150	Prepare for meeting with investor regarding information about potential claims recovery.	0.20	59.00

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

Page 10
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
Subtotal Meetings of and Communications with Creditors				1.80	531.00
Fee/Employment Applications					
R. Rodriguez	07/12/23	B160	(No Charge) Review RR time entries and correct same.	0.90	N/C
R. Rodriguez	07/18/23	B160	(No Charge) Review and comment on Fee Application Motion.	0.80	N/C
Subtotal Fee/Employment Applications				1.70	0.00
Tax Issues					
E. M. Murphy	09/12/23	B240	Review regarding updated investor addresses and plan for distribution of K-1 tax forms.	0.30	61.50
E. M. Murphy	09/14/23	B240	Coordinate with document services and office services regarding formatting issues for K-1 mailing project (including updating investor contact information) and follow-up with attorney team regarding same	0.90	184.50
E. M. Murphy	09/15/23	B240	Continued coordination with Document Service, Office Services, and attorney team for K-1 mailing project and related follow-up.	0.50	102.50
E. M. Murphy	09/15/23	B240	Complete coordination with document services and office services for formatting and data list for investor contact information (for K-1 mailings and follow-up investor contacts).	0.50	102.50
E. M. Murphy	09/18/23	B240	Follow-up regarding K-1 mailing project and review mailing spreadsheet for upcoming Distribution Mailing.	0.20	41.00
E. M. Murphy	09/19/23	B240	Follow-up for K-1 mailing project and confirm mailing addresses based on investor inquiries.	0.30	61.50
E. M. Murphy	09/20/23	B240	Follow-up for investor inquiries regarding K-1 mailing and address information.	0.20	41.00

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

Page 11
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	09/21/23	B240	Follow-up with attorney team and accountant communications regarding status of K-1 packet.	0.30	61.50
E. M. Murphy	09/21/23	B240	Review files and provide updates for investor inquiries (K-1 mailings and claims) (Investor R.B.).	0.30	61.50
E. M. Murphy	09/21/23	B240	Review files and provide updates for investor inquiries (K-1 mailings and claims) for 5 K-1 recipients.	0.60	123.00
E. M. Murphy	09/21/23	B240	Review files and provide updates for investor inquiries (K-1 mailings and claims) (Trustee, C.L, for partnership, J.S).	0.30	61.50
E. M. Murphy	09/22/23	B240	Prepare additional certified mailings for K-1 recipients with updated contact information or based on postal returns (RTS) and additional research for continuous returned mailings (OPH, AE&PE, RB, MH, CD, DR, VS, JH, P&E/PZ, GLF, JTM).	1.90	389.50
E. M. Murphy	09/25/23	B240	Additional review for information and prepare updated K-1 mailings (G LaV, RL/SG Company, RF).	0.50	102.50
E. M. Murphy	09/26/23	B240	Transmittal of additional K-1 packets for updated addresses (RF, RL, GL)	0.50	102.50
E. M. Murphy	09/29/23	B240	Prepare K-1's for replacement mailing (for updated addresses) (Investors GF Trust and W.S.).	0.50	102.50
Subtotal Tax Issues				7.80	1,599.00
Claims and Plan					
E. M. Murphy	07/13/23	B300	Review file and work on draft letter to investors for transmittal of Order on Claims Determination Motion.	0.60	123.00
E. M. Murphy	07/13/23	B300	(No Charge)Review file and Non-Party discovery regarding Brodman loss of deposit prior to receivership and follow-up regarding same.	1.00	N/C
E. M. Murphy	07/19/23	B300	Review Motion Exhibits and claims for information for returning investor calls (JH and family trust, D&L M)	0.30	61.50

