

# CERTIFIED TRANSCRIPT

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**BOY SCOUTS OF AMERICA  
OFFICIAL TORT CLAIMANTS COMMITTEE TOWN HALL  
MARCH 11, 2021**

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1 **HUMPHREY:** Alrighty. Let's go ahead and get started. Welcome, everybody to another  
2 Town Hall meeting with the Tort Claim Committee. John Humphrey here, with Doug Kennedy,  
3 and John Lucas and Jim Stang, our counsel. And we're going to get right to it tonight. You have  
4 heard my story as a survivor, and Doug's as well. It was in the first recording. You can go to the  
5 BSA or tccbsa.com website to listen to those.

6 Tonight we're gonna hear a lot about this plan that's been filed by the BSA. We're gonna try to  
7 keep it just under an hour. The email address that was on the slide, bsasurvivors@pszjlaw.com is  
8 where you can submit questions, and we will be answering those. You can see that we've done  
9 some of those before. We did pull some questions out that people have been asking, and we'll  
10 get to that at the end.

11 So why are we here today? For those of you who have joined all of our Town Halls, you're  
12 gonna hear this broken record. We're here to answer questions about the Chapter 11 bankruptcy,  
13 let you know a little bit about what the TCC does day in and day out, educate you in the process,  
14 and obviously today talk about the plan that BSA has filed. We're not here to provide legal  
15 advice for you personally. It's very informational. It's third in a series. And we're excited to try  
16 to communicate with you guys on a regular basis.

17 If you're looking at your calendar, it's the second Thursday of every month we're trying to do  
18 this, so you can put that on your calendar. And so before I turn it over to Doug, I just wanted you  
19 all to know that the group is working hard. We continue to have a lot of new developments.  
20 There's a lot of moving parts. And before we get Jim on and John to talk about the plan itself, I'd  
21 like to turn things over to Doug. Doug?

22 **KENNEDY:** Thanks, John. I appreciate all you do for us, buddy. I've told you that before, but I  
23 just want everybody to know that you work hard for every victim out there, and that's so  
24 appreciated. I want to say good evening to everyone, and also, what I want to talk about tonight

1 is the fact that the TCC has tried to be transparent in what it does. We try and communicate as  
2 much as we can. The reality though is that our work is also under what's called mediation  
3 confidentiality, and because of that, there are a lot of things that we can't talk about. That's just  
4 part of the process.

5 But as we go through this process, we want to be able to share as much as we can, and we  
6 thought it'd be valuable tonight if we just talked a little bit about how the TCC is viewing where  
7 we are in the bankruptcy, and maybe some thoughts that might help you to think through this as  
8 well. The nine of us on the TCC have been working as volunteers for the last year. I think last  
9 weekend was our one year anniversary. And there's some things that we've come to realize that  
10 might help you as a victim, and that's who we are really trying to address tonight are the victims,  
11 so that you have a little bit of an idea and maybe your thought process will be headed in the right  
12 direction, sort of towards a bankruptcy direction more than anything else.

13 As John mentioned, you're going to hear from our professionals that are going to talk tonight  
14 about the plan that's been submitted, as well as the profile of claims, the analysis of claims too.  
15 But what I want to do right now is I want to talk to the victims. And if you're like me, you woke  
16 up last week and you saw the headlines, and the headlines all said something to the effect of,  
17 "The Boy Scouts filed their bankruptcy plan. Every victim is going to get \$6,000 apiece." And if  
18 you were like me, you were probably disgusted by that.

19 Our professionals are going to talk about what that really means. But the best piece of advice that  
20 TCC can give you right now about those headlines is simple: Ignore them. They make good  
21 headlines, they make splashy news, but ignore them. And we're gonna try and explain why  
22 tonight.

23 You know, I'm speaking on behalf of the TCC, but personally I taught my children not to use the  
24 word hate, because it's an ugly word, and you only want to use it when it's absolutely necessary.

