

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/Counter-Defendant,

and

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

CARL L. KENNEDY

Defendant/Counter-Plaintiff.

SECOND SET OF INTERROGATORIES
DIRECTED TO PLAINTIFF/COUNTER-DEFENDANT

CARL L. KENNEDY, II, Defendant and Counter-Plaintiff, hereby propound the following Interrogatories to Plaintiff/Counter-Defendant and requests that the following Interrogatories be answered under oath or affirmation as to their truthfulness within thirty (30) days, in accordance with the Florida Rules of Civil Procedure:

1. Using the American Express credit card statements which I provided to you for the years 2017, 2018, 2019 up through the last charge I made on the card for Club purposes in 2020, list chronologically by date, amount and description of every single American Express payment which you contend was my personal expense but improperly paid for by PBFC, or for which I have requested reimbursement in writing to PBFC, using/requesting PBFC funds.

2. List the date and amount of every payment made by PBFC to member(s) Paul Sanchez, Bruce Ayala, David Watkins, Thor Holm, Greg Gilhooly, Gregg Galyo, Greg Worley, Keriann Worley, Andrew Bilukha and Ara Yanikian since February 12, 2020, stating the detailed purpose for each payment and the description of each payment, breaking down the specific purpose of each item within each payment.

3. List each and every action I took or any expense I paid using PBFC funds which you contend represent(ed) mismanagement of funds, describing specifically with respect to each action or expense why you contend the action or expense constituted mismanagement of Club funds.

4. List each and every personal credit card and debit card used by any Officer or member of the Board of Directors, since February 12, 2020, to pay or for which reimbursement has already been or is expected to be repaid, any expense using Club funds, stating in whose name the card is held, the date and to whom the expense was paid, including any amounts.

5. List any and all credit cards and debit cards held specifically in the name of Pompano Senior Squadron Flying Club and Pompano Beach Flying Club since February 12, 2020.

6. Identify and describe in detail the original source(s) of all funds, other than member dues [including credit cards, sale of assets, member initial deposits (\$1700 or other "buy-in funds") etc.], used for all payments for all expenses of PBFC (including but not limited to fuel, hangar costs, insurances, maintenance, professional fees and costs, etc.), and whether or not any Officer, member of the Board of Directors or regular member contributed to the payment of these expenses in any amount in excess of their monthly dues (regardless of whether reimbursement has been or is expected), and if so, the name of any Officer, member of the Board of Directors or regular member making such contributions, and whether reimbursement has been or is expected to be paid to each.

7. Identify payments of any kind that have been made by PBFC to any member or former member of PBFC since February 12, 2020, including reimbursements, loan payments and return of funds, providing the name of the individual(s) to whom such payments have been made as well as the date, amount and purpose for which each payment was made.

8. Identify by name, date, amount and purpose of all funds or any form of payment received by PBFC from any new member(s) of PBFC since February 12, 2020.

I hereby certify that on the 25th day of October, 2020, I sent a copy of the foregoing via the Florida e-portal to Edward Holodak, Esquire at pleadings@holodakpa.com.

BY:

/s/ Carl L. Kennedy, II

Carl L. Kennedy, II

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