

IN THE CIRCUIT COURT OF
THE 17TH JUDICIAL CIRCUIT IN
AND FOR BROWARD COUNTY
FLORIDA

POMPANO SENIOR SQUADRON
FLYING CLUB, INC., a Florida
corporation,

CASE NO.: CACE 20-005993 (08)

Plaintiff,

v

CARL KENNEDY, individually,

Defendant.

**VERIFIED MOTION TO DISQUALIFY COUNSEL
PURSUANT TO FLORIDA BAR RULE 4-1.9**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff "Club"), by and through its undersigned counsel, files this Motion to Disqualify Wendy Hausmann, Esq. as counsel for Defendant Carl Kennedy (Defendant "Kennedy"), pursuant to Rule 401.9 Florida Rules Regulating the Florida Bar and Florida law and says:

1. Plaintiff Club filed suit against Defendant Kennedy seeking an accounting from its former treasurer and as importantly for purposes of this motion, seeking information regarding an alleged loan from Wendy Hausmann, Esq., to the Club and payments made to Ms. Hausmann.
2. It is the Club's assertion that Ms. Hausmann was Plaintiff Club's attorney and was Plaintiff Club's attorney during the time she made the alleged loan to Plaintiff Club.
3. Plaintiff Club needs the accounting from Defendant Kennedy because there is no promissory note, no documentation from Ms. Hausmann to Plaintiff Club, as

required by the Florida Bar as Ms. Hausmann was Plaintiff Club's attorney at the time.

4. In response to the lawsuit, Ms. Hausmann has:
 - a. Filed a Notice of Appearance on Defendant Kennedy's behalf in opposition to a Motion for Default;
 - b. Sent numerous emails indicating that she fully intends to represent Mr. Kennedy;
 - c. In response to a Court Order that the parties participate in mediation, sent emails indicating she would represent Defendant Kennedy during the mediation on the above matters. Copies of Notice and emails attached as Plaintiff Club's Composite Exhibit #1.

5. In support of its position that Ms. Hausmann was Plaintiff Club's attorney, Plaintiff Club attaches and incorporates herein by reference the following:

- a. Invoices from Ms. Hausmann to the Club for professional services;
- b. Payments from Plaintiff Club to Ms. Hausmann for those invoices;
- c. Communications from Ms. Hausmann to members of Plaintiff Club in which she states she is representing the Club;
- d. Notices that Ms. Hausmann has amended the Club's By-Laws.

Copies of communications attached as Plaintiff Club's Composite Exhibit #2.

6. Rule 4-1.9 Conflict of Interest; Former client of the Rules that Govern the Florida Bar states:

"A lawyer who has formerly represented a client in a matter must not afterwards:

- (a) Represent another person in the same or a substantially related matter in which that person's interests are materially adverse to the interest of the former client unless the former client gives informed consent;

(b) Use information relating to the representation to the disadvantage of the former client except as these rules would permit or require with respect to a client or when the information has become generally known; or

(c) Reveal information relating to the representation except as these rules would permit or require with respect to a client.

7. It is Plaintiff Club's assertion that Wendy Hausmann represented the Club as its former general counsel.

8. The interest of Plaintiff Club and Defendant Kennedy are clearly adverse and Plaintiff Club has not given its consent to Ms. Hausmann's representation of Defendant Kennedy. See Composite Exhibit #3.

9. Formerly, Ms. Hausmann has represented the Club in an attempt to collect membership fees and dues from members. See copy of communications from Wendy Hausmann on behalf of the Club attached hereto as Plaintiff's Composite Exhibit #4.

10. Ms. Hausmann has reviewed the Club's By-Laws and made proposed changes thereto, billed the Club for such work and receive payment from the Club. See invoices and communication attached hereto as Plaintiff's Composite Exhibit #5.

11. Ms. Hausmann has given advise and consent to the Club relative to protecting the Club's interest against former members of the Club who have threatened suit and legal action against it. See copies of communications from Ms. Hausmann attached hereto as Plaintiff's Composite Exhibit #6.

12. Florida law presumes that during each of these matters of representation that confidential and privileged information was given by the former client to the former attorney. See *State Farm Mut. Auto Ins. Co. v. K.A.W.* 575 So.2d 630, 634 (Fla. 1991).

13. In discussing the By-Laws and Amendments to By-Laws, clearly Ms.

Hausmann would have discussed with Plaintiff Club the operation of the Club, the duties and responsibilities of directors to the Club, the duties and responsibilities of members to the Club and the Club's converse duties and obligations.

14. The Club is now suing Defendant Kennedy, its former officer and director, regarding the former officer and director's duties and obligations to the Club including but not limited to providing financial records, providing an accounting for the financial activities that occurred during the time Defendant Kennedy was the Club's director, questions about payments made to Ms. Hausmann, questions about an alleged loan made by Ms. Hausmann to the Club with no associated promissory note, written communications from Ms. Hausmann to the Club regarding the loan and any potential conflicts of interest that arise from same as it was made during the time she represented Plaintiff Club as based upon the documents attached hereto, the terms of such loan and repayment thereof. A copy of check from Ms. Hausmann to the Club marked loan is attached hereto as Plaintiff's Exhibit #7.

15. Based upon the above, there is also the strong probability that Ms. Hausmann will be a material witness in that she will have to give testimony as to the alleged loan between herself and Plaintiff Club. Clearly, in addition to Rule 4-1.9 as stated above, the fact that Ms. Hausmann will be a material witness and have to give deposition testimony regarding the very issue of the litigation between Plaintiff Club and Defendant Kennedy requires Ms. Hausmann's disqualification as an attorney for Defendant Kennedy. See *Fleitman v McPherson*, 691 So.2d 37, 38 (Fla. 1st DCA 1997) (holding disqualification of attorney is warranted when the attorney becomes a central figure or indispensable witness in a case). It is abundantly clear to any reasonable person that the issues involved in Ms. Hausmann's former representation of Plaintiff

Club and the litigation between the Club and Defendant Kennedy are identical or substantially similar thus requiring her disqualification pursuant to Rule 4-1.9. See *Rule 4-1.9*.

