

**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-394

Defendants, and

KINETIC FUNDS I, LLC,
KCL SERVICES, LLC d/b/a LENDACY,
SCIPIO, LLC, LF 42, LLC, EL MORRO
FINANCIAL GROUP, LLC, and KIH, INC.,
f/k/a KINETIC INTERNATIONAL, LLC,

Relief Defendants.

**RECEIVER'S UNOPPOSED MOTION FOR AUTHORIZATION TO EMPLOY
RAD TECHNOLOGY CONSULTING FOR WEBSITE HOSTING**

Mark A. Kornfeld, Esq., as Receiver (the "Receiver") appointed over Defendant Kinetic Investment Group, LLC and Relief Defendants Kinetic Funds I, LLC, KCL Services, LLC d/b/a Lendacy, Scipio, LLC, LF 42, LLC, El Morro Financial Group, LLC, and KIH Inc., f/k/a Kinetic International, LLC (the "Receivership Entities"), by and through undersigned counsel and pursuant to the Court's Order Granting Plaintiff Securities and Exchange Commission's Emergency Motion for Appointment of Receiver (the "Order Appointing Receiver") (Doc. 34), hereby files this Motion for Authorization to Employ **RAD TECHNOLOGY CONSULTING** ("RAD Consulting") and states as follows:

1. This action commenced on February 20, 2020, with the filing of the Securities and Exchange Commission’s (“SEC”) Complaint against Defendants and Relief Defendants, the SEC’s Emergency Motion and Memorandum of Law for Asset Freeze and Other Relief (Doc. 2), and the SEC’s Emergency Motion and Memorandum of Law for Appointment of Receiver (Doc. 3).

2. Following a hearing on March 6, 2020, this Court entered the Order Appointing Receiver appointing Mark A. Kornfeld, Esq., as Receiver of all assets of the Receivership Entities. Pursuant to the Order Appointing Receiver, the Receiver is authorized to, among other things, “engage and employ persons in his discretion to assist him in carrying out his duties and responsibilities hereunder, including, but not limited to, accountants...financial or business advisors,...forensic experts...” *See* Order Appointing Receiver at ¶ 7.F.

3. The Receiver must obtain an Order of this Court to retain professionals to assist with the Receivership. *See* Order Appointing Receiver at ¶ 52. Any professionals that the Receiver engages with this Court’s approval are “entitled to reasonable compensation and expense reimbursement from the Receivership Estates as described in the ‘Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission’... agreed to by the Receiver.” *Id.*

4. Pursuant to the Order Appointing Receiver, the Receiver seeks to approve the work of website host provider RAD TECHNOLOGY CONSULTING (“**RAD Consulting**”), who will provide monthly hosting, management, and security

for the Receivership website.¹

5. Previously, the Receiver sought and received Court approve for the website host provider, K. Tek Systems, Inc. (“K. Tek”) (Doc. 46 and Doc 47), who provided services up until January 2025.

6. In January of 2025, the Receiver’s staff learned that K. Tek is no longer in operation and could not provide website hosting services to the Receivership. Understanding that the website would not be accessible to investors and other interested parties, the Receiver and his counsel took immediate steps to locate a new website host provider. RAD Consulting offered to provided transition and conversion of the prior website to its hosting platform at no cost.

7. RAD Consulting is a concierge technology company that provides web development solutions and manages hosting services. The services to be provided for the Receivership by RAD Consulting will be domain name management services, DNS hosting services, web development services, site content maintenance, and site hosting.

8. RAD Consulting charges \$100 per month for its website hosting services. If hourly service is needed for development or content maintenance, principal Ron During charges \$150 an hour for his services. The website for Rad Consulting is <https://radtechconsulting.com/>.

¹ Due to the closure of Receiver’s prior website host, the Receiver took steps immediately to ensure the website remained online and accessible to investors including the onboarding RAD Consulting to provide services as soon as the Receiver learned the website would be offline.

9. As always, the Receiver and his staff will take all steps to ensure that there is no duplication of efforts or expenses between or among any of the professionals he engages with the approval of this Court.

WHEREFORE, the Receiver respectfully requests that this Court enter the proposed Order attached as **Exhibit A**, authorizing the Receiver to employ RAD TECHNOLOGY CONSULTING professionals for the Receiver and for such other and further relief as is just and proper.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), the Receiver hereby certifies that he has conferred with counsel for Plaintiff, Securities and Exchange Commission, which does not oppose the requested relief. The Receiver has also conferred with counsel for Defendant Michael S. Williams, who takes no position on the requested relief.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC



Lauren V. Humphries, Esq. (FBN 117517)
401 E. Jackson St., Suite 2400
Tampa, FL 33602
Telephone: (813) 222-2098
Facsimile: (813) 222-8189
Email: Lauren.Humphries@bipc.com
Attorneys for Receiver Mark A. Kornfeld

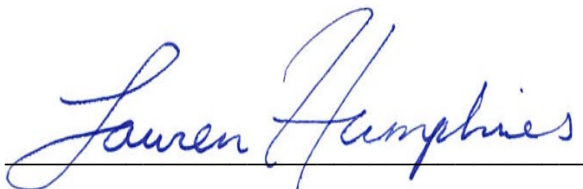
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of March, 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:

Christine Nestor, Esq.
Stephanie N. Moot, Esq.
John T. Houchin, Esq.
Barbara Viniegra, Esq.
Securities and Exchange Commission
801 Brickell Avenue, Suite 1950
Miami, FL 33131
nestorc@sec.gov
moots@sec.gov
houchinj@sec.gov
viniegrab@sec.gov
Counsel for Plaintiff

Timothy W. Schulz, Esq.
Timothy W. Schulz, P.A.
224 Datura Street, Suite 815
West Palm Beach, FL 33401
e-service@twslegal.com

Jon A. Jacobson, Esq.
Jacobson Law, P.A.
224 Datura Street, Suite 812
West Palm Beach, FL 33401
jjacobson@jlpa.com
e-service@jlpa.com
Counsel for Defendant Michael Williams



Attorney for Receiver Mark A. Kornfeld

SEC vs. Kinetic Investment Group, LLC, et al
CASE NO.: 8:20-cv-394

EXHIBIT "A"

**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-394

Defendants, and

KINETIC FUNDS I, LLC,
KCL SERVICES, LLC d/b/a LENDACY,
SCIPIO, LLC, LF 42, LLC, EL MORRO
FINANCIAL GROUP, LLC, and KIH, INC.,
f/k/a KINETIC INTERNATIONAL, LLC,

Relief Defendants.

_____/

**ORDER GRANTING RECEIVER'S UNOPPOSED MOTION FOR
AUTHORIZATION TO EMPLOY RAD TECHNOLOGY
CONSULTING FOR WEBSITE HOSTING**

THIS CASE came before the Court on Mark A. Kornfeld, Esq., as Receiver Motion for Authorization to Employ **RAD TECHNOLOGY CONSULTING** ("RAD Consulting") (Doc. ____). With the court having considered the Motion, reviewed the file, and finding that cause exists to grant the Motion, it is hereby **ORDERED** as follows:

1. The Motion (Doc. ____) is GRANTED.

2. The Receiver is authorized to engage RAD TECHNOLOGY
CONSULTING as website professionals for the Receiver.

ORDERED in Tampa, Florida on _____, 2025.

SEAN P. FLYNN
UNITED STATES MAGISTRATE JUDGE