

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.

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MIRANDA L. SOTO, as Receiver for 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,

Third-Party Plaintiff,

v.

KELLEY & GRANT P.A. and JERRON LEON  
KELLEY, individually,

Third-Party Defendants.

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**RECEIVER'S NOTICE OF FILING THIRD PARTY SUMMONSES**

Miranda L. Soto, Esq., solely in her capacity as Receiver (the “Receiver”) for Defendants, PROPERTY INCOME INVESTORS, LLC; EQUINOX HOLDINGS, INC.; PROPERTY INCOME INVESTORS 26, LLC; PROPERTY INCOME INVESTORS 304, LLC; PROPERTY INCOME INVESTORS 201, LLC; PROPERTY INCOME INVESTORS 3504, LLC; PROPERTY INCOME INVESTORS 1361, LLC; PROPERTY INCOME INVESTORS 4020, LLC; PROPERTY INCOME INVESTORS 9007, LLC; PROPERTY INCOME INVESTORS 417, LLC; PROPERTY INCOME INVESTORS 4450, LLC; and PROPERTY INCOME INVESTORS 3050, LLC, by and through undersigned counsel, hereby files the attached proposed Third Party Summons.

Respectfully submitted,

**BUCHANAN INGERSOLL & ROONEY PC**

/s/Lauren V. Humphries

Lauren V. Humphries

Florida Bar No.: 117517

[Lauren.humphries@bipc.com](mailto:Lauren.humphries@bipc.com)

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Miami, FL 33131-1822

T: 305-347-4080

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*Attorneys for Receiver Miranda L. Soto*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2025, 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 February 12, 2025 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](mailto:carl@schoeppllaw.com)  
*Counsel for Defendant Larry Brodman*

/s/Lauren V. Humphries  
Lauren V. Humphries  
Florida Bar No.: 117517

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Third-Party Plaintiff,

v.

KELLEY & GRANT P.A. and JERRON LEON  
KELLEY, individually,

Third-Party Defendants.

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**THIRD PARTY SUMMONS IN A CIVIL ACTION**

**THE STATE OF FLORIDA:**

To: KELLEY & GRANT P.A.  
c/o Jerron L. Kelley, Registered Agent  
370 Camino Gardens Blvd., Suite 301  
Boca Raton, FL 33432

Each Third-Party Defendant is required to serve written defenses to the Third-Party Complaint or petition on the Third-Party Plaintiff's attorney:

Lauren V. Humphries, Esq.  
Buchanan Ingersoll & Rooney PC  
401 E. Jackson St., Suite 2400  
Tampa, FL 33602

within 20 days after service of this Third-Party Summons on that Third-Party Defendant, exclusive of the day of service and to file the original of the defenses with the Clerk of this Court either before service on Third-Party Plaintiffs' attorney or immediately thereafter. If a Third-Party Defendant fails to do so, a default will be entered against that Third-Party Defendant for the relief demanded in the Third-Party Complaint or petition.

Clerk of Court

DATED: \_\_\_\_\_ By: \_\_\_\_\_

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KELLEY & GRANT P.A. and JERRON LEON  
KELLEY, individually,

Third-Party Defendants.

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**THE STATE OF FLORIDA:**

To: Jerron L. Kelley, Esq.  
370 Camino Gardens Blvd., Suite 301  
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Clerk of Court

DATED: \_\_\_\_\_ By: \_\_\_\_\_