16. Although under Florida law, whether an attorney represents a client is to be taken from the client's point of view, it is clear from Ms. Hausmann's own words, invoices, checks, and receipts of payment that Ms. Hausmann formerly represented the Club. See *Florida Bar v Dunegan*, 731 So.2d 1237 (Fla. 1999)(holding an attorney violated Bar Rules 4-1.7 and 4-1.9 when the attorney attempted to represent the husband in dissolution proceedings after formerly representing the husband and wife in matters relating to their business. The case between the Club and Carl Kennedy it tantamount to a family dissolution case in that it involves the interest of the business, the requirements of a former board of director pursuant to the By-Laws, and the financial interest of the company.

17. While Ms. Hausmann denies that she ever represented the Club, such denials defy logic are contrary to the attached exhibits and are contrary to Plaintiff Club's position that Ms. Hausmann was its former counsel.

Based upon the attached exhibits, Ms. Hausmann formerly represented the Club to rewrite its By-Laws, to be involved in litigation matters regarding collected monies on behalf of the Club, and in giving the Club an alleged undocumented loan. Clearly those former representations are substantially similar to the issues involved between the Club and Defendant Kennedy in this matter and as such, would require disqualification pursuant to Rule 4.1-9 as stated by the Supreme Court in *Dunegan*. See *Blamey v Menadier*, 283 So.2d 938 (Fla. 3rd DCA 2019) (holding that disqualification of attorney was justified where attorney drafted a proposed term sheet, bills for the term sheet were

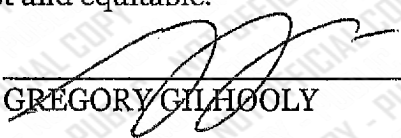
paid for by the corporation and attorney did various other legal tasks for corporation prior to the suit and the lawsuit involved the term sheet). In *Blamey*, the attorney drafted a term sheet which became a subject matter of litigation between the parties. In this case, the exhibits attached to this motion evidence that Ms. Hausmann amended and rewrote the corporation's By-Laws which control the obligations of directors to the corporation. The dispute is now between the corporation and a former director regarding alleged violations of those duties and obligations.

18. Although Wendy Hausmann has already informed this Court that The Florida Bar is considering an Inquiry against her filed by Plaintiff Club, an actual violation of ethical rules is not a prerequisite to granting a motion for disqualifying an attorney to avoid the appearance of impropriety. See *Kenn Air Corp. v Gainesville-Alachua County Regional Airport Authority*, 593 So.2d 1219 (Fla. 1st DCA 1992). In *Kenn Air Corp.*, the corporation sought to disqualify the opposing attorney based upon the fact that the former attorney represented the corporation's prior predecessor in interest. *Id.* at 1221. In this case, Ms. Hausmann represented Plaintiff Club, not Plaintiff Club's predecessor in interest. If the court found disqualification was necessary when the attorney represented a corporation's predecessor in interest, how much more so when the attorney represented the actual corporation.

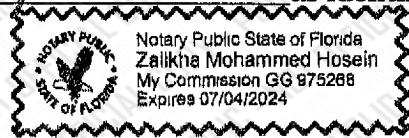
19. The *Kenn Air Corp.* Court went on to hold that Rule 4-1.9 prohibits an attorney from switching sides because under Rule 4-1.6, the duty of confidentiality requires all attorneys to protect all confidences and information obtained during representation of a client, and the duty continues even after the attorney/client relationship is terminated. In *Kenn Air Corp.*, the attorney represented the corporation regarding the corporation's leases at the airport and an irrebuttable presumption arose

that the company had disclosed confidences to the attorney regarding leases and its operation related to leases. In this matter, based upon the exhibits attached hereto, Ms. Hausmann represented Plaintiff Club regarding the By-Laws, financial collection matters, and the interest of the company and threatened litigation by a former shareholder. The company now sues Defendant Kennedy over his duties as a director, the financial dealings of the company, and the financial interactions between Plaintiff Club and Ms. Hausmann. Just as the court found disqualification of the attorney in *Kenn Air Corp.*, this Court should also disqualify Ms. Hausmann. See *TTT Corp. v Jalis Development, Inc.*, 682 So.2d 1160 (Fla. 5th DCA 1996) (holding disqualification of attorney is warranted where attorney had gained access to corporation records and new lawsuit involved former corporate director).

WHEREFORE, Plaintiff Flying Club moves this Honorable Court for entry of a judicial default against Defendant Kennedy for failure to file a responsive pleading, and any other relief that this Court deems just and equitable.


GREGORY GILHOOLY

The foregoing instrument was acknowledged before me, by means of physical presence or online notarization, this 18th day of July, 2020, by GREGORY GILHOOLY who is personally known to me or who produced FDL as identification and who did take an oath.



7/18/2024 
NOTARY PUBLIC

My Commission Expires: 7-4-2024

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 27th day of July 2020, to Carl L. Kennedy, II, clktax@aol.com and to Wendy Hausmann, Esq., 20283 State Rd. 7, Suite 400, Boca Raton, FL 33498

/s/Edward F. Holodak
EDWARD F. HOLODAK, ESQ.
Attorney for Plaintiff
Fla. Bar No.: 059234
Edward F. Holodak, P.A.
7951 SW 6th Street, Ste. 210
Plantation, FL 33324
Tel.: 954-927-3436
pleadings@holodakpa.com

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

POMPANO SENIOR SQUADRON FLYING CLUB, INC.
(aka POMPANO BEACH FLYING CLUB)

Plaintiff,

and

Case No.: CACE 20-005993
Division (8)

CARL L. KENNEDY, II

Defendant.

NOTICE OF LIMITED APPEARANCE

Wendy A. Hausmann, Esquire, hereby files this Notice of Limited Appearance **on behalf of Carl L. Kennedy, II, Defendant**, for the limited purpose of **the hearing scheduled for 8:45 a.m. on July 14, 2020** to represent Mr. Kennedy in connection with his **Second Motion for Extension of Time Due to Plaintiff's Knowing and Intentional Interference with Defendant's Ability to Obtain Counsel, as well as Plaintiff's Opposition thereto and Motion for Judicial Default.**

Copies of all court papers in connection with these issue(s) should be served to the undersigned attorney, as well as to Mr. Kennedy, at the addresses listed below.

