

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
BROWARD DIVISION
www.flsb.uscourts.gov

In re:

Case No. 22-15714-PDR

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.,

Chapter 11
(Subchapter V)

Debtor.

**CERTIFICATE OF PLAN PROPONENT OF DEBTOR'S
PLAN OF REORGANIZATION, ACCEPTANCE OF PLAN, REPORT ON AMOUNT
TO BE DEPOSITED, CERTIFICATE OF AMOUNT DEPOSITED AND PAYMENT OF FEES**

The undersigned counsel for the Debtor, Pompano Senior Squadron Flying Club, Inc. ("PSSFC" or "Plan Proponent") and filed Plan of Reorganization for Small Business Under Chapter 11 Subchapter V (the "Plan") [ECF 61], on October 24, 2022, and certifies the following:

1. I have examined the Court files in this proceeding, particularly as to claims, schedules and ballots filed.

2. A total of 11 ballots were filed on account of 10 claims or interests, Exhibit "A" is a summary of ballots submitted by class. Exhibit "B" is a list of all ballots filed. Classes 2.1, 2.2, 3, 3.1 and 4 are impaired and holders of claims and interests in this Class are entitled to vote if otherwise qualified to vote under the Bankruptcy Code.

3. Exhibit "C" lists each creditor with an allowed claim to be paid pursuant to the Plan. Exhibit "D" lists disputed, contingent or unliquidated claims not included in Exhibit "C". Below is a summary of the amount of money to be deposited for Confirmation pursuant to the Plan:

CLASSES

FUNDS REQUIRED FOR CONFIRMATION

Class 2.1:

Allowed Secured Claim of
Charly Guzman (Claim 6)

No funds required at Confirmation.

Class 2.2:

Lien Claim of Sunwood, Inc.

No funds required at Confirmation. Funds to be paid at first quarterly payment following effective date of plan.

Class 2.3:

Liens of Carl Kennedy, II

No funds required at Confirmation.

Class 3:

General Unsecured Claims

No funds required at Confirmation. Initial funds to be paid at first quarterly payment following effective date of plan.

Class 3.1:

Proof of Claim of Paul Sanchez

No funds required at Confirmation. Initial funds to be paid at first quarterly payment following effective date of plan.

Class 4:

Equity

No funds required at Confirmation.

4. All fees required by 28 U.S.C. §1930 have been paid or will be paid prior to the Confirmation Hearing.

5. Allowed Administrative expenses shall be paid on the Effective Date unless agreed by the claimant.

Dated this 12th day of December, 2022.

LORIUM, PLLC

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EXHIBIT "A" SUMMARY OF BALLOTS**Class 2.1 – Secured Claim of Charly Guzman – Impaired**

Total Acceptances in Dollar Amount	0 of 0 total = 0%
Total Rejections in Dollar Amount	0 of 0 total = 0%
Total # of Acceptances Filed	0 of 0 total = 0%
Total # of Rejections Filed	0 of 0 total = 0%

Pending objection to claim.

Class 2.2– Lien Claim of Sunwood, Inc. – Impaired

Total Acceptances in Dollar Amount	1 of 1 total = 100%
Total Rejections in Dollar Amount	0 of 0 total = 0%
Total # of Acceptances Filed	1 of 1 total = 100%
Total # of Rejections Filed	0 of 0 total = 0%

Class 2.3 – Liens of Carl L. Kennedy, II – Unimpaired

Total Acceptances in Dollar Amount	0 of 0 total = 0%
Total Rejections in Dollar Amount	0 of 0 total = 0%
Total # of Acceptances Filed	0 of 0 total = 0%
Total # of Rejections Filed	0 of 0 total = 0%

Pending objection to claim.

Class 3 – General Unsecured Claims – Impaired

Total Acceptances in Dollar Amount	2 of 2 total = 100%
Total Rejections in Dollar Amount	0 of 0 total = 0%
Total # of Acceptances Filed	2 of 2 total = 100%
Total # of Rejections Filed	0 of 0 total = 0%

Class 3.1 – Proof of Claim of Paul K. Sanchez – Impaired¹

Total Acceptances in Dollar Amount	0 of 0 total = \$0.00
Total Rejections in Dollar Amount	1 of 1 total = \$100%
Total # of Acceptances Filed	0 of 0 total = 0%
Total # of Rejections Filed	1 of 1 total = 100%

Class 4 – PSSFC's Equity Members – Impaired

Total Acceptances in Dollar Amount	6 of 6 total = 100% ²
Total Rejections in Dollar Amount	0 of 0 total = 0%
Total # of Acceptances Filed	6 of 6 total = 100%
Total # of Rejections Filed	0 of 0 total = 0%

¹ There are 2 ballots cast by Paul Sanchez but such ballots aggregate and arise from one proof of claim. Accordingly, they are aggregated and tabulated as one ballot. Additionally, the claim of Paul K. Sanchez is subject to a pending objection and thus such vote is not tabulated for acceptance of class 3.1 or 3. However, even if such ballot were tabulated in class 3, class 3 remains a consenting class.

