

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

Case No. 8:20-cv-00394

KINETIC INVESTMENT GROUP, LLC and
MICHAEL SCOTT WILLIAMS,

Defendants, and

KINETIC FUNDS I, LLC,
KCL SERVICES, LLC D/B/A LENDACY,
SCIPIO, LLC,
LF42, LLC,
EL MORRO FINANCIAL GROUP, LLC, and
KIH, INC. F/K/A KINETIC INTERNATIONAL, LLC

Relief Defendants

**DEFENDANT MICHAEL SCOTT WILLIAMS’
EMERGENCY MOTION FOR RELIEF FROM ORDER GRANTING
MOTION FOR APPOINTMENT OF RECEIVER**

Defendant Michael Scott Williams moves to modify the Order Granting Plaintiff Securities and Exchange Commission’s Emergency Motion for Appointment of Receiver (Doc. 34) to allowing him, his girlfriend and her sister, and a tenant with access to their residences in Puerto Rico, and in support states as follows:

1. On March 6, 2020, the Court entered an Order Granting Plaintiff Securities and Exchange Commission’s (“SEC”) Emergency Motion for Appointment of Receiver (the “Order”) (Doc. 34).

2. Paragraph 15 of the Order provides that the Receiver is “authorized to take immediate possession of all real property of the Receivership Defendants [i.e., Williams], wherever located, including but not limited to all ownership and leasehold interest and fixtures” and that “**all persons** other than law enforcement offices . . . are (without express written permission of the Receiver) prohibited from: (a) entering such premises” (Doc. 34 at ¶ 15. The Order also provides that the Receiver is also authorized to change the door locks to the premises. *Id.*

3. Mr. Williams owns real property located at 109 Calle Cruz, Unit A & B, San Juan, Puerto Rico (“Calle Cruz”), and 200 Luna Street, Unit 2E, San Juan, Puerto (“Luna Street”). Mr. Williams presently resides at Calle Cruz with his girlfriend and her younger sister—a college student. In addition, Luna Street is presently occupied by a tenant with a written lease that expires in approximately six months.

4. The Order’s broad language, however, precludes Mr. Williams, his girlfriend, her sister, and the tenant from entering their homes. Mr. Williams, his girlfriend, and her younger sister have no other residences besides Calle Cruz and have no family with which they can reside.

5. Accordingly, Mr. Williams respectfully requests that this Court modify the Order to provide (1) him with access to Calle Cruz and the ability to continue to live at the property, (2) Mr. Williams’ girlfriend and her sister with access to Calle Cruz and the ability to continue to live at the property; and (3) the tenant with access to Luna Street and the ability to continue to live at the property.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), counsel for Mr. Williams certifies that they attempted to confer with counsel for the Receiver regarding the relief requested in this Motion on March 6, 2020, but has not received a response as of the filing of this Motion

Dated: March 6, 2020

Respectfully submitted,

/s/ Gregory W. Kehoe

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CERTIFICATE OF SERVICE

I CERTIFY that on March 6, 2020 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice to electronic filing to counsel of record.

/s/ Gregory W. Kehoe
Attorney