

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

CASE NO.: 8:20-CV-00394-T-35SPF

SECURITIES AND EXCHANGE COMMISSION,)
)
 Plaintiff,)
)
 v.)
)
 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.)
)
 _____)

NOTICE OF FILING PROPOSED ORDER TO MODIFY ASSET FREEZE ORDER

Pursuant to the Court's Order (ECF No. 104), Plaintiff Securities and Exchange Commission hereby gives notice of filing the attached proposed Order on Defendant Michael Williams' opposed Motion to Modify Asset Freeze Order (ECF No. 33) to Unfreeze Funds for Williams to Defend this Case (ECF No. 102).

At the request of Williams' counsel, the Commission also hereby files Williams' counsels' invoices for time billed from May 27, 2020 through July 14, 2020. Williams' counsel represented to counsel for the Commission that the time billed is only for work that fell within one of the categories in their proposed litigation budget (ECF No. 102-1).

July 15, 2020

By: /s/ Christine Nestor & Stephanie N. Moot

Christine Nestor
Senior Trial Counsel
Fla. Bar No. 597211
Direct Dial: (305) 982-6367
E-mail: nestorc@sec.gov

Stephanie N. Moot
Trial Counsel
Fla. Bar No. 30377
Direct Dial: (305) 982-6313
E-mail: moots@sec.gov

John T. Houchin
Senior Counsel
Fla. Bar No. 118966
Direct Dial: (305) 416-6292
E-mail: houchinj@sec.gov

Barbara Viniegra
Senior Counsel
Fla. Bar No. 716901
Direct Dial: (305) 416-6218
E-mail: viniegrab@sec.gov

Attorneys for Plaintiff
Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, FL 33131
Facsimile: (305) 536-4154

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 15, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Stephanie N. Moot
Stephanie N. Moot

SERVICE LIST

Timothy W. Schulz, Esq.
TIMOTHY W. SCHULZ, P.A.
224 Datura Street, Suite 815
West Palm Beach, Florida 33401
Telephone: (561) 659-1167
Facsimile: (561) 659-1168
Email: schulzt@twslegal.com
Email: e-service@twslegal.com
Co-Trial Counsel for Williams

Jon A. Jacobson, Esq.
JACOBSON LAW P.A.
224 Datura St., Suite 812
West Palm Beach, FL 33401
Telephone: (561) 880-8900
Facsimile: (561) 880-8910
Email: jjacobson@jlpa.com
Email: e-service@jlpa.com
Co-Trial Counsel for Williams

Jordan D. Maglich, Esq.
Quarles & Brady LLP
101 E. Kennedy Blvd., Suite 3400
Tampa, FL 33602
Telephone: 813-387-0300
Email: Jordan.maglich@quarles.com
Counsel for Receiver, Mark A. Kornfeld



JACOBSON LAW P.A.

July 15, 2020

Mark A. Kornfeld
c/o Jordan D. Maglich, Esq.
Quarles & Brady LLP
101 E. Kennedy Blvd., Suite 3400
Tampa, FL 33602

Re: *SEC v. Kinetic Inv. Group, LLC, et al.*, Case No. 8:20-cv-00394

Dear Mark A. Kornfeld:

Enclosed is invoice 10193, which covers Jacobson Law P.A.'s services from 5/27/2020 to 7/14/2020. This invoice, dated 7/15/2020, is for \$24,667.50. Your total balance, including past charges, is \$24,667.50. Prompt payment of your total balance is appreciated.

Billing Summary

Total for services rendered	\$24,667.50
Total expenses	\$0.00
Total interest and finance charges	\$0.00
Total payments and other transactions	\$0.00
Total previous balance	\$0.00
Balance Due	\$24,667.50

Thank you for your confidence in our work and our commitment to serving you.

If you have questions, please call us at 561-880-8900.

Very truly yours,

Jon A. Jacobson
Enclosure



JACOBSON LAW P.A.