I hereby certify that on the 14th day of July, 2020, I served a copy of this document via the Florida e-portal to Edward Holodak, Esquire at pleadings@holodakpa.com.

Respectfully submitted,

/s/ Wendy A. Hausmann

Wendy A. Hausmann, Esquire
20283 State Road 7, Suite #400
Boca Raton, Florida 33498
(561) 477-5353
Fla. Bar No. 304300
hausmannw@aol.com

E-service:

/s/ Carl L. Kennedy, II
Carl L. Kennedy, II
2929 S. Ocean Blvd., #510
Boca Raton, FL 33432
304-552-0206
E-Mail Address: clktax@aol.com

Composite Exhibit #1

From: hausmannw@aol.com
To: [Edward Holodak](#)
Cc: clktax@aol.com
Subject: Our telephone call after the Hearing this morning
Date: Tuesday, July 14, 2020 11:34:59 AM

Mr. Holodak:

This will confirm that I called you almost immediately after the Hearing this morning to "play nice in the sandbox" and offered to mediate this case in the next 20 days (before Mr. Kennedy's responsive pleading is due in 30 days) rather than your client having to wait 45 days. In response, you advised me that your client "does not want to play nice in the sandbox" and objects to my accompanying Mr. Kennedy to mediation. You further advised that you would be filing a Motion to Disqualify me tomorrow and would be setting such Motion on Motion Calendar. I will object to your Motion to Disqualify me as being inappropriate for Motion Calendar, as such a Motion will clearly require testimony and other evidence. Kindly ensure that you coordinate an evidentiary hearing with both myself and Mr. Kennedy. I will have at least two (2) witnesses (in addition to Mr. Kennedy and myself) and I believe I will need 45 minutes to defend against such a Motion. If you need equal time, kindly obtain dates and times for a 90-minute hearing.

It seems antithetical to your client's alleged purpose in resolving this matter and obtaining whatever they need from Mr. Kennedy that they believe he has, to oppose my attendance at a mediation, as Mr. Kennedy would be within his rights, if he must go alone, to simply keep his mouth shut at a mediation if he is unable to have me there to participate. Is that what your client wants? To prolong this matter further? Again, this belies anything other than a witch-hunt of Carl Kennedy, rather than a legitimate business purpose.

I will await your Motion to Disqualify.

Wendy A. Hausmann

From: hausmannw@aol.com
To: [Edward Holodak](#)
Subject: PBFC - 5/13/20 Zoom Meetings
Date: Wednesday, May 13, 2020 11:31:29 AM

Mr. Holodak:

Although my client requested in writing of the PBFC Club Secretary, Greg Galyo (which request was copied to all Officers and Directors), that he be permitted to record the PBFC Board of Directors meeting as well as the general membership meeting beginning at 5:00 p.m. today on Zoom, as is available by the program. As of this writing he has received no response from Mr. Galyo.

Kindly advise your client to permit the recording of the Zoom meetings this evening for litigation hold purposes.

Thank you,
Wendy A. Hausmann

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Carl

-----Original Message-----

To: edward@holodakpa.com <edward@holodakpa.com>

Cc: clktax@aol.com <clktax@aol.com>

Sent: Fri, May 8, 2020 9:32 am

Subject: PBFC - Minutes of 5/4/20 Special Meeting

Mr. Holodak:

I have been provided a copy of the Minutes of the Special Meeting held by the PBFC Board of Directors on May 4, 2020. Unfortunately, the Minutes are inaccurate and must immediately be corrected to include the conspicuous omission of the Motion made by Robert Breeden to disavow and default on the monies owed to former members of PBFC. You see, Mr. Holodak, I was "present" for that Zoom meeting. I am a witness and will testify to Robert Breeden's Motion for attempted theft of former members monies. I personally saw his face and heard him speak the words. The omission from the Minutes is hardly inadvertent. It is reprehensible, outrageous and reveals the new Board of PBFC and its Officers to be both thieves and liars. Since I will be a witness to the events at the Special Meeting on May 4, 2020, I have already provided the contact information of a collection attorney to Carl Kennedy for dissemination to current members or former members as may be necessary or appropriate (current members are also entitled to the return of their \$1700 should they decide to withdraw from PBFC at this point as that is the contract into which they entered when they joined PBFC). My colleague will easily and without hesitation subpoena the "Zoom" records pertaining to the meeting held on May 4, 2020 to be used in any action, and of course, I can also provide him with a list of all participants at the Special Meeting.

The purpose of this email is solely to demand that your client correct the Minutes of the Special Meeting held on May 4, 2020 to accurately contain and reflect the Motion made by Robert Breeden during said meeting, as well as the immediately following response to same by the PBFC President in connection with a "non-refundable deposit", neither of which issues were noticed for this Special Meeting. Your client's underhanded, sneaky and far from transparent conduct will not be ignored or tolerated, nor will it be kept hidden or secret.

Please do not reply to this email as it will be not be read. This email is being sent solely to put you and PBFC on notice; it is not to open a dialogue between us.

Thank you,
Wendy A. Hausmann

WENDY A. HAUSMANN

Attorney and Counselor at Law

*Member Florida and
Maryland Bars

February 1, 2020

Pompano Beach Flying Club
c/o Treasurer - Carl L. Kennedy
2929 S. Ocean Blvd.
Unit #510
Boca Raton, FL 33432

Professional services

	<u>Hours</u>	<u>Amount</u>
1/30/20 Preparation of revisions to Corporate Bylaws; Multiple telephone conferences with Carl L. Kennedy re: same.	5.00	1,750.00
For professional services rendered	5.00	\$1,750.00
Balance due		<u>\$1,750.00</u>

Exhibit # 2

JPMORGAN CHASE & CO.

Post date: 02/03/2020

Amount: \$ 1750.00

Account: [REDACTED]

Check Number: 5984

POMPAHO FLYING CLUB
c/o CARL L. KENNEDY
3825 S. OCEAN BLVD., STE. #310
BOCA RATON, FL 33432
001-000-0000

BANK OF AMERICA, NA
00121781

5984

1/31/2020

PAY TO THE ORDER OF Wendy A. Hasemann \$ 1,750.00

One Thousand Seven Hundred Fifty and 00/100 DOLLARS

Wendy A. Hasemann
Attorney At Law
3704 Anella Drive
Delray Beach, FL 33448

MEMO [REDACTED]

[Signature]

CPBS
785
15010
JPMorgan Chase Bank, N.A.

