

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

SUNWOOD, INC.,

CASE NO. 21-003202 CACE 12

Plaintiff,

vs.

POMPANO SENIOR SQUADRON FLYING  
CLUB, INC.,

Defendant.

**NOTICE OF FILING DEPOSITION OF GREGORY RAYMOND GILHOOLY**

Plaintiff hereby files the deposition of Gregory Raymond Gilhooly taken on November 22, 2021.

I HEREBY CERTIFY that a true copy of the foregoing has been served via the State of Florida e-Filing Portal on Edward F. Holodak, Esq., at pleadings@holodakpa.com and Carolyn N. Budnik, Esq., at carolyn@cbudlaw.com, this 24th day of January 2022.

LAW OFFICES OF DANE STANISH, P.A.  
Attorney for Plaintiff  
3475 Sheridan Street, Suite 209  
Hollywood, FL 33021  
Telephone (954) 923-0524  
Facsimile (954) 212-0770  
Stanishd@gmail.com

By: /s/ Dane T. Stanish  
Dane T. Stanish  
Florida Bar Number: 931993

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SUNWOOD, INC.,  
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POMPANO SENIOR SQUADRON  
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VIDEO CONFERENCE DEPOSITION OF  
GREGORY RAYMOND GILHOOLY

November 22nd, 2021  
Via Video Conference  
1:00 p.m. - 2:03 p.m.

Reported by:  
MARCIA L. ALF, R.P.R.  
Notary Public - State of Florida

## 1 APPEARANCES:

2 Appearing on behalf of the Plaintiff:  
3 CAROLYN N. BUDNIK, ESQ.  
4 JARED ANTON, PARALEGAL  
5 LAW OFFICES OF DANE STANISH, P.A.  
6 3475 Sheridan Street  
7 Suite 209  
8 Hollywood, Florida 33021  
9 954-923-0524 (phone)  
10 Stanishd@gmail.com  
11 Cbudnik@bellsouth.net

12 Appearing on behalf of the Defendant:  
13 EDWARD F. HOLODAK, ESQ.  
14 EDWARD F. HOLODAK, P.A.  
15 7951 S.W. 6th Street  
16 Suite 210  
17 Plantation, Florida 33324  
18 954-927-3436 (phone)  
19 Edward@holodakpa.com

## 20 ALSO PRESENT:

21 CARL KENNEDY  
22  
23  
24  
25

INDEX

GREGORY RAYMOND GILHOOLY

DIRECT EXAMINATION BY MS. BUDNIK

5

E X H I B I T S

Plaintiff's Exhibit 1

A letter dated 5/5/2020

Plaintiff's Exhibit 2

A front and back copy of a check

Plaintiff's Exhibit 3

The meeting minutes 5/9/2018

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1 Video Conference Deposition taken  
2 before MARCIA L. ALF, Registered Professional  
3 Reporter and Notary Public in and for the State of  
4 Florida at Large, in the above cause.

5 -----  
6 Thereupon:

7 GREGORY RAYMOND GILHOOLY,  
8 having produced identification and then having been  
9 duly sworn, was examined and testified as follows:

10 MS. BUDNIK: Ed, Marcia, I'm going to  
11 be using as exhibits, the Request For  
12 Admissions, the response to Request for  
13 Admissions. And the letter dated I think  
14 it's May 5th, 2020. Yes.

15 MR. HOLODAK: Okay, Greg, do you have  
16 each of those already?

17 THE WITNESS: I do.

18 MS. BUDNIK: I think everybody has  
19 seen these a bunch of times, correct?

20 THE WITNESS: I do.

21 MR. HOLODAK: Yeah, we've seen them, I  
22 want to make sure he's physically got them  
23 with him.

24 THE WITNESS: I have them in front of  
25 me.

## DIRECT EXAMINATION

1  
2 BY MS. BUDNIK:

3 Q. Good afternoon, Mr. Gilhooly.

4 A. Good afternoon.

5 Q. My name is Carolyn Budnik, I represent  
6 the Plaintiff here in Sunwood, Inc. and I'm taking  
7 the deposition as noticed of the corporate  
8 representative, I can't remember if this is duces  
9 tecum or not.

10 Would you please state your name for  
11 the record?

12 A. Gregory Gilhooly, G-I-L-H-O-O-L-Y.

13 Q. And Mr. Gilhooly, where do you live?

14 A. I live at 1421 South Ocean Boulevard,  
15 Pompano Beach, Florida, 33062.

16 Q. And is there an apartment there,  
17 please?

18 A. Apartment 102.

19 Q. And, Mr. Gilhooly, are you employed?

20 A. Yes, I am.

21 Q. And where do you work?

22 A. Southeast Airways Express.

23 Q. Southeast Airways Express.

24 A. I'm sorry, Southern Airways Express,  
25 my apologies, I just started.

1 Q. I know you did start somewhere.

2 A. Yeah.

3 Q. So you've been there, a week, two?

4 A. I'll be here two weeks to be exact,  
5 yeah.

6 Q. And where did you work before that?

7 A. I was retired before that.

8 Q. What's your job description at  
9 Southern Airways Express?

10 A. Pilot, captain.

11 Q. And how long were you retired?

12 A. Since 2010.

13 Q. What did you do before you retired?

14 A. Police officer.

15 Q. And where did you work?

16 A. City of Newark, New Jersey Police  
17 Department.

18 Q. That must have been interesting.

19 A. Yeah, that was -- after I retired  
20 there, I came down to Broward Sheriff's Office for  
21 a brief period of time, about two and a half years,  
22 I was a deputy with Broward BSO.

23 Q. What precinct?

24 A. I was at the District 15, which is  
25 North Lauderdale for BSO. Also interesting.

1 Q. Have you ever prior to working for  
2 Southern, have you ever been employed as a captain  
3 or pilot before?

4 A. Um, I was a -- I was a brief period of  
5 time at the American Flyers, I was an instructor,  
6 an instructor pilot for them, probably about three  
7 months.