Invoice submitted to:

July 15, 2020

Mark A. Kornfeld
 c/o Jordan D. Maglich, Esq.
 Quarles & Brady LLP
 101 E. Kennedy Blvd., Suite 3400
 Tampa, FL 33602

In Reference To: *SEC v. Kinetic Inv. Group, LLC, et al.*, Case No. 8:20-cv-00394

Invoice # 10193

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
5/27/2020	JAJ	Review correspondence from/to M. Williams re: Case status, pending issues, strategy, substitution of counsel; review file; draft correspondence to M. Williams re: Substitution of counsel.	0.30 357.50/hr	107.25
	JAJ	Draft correspondence to attorney S. Malina re: Motion to Withdraw; review correspondence from attorney S. Malina.	0.20 357.50/hr	71.50
5/28/2020	JAJ	Review correspondence from/to M. Williams re: Case status, pending issues, strategy.	0.20 357.50/hr	71.50
	JAJ	Review correspondence from attorney J. Maglich re: Substitution of counsel, pending issues, extension of time; review correspondence from attorney J. Picone; draft correspondence to attorney J. Maglich; conference call with attorney J. Maglich.	0.40 357.50/hr	143.00
	JAJ	Review correspondence from attorney J. Picone re: Pending issues, prior communications w/ SEC and Receiver; review file.	0.30 357.50/hr	107.25
	JAJ	Review and edit Motion for Extension of Time.	0.20 357.50/hr	71.50
5/29/2020	JAJ	Review Order re: Extension of Time; Review Motion for Permanent Injunction; review and analyze prior pleadings.	1.50 357.50/hr	536.25
	JAJ	Research SEC Receiverships, forfeiture, wrongful taking.	1.30 357.50/hr	464.75
	JAJ	Draft correspondence to attorneys J. Picone and S. Malina re: Prior filings and exchange of documents/information; review correspondence from attorney S. Malina.	0.20 357.50/hr	71.50
5/30/2020	JAJ	Review and analyze prior pleadings.	4.00 357.50/hr	1,430.00

Mark A. Kornfeld

Page 2

			<u>Hrs/Rate</u>	<u>Amount</u>
5/30/2020	JAJ	Review correspondence from M. Williams re: Pending issues, asset freeze, strategy; review file.	0.40 357.50/hr	143.00
6/1/2020	JAJ	Review correspondence to/from M. Williams re: Pending issues, asset freeze, living expenses; draft correspondence to M. Williams.	0.30 357.50/hr	107.25
	JAJ	Review correspondence from attorney S. Malina re: Receiver's fees.	0.10 357.50/hr	35.75
	JAJ	Review correspondence, pleadings, file; draft correspondence to attorneys S. Moot, J. Maglich, C. Nestor, V. Jacqmein, and M. Kornfeld re: Modifying asset freeze; review correspondence from attorney S. Moot.	1.70 357.50/hr	607.75
6/2/2020	JAJ	Draft correspondence to attorneys S. Moot, J. Maglich, C. Nestor, V. Jacqmein, and M. Kornfeld re: Modifying asset freeze; review correspondence from/to attorney S. Moot.	1.20 357.50/hr	429.00
	JAJ	Review correspondence to/from M. Williams re: Pending issues, asset freeze, living expenses; draft correspondence to M. Williams.	0.30 357.50/hr	107.25
	JAJ	Review and analyze Receiver's First Fee Application and exhibits.	0.90 357.50/hr	321.75
6/3/2020	JAJ	Review correspondence from/to attorney J. Maglich re: Modifying asset freeze, frozen accounts; Draft correspondence to attorneys S. Moot, J. Maglich, C. Nestor, V. Jacqmein, and M. Kornfeld re: Modifying asset freeze, frozen accounts, proposed Motion.	0.30 357.50/hr	107.25
	JAJ	Revise and edit Response to Receiver's First Application for Fees; revise and edit Joint Motion to Modify Freeze Order.	1.30 357.50/hr	464.75
	JAJ	Research line-by-line vs. across-the-board fee modifications.	0.70 357.50/hr	250.25
	JAJ	Draft correspondence to M. Williams re: Modifying Freeze Order; talk to M. Williams; review correspondence to M. Williams re: Receiver's Notice of Compliance.	0.40 357.50/hr	143.00
	JAJ	Review and analyze documents received from GT.	0.80 357.50/hr	286.00
	JAJ	Review and analyze Receiver's Notice of Compliance; review file.	0.10 357.50/hr	35.75
	JAJ	Review correspondence from attorney S. Malina re: Frozen accounts; draft correspondence to attorney S. Malina.	0.10 357.50/hr	35.75
6/4/2020	JAJ	Review and analyze pleadings; verify deadlines.	0.70 357.50/hr	250.25