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

Page 12
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	07/20/23	B300	Review file and follow-up for call to investor regarding status of distribution (investor WH).	0.20	41.00
E. M. Murphy	07/25/23	B300	Follow-up for investor inquiry and status (Investor K.T. and K.T. IRA)	0.20	41.00
E. M. Murphy	07/26/23	B300	Follow-up for investor status and inquiries	0.20	41.00
E. M. Murphy	07/26/23	B300	Review claim information submitted by Investor R.B./custodian for status and investor inquiry and follow-up for same.	0.20	41.00
E. M. Murphy	08/02/23	B300	Review status of investor claim and follow-up for same (Estate of J.J.)	0.10	20.50
E. M. Murphy	08/15/23	B300	(No Charge) Review for filings in preparation for attorney conference.	0.20	N/C
E. M. Murphy	08/15/23	B300	Follow-up for information for investor inquiries (Investors McC and JH)	0.20	41.00
E. M. Murphy	08/15/23	B300	Prepare for and participate in attorney call regarding status of distribution motion and investor issues.	1.10	225.50
E. M. Murphy	08/17/23	B300	Work on updates to spreadsheets for investor letters noting investor number and motion for distribution.	2.70	553.50
E. M. Murphy	08/18/23	B300	Continued work on spreadsheets for investor letters noting investor number and motion for distribution.	0.90	184.50
E. M. Murphy	08/22/23	B300	Create updated sets of Exhibits (A-D) to Distribution Motion in accordance with SEC recommendations	3.10	635.50
E. M. Murphy	08/22/23	B300	Update draft investor letter (with all new contact information) and work with attorneys for Distribution Motion scheduling and procedure (for investors)	0.90	184.50
E. M. Murphy	08/23/23	B300	Complete exhibits for Motion (finalize Exhibit D) and review/edit all for inclusion with Distribution Motion.	0.70	143.50
E. M. Murphy	08/24/23	B300	Review for, follow-up and provide information for investor contact (E.W and B.T)	0.50	102.50
E. M. Murphy	09/06/23	B300	Follow-up for update for Investor MS, trustee new contact information and update.	0.20	41.00

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

Page 13
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	09/11/23	B300	Follow-up for investor inquiries (D.C. for H.C. and TMc) and update new contact information from same	0.20	41.00
E. M. Murphy	09/18/23	B300	Review for information for investor inquiries and provide same (Investor D.M/L.M. and investor J.J., dec.).	0.20	41.00
E. M. Murphy	09/21/23	B300	Research (address/last contacts) for remailings where necessary for 2022 K-1 packets.	1.00	205.00
E. M. Murphy	09/22/23	B300	Continued work on investor/claimant contact spreadsheet to complete information for K-1 and future mailings projects.	0.60	123.00
E. M. Murphy	09/22/23	B300	Review for and update information for investor/claimant inquiries (PE/PZ, AE&PE and others) and follow-up for same.	0.60	123.00
E. M. Murphy	09/25/23	B300	Follow-up for investor information request (Investor J.R.)	0.10	20.50
E. M. Murphy	09/26/23	B300	Follow-up with attorney team regarding results of research into Investor W.A. claim and status of claims on Distribution Motion.	0.20	41.00
E. M. Murphy	09/26/23	B300	Research for all contacts and transmittals by Investor W.A. to determine status of Claim submission (fax copy v. paper copy).	0.50	102.50
E. M. Murphy	09/26/23	B300	Research for all contacts and transmittals by Claimants (A.E., P.E. and M/M E) to determine status of submission of individual claim vs. Midland IRA claims.	0.80	164.00
E. M. Murphy	09/26/23	B300	Create files for Claimants (A.E. & P.E. and M/M E) for review of claims status.	0.20	41.00
E. M. Murphy	09/26/23	B300	Follow-up with attorney team regarding results of research into M/M E claim and status of claims on Distribution Motion.	0.30	61.50
E. M. Murphy	09/26/23	B300	Follow-up regarding status of K-1 mailings, procedure to update addresses for CPA records, and planning for Distribution Motion letter for eligible Claimants.	0.60	123.00