8 Q. Where is American Flyers located --

9 A. Yeah, they were located -- 801  
10 N.E. 10th Street in Pompano. So Pompano Air Park.

11 Q. How long have you been a pilot?

12 A. Since 1980.

13 Q. What professional licenses do you  
14 hold?

15 A. I'll go on forever.

16 So, it's a private pilot instrument  
17 rating, fixed wing, multiengine, rotocraft  
18 helicopter. Instructor, single engine instructor  
19 rotocraft. Ground instructor, advanced ground  
20 instructor.

21 Q. Okay. But other than a pilot license,  
22 what professional licenses do you hold, if any?

23 A. No, just pilot license.

24 Q. So when did you move to Broward  
25 County?



1           **A.**    2016.  Yeah, 2016.

2           **Q.**    When did you first become involved in  
3 the Pompano Senior Squadron Flying Club?

4           **A.**    Probably later 2016, early 2017.

5           **Q.**    And what was your initial involvement  
6 with the club?

7           **A.**    I was just a member.

8           **Q.**    And why did you become a member of the  
9 club?

10          **A.**    Um, for access to aircraft to fly.

11          **Q.**    And you're currently the president of  
12 the club, is that correct?

13          **A.**    That's correct.

14          **Q.**    When did you become the president of  
15 the club?

16          **A.**    It was February, not this past  
17 February, the February prior to that.  So we're 21,  
18 February -- it's either February 2019 or  
19 February, 2018.  I'm gonna say February 2019.

20          **Q.**    And there was a big turnover of the  
21 Board of Directors of the club at that time, was  
22 there not?

23          **A.**    There was a new election held, and it  
24 was a complete board that was reelected -- that was  
25 elected into their positions.

1                   If I'm looking, it was probably  
2 February 20, so if I can make a correction, it was  
3 February 2020.

4           Q.     That's what I was looking at, I think  
5 it was February, 2020.

6           A.     Yeah, we're reelected this February,  
7 initially the February prior was --

8           Q.     No, I want the record to be accurate,  
9 that's why, I wasn't trying to trick you --

10          A.     No, no, that's fine.

11          Q.     See if I can figure it out.

12          A.     I can trick myself, I don't need help.  
13 But, yeah, February, 2020.

14          Q.     I don't play dirty pool.

15          A.     That's fine, I'm good.

16          Q.     So February, 2020.

17          A.     Yeah, I'm gonna say that.

18          Q.     On my notes I put a big question mark.

19          A.     Yes, we're good, we're good. I'm glad  
20 we clarified that.

21          Q.     So, as the new president in February  
22 of 2020, what steps did you take, if any, to fix  
23 problems with the club?

24          A.     We took -- well, we tried to get the  
25 financials in order --

1 (Multiple speakers)

2 THE COURT REPORTER: I'm sorry.

3 MR. HOLODAK: Sorry, objection to the  
4 form of the question.

5 BY MS. BUDNIK:

6 Q. Let me start over.

7 When you became president of the club,  
8 were there any -- any issues, outstanding issues  
9 with the club?

10 A. There was, yeah. First day that we  
11 took over there seemed to be a shortage of funds in  
12 our account.

13 Q. Okay. And, were there other issues  
14 with regard to the former board leaving and the new  
15 board coming in?

16 A. I don't -- I don't understand issues,  
17 if you could clarify that, I could answer. I  
18 don't -- what issues?

19 Q. Were all the issues financial?

20 A. All the issues financial.

21 Q. Okay. So your first -- your first  
22 task then was to address the financial issues of  
23 the club, is that correct?

24 A. That's correct.

25 Q. I don't want to put words in your

1 mouth --

2           **A.** No, no, no, that's fair. That was the  
3 first order of business was to get our financials  
4 in order.

5           **Q.** So what steps did you take to do that?

6           **A.** Um, well, one of the first things we  
7 did was we had to reevaluate our shares, the share  
8 member's valuation of their shares.

9                       So, um, we looked at the money that  
10 was owed, or allegedly owed, the liens on our  
11 airplanes and how much our airplanes are worth, and  
12 then we assigned a value to the shares of  
13 membership.

14           **Q.** So the shares then obviously had to go  
15 up, is that correct?

16           **A.** The share, the value of the shares?

17           **Q.** No, the amount to buy in.

18           **A.** Actually it went down, because it was  
19 worth less. It had to go down because -- we owed  
20 more money than our planes were worth, so we  
21 couldn't ask members to pay more.

22           **Q.** Before you became president, shares  
23 were \$1,700, correct?

24           **A.** I don't know if shares were, the way  
25 it was -- the way it was sold to me was there was a

1 deposit of \$1,700. I don't think it was ever  
2 represented in any way as a share, other than  
3 deposit of \$1,700.

4 Q. Okay. And then if a person used an  
5 aircraft, then they rented the aircraft and paid  
6 for the fuel at that time, correct?

7 A. They paid for it, not necessarily at  
8 the time they rented it. But basically they rented  
9 an aircraft and they paid for their time and their  
10 fuel.

11 Q. And did they have a certain number of  
12 days within which to pay once they were notified of  
13 the amount?

14 A. Yeah, they did, close to 60 days they  
15 had.

16 Q. They had, okay.

17 A. The way the old billing was, prior to  
18 the 20th of the next month, I think was the rule's  
19 that they were going by.

20 Q. And what would happen if a member  
21 didn't pay?

22 A. I guess the board -- there was --  
23 there was writing in place with our bylaws that  
24 they would be expelled from the club.

25 Q. Is that still in place?

1           **A.**    Yes.

2           **Q.**    Is there any first chance, second  
3 chance, third chance?