From: Carl Kennedy <clktax@aol.com>
Date: May 10, 2020 at 7:55 PM
To: Carl Kennedy <clktax@aol.com>
Cc: Cbaker847 <cbaker847@gmail.com>, Gblohm <gblohm@runbox.com>, Borersj <borersj@g.cofc.edu>, Kobe Rc12 <kobe.rc12@gmail.com>, Shelbychristmas <shelbychristmas@gmail.com>, Gilc <gilc@cfnsfl.com>, Chrisdavy <chrisdavy@me.com>, Blueskydoc <blueskydoc@aol.com>, Carlos Figueroa <carlos_a_figueroa@mac.com>, Eac4Me <eac4me@gmail.com>, Tonyha81 <tonyha81@bellsouth.net>, Grantcorbett <grantcorbett@yahoo.com>, Markjohnson75 <markjohnson75@hotmail.com>, James <james@autobasecorp.com>, John <john@ewaycorp.com>, Rpmagnusson <rpmagnusson@me.com>, Evanairplane <evanairplane@gmail.com>, Jeff <jeff@drakealexander.com>, Inozick <inozick@gmail.com>, Luis Ochoa <luis.m.ochoa@gmail.com>, Antonlopalazuelos <antonlopalazuelos@gmail.com>, Mjrascoe <mirascoe@gmail.com>, Morganwuzhere <morganwuzhere@gmail.com>, Hdossantosneto <hdossantosneto@gmail.com>, Cap9722 <cap9722@gmail.com>, Nsolano66 <nsolano66@hotmail.com>, Rosstigner <rosstigner@gmail.com>, Rolecall5 <rolecall5@gmail.com>, Sniper0910 <sniper0910@yahoo.com>, Blackbat <blackbat@bellsouth.net>, Ba5852 <ba5852@aol.com>, Djayoub <djayoub@bellsouth.net>, Marc Bajaj <marc.bajaj@gmail.com>, Martinbaybutt <martinbaybutt@aol.com>, Abiloukha <abiloukha@gmail.com>, Bobbreeden <bobbreeden@me.com>, Lesliebutzer01 <lesliebutzer01@yahoo.com>, Dcannaro <dcannaro@hotmail.com>, Wchurchill <wchurchill@scppartners.com>, Jamie <jamie@cliffordassociatesinc.com>, Maxcraddock <maxcraddock@gmail.com>, Gdarrow55 <gdarrow55@gmail.com>, Johndunne3774 <johndunne3774@comcast.net>, Dutranc <dutranc@gmail.com>, Marc <marc@allaircrafttraining.com>, Ggalyo <ggalyo@gmail.com>, Sgtgrg <sgtgrg@aol.com>, Justin Golda <justin.golda@yahoo.com>, Genesisproperty <genesisproperty@aol.com>, Matthanley123 <matthanley123@gmail.com>, Wingpropgo <wingpropgo@aol.com>, Barry Ttds <barry.ttds@gmail.com>, Ghill <ghill@ourhillhouse.com>, LHill@ourhillhouse.com <lhill@ourhillhouse.com>, Torholm <torholm@gmail.com>, Markjarvis21 <markjarvis21@gmail.com>, Seals1967 <seals1967@yahoo.com>, Carl Kennedy <clktax@aol.com>, Robbykennedy <robykennedy@yahoo.com>, J Kittay <j.kittay@icloud.com>, Rob <rob@patriotmarinellc.com>, Kevin Maclean <kevin.maclean@nee.com>, CLKTax@aol.com <clktax@aol.com>, Matosc <matosc@bellsouth.net>, Dsmcniel <dsmcniel@bellsouth.net>, Pilotasa <pilotasa@bellsouth.net>, Rick <rick@skydiveseb.com>, Eric <eric@myerscommercial.com>, Paul Nudelman <paul.nudelman@gmail.com>, J 32 <j.otero.32@gmail.com>, L Pastore <l.pastore@ops-corp.com>, Carrisachris <carrisachris@gmail.com>, Harry <harry@realtybythebeach.com>, Apotenti <apotenti@doublepconstruction.com>, Tgp103 <tg103@gmail.com>, Josh Prince <josh_prince@outlook.com>, Reischer Mark <reischer.mark@gmail.com>, Kamarsblessed <kamarsblessed@yahoo.com>, Jrodengen <jrodengen@aol.com>, Deltico1 <deltico1@gmail.com>, Richsack <richsack@bellsouth.net>, Itel933 <itel933@netscape.net>, Sanchezpaulk <sanchezpaulk@mac.com>, Mosart <mosart@sebben.com>, Informationbravo <informationbravo@gmail.com>, Tiger <tiger@flightvelocity.com>, Steveswhere <steveswhere@msn.com>, Santiago <santiago@savigroup.com>, Sterlingwelch <sterlingwelch@yahoo.com>, Info <info@gerardwilliamsllaw.com>, Gworley Crna <gworley.crna@gmail.com>, Kergator <kergator@gmail.com>, Ayanikian <ayanikian@aol.com>, Zworthy2 <zworthy2@juno.com>
Subject: Fwd: PBFC - Minutes of 5/4/20 Special Meeting

Composite Exhibit 3

To All,

Below is my lawyer's response to me upon her review of Greg Gilhooly's letter today to former and presumably current members.

I thought I would share.

Respectfully,

Carl Kennedy

-----Original Message-----

To: clktax@aol.com <clktax@aol.com>

Sent: Sun, May 10, 2020 3:56 pm

Subject: Re: PBFC - Minutes of 5/4/20 Special Meeting

Carl:

I have read Gilhooly's letter to the Former Members. My response is.....

hahahahahahahahahahaha if he thinks he's going to get away with that! I would argue that the provision he quotes is a *supplement to, and not an "instead of"* as he is attempting to portray. I believe the entitled return of the \$1700 to the former and current members by PBFC is solid. The audacity this new Board has in attempting to discharge its responsibilities and cast you as the Devil is astonishing. I am certain "right" will prevail.

I have also reviewed Ms. Worley's e-mail, so before you ask me, I will say this. Ms. Worley has an impressive resume, but unfortunately it does not include being a lawyer.