² The 5 votes in this class include the votes received by Debtor's counsel and filed with the Court under a notice of filing. Such votes do not have a bearing on the consent of the equity class.

EXHIBIT "B"
LIST OF ALL BALLOTS FILED

ECF	CLASS	NAME OF CREDITOR	AMOUNT SCHEDULED OR CLAIMED	DATE BALLOT FILED WITH COURT	ACCEPTS	REJECTS	SHOULD BE ALLOWED TO VOTE IF NOT, WHY?
71	4	Anthony Ard	1 Share Equity	11/29/2022	X		Y
83	4	Jeffrey Ronner	1 Share Equity	12/6/2022	X		Y
87	3	Bruce Ayala	\$40,000.00	12/8/2022	X		Y
88	3.1	Paul K. Sanchez	\$69,800.00	12/8/2022		X	No. Objection Pending, single proof of claim.
89	3.1	Paul K. Sanchez	\$34,284.51	12/8/2022		X	No. Objection Pending, single proof of claim (should only be one ballot)
90	2.2	Sunwood, Inc. (secured claim)	\$117,624.24	12/9/2022	X		Y
91	3	Sunwood, Inc. (unsecured claim)	Unknown	12/9/2022	X		Y
NOF ³	4	Casey Ahlbum	1 Share Equity	11/18/2022	X		Y
NOF ⁴	4	Daniel Marty	1 Share Equity	12/7/2022	X		Y
NOF ⁵	4	Gregory Galyo	1 Share Equity	12/2/2022	X		Y
NOF ⁶	4	Tor Holm	1 Share Equity	11/21/2022	X		Y

³ Sent directly to Debtor Counsel and timely received. Included in notice of filing (NOF).

⁴ Sent directly to Debtor Counsel and timely received. Included in notice of filing (NOF).

⁵ Sent directly to Debtor Counsel and timely received. Included in notice of filing (NOF).

⁶ Sent directly to Debtor Counsel and timely received. Included in notice of filing (NOF).

EXHIBIT "C"
LIST OF ALLOWED CLAIMS TO BE PAID PURSUANT TO THE PLAN

The following is a list of creditors as provided for by the plan under consideration. These creditors are indicated by class and amount as scheduled or claimed. The dividend to be paid pursuant to the plan is indicated. (Indicate claim number as reflected in the claims register). Total each individual class.

Class	POC/ Schedule D, E & F	Creditors	Claim Amount	1st Payment/Disbursement Amount
2.2	POC 4	Sunwood, Inc,	\$117,624.24	Class 3 unsecured creditors claim to be paid pro rata from \$10,000 quarterly payment. Class 2.2 and 3 shall be an aggregate payment of \$5,884.212 quarterly.
3	POC 1	Bruce Ayala	\$40,000.00	Class 3 unsecured creditors claim to be paid pro rata from \$10,000 quarterly payment.
3	POC 2	JP Morgan Chase Bank, N.A.	\$761.34	PAID by non-debtor third party. Claim has been satisfied outside of the plan. No Plan payment.
3	Schedule F	Law Offices of Edward F. Holodak, PA	\$2,512.50	Class 3 unsecured creditors claim to be paid pro rata from \$10,000 quarterly payment.

* Class 3 - all general unsecured creditor claims allowed under § 502 of the Code, shall receive a distribution in the amount which is the lesser of 1) payment full on account of their claim by the receipt of 20 quarterly distributions in the amount of 1/20 of the amount of the allowed claim with such distributions beginning January 1, 2023 and continuing until the amount of the claim is paid in full or 2) pro rata quarterly distribution of \$10,000. The amount of undisputed creditors plus an additional amount of \$39,863.26 allowed on disputed claims will yield 100% to allowed claims.

EXHIBIT "D"
LIST OF DISPUTED CLAIMS

The following is a list of disputed, contingent or unliquidated claims which are also included in Exhibit C. Note: If a claim was filed and is still in dispute, indicate claim number as is reflected in the claims register and give status of dispute (e.g. objection pending, etc.). Until there is an order on an objection, you must have enough money in the trust account to cover these creditors. If a person was listed in the schedules as disputed and they did not file a claim by the deadline date to file claims, you need not list them below or have money in your trust account to cover them. They are automatically taken off the case creditors.

Class	Creditor and Objection	POC Claim No. /Schedule D, E and F,	POC/Schedule Amount
2.1	Objection to Claim of Charly J. Guzman [# 6] [ECF 76]	POC 6	\$50,545.15
2.3	Objection to Claim of Carl L. Kennedy, II (Claim No. 5) [ECF 77]	POC 5	\$4,212.52
3.1	Objection to Claim of Paul K. Sanchez (Claim No. 3) [ECF 78]	POC 3	\$104,084.54