4           **A.**    No.  If the member -- I don't recall  
5 exactly, but if the member is in arrears for  
6 30 days he could be expelled.  That's -- that's the  
7 writing on the -- on the bylaws.

8           **Q.**    Okay.

9           MS. BUDNIK:  Ed, the Amended  
10 Complaint, Mr. Stanish's office attached  
11 the wrong check to.

12          MR. HOLODAK:  I thought so.

13          MS. BUDNIK:  I don't want to ask you  
14 work product, when you did the Answer and  
15 Affirmative Defenses, were you going off  
16 the real check?

17          MR. HOLODAK:  Yes.

18          MS. BUDNIK:  What I'm going to do is a  
19 motion to substitute exhibits.  I think  
20 we'll prepare a motion to substitute the  
21 exhibits.

22          MR. HOLODAK:  You can submit an agreed  
23 order on that.  Just send me a copy of the  
24 one you want to substitute in but I'll  
25 agree to an order.

1 MS. BUDNIK: I think it's the one  
2 attached to the first.

3 MR. HOLODAK: Yeah, that's what I  
4 assumed. That's what we assumed when we  
5 answered it, but.

6 BY MS. BUDNIK:

7 Q. I just wanted to clear that up.

8 So I don't know how to show you this,  
9 there was a letter I'd like to be Exhibit 1. Which  
10 is dated May 5th, 2020.

11 A. Okie dokie, that's the letter made to  
12 the -- to the members?

13 Q. It says former member.

14 A. Okay.

15 Q. But it doesn't say to whom. I don't  
16 know if it was a form you were trying to develop,  
17 but that's my questioning.

18 So, do you have that letter in front  
19 of you?

20 A. I have the letter in front of me.

21 That brings up also a question to me.  
22 What member and was this actually sent out to the  
23 membership or was it sent out to a particular  
24 member, that I don't have -- I don't recall, I'm  
25 sorry.

1                   Former member. Yeah, I don't know if  
2 this was sent to a particular member or if this was  
3 a form, like you say, I don't recall. But this was  
4 my letter.

5                   **Q.** And you drafted it?

6                   **A.** Again? I did draft it, yes.

7                   **Q.** Okay. Did anybody corroborate or  
8 collaborate with you when you drafted it?

9                   **A.** No.

10                  **Q.** And it says on February 12, 2020 you  
11 were elected.

12                  **A.** Okay, that's good, I'll stand by that.  
13 I'll stick with it.

14                  **Q.** I'll stand by that too.

15                  **A.** Okay.

16                  **Q.** So the second paragraph, my copy is  
17 highlighted, I don't know if yours is.

18                  **A.** Well, it's blacked out but I could  
19 read right through it. It's supposed to be  
20 highlighted but it looks blacked out. I could make  
21 it out.

22                  **Q.** All right. So with regards to  
23 paragraph 2 of the letter.

24                  **A.** Okay.

25                  **Q.** You state that the board inherited a



1 bank account with a \$700 balance. And that was  
2 within three days -- or within days, I'm sorry,  
3 three checks were presented for \$11,700. Thus  
4 overdrawing the account. Is that correct?

5 A. That is correct.

6 Q. And that's the financial issue that  
7 you were --

8 A. That was -- that was --

9 Q. That you were addressing as the  
10 president?

11 A. That was the start of the financial  
12 issues, yes.

13 Q. And then the next section of the  
14 paragraph talks about the final meeting of the  
15 prior board, the then treasurer, Carl Kennedy, made  
16 a motion to secure \$200,000 of his alleged personal  
17 loans to the club with a lien on the aircraft, and  
18 the motion was approved unanimously, correct?

19 A. That is correct, and that's by the  
20 prior board, not the current board, that was the  
21 prior board.

22 Q. Okay. So who were the members of the  
23 prior board who approved this?

24 Mr. Mellgren the president, correct?

25 A. That's correct, that's correct.

1 Q. Probably Mr. Kennedy himself.

2 A. That's also correct.

3 Q. And, Mr. Sanchez?

4 A. Mr. Sanchez was probably acting as the  
5 secretary although not listed in Florida SunBiz,  
6 but I believe he was holding out as the secretary  
7 of the club.

8 MR. HOLODAK: Let's go back for a  
9 second and make an objection to clarify the  
10 record.

11 Are you asking him who the prior board  
12 members were or are you asking him if he  
13 has personal knowledge as to who voted for  
14 what?

15 BY MS. BUDNIK:

16 Q. I was trying to determine who the  
17 prior board members were at that meeting.

18 So, based on the discovery we've had  
19 to date, I asked if it was Mr. Mellgren,  
20 Mr. Kennedy and Mr. Sanchez.

21 MR. HOLODAK: That's fine, I just  
22 wanted to make sure the question was clear  
23 that you're asking who the prior board  
24 members were.

25 THE WITNESS: Good.

1 MR. HOLODAK: Thank you.

2 BY MS. BUDNIK:

3 Q. Okay. Mr. Gilhooly, do you know of  
4 anybody else who was at that meeting?

5 A. I don't. There is two other board  
6 members, if you mentioned the names I'd be able to  
7 confirm it, I don't have there -- I think there was  
8 a board member Alex Sanchez, that might have been  
9 the fourth board member. And -- I don't know the  
10 fifth member. I don't.

11 Q. Don McNiel?

12 A. Don McNiel, thank you, correct.

13 Q. Has the club taken any steps to get  
14 the liens on the aircraft vacated?

15 A. I guess we're in the process of  
16 establishing if they're legitimate liens. Yes, we  
17 have taken steps to attempt to verify that there  
18 are actual liens on -- that they're legitimate  
19 liens.

20 It's the club's position they're not  
21 legitimate liens, so we're taking all the actions  
22 to see if they are legitimate and how they became  
23 legitimate.