My advice is....do nothing at this time....when the lawsuits start rolling in or inquiries are made of you as to how to proceed, simply give them the contact info I gave to you for my colleague. He is already on it.

Wendy

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-----Original Message-----

From: Carl Kennedy <clktax@aol.com>
To: hausmannw@aol.com <hausmannw@aol.com>
Sent: Sun, May 10, 2020 3:11 pm
Subject: Fwd: PBFC - Minutes of 5/4/20 Special Meeting

Wendy,

For your review and advice.

Respectfully,

Carl

-----Original Message-----

From: Gregory Gilhooly <sgtgrg@aol.com>
To: clktax@aol.com <clktax@aol.com>
Cc: cbaker847@gmail.com <cbaker847@gmail.com>; gblohm@runbox.com <gblohm@runbox.com>; borersj@g.cofc.edu <borersj@g.cofc.edu>; kobe.rc12@gmail.com <kobe.rc12@gmail.com>; shelbychristmas@gmail.com <shelbychristmas@gmail.com>; chrisdavy@me.com <chrisdavy@me.com>; blueskydoc@aol.com <blueskydoc@aol.com>; carlos_a_figueroa@mac.com <carlos_a_figueroa@mac.com>; eac4me@gmail.com <eac4me@gmail.com>; tonyha81@bellsouth.net <tonyha81@bellsouth.net>; markjohnson75@hotmail.com <markjohnson75@hotmail.com>; james@autobasecorp.com <james@autobasecorp.com>; john@ewaycorp.com <john@ewaycorp.com>; rpmagnusson@me.com <rpmagnusson@me.com>; evanairplane@gmail.com <evanairplane@gmail.com>; jeff@drakealexander.com <jeff@drakealexander.com>; inozick@gmail.com <inozick@gmail.com>; luis.m.ochoa@gmail.com <luis.m.ochoa@gmail.com>; antoniopalazuelos@gmail.com <antoniopalazuelos@gmail.com>; mjrascoe@gmail.com <mjrascoe@gmail.com>; morganwuzhere@gmail.com <morganwuzhere@gmail.com>; hdossantosneto@gmail.com <hdossantosneto@gmail.com>; cap9722@gmail.com <cap9722@gmail.com>; nsolano66@hotmail.com <nsolano66@hotmail.com>; rosstigner@gmail.com <rosstigner@gmail.com>; rolecall5@gmail.com <rolecall5@gmail.com>; sniper0910@yahoo.com <sniper0910@yahoo.com>; blackbat@bellsouth.net <blackbat@bellsouth.net>; ba5852@aol.com <ba5852@aol.com>; djayoub@bellsouth.net <djayoub@bellsouth.net>; marc.bajaj@gmail.com <marc.bajaj@gmail.com>; martinbaybutt@aol.com <martinbaybutt@aol.com>; abiloukha@gmail.com <abiloukha@gmail.com>; bobbreeden@me.com <bobbreeden@me.com>; lesliebutzer01@yahoo.com <lesliebutzer01@yahoo.com>; dcannaro@hotmail.com <dcannaro@hotmail.com>; wchurchill@scppartners.com <wchurchill@scppartners.com>; jamie@cliffordassociatesinc.com <jamie@cliffordassociatesinc.com>; maxcraddock@gmail.com <maxcraddock@gmail.com>;

gdarrow55@gmail.com <gdarrow55@gmail.com>; johnnunne3774@comcast.net <johnnunne3774@comcast.net>; dutranc@gmail.com <dutranc@gmail.com>; marc@allaircrafttraining.com <marc@allaircrafttraining.com>; ggalyo@gmail.com <ggalyo@gmail.com>; justin.golda@yahoo.com <justin.golda@yahoo.com>; genesisproperty@aol.com <genesisproperty@aol.com>; matthanley123@gmail.com <matthanley123@gmail.com>; wingpropgo@aol.com <wingpropgo@aol.com>; barry.ttds@gmail.com <barry.ttds@gmail.com>; ghill@ourhillhouse.com <ghill@ourhillhouse.com>; LHill@ourhillhouse.com <LHill@ourhillhouse.com>; torholm@gmail.com <torholm@gmail.com>; markjarvis21@gmail.com <markjarvis21@gmail.com>; seals1967@yahoo.com <seals1967@yahoo.com>; clktax@aol.com <clktax@aol.com>; robbykennedy@yahoo.com <robbykennedy@yahoo.com>; j.kittay@icloud.com <j.kittay@icloud.com>; rob@patriotmarinellc.com <rob@patriotmarinellc.com>; kevin.maclean@nee.com <kevin.maclean@nee.com>; CLKTax@aol.com <CLKTax@aol.com>; matosc@bellsouth.net <matosc@bellsouth.net>; dsmcniel@bellsouth.net <dsmcniel@bellsouth.net>; pilotasa@bellsouth.net <pilotasa@bellsouth.net>; rick@skydiveseb.com <rick@skydiveseb.com>; eric@myerscommercial.com <eric@myerscommercial.com>; paul.nudelman@gmail.com <paul.nudelman@gmail.com>; j.otero.32@gmail.com <j.otero.32@gmail.com>; l.pastore@ops-corp.com <l.pastore@ops-corp.com>; carrisachris@gmail.com <carrisachris@gmail.com>; harry@realtybythebeach.com <harry@realtybythebeach.com>; apotenti@doublepconstruction.com <apotenti@doublepconstruction.com>; tgp103@gmail.com <tgp103@gmail.com>; josh_prince@outlook.com <josh_prince@outlook.com>; reischer.mark@gmail.com <reischer.mark@gmail.com>; kamarsblessed@yahoo.com <kamarsblessed@yahoo.com>; jrodengen@aol.com <jrodengen@aol.com>; deltico1@gmail.com <deltico1@gmail.com>; richsack@bellsouth.net <richsack@bellsouth.net>; itel933@netscape.net <itel933@netscape.net>; sanchezpaulk@mac.com <sanchezpaulk@mac.com>; mosart@sebbsen.com <mosart@sebbsen.com>; informationbravo@gmail.com <informationbravo@gmail.com>; tiger@flightvelocity.com <tiger@flightvelocity.com>; steveswhere@msn.com <steveswhere@msn.com>; santiago@savigroup.com <santiago@savigroup.com>; sterlingwelch@yahoo.com <sterlingwelch@yahoo.com>; info@gerardwilliamsllaw.com <info@gerardwilliamsllaw.com>; gworley.crna@gmail.com <gworley.crna@gmail.com>; kergator@gmail.com <kergator@gmail.com>; ayanikian@aol.com <ayanikian@aol.com>; zworthy2@juno.com <zworthy2@juno.com>
Sent: Sun, May 10, 2020 3:00 pm
Subject: Re: PBFC - Minutes of 5/4/20 Special Meeting