Mark A. Kornfeld

Page 3

			<u>Hrs/Rate</u>	<u>Amount</u>
6/4/2020	JAJ	Research Local Rules; research J. Scriven's standing and procedural rules; research elements of 10b-5, Section 17, Section 206, and unjust enrichment claims; research SEC authority and jurisdiction; research jury instructions.	2.70 357.50/hr	965.25
	JAJ	Review correspondence from attorney C. Nestor re: Motion to Modify Freeze Order; review correspondence to/from attorneys S. Moot, J. Maglich, C. Nestor, V. Jacqmein, and M. Kornfeld re: Motion to Modify Freeze Order.	0.30 357.50/hr	107.25
	JAJ	Draft correspondence to M. Williams re: Motion to Modify Freeze Order.	0.10 357.50/hr	35.75
	JAJ	Revise and edit Motion to Modify Freeze Order; review and edit proposed Order.	0.40 357.50/hr	143.00
	JAJ	Review and analyze Receiver's Liquidation Plan; review file.	0.30 357.50/hr	107.25
6/5/2020	JAJ	Review correspondence to/from M. Williams re: Monthly expenses, frozen accounts, Motion to Modify Freeze Order; review file.	0.20 357.50/hr	71.50
	JAJ	Review correspondence to/from attorney C. Nestor re: Motion to Modify Freeze Order; draft correspondence to attorney S. Malina re: Motion to Modify Freeze Order; review correspondence from attorney S. Malina.	0.10 357.50/hr	35.75
6/6/2020	JAJ	Review and analyze documents.	3.50 357.50/hr	1,251.25
6/9/2020	JAJ	Review correspondence to/from M. Williams re: Monthly expenses, frozen accounts, Order Modifying Freeze Order; review file; draft correspondence to M. Williams re: Order Modifying Freeze Order.	0.30 357.50/hr	107.25
	JAJ	Review and analyze Receiver's Notice of Issuance of Subpoenas to Non-Parties; review and analyze Order Modifying Freeze Order; review file.	0.20 357.50/hr	71.50
	JAJ	Draft correspondence to attorney S. Malina re: Order Modifying Freeze Order; review correspondence from attorney S. Malina.	0.20 357.50/hr	71.50
6/10/2020	JAJ	Review correspondence to/from M. Williams re: Frozen accounts, Order Modifying Freeze Order.	0.10 357.50/hr	35.75
	JAJ	Review correspondence to/from attorney J. Maglich re: Frozen accounts, Order Modifying Freeze Order; review correspondence from attorney S. Malina re: Wire transfer; draft correspondence to attorney S. Malina; draft correspondence to M. Williams re: Wire transfer.	0.20 357.50/hr	71.50
6/17/2020	JAJ	Conference call w/ M. Williams re: Receiver's Motion to Take Possession of Condos, underlying facts, case strategy.	1.00 357.50/hr	357.50