1 But I use it tonight to tell you that I, the TCC, we hate the fact that the Boy Scouts have put us in  
2 this position to be claimants in a bankruptcy proceeding. Since its inception, the Scouts had a  
3 responsibility to protect its members, to protect us from abuse. And as you know from personal  
4 history, as you'll hear more about tonight, the Boy Scouts have failed in doing that.

5 Our professionals are going to discuss the analysis of the claims, but something that you need to  
6 consider as we go through this is that since 1990, and that's an important date, because in 1990  
7 the Boy Scouts established and started following many of the youth protection protocols that are  
8 in place today. Since 1990 we now know that there are 11,000 claims of abuse, 11,000 in the past  
9 30 years alone.

10 So the solution to the Boy Scouts' problem, up until last year, has been to fight every case it  
11 could. And then when it couldn't do that anymore, because it didn't have the ability to do so,  
12 that's when it filed its bankruptcy. So what happened to all of us then was we didn't become part  
13 of the justice system. We became part of a bankruptcy business process. And what we want you  
14 to understand is that bankruptcy is a business. We hate to say that, but it is. It's business when  
15 the Boy Scouts enter bankruptcy with the goal of paying us off as little as possible, so that they  
16 can keep as much as possible and then continue to operate. That was business for the Boy  
17 Scouts. That's the business of bankruptcy. And for the nine men on the TCC it's, unfortunately,  
18 what we have to remind each other of all the time. It's tough to say, it's hard to think about, but  
19 the reality is that bankruptcy is business, and we're a part of it.

20 So there's five things that I really want to highlight. The first one is the TCC has read, heard  
21 people saying that we just want to put the Boy Scouts out of business. What I want to say is this:  
22 Within its first hour of meeting in Wilmington, Delaware, when we were selected, we were put  
23 in a room, we started to get organized. Within our first hour what we decided was that the future  
24 of the Boy Scouts was not our mission. Our mission, quite simply, was to come up with the

1 maximum amount of compensation for every victim possible. Whether that means the Boy  
2 Scouts continues afterwards or not was not our concern. What our concern was, was the  
3 maximum amount of compensation for victims. That is still our number one concern and  
4 mission.

5 The second piece of this is that while we're trying to get compensation from the Boy Scouts, that  
6 also means getting the maximum amount of compensation from local councils, insurers and  
7 sponsoring organizations. You might have read that the Boy Scouts are now expecting the local  
8 councils to voluntarily contribute \$300 million to a fund for victims. Well, the professionals have  
9 been poring over the financial records. They've been looking at statements. That's business.  
10 We've been trying to figure out whether or not that amount of money is appropriate, and you  
11 probably know what the answer is to that, and then what a more appropriate number is.

12 But at the same time that the TCC and its professionals are doing that work with the local  
13 councils, insurers and sponsoring organizations, we really want to implore you that if you can  
14 file suit against any of those parties, that you should do so. If you have an attorney, discuss with  
15 an attorney the opportunity to bring suit against your abuser, local council, insurer, sponsoring  
16 organizations. If you're unsure whether or not you can do that, please seek out advice from an  
17 attorney. Bankruptcy is a business, and the reality is that the pressure from litigation, those  
18 lawsuits that are hanging over organizations' heads, that will make them come to the table and  
19 add to that compensation that's going to assist all victims.

20 The third piece of this, aside from the business of bankruptcy, is the fate of your abuser. Again, if  
21 you can bring suit against your abuser, do so. If you're not sure, speak to an attorney. Speak to  
22 an attorney about whether or not you can and whether or not you should.