Attached hereto are two files. File #1 are the current by laws File #2 A letter sent to past members

Thank you
Gregory Gilhooly
President, Pompano Beach Flying Club

-----Original Message-----

From: Carl Kennedy <clktax@aol.com>
To: sgtgrg@aol.com <sgtgrg@aol.com>
Cc: cbaker847@gmail.com <cbaker847@gmail.com>; gblohm@runbox.com <gblohm@runbox.com>; borersj@g.cofc.edu <borersj@g.cofc.edu>; kobe.rc12@gmail.com <kobe.rc12@gmail.com>; shelbychristmas@gmail.com <shelbychristmas@gmail.com>; chrisdavy@me.com <chrisdavy@me.com>; blueskydoc@aol.com <blueskydoc@aol.com>; carlos_a_figueroa@mac.com <carlos_a_figueroa@mac.com>; eac4me@gmail.com <eac4me@gmail.com>; tonyha81@bellsouth.net <tonyha81@bellsouth.net>; markjohnson75@hotmail.com <markjohnson75@hotmail.com>; james@autobasecorp.com <james@autobasecorp.com>; john@ewaycorp.com <john@ewaycorp.com>; rpmagnusson@me.com <rpmagnusson@me.com>; evanairplane@gmail.com <evanairplane@gmail.com>; jeff@drakealexander.com <jeff@drakealexander.com>; inozick@gmail.com <inozick@gmail.com>; luis.m.choa@gmail.com <luis.m.choa@gmail.com>; antoniopalazuelos@gmail.com <antoniopalazuelos@gmail.com>; mjrascoe@gmail.com <mjrascoe@gmail.com>; morganwuzhere@gmail.com <morganwuzhere@gmail.com>; hdossantosneto@gmail.com <hdossantosneto@gmail.com>; cap9722@gmail.com

<cap9722@gmail.com>; nsolano66@hotmail.com <nsolano66@hotmail.com>; rosstigner@gmail.com <rosstigner@gmail.com>; rolecall5@gmail.com <rolecall5@gmail.com>; sniper0910@yahoo.com <sniper0910@yahoo.com>; blackbat@bellsouth.net <blackbat@bellsouth.net>; ba5852@aol.com <ba5852@aol.com>; djayoub@bellsouth.net <djayoub@bellsouth.net>; marc.bajaj@gmail.com <marc.bajaj@gmail.com>; martinbaybutt@aol.com <martinbaybutt@aol.com>; abiloukha@gmail.com <abiloukha@gmail.com>; bobbreeden@me.com <bobbreeden@me.com>; lesliebutzer01@yahoo.com <lesliebutzer01@yahoo.com>; dcannaro@hotmail.com <dcannaro@hotmail.com>; wchurchill@scppartners.com <wchurchill@scppartners.com>; jamie@cliffordassociatesinc.com <jamie@cliffordassociatesinc.com>; maxcraddock@gmail.com <maxcraddock@gmail.com>; gdarrow55@gmail.com <gdarrow55@gmail.com>; johndunne3774@comcast.net <johndunne3774@comcast.net>; dutranc@gmail.com <dutranc@gmail.com>; marc@allaircrafttraining.com <marc@allaircrafttraining.com>; ggalvo@gmail.com <ggalvo@gmail.com>; sgtqrq@aol.com <sgtqrq@aol.com>; justin.golda@yahoo.com <justin.golda@yahoo.com>; genesisproperty@aol.com <genesisproperty@aol.com>; matthanley123@gmail.com <matthanley123@gmail.com>; wingpropgo@aol.com <wingpropgo@aol.com>; barry.ttds@gmail.com <barry.ttds@gmail.com>; ghill@ourhillhouse.com <ghill@ourhillhouse.com>; LHill@ourhillhouse.com <LHill@ourhillhouse.com>; torholm@gmail.com <torholm@gmail.com>; markjarvis21@gmail.com <markjarvis21@gmail.com>; seals1967@yahoo.com <seals1967@yahoo.com>; Carl Kennedy <clktax@aol.com>; robbykennedy@yahoo.com <robbykennedy@yahoo.com>; j.kittay@icloud.com <j.kittay@icloud.com>; rob@patriotmarinellc.com <rob@patriotmarinellc.com>; kevin.maclean@nee.com <kevin.maclean@nee.com>; CLKTax@aol.com <CLKTax@aol.com>; matosc@bellsouth.net <matosc@bellsouth.net>; dsmcniel@bellsouth.net <dsmcniel@bellsouth.net>; pilotasa@bellsouth.net <pilotasa@bellsouth.net>; rick@skydiveoseb.com <rick@skydiveoseb.com>; eric@myerscommercial.com <eric@myerscommercial.com>; paul.nudelman@gmail.com <paul.nudelman@gmail.com>; j.otero.32@gmail.com <j.otero.32@gmail.com>; l.pastore@ops-corp.com <l.pastore@ops-corp.com>; carrisachris@gmail.com <carrisachris@gmail.com>; harry@realtybythebeach.com <harry@realtybythebeach.com>; apotenti@doubleconstruction.com <apotenti@doubleconstruction.com>; tgp103@gmail.com <tgp103@gmail.com>; josh_prince@outlook.com <josh_prince@outlook.com>; reischer.mark@gmail.com <reischer.mark@gmail.com>; kamarsblessed@yahoo.com <kamarsblessed@yahoo.com>; jrodengen@aol.com <jrodengen@aol.com>; deltico1@gmail.com <deltico1@gmail.com>; richsack@bellsouth.net <richsack@bellsouth.net>; itel933@netscape.net <itel933@netscape.net>; sanchezpaulk@mac.com <sanchezpaulk@mac.com>; mosart@sebben.com <mosart@sebben.com>; informationbravo@gmail.com <informationbravo@gmail.com>; tiger@flightvelocity.com <tiger@flightvelocity.com>; steveswhere@msn.com <steveswhere@msn.com>; santiago@savigroup.com <santiago@savigroup.com>; sterlingwelch@yahoo.com <sterlingwelch@yahoo.com>; info@gerardwilliamslaw.com <info@gerardwilliamslaw.com>; gworley.crna@gmail.com <gworley.crna@gmail.com>; kergator@gmail.com <kergator@gmail.com>; avanikian@aol.com <avanikian@aol.com>; zworthy2@juno.com <zworthy2@juno.com>