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

Page 14
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
E. M. Murphy	09/26/23	B300	Review all paper copies of submitted Proof of Claim forms to confirm receipt of all of record by the Claims Bar Date and listed on Motion Exhibits.	1.30	266.50
E. M. Murphy	09/26/23	B300	Create files for Investor (W.A.) for review of claims status.	0.20	41.00
E. M. Murphy	09/26/23	B300	Confirm delivery status for July 2022 Proof of Claim packets (through UPS confirmation returns) for W.A. and for A&P E.	0.20	41.00
E. M. Murphy	09/28/23	B300	Follow-up regarding Notice requirements for claimants, proposed order and transmittal methods for Investor Notice letters.	1.10	225.50
E. M. Murphy	09/28/23	B300	Review for and follow-up for claimant request for Claims Motion details (J.H.) and for K-1 inquiry by investor W.T./T.E.	0.30	61.50
E. M. Murphy	09/28/23	B300	Planning with office services for completion of K-1 mailings and Distribution Motion mailing project.	0.30	61.50
E. M. Murphy	09/28/23	B300	Review Motion for Distribution as filed with exhibits.	0.30	61.50
E. M. Murphy	09/29/23	B300	Update mailing information for Claimant number/amount for Mail Merge tables in preparation for Distribution Notice mailing project and verify with filed Motion (Exhibits A-C).	1.80	369.00
E. M. Murphy	09/29/23	B300	Follow-up with information for Claimant's inquiries (TE)	0.10	20.50
Subtotal Claims and Plan				24.20	4,715.00
Claims Administration and Objections					
C. C. Kohlsaat	08/24/23	B310	Analyze proof of claim materials for investors in preparation for calls regarding status of receivership, distribution and K-1s.	0.90	229.50
C. C. Kohlsaat	08/25/23	B310	Telephone conference with claimant investor L.D. regarding receivership status and next steps.	0.30	76.50

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

Page 15
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
C. C. Kohlsaat	08/25/23	B310	Draft correspondence to investor claimant L.D. regarding inclusion of Equinox investors in ultimate distribution of funds.	0.50	127.50
C. C. Kohlsaat	08/25/23	B310	Analysis of investor claimant L.D.'s claim information; analysis of claims distribution issues related to Equinox and resolutions of same.	0.90	229.50
C. C. Kohlsaat	08/28/23	B310	Communication with claimant investor, L.D., regarding distribution of funds.	0.10	25.50
C. C. Kohlsaat	09/05/23	B310	Communication with claimant investor M.S. regarding update on status of receivership.	0.10	25.50
C. C. Kohlsaat	09/05/23	B310	Analyze investor claimant M.S.'s claim materials in preparation for communication regarding receivership status.	0.10	25.50
C. C. Kohlsaat	09/06/23	B310	Telephone conference and correspondence with investor claimant M.S. providing receivership status update.	0.20	51.00
C. C. Kohlsaat	09/11/23	B310	Analysis of claim of claimant investor D.C. in preparation for telephone conference regarding status of claim and receivership.	0.20	51.00
C. C. Kohlsaat	09/11/23	B310	Telephone conference with investor claimant D.C. regarding status of claim and receivership, and to update and confirm contact information.	0.10	25.50
C. C. Kohlsaat	09/11/23	B310	Communication with claimant investor T.M. regarding status of receivership	0.10	25.50
C. C. Kohlsaat	09/14/23	B310	Correspondence with claimant investor C.S. regarding status of K-1 tax form.	0.10	25.50
C. C. Kohlsaat	09/14/23	B310	Telephone conference with claimant investor C.S. regarding status of K-1 tax form.	0.10	25.50
C. C. Kohlsaat	09/15/23	B310	Finalize organization of K-1s and procedure for distribution of same to claimant investors.	0.40	102.00
C. C. Kohlsaat	09/18/23	B310	Telephone conference with claimant investor, C.M., regarding status of claims determination motion and K-1s.	0.10	25.50