23 But also part of this are what are called in bankruptcy non-monetary demands. The TCC is  
24 committed to addressing non-monetary demands at the appropriate time. The Boy Scouts have

1 held the names of accused abusers, what they call the ineligible volunteers, or the IV files.  
2 They've held these files privately, and we're committed to seeing them made public. As well, we  
3 are committed to the Boy Scouts doing something about its Youth Protection Program. As I  
4 mentioned, 11,000 claims in the last 30 years since those protocols were enacted. The TCC  
5 wants to address both those things, but the time for non-monetary demands will be after we deal  
6 with the appropriate amount of compensation. So we don't want anybody to think we aren't  
7 concerned or have forgotten about that. We will when it's the appropriate time.  
8 And then lastly, and I think I might've said there's five things, but I think there was four, the  
9 TCC has a special message for the insurers. The vast majority of victims have been dealing with  
10 their abuse for years. We've been patient. We've gotten ready for the fight that's before us right  
11 now. Well, we're not going to be bought off quickly or cheaply with the first lowball offer. The  
12 TCC and every victim is going to fight for what is owed them, and we're gonna fight hard. So  
13 we don't want anyone to think that we're gonna roll over on that.  
14 So let me close by, again, giving you the best piece of advice I can give you right now. Ignore  
15 those headlines. What you're gonna learn tonight is that this is another step in a long process.  
16 We're gonna talk about the bankruptcy plan and disclosures and what that means to us. And  
17 hopefully after tonight you'll have a little bit better idea of how this process works, unfortunately  
18 why it's business, and why we're trying to conduct that business aggressively. We want you to  
19 be patient, we want you to be strong, and we want you to know that the TCC has your back. And  
20 we're working hard, and our professionals are working hard. So please, everyone, hang in there,  
21 stay strong, and I hope tonight is valuable. Thanks. John, back to you.

22 **HUMPHREY:** Thanks, Doug. Really appreciate it. You know, I echo Doug's comments.  
23 For us to have been doing this and talking about it for the last year, you know, it rings in our  
24 hearts. And we know that some of you are telling families for the first time, kids for the first

1 time, grandkids for the first time, spouses, and we know it's really hard. We know it's difficult.  
2 So just hang in there, and know that we're doing everything that we can to represent you fairly.  
3 Tonight we have three topics. Jim is gonna cover the plan, overview, and what we know about  
4 what's been filed by the BSA. And then John Lucas is going to cover the claims data and how  
5 things shake out so far. And then we're going to spend some time on five or six questions that we  
6 fielded through the BSA survivors email address that you guys have. So with that, I'd like to turn  
7 it over to Jim, and have you lead us through the plan discussion, Jim.

8 **STANG:** Good evening, everybody. Jim Stang, Pachulski Stang Ziehl and Jones. I'm one of  
9 the several bankruptcy lawyers representing the Tort Claimants Committee.

10 So the Boy Scouts filed two pleadings of significance in connection with the resolution of this  
11 case. One is called a Plan of Reorganization. It actually is labeled the Amended Plan of  
12 Reorganization, and it's amended because on the first day of the bankruptcy the Boy Scouts what  
13 in effect was a placeholder plan that really had very little context. In some ways the plan that  
14 they amended and filed had very little content, but we'll talk about that tonight.

15 The second document they filed is called a disclosure statement. The purpose of this disclosure  
16 statement is to provide each of you enough information about the Boy Scouts' financial  
17 condition and its plan, so that you can make an informed decision on whether to accept the plan  
18 or reject it. The disclosure statement has to be approved by Judge Silverstein, the bankruptcy  
19 judge, before it is sent to you with the plan and a ballot to vote yes or no. So right now the TCC,  
20 and other groups representing survivors, are poring over the disclosure statement to see if it has  
21 enough information. It doesn't have to have every detail about the Boy Scouts in it, but enough  
22 so that you can make an informed decision. And the work that we are doing, that Berkeley  
23 Research Group is doing, they are our forensic accountants, has in a sense all led to a critique of  
24 the disclosure statement.

1 The disclosure statement hearing for approval of the disclosure statement is set currently for  
2 April 15. You could knock me over with a feather, and I'm 6'6" and weigh 255 pounds, if it  
3 actually happens that day. This is a process of editing, of getting more information out of the  
4 Boy Scouts. And while we may have a hearing on April 15, I suspect that the disclosure  
5 statement will not be approved that day.

6 Once the disclosure statement is approved by the court, it will be put in an envelope with the  
7 Plan of Reorganization and the ballot, and be sent out for creditors to vote yes or no. We'll talk a  
8 little bit later about exactly how that process of getting these documents to you will actually  
9 work.