Sent: Fri, May 8, 2020 10:45 am

Subject: Fwd: PBFC - Minutes of 5/4/20 Special Meeting

To All,

Please see below the e-mail my attorney sent to the PBFC attorney regarding the special meeting on 05-04-2020 in connection with Bob Breeden's motion to disavow monies owed to former and current members.

Respectfully,

WENDY A. HAUSMANN

Attorney and Counselor at Law

*Member Florida and
Maryland Bars

February 11, 2020

Mr. Amaury Ortiz
7107 Quail Hollow Blvd.
Westley Chapel, FL 33544

RE: Pompano Beach Flying Club

Dear Mr. Ortiz:

This letter will serve as a demand for payment of the debt you owe to the Pompano Beach Flying Club for charges incurred by you in connection with membership dues and/or flying time. Your debt has been assigned to this office for collection.

As of the date hereof, demand is made for the amounts of \$841.88 as reflected by the attached invoice. If we are forced to pursue this matter through litigation, we will additionally seek pre-judgment and post judgment interest as allowed by law.

It is imperative that you contact this office within thirty (30) days from the date hereof to discuss this matter. If we have not reached a resolution within thirty (30) days, I have the right to commence legal proceedings against you to recover the debt without any additional or further notice to you and this letter may be offered in court in any trial of this matter.

IMPORTANT CONSUMER INFORMATION

Unless you notify this office within thirty (30) days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within thirty (30) days from receiving this notice, this office will obtain verification of the debt and mail you a copy of such verification. If you request of this office in writing within thirty (30) days of receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor. This communication is from a debt collector.

This is an attempt to collect a debt and any information obtained will be used for that purpose.

Kindly give this matter your prompt attention.

Very truly yours,

Wendy A. Hausmann
Attorney at Law

2100 Sun Road, Suite 400, Boca Raton, Florida 33433
Telephone (561) 993-1355 E-mail hausmann@wax.com

Composite Exhibit 4

Wendy A. Hausmann, Esq.
20283 State Road 7
Suite #400
Boca Raton, FL 33498

WEST PALM BEACH FL 334

14 FEB 2020 PH 1 L

Mr. Armaury Ortiz
7107 Quail Hollow Blvd.
Wesley Chapel, FL 33544

33544-250307

PH 1 L 14 FEB 2020

WENDY A. HAUSMANN

Attorney and Counselor at Law

*Member Florida and
Maryland Bars

February 1, 2020

Pompano Beach Flying Club
c/o Treasurer - Carl L. Kennedy
2929 S. Ocean Blvd.
Unit #510
Boca Raton, FL 33432

Professional services

	<u>Hours</u>	<u>Amount</u>
1/30/20 Preparation of revisions to Corporate Bylaws; Multiple telephone conferences with Carl L. Kennedy re: same.	5.00	1,750.00
For professional services rendered	5.00	\$1,750.00
Balance due		<u>\$1,750.00</u>

20283 State Road 7, Suite #400, Boca Raton, Florida 33498
Telephone (561) 477-5353 E-mail: hausmannw@aol.com

Composit Exhibit # 5

JPMORGAN CHASE & CO.

Post date: 02/03/2020
Amount: \$ 1750.00

Account: [REDACTED]
Check Number: 5984

POMPANO FLYING CLUB
202 S. OCEAN BLVD, STE #510
BOCA RATON, FL 33432
304-998-9200

BANK OF AMERICA, NA
43027831

5984

1/3/2020

PAY TO THE ORDER OF Wendy A. Hauptmann \$ 1,750.00

One Thousand Seven Hundred Fifty and 00/100 DOLLARS

Wendy A. Hauptmann
Attorney At Law
3794 Arafia Drive
Deeray Beach, FL 33446

MEMO

[REDACTED]

[Signature]

DEPOSIT ONLY
FOR DEPOSIT ONLY
JPMorgan Chase Bank, N.A.

From: <hausmannw@aol.com>
Date: Thu, Nov 14, 2019 at 6:29 PM
Subject: Re: PBFC Meeting - 11/13 - Response to Questions
To: <brentbutrym@gmail.com>
CC: <clktax@aol.com>

Carl:

Kindly forward this, my below email to Brent Butrym, to all members of the Board and anyone else you may deem appropriate. Thank you.

Mr. Butrym:

Since you appear insistent on, and even attempted to again cause chaos for the PBFC at last night's membership meeting by having someone else do your dirty work in your absence, I have requested and been granted the opportunity to reply to your email and answer your questions below, as I believe they address legal matters.

1. Treasurer's assistant

I am fully aware of this issue. I have advised both Carl and the BOD regarding same. Now I will explain it very clearly to you, Sir.

You are not now, nor were you ever, "Assistant Treasurer". In addition, you are not now, nor were you ever, a "non-voting member of the Board". Neither of those positions are valid or legal under the PBFC Bylaws. They do not, and cannot, exist without a parliamentary revision to the Bylaws. Period. There are only 5 permissible members of the BOD, whether "without voting privileges" or not. There are only 4 permissible Officers. At best, it sounds like perhaps for a few minutes, maybe you volunteered to be the Treasurer's assistant. Much different than Assistant Treasurer. These are not just semantics. The difference is huge. A Treasurer's assistant is like a secretary. No authority, no liability, no rights. A Treasurer's assistant goes to Office Depot and gets new rolls of paper for the calculator, puts checks in order, whatever the Treasurer asks him/her to do. On the other hand, an Assistant Treasurer, like an Assistant Manager, has the same authority as the manager and stands in the manager's place in the manager's absence. Similarly, an Assistant Treasurer has authority, rights and liabilities.

