

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA

CASE NO.: 8:20-cv-00394-MSS-SPF

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. )  
\_\_\_\_\_ )

**PLAINTIFF’S NOTICE OF OBJECTION TO DEFENDANT’S SECOND MOTION  
TO MODIFY ASSET FREEZE ORDER**

Plaintiff Securities and Exchange Commission hereby notifies the Court that it objects to Defendant Michael Scott Williams’ second motion to modify the Asset Freeze Order (ECF No. 33) to release an additional \$214,500 to pay for Williams’ attorneys’ fees in defense of this action from August 29, 2020 through June 30, 2021 (ECF No. 135).

Pursuant to Federal Rule of Civil Procedure 7(b) and Local Rule 3.01(b), the Commission will timely file an Opposition describing in more detail its objections to Williams’ proposed use of investor assets to fund his defense, including applicable case law on the matter.

We respectfully request that the Court withhold its ruling until after the Commission has submitted its opposition brief.

September 9, 2020

Respectfully submitted,

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

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**Securities and Exchange Commission**  
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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on September 9, 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

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