Mark A. Kornfeld

Page 4

			<u>Hrs/Rate</u>	<u>Amount</u>
6/19/2020	JAJ	Review and analyze pleadings; draft memo re: alleged wrongdoing.	5.50 357.50/hr	1,966.25
	JAJ	Review correspondence from attorney C. Nestor re: Mediation; draft correspondence to attorney C. Nestor; draft correspondence to attorney J. Maglich re: Motion to Take Possession of Condos; review correspondence from attorney J. Maglich.	0.10 357.50/hr	35.75
	JAJ	Draft correspondence to M. Williams re: Mediation, underlying facts; review correspondence from M. Williams; talk to M. Williams.	0.40 357.50/hr	143.00
	JAJ	Review and analyze Notice of Mediation; review file.	0.10 357.50/hr	35.75
6/23/2020	JAJ	Draft correspondence to M. Williams re: Motion to Take Possession of Condos, strategy; review correspondence from M. Williams.	0.10 357.50/hr	35.75
	JAJ	Talk to attorney J. Maglich re: Motion to Take Possession of Condos.	0.30 357.50/hr	107.25
6/24/2020	JAJ	Review correspondence from M. Williams re: Underlying facts, case strategy; draft correspondence to M. Williams.	0.30 357.50/hr	107.25
	JAJ	Draft correspondence to attorney J. Maglich re: Motion to Take Possession of Condos; review correspondence from attorney J. Maglich.	0.80 357.50/hr	286.00
6/25/2020	JAJ	Review correspondence from attorney J. Maglich re: Motion to Take Possession of Condos; draft correspondence to attorney J. Maglich; talk to attorney J. Maglich.	0.30 357.50/hr	107.25
6/26/2020	JAJ	Review correspondence to M. Williams re: Motion to Take Possession of Condos, strategy; draft correspondence to M. Williams re: Motion to Modify Asset Freeze Order, underlying facts.	0.50 357.50/hr	178.75
	JAJ	Draft Motion to Modify Asset Freeze Order to Pay Attorneys' Fees; draft affidavit.	3.20 357.50/hr	1,144.00
	JAJ	Review and analyze Receiver's Notice of Issuance of Subpoenas; review file.	0.10 357.50/hr	35.75
6/29/2020	JAJ	Draft correspondence to attorney J. Maglich re: Motion to Take Possession of Condos; review correspondence from attorney J. Maglich; talk to attorney J. Maglich.	0.20 357.50/hr	71.50
6/30/2020	JAJ	Review correspondence from attorney J. Maglich re: Motion to Take Possession of Condos.	0.20 357.50/hr	71.50
	JAJ	Draft correspondence to M. Williams re: Motion to Take Possession of Condos and proposed compromise, Motion to Modify Asset Freeze Order, underlying facts; review correspondence from M. Williams; talk to M. Williams.	0.60 357.50/hr	214.50

Mark A. Kornfeld

Page 5

			<u>Hrs/Rate</u>	<u>Amount</u>
6/30/2020	JAJ	Review, revise, and edit proposed compromise/stipulation re: Motion to Take Possession of Condos.	0.20 357.50/hr	71.50
7/1/2020	JAJ	Review correspondence to M. Williams re: Motion to Modify Asset Freeze Order, underlying facts.	0.20 357.50/hr	71.50
	JAJ	Revise and edit proposed compromise/stipulation re: Motion to Take Possession of Condos.	0.20 357.50/hr	71.50
	JAJ	Draft correspondence to attorney J. Maglich re: Revised compromise/stipulation re: Motion to Take Possession of Condos; review correspondence from attorney J. Maglich.	0.30 357.50/hr	107.25
	JAJ	Review and analyze Order Directing Receiver to Supplement First Application for Fees; review file.	0.20 357.50/hr	71.50
7/2/2020	JAJ	Review and analyze Receiver's Response Supplementing First Application for Fees; review file.	0.20 357.50/hr	71.50
	JAJ	Review correspondence from attorney J. Maglich re: Revised compromise/stipulation re: Motion to Take Possession of Condos; review file; draft correspondence to attorney J. Maglich.	0.30 357.50/hr	107.25
	JAJ	Draft correspondence to M. Williams re: Revised compromise/stipulation re: Motion to Take Possession of Condos; review correspondence from M. Williams.	0.20 357.50/hr	71.50
	JAJ	Review and analyze Order Granting Receiver's First Application for Fees.	0.10 357.50/hr	35.75
	JAJ	Revise, edit, and file Motion to Modify Asset Freeze Order to Pay Attorneys' Fees; revise and finalize affidavit.	2.60 357.50/hr	929.50
7/3/2020	JAJ	Review correspondence from M. Williams re: Revised compromise/stipulation re: Motion to Take Possession of Condos, strategy; draft correspondence to M. Williams; talk to M. Williams; draft correspondence to M. Williams re: underlying facts; review correspondence from M. Williams.	0.70 357.50/hr	250.25
	JAJ	Draft correspondence to attorney J. Maglich re: Revised compromise/stipulation re: Motion to Take Possession of Condos; review file; review correspondence from attorney J. Maglich; talk to attorney J. Maglich.	0.40 357.50/hr	143.00
7/6/2020	JAJ	Draft correspondence to M. Williams re: Underlying facts, allegations of wrongdoing, documents provided by GT, Initial Disclosures.	0.30 357.50/hr	107.25
	JAJ	Review file; draft and serve Initial Disclosures.	2.60 357.50/hr	929.50
	JAJ	Research FRCP 26; research Local Rules re: Initial Disclosures.	0.30 357.50/hr	107.25