24 Q. And the next part of the letter, so  
25 then the next part of your letter states: There is

1 an FAA search showing an additional 200,000 in  
2 liens.

3 A. That's correct.

4 Q. So there are \$400,000 in liens on four  
5 aircraft, is that correct?

6 A. That's the way it appears at this  
7 time, yes.

8 Q. And who holds the liens?

9 A. Mr. Sanchez has some liens, um,  
10 another member has a lien, I'll think of his name.  
11 Kennedy has \$200,000 in lien. The other members,  
12 his name escapes me right now, but there is another  
13 member that has about \$40,000. It was originally a  
14 \$50,000 lien and I think we paid \$10,000 towards  
15 it. His name escapes me right now. I could  
16 probably find it. If you bear with me for a  
17 second, I'll go through the list.

18 Q. I would throw Ziller out there.

19 A. Ziller, Ziller -- at the time of this  
20 letter I don't believe Ziller -- I don't recall if  
21 Ziller had a lien at that time of this letter, I  
22 don't recall.

23 Although possible, I just -- I just  
24 can't recall from this seat right now. Very  
25 possible, I just can't testify to it, I just can't

1 recall, but very possible. There is one other  
2 member, but. Bruce Ayala, Bruce Ayala. So very  
3 possible Ziller, Bruce Ayala, Sanchez and Ziller.  
4 I would -- I wouldn't dispute Ziller, I just don't  
5 have personal knowledge at this time.

6 Q. All right. So I had written down  
7 Sanchez, Kennedy, somebody for 40 K and I can't  
8 remember who that is.

9 A. That might be Bruce Ayala.

10 Q. I have him. So he was 40 K?

11 A. Yeah.

12 Q. Sanchez has his own suit against the  
13 club, is that correct?

14 A. I believe he does. I don't know if  
15 it's been dismissed or if it's still in process,  
16 but doesn't seem like much is going on with that.

17 Q. Okay.

18 My next exhibit is going to be a copy  
19 of the check, do you have a copy of the check that  
20 Sunwood wrote to the club --

21 A. I do.

22 Q. -- available to review?

23 A. I do.

24 Q. All right. I could share it, I guess,  
25 it's just going to be tiny. Probably not for you,

1 probably just for me, let me share it.

2 So this is going to be Exhibit 2. Let  
3 me rotate it.

4 All right. Have you seen this check  
5 before your deposition today, Mr. Gilhooly?

6 A. Originally I have Exhibit A and yes, I  
7 do have the check number 3043 drawn on Bank United,  
8 Sunwood, Incorporated for \$100,000, yes.

9 Q. Okay. I was served with a response to  
10 Request for Admissions this morning. That  
11 basically disputed the fact that these funds were  
12 deposited into the club's bank account. Are you  
13 familiar with that?

14 A. Are you talking to me?

15 Q. Yes.

16 A. I'm familiar with it, we're here over  
17 this check being deposited into our bank account,  
18 yes.

19 Q. Okay. As the president and have you  
20 been able to obtain the prior banking records yet  
21 from the -- from Mr. Kennedy?

22 A. I don't know what we received and what  
23 we did not receive. I believe we do have the bank  
24 records. I believe we do have the bank records.

25 Q. Okay.

1 MR. HOLODAK: Carolyn.

2 MS. BUDNIK: Ed.

3 MR. HOLODAK: I want to clarify, we  
4 didn't dispute that we got the check.  
5 Check -- go back to the request and the  
6 Answers. We didn't dispute that the check  
7 was deposited.

8 MS. BUDNIK: A deposit was made but  
9 cannot verify the deposit was Sunwood's.

10 MR. HOLODAK: That it was a loan.

11 MS. BUDNIK: No, it says admitted a  
12 deposit was made but cannot verify that the  
13 deposit was Sunwood's money or a loan. Is  
14 your response to number 3.

15 MR. HOLODAK: Okay.

16 THE WITNESS: If the question is put  
17 out to me, I will admit there is a check,  
18 it was deposited but we can't admit that  
19 it's on a loan, we have no knowledge  
20 whether it's a loan or not. If that  
21 clarifies it up.

22 Yes, it is a check, yes it was  
23 deposited. No, we're not admitting it is a  
24 loan. We have no knowledge on that. If  
25 that clears it up.

1 BY MS. BUDNIK:

2 Q. Okay. So is that the official  
3 position of the club?

4 A. That's correct, it is.

5 MR. HOLODAK: Yes.

6 BY MS. BUDNIK:

7 Q. Okay. If it's not a loan, what was  
8 the \$100,000 for?

9 A. Ma'am, I guess that would be up to you  
10 to provide that information to me, not for me to  
11 provide it to you.

12 I mean, I guess that's the \$100,000  
13 question. How would I have knowledge?

14 Q. Well, in September of 2018 was a plane  
15 transferred out of the club's ownership to Sunwood,  
16 Inc.?

17 A. I don't have knowledge on that, if you  
18 could provide me that, I would -- I would love to  
19 know that.

20 Was there a plane that was  
21 transferred?

22 Q. No.

23 A. Okay.

24 Q. The discovery in this case to date,  
25 and this is my paraphrasing and my understanding,



1 is that a plane had crashed and the club needed  
2 money to buy a new plane.

3 **A.** That would be prior to me becoming  
4 president and I -- I can't testify to that. Why  
5 they needed the money.

6 **Q.** Okay. What's the basis for denying  
7 that Sunwood is entitled to their money back?

8 **A.** Well, we have -- we have no -- we have  
9 no verification. We don't have a mortgage, we  
10 don't have minutes of the meeting, we have no  
11 written documentation. I don't know why we would  
12 accept responsibility of \$100,000 when there is --  
13 there is no -- there is no paperwork to show it.  
14 There is not a promissory note, there is not a  
15 mortgage. There is not minutes of the meeting  
16 reflecting that this was. It wasn't a vote of the  
17 membership which is required under our bylaws.