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

Page 16
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
C. C. Kohlsaas	09/20/23	B310	Analyze claim file of claimant investor J.O. in preparation for telephone conference regarding receivership status and K-1s.	0.10	25.50
C. C. Kohlsaas	09/20/23	B310	Analyze claim file in preparation for telephone conference with claimant investor C.L. regarding status of receivership and K-1s.	0.10	25.50
C. C. Kohlsaas	09/20/23	B310	Telephone conference with claimant investor J.O. regarding receivership status and K-1s.	0.10	25.50
C. C. Kohlsaas	09/20/23	B310	Telephone conference with claimant investor C.L. regarding status of receivership and K-1s.	0.10	25.50
C. C. Kohlsaas	09/20/23	B310	Correspondence with claimant investor R.B. regarding K-1s and related issues.	0.20	51.00
C. C. Kohlsaas	09/21/23	B310	Communication with claimant investor D.T. regarding K-1 and status of receivership.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Communication with claimant investor J.J. regarding K-1 and status of receivership.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Analyze claim file of claimant investor J.S. in preparation for communication regarding K-1 and receivership status.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Communication with investor T.H. regarding K-1.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Communication with claimant investor J.S. regarding K-1 and status of receivership.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Analyze claim file in preparation for communication with claimant investor J.J. regarding K-1 and status of receivership.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Analyze receivership file in preparation for communication with investor T.H.	0.10	25.50
C. C. Kohlsaas	09/21/23	B310	Identification and administration of post-K-1 mailing issues and updates to general claim file resulting from same.	1.00	255.00
C. C. Kohlsaas	09/21/23	B310	Analyze receivership file in preparation for communication with claimant investor D.T. regarding K-1 and status of receivership.	0.10	25.50

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

Page 17
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
C. C. Kohlsaas	09/22/23	B310	Analyze claim file in preparation for communication with claimant investor R.B. regarding K-1s.	0.20	51.00
C. C. Kohlsaas	09/22/23	B310	Draft correspondence in response to inquiry from claimant investor C.S. regarding K-1 and receivership status.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Telephone conference with claimant investor A.E. regarding K-1 and receivership status.	0.20	51.00
C. C. Kohlsaas	09/22/23	B310	Analyze claim file in preparation for correspondence with claimant investor P.Z. regarding K-1 status.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Correspondence with claimant investor P.Z. regarding K-1 status.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Draft correspondence to claimant investor R.B. regarding K-1.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Analyze claim file in preparation for telephone conference with claimant investor A.E.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Analyze claim file in preparation for correspondence with claimant investor J.H.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Correspondence with claimant investor J.H. regarding K-1 status.	0.10	25.50
C. C. Kohlsaas	09/22/23	B310	Draft correspondence to claimant investor A.E. regarding K-1 and receivership status.	0.10	25.50
C. C. Kohlsaas	09/25/23	B310	Telephone conference with investor W.A. regarding K-1 forms and receivership status.	0.20	51.00
C. C. Kohlsaas	09/25/23	B310	Telephone conference with claimant investor J.R. regarding receivership status and claims determination motion.	0.10	25.50
C. C. Kohlsaas	09/25/23	B310	Analyze claim file in preparation for telephone conference with investor W.A.	0.10	25.50
C. C. Kohlsaas	09/25/23	B310	Analyze claim file in preparation for telephone conference with claimant investor J.R.	0.10	25.50
C. C. Kohlsaas	09/25/23	B310	Telephone conference with claimant investor J.R. regarding K-1 and receivership status.	0.10	25.50