Mark A. Kornfeld

Page 6

			<u>Hrs/Rate</u>	<u>Amount</u>
7/6/2020	JAJ	Review correspondence from attorney S. Moot re: SEC's Initial Disclosures and production; draft correspondence to attorney S. Moot; review correspondence from attorney J. Maglich re: Compromise/stipulation re: Motion to Take Possession of Condos; draft correspondence to attorney J. Maglich.	0.10 357.50/hr	35.75
	JAJ	Review and analyze SEC's Initial Disclosures; review file.	0.30 357.50/hr	107.25
7/7/2020	JAJ	Review correspondence from attorney C. Nestor re: SEC's production; draft correspondence to attorney C. Nestor.	0.10 357.50/hr	35.75
7/8/2020	JAJ	Draft correspondence to M. Williams re: Underlying facts, discovery requests, case strategy; talk to M. Williams.	0.80 357.50/hr	286.00
	JAJ	Review correspondence from attorney C. Nestor re: SEC production; draft correspondence to C. Nestor re: SEC production, scope of claims.	0.10 357.50/hr	35.75
	JAJ	Review and analyze Receiver's Notice of Issuance of Subpoenas; review and analyze Order re: Motion to Modify Freeze Order; review and analyze Order re: Motion to Take Possession of Condos.	0.10 357.50/hr	35.75
	JAJ	Review file; review pleadings, draft First Request for Documents to SEC.	2.00 357.50/hr	715.00
7/9/2020	JAJ	Review file; review pleadings, draft First Request for Documents to SEC.	2.60 357.50/hr	929.50
7/10/2020	JAJ	Review file; review pleadings, draft First Request for Documents to SEC.	2.50 357.50/hr	893.75
7/11/2020	JAJ	Review file; review pleadings, draft First Request for Documents to SEC.	1.50 357.50/hr	536.25
7/13/2020	JAJ	Review file; review pleadings, draft First Request for Documents to SEC.	5.20 357.50/hr	1,859.00
	JAJ	Research work product doctrine.	0.60 357.50/hr	214.50
7/14/2020	JAJ	Revise, finalize, and serve First Request for Documents to SEC; draft and serve First Set of Interrogatories to SEC.	1.60 357.50/hr	572.00
	JAJ	Research elements of '33 Act claims, '34 Act claims, and '40 Act claims.	0.80 357.50/hr	286.00
	JAJ	Draft correspondence to M. Williams re: Underlying facts, discovery; review correspondence from M. Williams.	0.20 357.50/hr	71.50
	JAJ	Draft and serve First Request for Documents to Kinetic, KFI, Lendacy, Scipio, LF42, El Morro, and KIH; draft and serve First Set of Interrogatories to Kinetic, KFI, Lendacy, Scipio, LF42, El Morro, and KIH; draft Schedule A of Subpoena to SEC.	1.50 357.50/hr	536.25

Mark A. Kornfeld

Page 7

	<u>Hours</u>	<u>Amount</u>
For professional services rendered	69.00	\$24,667.50
Balance due		<u><u>\$24,667.50</u></u>

TIMOTHY W. SCHULZ, P.A.

224 Datura Street
 Suite 815
 West Palm Beach, Florida 33401

STATEMENT

Phone: 561-659-1167 • Fax: 561-659-1168

Federal ID No. 8727

E-mail: schulzt@twslegal.com

A *Litigation Law Firm*

PRIVILEGED & CONFIDENTIAL

Williams, Michael

Re: SEC Charges

Statement Date: 06/08/2020
 Statement No. 5219
 Account No. 199.01
 Page No. 1

Payments received after 06/08/2020 are not included on this statement.