18 **Q.** Was the vote according to the bylaws  
19 required of the membership or of the board before  
20 accepting a loan?

21 **A.** It's my knowledge --

22 **MR. HOLODAK:** Greg, stop. You got to  
23 give me a second here to object, you've got  
24 to talk so fast I can't get my objections  
25 in.

1 THE WITNESS: Okay.

2 MR. HOLODAK: As much as this question  
3 and the last question called for legal  
4 conclusions, I'm objecting.

5 BY MS. BUDNIK:

6 Q. Do you know, Mr. Gilhooly, whether the  
7 bylaws require a membership meeting to accept a  
8 loan in the -- in that amount, in the amount of  
9 \$100,000?

10 A. To the best of my knowledge, any  
11 expense over \$80,000 has to become before the  
12 complete membership.

13 Q. Do the bylaws require a majority of  
14 the membership approval?

15 A. That's a good question, I don't -- I  
16 don't -- I don't know. I don't have that answer  
17 right now.

18 Q. What steps have you taken as president  
19 to attempt to learn whether or not Sunwood is  
20 entitled to its money back?

21 A. I guess we hired a counsel, we hired  
22 Mr. Holodak and be advised according to him. But I  
23 don't know -- I can't tell you step by step what we  
24 took, but we seeked legal counsel on this.

25 Q. Did you seek counsel before this suit

1 was filed?

2 **A.** Yes, I did.

3 **Q.** Okay. And, at what point in time  
4 after taking over as president of the board did you  
5 seek legal counsel regarding the issues the club  
6 was facing?

7 **A.** Almost immediately.

8 **Q.** As a prior member of the board, I  
9 mean, I'm sorry, strike that.

10 As a prior member of the club before  
11 becoming president, did you have any knowledge of  
12 this money coming into the club?

13 **A.** No, not -- not -- no, I did not.

14 **Q.** And we can go back to the check.  
15 Do you see in the memo section of the  
16 check where it says N 2921 S as in Sam?

17 **A.** I see it now.

18 **Q.** That's the registration number for an  
19 aircraft, correct?

20 **A.** It is, correct.

21 **Q.** And that aircraft was purchased by the  
22 club in 2018, was it not?

23 **A.** I would say that's correct.

24 **Q.** That aircraft was subsequently sold,  
25 correct?

1           **A.**     That is correct.

2           **Q.**     And Ron Ziller now owns it, correct?

3           **A.**     That is correct.

4           **Q.**     And he's been a member of the club for  
5 a long time, correct?

6           **A.**     That's correct.

7           **Q.**     Do you know how much Ron Ziller paid  
8 for the plane?

9           **A.**     Paid \$100,000.

10          **Q.**     Do you know when that was?

11          **A.**     The beginning of the summer of 2020, I  
12 could say the beginning of the summer of 2020,  
13 exactly I don't know.

14          **Q.**     Do you know how many planes Mr. Ziller  
15 owns?

16          **A.**     I can't tell you, I don't know that.

17          **Q.**     Okay. Let me take a quick break and I  
18 think I'm almost finished, all right?

19          **A.**     Okie dokie.

20                   MS. BUDNIK: All right, I'm going to  
21 mute myself.

22                   (Discussion off the record)

23 BY MS. BUDNIK:

24           **Q.**     Okay. When Mr. Ziller bought the  
25 plane for \$100,000, what was the purpose for --

1 what was the -- what did the club do with the  
2 \$100,000?

3 MR. HOLODAK: Objection. Irrelevant,  
4 immaterial, financial discovery.

5 MS. BUDNIK: You can answer.

6 MR. HOLODAK: No he can't, this is not  
7 an asset deposition. It's not discovery in  
8 Aid of Execution, what they did or didn't  
9 do with money or assets is irrelevant to  
10 this lawsuit.

11 MS. BUDNIK: No, Ed, if he was  
12 supposed to pay back Sunwood with the  
13 \$100,000, if the club was supposed to pay  
14 back Sunwood, that's my question.

15 MR. HOLODAK: It wasn't your question.  
16 You can ask that question, he'll answer  
17 you.

18 BY MS. BUDNIK:

19 Q. When Mr. Ziller bought the plane for  
20 \$100,000, the club received the money, correct?

21 A. Correct.

22 Q. Okay. Why wasn't Sunwood repaid the  
23 \$100,000 for the loan it made on that plane?

24 A. Ma'am, I had no knowledge that Sunwood  
25 actually made alleged loan to the club until

1 Sunwood, um, requested their money. There was no  
2 knowledge to the membership that this loan was out  
3 there.

4 So, I have no idea. Until someone --  
5 until Sunwood presented itself that we owe them  
6 money, I had no knowledge that Sunwood even  
7 existed.

8 So, at that time that the transaction  
9 was completed between Ziller and the club, I had no  
10 knowledge that Sunwood even existed. This wasn't  
11 common knowledge of -- of -- of the members that  
12 there was this loan, not at all.

13 Q. Why did the club sell the plane to  
14 Ziller?

15 A. They bought a -- they bought a plane  
16 with a bad motor, um, it would have cost \$50,000 to  
17 get that plane up and running. So Ziller stepped  
18 forward and purchased it at a discount so he could  
19 put the engine in it.

20 But I guess the answer would be that  
21 the -- the club purchased a plane with a bad engine  
22 and we would have been upside down in that plane by  
23 putting money into it, so Ziller bought it at a  
24 discount rate.

25 Q. Okay. So, when you say it was a bad

1 motor, were there actually mechanical issues with  
2 the motor or was it just --

3 A. That's correct.

4 Q. Okay.

5 A. I'm sorry. Yes --

6 Q. Let me start over.

7 When Mr. Ziller bought the plane --  
8 okay, let me start over again.

9 When you say it was a bad motor, was  
10 that because it was coming up on an annual that was  
11 going to be very expensive?

