

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 AMENDED 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

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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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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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**THIRD PARTY SUMMONS IN A CIVIL ACTION**

**THE STATE OF FLORIDA:**

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

A lawsuit has been filed against you.

Within 21 days after service of this Third Party Summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

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

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

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

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SOUTHERN DISTRICT OF FLORIDA  
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Income Investors 417, LLC; Property Income  
Investors 4450, LLC; and Property Income  
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Third-Party Plaintiff,

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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: Jerron L. Kelley, Esq.  
370 Camino Gardens Blvd., Suite 301  
Boca Raton, FL 33432

A lawsuit has been filed against you.

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

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

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