Fees

			Rate	Hours	
05/27/2020	TWS	review court order granting motion to withdraw.	395.00	0.10	
05/28/2020	TWS	review and analyze receiver's motion for possession (1.1); work on drafting motion for extension of time to respond to Receiver's motion for possession (.5); review and respond to e-mail communications from M. Williams (.4)	395.00	2.00	
05/29/2020	TWS	work on reviewing court filings including emergency motions and receiver's report.	395.00	1.90	
		For Current Services Rendered		4.00	1,580.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Timothy W. Schulz	4.00	\$395.00	\$1,580.00

General Office Expenses including copies, fax, postage, etc.

47.40

Total Current Work

1,627.40

Balance Due

\$1,627.40

1430.00

TIMOTHY W. SCHULZ, P.A.

224 Datura Street
Suite 815
West Palm Beach, Florida 33401

STATEMENT

Phone: 561-659-1167 • Fax: 561-659-1168

Federal ID No. 8727

E-mail: schulzt@twslegal.com

A Litigation Law Firm

PRIVILEGED & CONFIDENTIAL

Williams, Michael

Re: SEC Charges

Statement Date: 07/15/2020
Statement No. 5260
Account No. 199.01
Page No. 1

DRAFT STATEMENT

Previous Balance

1430.00
~~\$1,627.40~~

Fees

			Rate	Hours	
06/01/2020	TWS	review e-mail strings between former counsel for Williams and SEC regarding payment of living expenses (.2); review and analyze motion for permanent injunction filed by SEC	357.50	3.10	1,108.25
06/02/2020	TWS	review and respond to e-mail correspondence from client concerning living expenses and outstanding condo fees (.3); continue review and analysis of court filings (2.1); analyze receiver's 1st interim omnibus application for allowance and attached exhibits (2.7); begin drafting response to receiver's 1st interim omnibus application (.7).	357.50	5.80	2,073.50
06/03/2020	TWS	review and analyze exhibits attached to Receiver's first interim omnibus application for continued preparation and editing of response, and draft (5.2); review receiver's notice of compliance [DE 90](.1); telephone conference with M. Williams regarding SEC's proposed agreement concerning HOA dues (.2); review and respond to e-mails from M. Williams (.2); draft e-mail to M. Williams regarding notice of compliance (.1); review March 6th Orders and work on drafting motion for modification of asset freeze order and proposed order (1.2); review and analyze receiver's motion for possession and title to residential property (.8).	357.50	7.80	2,788.50
	TWS	complete revisions to unopposed motion for modification of asset freeze order (.4); review and respond to emails from receiver's			

To ensure proper credit, please include account number and statement date on remittance checks. Thank you.

Williams, Michael

Statement Date: 07/15/2020
Statement No. 5260
Account No. 199.01

			Rate	Hours	
		counsel and SEC (.1); draft proposed Order granting motion for modification of asset freeze order (.4); initiate review of documents received from prior counsel (1.1).	357.50	2.00	715.00
06/04/2020	TWS	conduct review of documents received from prior counsel (.5).	357.50	0.50	178.75
06/05/2020	TWS	review and respond to e-mail correspondence from M. Williams (.2); review and analyze receiver's motion for possession of PR property as well as cited-to documents, conduct legal research on receiver's equitable lien and/or constructive trust, work on drafting response to receiver's motion for possession (6.6); begin initial review of records previously obtained from client and produced to receiver by Greenberg Traurig (1.4).	357.50	8.20	2,931.50
06/08/2020	TWS	continue review and analysis of receiver's first interim report (1.1)	357.50	1.10	393.25
06/09/2020	TWS	review and respond to emails from M. Williams (.2)	357.50	0.20	71.50
	TWS	review order granting motion to modify asset freeze order (.1); draft several e-mails to client regarding order granting modification of asset freeze order (.1); continue review and analysis of receiver's first interim report (.7).	357.50	0.90	321.75
06/10/2020	TWS	conduct review and analysis of documents received from prior counsel (2.3).	357.50	2.30	822.25
06/17/2020	TWS	prepare for and participate in video meeting with M. Williams (.7).	357.50	0.70	250.25
06/18/2020	TWS	conduct case law review regarding legal standard for tainted funds.	357.50	0.50	178.75
06/25/2020	TWS	prepare for and attend telephone conference with counsel for receiver (.2)	357.50	0.20	71.50
	TWS	conduct legal research on sale of real property by receiver (.7).	357.50	0.70	250.25
06/26/2020	TWS	draft e-mail to M. Williams regarding discussion with counsel for receiver concerning motion for possession (.1); conduct legal research on issue of receiver's sale of real estate (1.2).	357.50	1.30	464.75
06/27/2020	TWS		395.00		
07/02/2020	TWS	review and revise motion for fees and declaration (.8).	357.50	0.80	286.00
07/06/2020	TWS	work on preparing joint stipulation concerning property in Puerto Rico	357.50	0.80	286.00
07/07/2020	TWS	review and analyze SEC's Rule 26 disclosures.	357.50	0.40	143.00
07/09/2020	TWS	review court orders modifying asset freeze order for defense fees and joint stipulation (.1); attend strategy meeting with J. Jacobson concerning division of labor (.2)	357.50	0.30	107.25