12 A. No, ma'am, it was a cracked block. It  
13 was a mechanical issue. A little more than an  
14 annual.

15 Q. Do you know when the plane was bought  
16 if it had had a survey?

17 A. I believe they did a prebuy inspection  
18 on it, yes.

19 Q. Was the cracked block mentioned in the  
20 prebuy inspection?

21 A. No.

22 Q. Do you remember who did the prebuy  
23 inspection?

24 A. I don't know the official name of the  
25 company but it's a company on the field that Amir's

1 the owner. South Florida -- I don't know the name  
2 of the company but it was a facility on Pompano Air  
3 Park, the owner's name is Amir.

4 Q. Has the club taken any steps against  
5 Amir with regards to the -- to the bad inspection?

6 A. No.

7 Q. Is there a rule in the bylaws  
8 regarding the purchase of new planes?

9 A. Specifically, I don't -- I don't know  
10 if there is a rule in particular of a new plane,  
11 it's just a purchase of an expenditure of \$80,000  
12 plus must have the -- the membership's approval,  
13 that's -- I guess that would come under that.

14 Q. All right. Do you have any records or  
15 minutes of any meetings approving the purchase of  
16 N 2921 S?

17 A. The original purchase or the Ron  
18 Ziller's purchase? Which purchase are we speaking  
19 of?

20 Q. The club's purchase.

21 A. Yeah, that was prior to me becoming  
22 president. No.

23 Q. Since you became president have you  
24 been able to reconstitute the meeting minutes of  
25 the prior meetings for let's say going back two



1 years before 2020?

2 A. We attempted, there was never -- to  
3 the best of my knowledge there was never any  
4 minutes submitted to the membership. Prior to the  
5 new board taking over, there was never minutes  
6 taken.

7 Q. As a regular member prior to becoming  
8 president, you never received emails with meeting  
9 minutes?

10 A. No, ma'am.

11 Q. Have you had an opportunity to review  
12 any of the email minutes produced in this case?

13 A. No, we didn't.

14 Q. Okay, I don't know if you can see  
15 this. These are allegedly meeting minutes from the  
16 May 9th, 2018 meeting. Have you ever seen this  
17 before?

18 A. No. I'm actually looking for my name.

19 Q. That's what I'm looking for.

20 A. Yeah.

21 Q. What's your email address?

22 A. SGTGRG@aol.com.

23 Q. Sergeant Greg?

24 A. My initials, GRG.

25 Q. Okay.

1           **A.**    Yeah, I don't see it there.  Unless  
2           it's hiding under the pictures.

3           **Q.**    It seems to be in alphabetical order  
4           too.  No, because Evan is way down there.

5           **A.**    I don't see my email up there.

6           **Q.**    Was Robert Hannon on the prior board?

7           **A.**    Yes, he was.  Hannon, yes, he was.

8           **Q.**    Was he elected out in February  
9           of 2020?

10          **A.**    He was.

11                    Kind of wondered if my membership came  
12           after this, this is -- this is not familiar at all.

13          **Q.**    I chose May 9th, 2018 because you told  
14           me you joined the club in 2016.

15          **A.**    I may not have been at this meeting  
16           then because this is not familiar to me.

17                    MS. BUDNIK:  All right.  I'm going to  
18           take a break real quickly.

19                    (Discussion off the record)

20                    MS. BUDNIK:  Ed, I'm finished.

21                    I don't have any further questions  
22           unless Ed wants to cross or Mr. Kennedy  
23           wants to cross.  I don't have any  
24           questions.

25                    Marcia, did you note that Mr. Kennedy

1 joined the proceedings?

2 THE COURT REPORTER: Yes.

3 MS. BUDNIK: He joined and dropped out  
4 and joined.

5 MR. KENNEDY: Yeah, I've got a  
6 fuzzy -- (unintelligible)

7 (Mr. Kennedy disconnected)

8 MR. KENNEDY: You guys have frozen up  
9 on me.

10 MS. BUDNIK: Your screen is frozen but  
11 we hear you fine.

12 Ed, what's the rule, do we conclude?

13 MR. HOLODAK: At this point, I don't  
14 have any questions.

15 We'll read.

16 MS. BUDNIK: Ed always reads.

17 MR. KENNEDY: Is my connection any  
18 better?

19 THE COURT REPORTER: Not really.

20 MR. KENNEDY: Okay -- (unintelligible)

21 Is my connection any better now?

22 (Unintelligible)

23 I'd like to ask Greg if there

24 is -- (unintelligible)

25 THE COURT REPORTER: You're inaudible,

1 Mr. Kennedy.

2 MR. KENNEDY: How about now? Can you  
3 hear me, Greg?

4 All right, I did the best I could.  
5 But I'm still inaudible.

6 MR. HOLODAK: Yes, you are inaudible.

7 MR. KENNEDY: I don't know, my  
8 connection is fuzzy at best, I guess, and I  
9 can't add -- if I can't get the question  
10 out, I mean, it's just what it  
11 is. (Unintelligible)

12 THE COURT REPORTER: I'm sorry, I  
13 can't understand you at all.

14 MS. BUDNIK: I vote we end the  
15 deposition and if Mr. Kennedy needs to, he  
16 can send interrogatories.

17 MR. HOLODAK: I agree. We can't  
18 understand him. He keeps fading in and out  
19 and disconnecting.

20 Carl, if you hear us, if you have  
21 questions for Greg, send us interrogatories  
22 to us and we'll answer them, because your  
23 connection keeps bouncing in and out.

24 You can conclude it and we'll go along  
25 with you.

1 MS. BUDNIK: I'm concluding it.

2 MR. HOLODAK: All right, we're done  
3 and Greg will read.

4 MS. BUDNIK: I'll mark the minutes as  
5 Exhibit 3.

6 (Thereupon, the deposition concluded at 2:03 p.m.)