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

Page 18
 October 30, 2023
 Invoice No. 12266115

Timekeeper	Date	Task	Narrative	Hours	Amount
C. C. Kohlsaat	09/25/23	B310	Analyze approved proofs of claim submitted by claimant investors and prior correspondence related to same in advance of letter to claimant investors regarding claims determination motion.	1.00	255.00
C. C. Kohlsaat	09/25/23	B310	Analyze claim file in preparation for telephone conference with claimant investor J.R.	0.10	25.50
C. C. Kohlsaat	09/26/23	B310	Finalize updates to claims determination motion, including methodology for handling potential objections by investors.	1.90	484.50
Subtotal Claims Administration and Objections				11.40	2,907.00
Plan and Disclosure Statement					
E. M. Murphy	08/28/23	B320	Reformat Exhibits A-D and follow-up regarding same.	1.10	225.50
E. M. Murphy	08/29/23	B320	Follow-up regarding Distribution Plan motion and investor mailings.	0.20	41.00
E. M. Murphy	08/30/23	B320	Finalize mailing list for upcoming Distribution letter and future mailings (K-1 and other).	1.60	328.00
E. M. Murphy	09/05/23	B320	Follow-up for investor inquiries (D.C for H.C. (dec) and MS, as Trustee.	0.30	61.50
Subtotal Plan and Disclosure Statement				3.20	656.00
Total Hours				123.00	

Total Fees \$22,748.00

Amount Due This Invoice:	\$22,748.00
---------------------------------	--------------------

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

Page 19
 October 30, 2023
 Invoice No. 12266115

TIMEKEEPER SUMMARY

Name	Title	Hours	Rate	Amount
Lit Tech Support	Litigation Supp	6.70	N/C	N/C
K. L. Ecker	Paralegal	10.60	205.00	2,173.00
K. L. Ecker	Paralegal	0.20	N/C	N/C
E. M. Murphy	Paralegal	34.40	205.00	7,052.00
E. M. Murphy	Paralegal	1.20	N/C	N/C
M. E. Fleming	Summer Clerk	14.20	150.00	2,130.00
M. E. Fleming	Summer Clerk	3.00	N/C	N/C
L. Humphries	Associate	18.00	255.00	4,590.00
L. Humphries	Associate	6.70	N/C	N/C
C. C. Kohlsaat	Associate	20.20	255.00	5,151.00
R. Rodriguez	Partner	5.60	295.00	1,652.00
R. Rodriguez	Partner	2.20	N/C	N/C
Total		123.00		22,748.00



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

October 30, 2023
Invoice No. 12266115

Our Reference: 0104027-000002
Client Name: MIRANDA L. SOTO, RECEIVER
Invoice Date: October 30, 2023
Invoice Number: 12266115
Total Due This Invoice: \$22,748.00

Total Due All Invoices For this Matter:	\$22,748.00
--	--------------------

**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: 12266115

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 Q3 2023

July				
Net hours billed		Hours	Rate	Billed
	MO	4.7	450	2,115.00

August				
	HF	1.5	200	300.00
	MO	1.6	450	720.00
	DMK	4.25	450	<u>1,912.50</u>
		7.35		2,932.50
	Tax Returns			<u>14,000.00</u>
Total August				<u>16,932.50</u>

September				
	MO	3.3	450	1,485.00

	Billed	Discount	Net
Jul-23	2,115.00	(528.75)	1,586.25
Aug-23	2,932.50	(733.12)	2,199.38
Sep-23	1,485.00	(371.25)	1,113.75
Tax returns			14,000.00
	<u>6,532.50</u>	<u>(1,633.12)</u>	<u>18,899.38</u>

Balance due for Q3 2023 **18,899.38**

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: 12920

Property Income Investors Date: 07/31/2023
 Buchanan Ingersoll & Rooney Due Date: 08/30/2023
 One Biscayne Tower, Suite 1500
 Miami, FL 33131-1822

For professional service rendered as follows:

Litigation Support services for July 2023 2,115.00

See attached Time & Expense Journal

Billed Time & Expenses	\$2,115.00
Discount	(528.75)
Invoice Total	<u>\$1,586.25</u>
Beginning Balance	\$24,660.00
Invoices	1,586.25
Receipts	0.00
Adjustments	0.00
Service Charges	0.00
Amount Due	<u>\$26,246.25</u>

<u>07/31/2023</u>	<u>06/30/2023</u>	<u>05/31/2023</u>	<u>04/30/2023</u>	<u>03/31/2023+</u>	<u>Total</u>
1,586.25	14,426.25	6,420.00	3,813.75	0.00	\$26,246.25

Please return this portion with payment.