Moreover, Mr. Butrym, it is quite evident that you do not wish to *assist* the Treasurer, Carl Kennedy, in any way, shape or form. You want to monitor, supervise and constitute surveillance over him. Your motives are malevolent, not benevolent. And I will provide advice and "protect" the BOD to the extent that my client is a member of it and their interests are derivative of, or coincide with, his.

Exhibit # 6

In any event, if you are still interested and desire to volunteer to be the person who goes to Office Depot, kindly advise Carl. Otherwise, you have no legitimate purpose and are not needed in connection with the Treasurer of PBFC. I hope that puts an end to this issue and clears up any confusion you may have had to date.

2. PBFC audit

Mr. Butrym, your animosity against Carl Kennedy is so obvious and pervasive as to be an intrusion and permanent interference with the current audit process. Communications by any member with the auditing firm are entirely inappropriate and have irreparably tainted and compromised the integrity of the process initiated with this firm by the BOD. I intend to do everything in my power to convince each member of the BOD that the current audit *must* be terminated immediately, and without further cost to the Club, due to the lack of neutrality and impartiality caused by the member(s) contacting the auditing firm without the knowledge and participation of the BOD. Such hypocritical conduct is unconscionable and reeks of the sneakiness and underhandedness which you attribute to my client. Where is the transparency in the members who communicated with the auditing firm? Do they wish to identify themselves and make known their communications? For the sake of transparency, of course. I hope it is realized that the auditing firm has no privilege of confidentiality with you or any other individual member of PBFC, Mr. Butrym. Such communications comprise billable time for which the Board is paying and to which they should be privy.

With respect to your not even veiled accusation that there is a nefarious motive because the audit isn't moving quickly enough for your liking, perhaps you are unaware that PBFC is a hobby for Carl Kennedy and he has a full-time day job that requires his prioritized attention. He also has multiple functions within the Club that take a good portion of his "spare" time as well. If you can put more hours in a day, I'm sure Carl will be willing to fill them with performing extra, beyond the ordinary that he already does, accounting-related functions for the Club. If not, kindly be reminded that patience is a virtue. Be virtuous.

At this point I see 3 viable options regarding this audit. Either 1) get a new firm for the external audit and make it clear that there are to be no communications with PBFC members without full knowledge of the BOD. The BOD hired the firm and is paying for it. They are the client of the firm; 2) do an internal audit; or 3) drop these ridiculous antics, everybody play nice in the sandbox together, and go have a good time flying airplanes. You know this battle of spite is threatening to cause the decimation of PBFC, and you simply aren't going to get the "dirt" you want for or about Carl Kennedy. Take your pick, Mr. Butrym. But if you think I am going to watch you try to put my client's head on a platter because you clearly have a personal axe to grind, you need to look into my reputation more closely.

Do not hesitate to contact me should you have further questions or require additional clarification with respect to these 2 issues.

Thank you,
Wendy A. Hausmann
561.477.5353

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that may be legally privileged. If you are not the intended recipient, you must not review, retransmit, convert to hard copy, copy, use or disseminate this e-mail or any attachments to it. If you have received this e-mail in error, please notify us immediately by return e-mail or by telephone at 561.477.5353 and delete this message. Please note that if this e-mail message contains a forwarded message or is a reply to a prior message, some or all of the contents of this message or any attachments may not have been produced by THE LAW OFFICES OF WENDY A. HAUSMANN, 20283 STATE ROAD 7, SUITE 400, BOCA RATON, FL 33498, E-MAIL: hausmannw@aol.com.

-----Original Message-----

From: Kennedy <clktax@aol.com>
To: WENDY HAUSMANN <hausmannw@aol.com>
Sent: Wed, Nov 13, 2019 8:14 pm
Subject: Fwd: PBFC Meeting - 11/13 - Questions

Sent from my iPhone

Begin forwarded message:

From: Brent Butrym <NoReply@timesync.com>
Date: November 13, 2019 at 5:37:29 PM EST
To: Carl Kennedy <clktax@aol.com>
Subject: PBFC Meeting - 11/13 - Questions
Reply-To: brentbutrym@gmail.com

Unfortunately, I am unable to attend tonight's meeting. I went out of town on business last minute.

Will someone ask the following questions:

Why was I appointed assistant treasurer and then un-appointed when I started asking questions about the \$165,000 in expenses that have yet to be explained? I did not resign as was falsely reported. Seems like someone is trying to keep something hidden.

The board keeps talking about an independent accountant conducting an "audit or review." He has received nothing and hasn't heard from Carl yet. Kinda hard to do one's job without the requested documents. It's been three months since the engagement letter was signed. Will there actually be an independent review conducted?

And somebody PLEASE either record the audio of the meeting or send out minutes after?

Thank you,

Brent Butrym

From: **Gregg Galvo** <ggalvo@gmail.com>
Date: Sun, Nov 17, 2019 at 3:22 AM
To: Brent Butrym <brentbutrym@gmail.com>
Cc: Robert L. Breeden <bobbreeden@me.com>

Hello Brent,

I agree. The way she talks, it's apparent she is protecting the BOD and has stated she is advising them. She also threaten you in the end. Funny how she is quoting the bylaws but the BOD don't adhere to the them but that's okay. Her recommendations in the end shouldn't be addressed to you, they should be addressed to the BOD. Typically BS.

r/Gregg

CHASE for BUSINESS

Printed from Chase for Business

\$10,000.00

Dec 20, 2019

1281

Total

Post date

Check #

THE LAW OFFICES OF WENDY HAUSMANN 01-11 ATTORNEY OPERATING ACCOUNT 20283 STATE ROAD 7 STE. 400 BOCA RATON, FL 33498-6904		63-8413 41754 2670	1281
PAY TO THE ORDER OF <i>Pompano Sr. Squashon Flying Club</i> \$10,000.00 <i>Ten thousand 00/100</i>		DATE <i>12/20/19</i>	
CHASE		<i>Wendy A. Hausmann</i>	
JPMorgan Chase Bank, N.A. www.Chase.com		MEMO <i>Loan</i>	

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Exhibit 7