7 AND FURTHER DEPONENT SAITH NOT.

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\_\_\_\_\_  
(Signature of the Witness)

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CERTIFICATE OF OATH

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STATE OF FLORIDA )  
  ) ss:  
COUNTY OF BROWARD)

I, the undersigned authority, certify  
that GREGORY RAYMOND GILHOOLY appeared before me  
via video conferencing with proper identification  
on November 22nd, 2021 and was duly sworn.

Dated this 27th day of November, 2021.



MARCIA L. ALF, R.P.R.  
Notary Public - State of Florida  
My commission expires: June 21, 2023  
No. GG 316112

C E R T I F I C A T E

1  
2 STATE OF FLORIDA )  
3 ) ss:  
4 COUNTY OF BROWARD)

5 I, MARCIA L. ALF, Registered Professional  
6 Reporter, do hereby certify that I was authorized  
7 to and did stenographically report the foregoing  
8 proceedings via video conferencing, and that the  
9 transcript is a true and complete record of my  
10 stenographic notes.

11  
12 I further certify that I am not a relative,  
13 employee, attorney, or counsel of any of the  
14 parties, nor am I a relative or employee of any of  
15 the parties' attorney or counsel connected with the  
16 action, nor am I financially interested in the  
17 outcome of this action.

18  
19 Dated this 27th day of November, 2021.

20  
21 

22  
23  
24 MARCIA L. ALF, R.P.R.  
25

DEPOSITION ERRATA SHEET

IN RE: Sunwood vs. Pompano Senior

DEPOSITION OF: GREGORY RAYMOND GILHOOLY

TAKEN: November 22nd, 2021

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Please forward original signed errata sheet to our office so copies may be distributed to all parties.

Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE:

SIGNATURE OF DEPONENT:

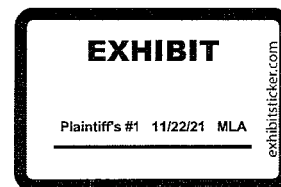


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May 5, 2020

Former Member,

It has been brought to the Board's attention that you have terminated your membership in the Pompano Beach Flying Club and have not received your "Buy in Money." On February 12, 2020, the entire Board was replaced by a new board. My name is Gregory Gilhooly, I have been elected to the Board of Directors and serve as the current President.

The new Board inherited a bank account with a \$700.00 balance, within days three checks were presented for payment totaling \$11,700.00. Thus, the Club was overdrawn \$11,000. On the final meeting of the prior Board, the then Treasurer, Carl Kennedy, made a motion to secure \$200,000 of his alleged personal loans to the Club with a lien on our aircrafts. The motion was approved unanimously. A F.A.A. search showed that there were an additional \$200,000 in liens on our four aircrafts. Thus, the Club currently has on record liens in the amount of \$400,000. A preliminary evaluation of the Pompano Beach Flying Club's assets including our four planes and miscellaneous hanger equipment equal approximately \$250,000.

The financial condition of the Club did not happen overnight. The prior Board, as well as members, allowed this to get carried away. It is the opinion of the current Board that the prior Board did not act in the best interest of the Club. We have been obstructed in obtaining past records from the prior Board. The action of the prior Board left us no alternative but to hire legal counsel to assist in determining our exact financial condition. Our attorney has filed the necessary filings to allow us to access to the financials. However, based on the previous Treasurer, Carl Kennedy's last Balance Sheet, our liabilities outweigh our assets. Although the numbers are in question by the current Board it is obvious that the amount owed is greater than assets owned.

As members, we are all governed by the 2010 By Laws, especially Section 6:

**WITHDRAWAL FROM MEMBERSHIP** In the event a member wishes to withdraw from the Corporation he shall notify the Corporation in writing, Within thirty (30) days from receipt of such notification, provided that the member is in standing in all respects, *The Corporation shall pay to the withdrawing member a sum as predetermined by the Board set annually as of January 1 of such stock.* If the member is in arrears in the payment of any payment or charge or otherwise is indebted to the Corporation, such arrearages or indebtedness shall be deducted from the book value payment.

PBFC P.O. BOX 10241 Pompano Beach FL 33061



It is my unfortunate duty to advise you that the Pompano Beach Flying Club appears to be currently insolvent. Based upon same, the Board has determined, pursuant to the above Section, the value to be paid to withdrawing members is One Dollar(\$1.00). As stated above we have retained legal counsel to guide us through these troubling times. I am sure this may come as a shock; however, the Board was shocked to inherit the Club in the condition it did from the prior Board.

Rest assured, the current Board is pursuing all avenues open to it to recoup what it can, restore the financial viability of the Club, and in the interim keep us all operating to the best of our abilities. Thank you for your attention, please let us know if you have any questions.

Sincerely,

Gregory Gilhooly

President, Pompano Beach Flying Club

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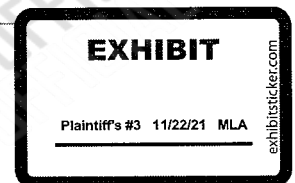
**From:** sanchezpaulk@mac.com,