Williams, Michael

Statement Date: 07/15/2020
Statement No. 5260
Account No. 199.01

		Rate	Hours	
07/14/2020	TWS			
	work on drafting subpoena for documents to M. Kornfeld, Esq. (.3);			
	review e-mail from M. Williams regarding monthly living allowance			
	and draft e-mail to J. Maglich (.1); review SEC's Rule 26 disclosure			
	(.2); conduct research on issue of whether relief defendants are			
	required to serve initial disclosures (.6); review and respond to			
	multiple e-mail communications from client (.3); review and			
	respond to e-mails from J. Maglich regarding monthly living			
	allowance payment (.2); work on issues regarding banco popular			
	routing numbers for ACH deposits (.3); conduct review of proposed			
	interrogatories before serving (.2).	357.50	2.20	786.50
	For Current Services Rendered		39.80	14,228.50
	General Office Expenses including copies, fax, postage, etc.			<u>305.66</u>
	Total Current Work			14,534.16
	Balance Due			\$16,161.56
				\$15,658.50

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

CASE NO.: 8:20-CV-00394-T-35SPF

SECURITIES AND EXCHANGE COMMISSION,)
)
 Plaintiff,)
)
 v.)
)
 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.)
)
 _____)

ORDER TO MODIFY ASSET FREEZE ORDER

THIS CAUSE comes before the Court for consideration of Defendant Michael Williams’ Motion to Modify the Asset Freeze Order (ECF No. 33) to Unfreeze Funds to Defend This Case (the “Motion”) (ECF No. 102). Upon review and consideration of the Motion, being advised that the Securities and Exchange Commission (the “Commission”) opposes the Motion, and being otherwise fully advised, the Court **GRANTS** the Motion under the terms set forth below. Accordingly, it is hereby **ORDERED** that the Asset Freeze Order (ECF No. 33) shall be modified as follows:

1. The Court approves the reduced hourly rate of \$357.50 for each of Williams' two attorneys, Jon A. Jacobson and Timothy W. Schultz (collectively, "Counsel").

2. The Court approves Williams' proposed litigation budget attached to his Motion as Exhibit "A" and based on the approved reduced hourly rate (ECF No. 102-1).

3. Counsel has provided the Commission and the Receiver with time records showing 112.8 hours billed related to services identified in their litigation budget and performed between May 27, 2020 through July 14, 2020. Within 3 days of entry of this Order, the Receiver shall pay Counsel \$40,326.00 from funds held in escrow at ServisFirst Bank (Account No. XXXXXX-0920).

4. After the Mediation of this matter, Counsel shall provide the Commission and the Receiver with time records showing time billed related to services identified in their litigation budget and performed between July 15, 2020 through August 28, 2020. Within 5 days the parties shall submit a proposed order to the Court related to the release of funds to cover approved fees.

5. All remaining terms of the Asset Freeze Order not modified by this Order remain in place.

DONE AND ORDERED in Chambers in _____, Florida, this ____ day of _____, 2020.

UNITED STATES DISTRICT JUDGE