Invoice: 12920

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

Date: 07/31/2023
 Due Date: 08/30/2023

Card Type: _____ CSV: _____ Exp Date: _____

Amount Due: \$26,246.25

Card #: _____

Amount Enclosed: \$ _____

Signature: _____

Time & Expense Journal

July 1, 2023 - July 31, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
July 31, 2023											
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/08/23	LIT		3.50	n/c billing for Q2 2023
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/10/23	LIT		0.70	n/c finalize billing and send to Lauren
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/12/23	LIT		2.60	Draft SFAR for Q3 2023
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/18/23	LIT		0.40	Telephone call with investor JH requesting information about his claim
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/18/23	LIT		0.40	Telephone call with investor WH requesting information about his claim
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/19/23	LIT		0.20	Prepare accountants' report in anticipation of finalizing SFAR
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/31/23	LIT		0.20	Respond to inquiry relating to finalizing SFAR for Q2
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	07/31/23	LIT		0.90	Finalize and issue SFAR Q2 2023
July 31, 2023										8.90	
Report Totals										8.90	

Time & Expense Journal

August 1, 2023 - August 31, 2023

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
August 2, 2023											
HF	J507800	Property Income Investors, LLC	GEN		2201	Time	08/02/23	1		1.50	Corresponding about 2022 returns, preparing returns to send to client for review
DMK	J507800	Property Income Investors, LLC	GEN		2201	Time	08/02/23	1		1.00	Tax consult
DMK	J507800	Property Income Investors, LLC	GEN		2201	Time	08/02/23	1		2.00	Tax returns
										4.50	
August 2, 2023											
August 3, 2023											
DMK	J507800	Property Income Investors, LLC	GEN		3500	Time	08/03/23	1		0.25	Call to DOR
										0.25	
August 3, 2023											
August 11, 2023											
DMK	J507800	Property Income Investors, LLC	GEN		5100	Time	08/11/23	1		1.00	iRS letter
										1.00	
August 11, 2023											
August 31, 2023											
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	08/02/23	LIT		0.30	Respond to Ms. Humphries re status of K-1 forms for investors
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	08/02/23	LIT		0.10	Review and respond to Ms. Rodriguez inquiry re Equinox Holdings inc FDOR inquiry
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	08/02/23	LIT		0.20	Transmit returns to Ms. Humphries for review and processing by Ms. Soto
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	08/07/23	LIT		0.90	Letter to IRS re PII 3504 extension - fourth letter and third response
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	08/10/23	LIT		0.10	Investor inquiry from B.H. re status of K-1s and re pending distributions
										1.60	
August 31, 2023											
Report Totals										7.35	

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

Staff	Client	Description	Engagement	Project	Activity	Type	Date	Rate	Description	Hrs/Units	Comments
September 30, 2023											
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	09/01/23	LIT		0.40	Receive efile authorization forms for partnership returns
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	09/01/23	LIT		2.20	Compile and upload K-1 packages for distribution to partners
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	09/20/23	LIT		0.20	Telephone conversation with Christian re Bentley K-1
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	09/22/23	LIT		0.40	Email to Christian to summarize the conversation relating to R.B. treatment on his K-1
MO	J507800	Property Income Investors, LLC	GEN		LIT	Time	09/25/23	LIT		0.10	Investor inquiry and forward to atty
September 30, 2023										<u>3.30</u>	
Report Totals										<u>3.30</u>	

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 TENTH INTERIM
OMNIBUS APPLICATION FOR ALLOWANCE AND PAYMENT
OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES
FOR JULY 1, 2023 – SEPTEMBER 30, 2023**

THIS CAUSE came before the Court on Miranda L. Soto, as Receiver's (the "Receiver") Unopposed Tenth Interim Omnibus Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for July 1, 2023 through September 30, 2023 (Doc. 121) (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	\$ 15,663.29
Buchanan Ingersoll & Rooney PC	\$ 22,748.00
Kaufman & Company PA	\$ 18,899.38

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

UNITED STATES DISTRICT COURT JUDGE

4886-6128-2080, v. 1