**To:** CLKTax@aol.com, newzbuff67@outlook.com, khurramozi@gmail.com, blackbat@bellsouth.net, ba5852@aol.com, djayoub@bellsouth.net, cbaker847@gmail.com, florian.a.becker@outlook.com, todd@toddbinkley.com, blake1641@hotmail.com, gblohm@runbox.com, ronbor@att.net, brentbutrym@gmail.com, lesliebutzer01@yahoo.com, dcannaro@hotmail.com, kobe.rc12@gmail.com, motolocoeric@gmail.com, shelbychristmas@gmail.com, jamie@cliffordassociatesinc.com, gocatalyst@gmail.com, danny@delriuno.com, bdershaw@yahoo.com, blueskydoc@aol.com, iandrefly@gmail.com, carlos\_a\_figuroa@mac.com, eac4me@gmail.com, ggalyo@gmail.com, drewagodfrey@gmail.com, legalpilot@aol.com, genesisproperty@aol.com, tonyha81@bellsouth.net, islndtym@bellsouth.net, trent.hawk@gmail.com, d\_horak@icloud.com, gshunsberger@gmail.com, jhurch@bellsouth.net, clktax@aol.com, robbykennedy@yahoo.com, akkohl@aol.com, jeremylangdon2@gmail.com, cmlishome@gmail.com, john@ewaycorp.com, kevin.maclean@nee.com, rpmagnusson@me.com, larry@floridahomesbocaraton.com, evanairplane@gmail.com, dsmcniel@bellsouth.net, pilotasa@bellsouth.net, pmoline@gmail.com, mosey.business@gmail.com, tmosey@minimelts.com, inozick@gmail.com, lipreston@hotmail.com, ed@edrebholz.com, jrodengen@aol.com, deltico1@gmail.com, richsack@bellsouth.net, sanchezpaulk@mac.com, aakritisareen@gmail.com, arun\_sareen23@yahoo.com, yash@zebidah.com, equinepilot@aol.com, cap9722@gmail.com, marc\_vandenrydt@yahoo.com, david.watkins0@gmail.com, brwilkins@gmail.com, info@gerardwilliamslaw.com, pyanikian@bellsouth.net, zworthy2@juno.com,

**Subject:** pompano beach flying club 9 may 2018 meeting minutes

**Date:** Sun, May 13, 2018 10:19 am

Pompano Beach Flying Club  
Monthly Meeting  
9 May 2018 18:00  
American Flyers PMP



18:01 President Larry Mellgren called the meeting to order. Introductions were made with members (and guests) attending. Photos were taken of those attending and sent to the membership on 10 May 2018

18:06 Paul Sanchez gave the secretary report, nothing to report from previous meeting

18:06 Carl Kennedy gave the treasurer report that we still have money in the bank. Archer N47LH's engine needs to be overhauled and was delivered to Tropic Air Power in Indiantown (on 10 May 2018) for work, estimated time 2 two weeks. Cherokee N8633E did 55 flight hours in April 2018 with the efforts of Yash & Arun Sareen, Trent Hawkins, Jeremy Langdon and others. Much thanks to all those who use Cherokee N8633E for the private pilot certificate or instrument proficiency with the Garmin equipment. Archer N47LH did 49 hours in April 2018. We have been paid our claim for Cherokee Six N54476 and thus have put an offer on a PA-32-300 in Kentucky.

18:08 Robert Hannan director of maintenance gave a rundown of what was found with the two cylinders on Archer N47LH and the reason why it was decided to have it overhauled at Tropic Air Power at Indiantown. Engine was 1470 hours since overhaul. Follow up on replacement PA-32-300 with an offer made on a Kentucky one but still looking at others. Warrior N7696F has the engine re-hung and waiting for other parts to complete power plant section. Mike Sweeney will be doing the remainder of the instrument panel including installing PS-Engineering PMA-6000 audio panel, Garmin GNC 250xl gps/com moving map, Honeywell KX 125 nav/com with internal LCD indicator. Interior and exterior also to be completed.

18:12 FXE tower manager Richard Sack arrived and was introduced. He is a Pompano Beach Flying Club member and approved trainer.

18:13 Carl Kennedy also described the frequent flyers program ("A-list preferred"?). Fly 5 hours in a month and 50% (\$70) of your membership dues will be credited, fly 10 hours in a month and 100% (\$140) of your membership dues will be credited. Hence for all members (and especially those seeking their private pilot certificate) fly 10 hours and your effective rental rate is decreased \$14/hour.

18:14 Larry Mellgren gave an update on the Safety Committee's report on the Cherokee Six N54476 mishap. NTSB should issue a final shortly.



18:16 ADS-B equipage update, so far Archer N30877 and Cherokee N8633E have the GTX345 mode-s transponder for ADS-B out (1090 MHz) and in (978 MHz and 1090 MHz) for weather/traffic. Next is Archer N47LH and Warrior N7696F and our next PA-32-300.

18:17 Hurricane season is coming up and we need 3 to 4 member pilots who can reposition aircraft out of the Tropical Storm wind field area. This does mean being prepared to leave your home/business and taking one of the PA-28-xxx or the PA-32-300 for up to 7 days. Pompano Beach Flying Club will reimburse you for hotel and meals for one person. Contact Larry Avimela to be put on the roster, we need a minimum of 4 pilots per aircraft.

18:19 Carl Kennedy informed us of the Pompano Beach Flying Club social meeting on 13 June 2018 at Galuppie's at 17:00. Happy hour at 17:00, dinner at 18:00. Please contact Carl Kennedy with your reservation and number of people attending.

18:20 Phil de Santis gave an update on the Pompano Airpark runway & taxiway improvement project.

18:25 Paul Sanchez secretary gave a presentation of the Garmin Aera 660 moving map in Cherokee N8633E and how it is harnessed to the GTN650 for flight plan, GTX345 for weather/traffic, synthetic vision, and has its own terrain, AOPA airport directory, FAA approach charts, VFR sectionals & IFR enroute charts. Screen captures of the Aera 660 were later emailed to all members showing those features in Cherokee N8633E.

19:15 Meeting adjourned.

paul k. sanchez, cfii-mei  
561-693-7374 office  
305-389-1742 wireless  
10643 shore drive  
boca raton, florida 33428-5645  
[sanchezpaulk@mac.com](mailto:sanchezpaulk@mac.com)

<http://ical.me.com/sanchezpaulk/work>

<http://www.sanchezaviationtrainingservices.com/home.html>