

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-cv-24903-JB

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

RISHI KAPOOR, et al,

Defendants.

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**OBJECTIONS TO AUCTIONING RISHI KAPOOR'S PERSONAL ITEMS**

COMES NOW the Defendant, Rishi Kapoor ("Kapoor"), by and through his undersigned attorney, and objects to the Receiver selling his personal property at an auction and states as follows:

1. On March 22, 2024, the Court entered an Order (ECF 109) giving Mr. Kapoor until today to object to the Receiver selling certain of Mr. Kapoor's personal property at auction.
2. The affidavit of Mr. Kapoor, attached hereto and made a part hereof as **Exhibit A**, lists the personal items he left in his former office at 200 Alhambra Circle, Suite 510, in Coral Gables, Florida, and which he seeks to have returned to him.
3. In Exhibit A, Mr. Kapoor enumerates how he came to own each of the items of personal property. Some were gifts, some were purchased years ago. Other than commemorative shovels, hard hats, and project books, none of these items were ever the property of the Defendant Companies now controlled by the Receiver.

4. Mr. Kapoor believes he has met his burden of going forward to show the Court how he obtained these items. He believes that the burden of going forward has now shifted to the Receiver, who has searchable databases of all the records of the Defendant Companies, to come forward with any document disproving the statements of Exhibit A.

5. Failing any such proof, Mr. Kapoor would ask the Court to order that the personal items be given to Mr. Kapoor's possession, subject to the Asset Freeze.

WHEREFORE, it is respectfully requested that the Court order the personal items listed in Exhibit A returned to the possession of Mr. Kapoor, subject to the Asset Freeze.

Respectfully submitted,

**SHAHADY & WURTENBERGER, P.A.**

*/s/ Fred A. Schwartz*

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2024, 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.

By: /s/ Fred A. Schwartz  
Fred A. Schwartz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 1:23-cv-24903-CMA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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Defendants.

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**AFFIDAVIT OF RISHI KAPOOR IN SUPPORT OF OBJECTIONS TO AUCTIONING HIS PERSONAL  
ITEMS**

Rishi Kapoor, being duly sworn, deposes and says:

When I left employment with Location Ventures and the other Defendant Companies related thereto in 2023, my office was Suite 510 at 299 Alhambra Circle ("299"). At that time I left in the office various personal items. Many of these items have historical and emotional value to me, but none has significant monetary value. As to items I purchased from 4 to 9 years ago I no longer have receipts. The items are:

1. Paw print painting:
  - a. My wife was a professional employee of the Miami-Dade County Metro Zoo. One of her programs included animals helping to create art. This painting was made by my wife and her cheetah when she was working at the zoo. It was a gift to me in 2015 / 2016.

**EXHIBIT A**

2. Two desks / old dining tables + coffee table + two barrel chairs:
  - a. I brought these items to our original office in Coconut Grove from a previous personal residence. When I moved to 299, these items were moved with me to 299. These items were purchased in 2016 / 2017.
3. Green couch:
  - a. This was a personal purchase by me in 2019 / 2020.
4. Model airplane:
  - a. This was a gift from an employee in 2019 / 2020.
5. Board game sets:
  - a. These were gifts from employees in 2018 – 2020.
6. Studio 54 coffee table book:
  - a. This was a gift from a vendor in 2022
7. “Lunch Atop a Skyscraper” painting:
  - a. This was a personal purchase by me in 2016 / 2017 at the Coconut Grove Arts Festival.
8. Sculpture of “Man Pulling Fruit of his Labor:”
  - a. This was a personal purchase by me in 2016 / 2017 at Coconut Grove Arts Festival.
9. “Yes I Am” painting:
  - a. This was a personal purchase in 2016 / 2017 at Coconut Grove Arts Festival.
10. Landscape painting of tree (orange and green):
  - a. This was a gift from my family in 2018 / 2019.

11. First dollar earned in glass case:

a. This was my first dollar earned in 2010. I personally purchased the case.

12. Additional Items in 510 Office which were personally acquired or gifted starting in 2010:

a. Various coffee table books (City history, one about cars, project books).

i. Personal purchases and gifts.

b. Shovels and hard hats of various projects

i. Gifts from employees or vendors.

c. Photos of family

i. Gifts from wife or family.

d. Cup holders and coasters

i. Personal purchases dating back to college.

e. Hindu (Indian) God figurine

i. Gift from my mother.

Except for the shovels, hard hats, and project books, which have little economic value and which were given to me to commemorate the Companies' various projects, none of these items were purchased with funds from any of the Company Defendants.



Rishi Kapoor

On April 5, 2024, Rishi Kapoor, who is known to me, appeared via the internet and initialed, signed and swore to the attached affidavit.



Notary Public

