UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

KINETIC INVESTMENT GROUP, LLC and MICHAEL SCOTT WILLIAMS, CASE NO.: 8:20-cv-00394

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.

RECEIVER'S NOTICE OF RECEIPT OF BONA FIDE OFFERS REGARDING SALE OF EL BANCO ESPANOL BUILDING LOCATED AT 152 TETUAN STREET IN <u>OLD SAN JUAN, PUERTO RICO</u>

On January 29, 2021, Mark A. Kornfeld, Esq., as Receiver (the "Receiver"), filed his Motion for Approval of the (1) Private Sale of El Banco Espanol Building located at 152 Tetuan Street, Old San Juan, Puerto Rico, 00901 and (2) Proposed Publication, Marketing, and Overbid Procedures Associated with the Sale of the Property (Doc. 174) (the "Motion"). The Court entered an Order granting the Motion on March 24, 2021 (Doc. 206) (the "Order"). Pursuant to the Order, the Receiver arranged for the Court-approved Notice of Sale to be published on March 31, 2021 in (i) *El Nuevo Dia*, which is the newspaper with the highest circulation in Puerto Rico, and (ii) the *Sarasota Herald Tribune*, which is regularly issued and circulated in the district where Defendant Kinetic Investment Group, LLC's main office was located.

As indicated in this Motion, the Receiver files this notice to inform the Court, that pursuant to 28 U.S.C. § 2001(b), the Receiver received four (4) *bona fide* offers within ten days after the Notice of Sale was advertised in the two above publications. Pursuant to Paragraph 8 of the Order, the Receiver exercised his sole discretion and business judgment in selecting the offer that is in the best interest of the Receivership Estate and is working to close the transaction as soon as possible. The Receiver will update the Court immediately once the sale has officially closed.

Dated this 21st day of April, 2021.

Respectfully submitted,

<u>/s/ Lauren V. Humphries</u> Lauren V. Humphries, Esq. Florida Bar No.: 117517 Jordan D. Maglich, Esq. Florida Bar No.: 0086106 401 E. Jackson St., Suite 2400 Tampa, Florida 33602 Telephone: (813) 222-1141 Fax: (813) 222-8189 <u>lauren.humphries@bipc.com</u> <u>jordan.maglich@bipc.com</u>

Attorneys for Receiver Mark A. Kornfeld

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2021, 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:

Christine Nestor, Esq.	Timothy W. Schulz, Esq.
Stephanie N. Moot, Esq.	Timothy W. Schulz, P.A.
John T. Houchin, Esq.	224 Datura Street, Suite 815
Barbara Viniegra, Esq.	West Palm Beach, FL 33401
Securities and Exchange Commission	e-service@twslegal.com
801 Brickell Avenue, Suite 1950	
Miami, FL 33131	Jon A. Jacobson, Esq.
nestorc@sec.gov	Jacobson Law, P.A.
moots@sec.gov	224 Datura Street, Suite 812
houchinj@sec.gov	West Palm Beach, FL 33401
viniegrab@sec.gov	jjacobson@jlpa.com
Counsel for Plaintiff	e-service@jlpa.com
	Counsel for Defendant Michael

Maria S. Bellafronto, Esq. Jedidiah L. Dooley, Esq. Hopkins Carley 70 South First Street San Jose, CA 95113 mbellafr@hopkinscarley.com jdooey@hopkinscarley.com *Counsel for Fogarty Family* Nathaniel G. Foell, Esq. John E. Clabby, Esq. Carlton Fields, P.A. Post Office Box 3239 Tampa, FL 33601-3239 jclabby@carltonfields.com nfoell@carltonfields.com *Counsel for Fogarty Family* Williams

By: <u>/s/ Lauren V. Humphries</u> Attorney

4842-2566-9094, v. 1