10 So I just want to take two things up front, and then John's gonna put up some slides that will  
11 walk us through in more detail what I've been talking about. The first is Doug said that the local  
12 councils were aspirationally going to put up \$300,000. It actually is \$300 million. When you've  
13 got 85,000 claimants, one can say it moved the needle a little bit, but we'll talk about that as  
14 well, what is a material amount of money.

15 The other thing is what John mentioned, which is the headline of \$6,000. There are gonna be  
16 three sources of money in this case. One is the Boy Scouts and its insurers. The "and its insurers"  
17 is always an add-on, if you will. So you've got the Boy Scouts and its insurers, you have the  
18 local councils and their insurers, and you have chartered organizations and their insurers. Right  
19 now the only commitment that has actually been made to put money towards the payment of  
20 survivors is the Boy Scout contribution. The local councils have not signed a piece of paper  
21 saying, "We are collectively putting up this amount." The Boy Scouts actually in their plan have  
22 said, "We hope they will put up this amount, and Judge, we'll check in with you in about 60 days  
23 to tell you how that fundraising is going."

24 Now, we've met with groups of the local councils, and they may be, some or all of them, behind

1 that number, but we don't have that commitment from them. The other group, the chartered  
2 organizations, there's no dollar amount at all. There are some chartered organizations that have  
3 come into the mediation process to discuss a resolution of their responsibility for the abuse, but  
4 in terms of a dollar amount being put up, crickets. So when we say \$6,000 a person, we have  
5 taken what we believe is the value of the BSA's promise, which consists of cash, some real  
6 estate, the Norman Rockwell collection. And we've come up with a value for that, and that value  
7 is informed by our own work and some information supplied by the Boy Scouts. And then we  
8 divided it by 85,000, which is the number of claims filed in the case. You've heard a higher  
9 number, but this is the number net of duplicates. Because some people filed, for one reason or  
10 another, more than one claim. That number comes out to be about \$6,000.

11 That's where that number comes from. So it's a headline number. It's a number, frankly, that the  
12 TCC announced, because we wanted to demonstrate how pathetic it was. But I want you all to  
13 know that there are other sources of money. And I have been representing creditor's committees  
14 like this committee since 2004. I've probably done 18 committees in the context of sexual abuse  
15 claims. There is not a single case, not one, where a plan has been confirmed over the unified  
16 rejection of abuse survivors. And so we talk a lot at meetings about unity, about working  
17 together. If there's a solid message from survivors that this plan is not acceptable, I cannot  
18 imagine a circumstance where Judge Silverstein will confirm it over the strong and unified  
19 objection of survivors. So when they say hang in there, hang in there.

20 So John, if we can put up the slides, we'll start walking through the plan and disclosure  
21 statement. Okay. Let's go to the next one. John is new at this, so give him a moment to figure out  
22 how to go to the next slide. There we go. So the documents, as I said, include the plan and the  
23 disclosure statement. The ballot is literally something you will vote on, and it will ask you to  
24 accept or reject the plan. There may be some other decisions you have to make on the ballot, but

1 that is the primary one. The last thing that will certainly go into the envelope are position letters.  
2 There are groups representing different interests. The TCC represents all of you survivors. There  
3 are other groups that have formed together on an informal basis to represent a subset of the entire  
4 universe of abuse survivors. They may be able to put a letter in. And the letter will say to you,  
5 I'll just talk about the TCC letter, "We recommend you vote for the plan, and this is why," or,  
6 "We recommend you vote against the plan, and this is why."

7 Right now it wouldn't surprise you that the Boy Scouts have said the only people that can put  
8 position letters into the envelope are those that endorse their plan. Now, that's not the way this  
9 works, and I'm sure Judge Silverstein, we know from another case that is on her docket now,  
10 will allow the committees to put in position letters on the plan. And so you'll know where we  
11 come out other than through these Town Halls on the plan that's actually being voted on. So  
12 John, let's go on to the next one.

13 **LUCAS:** And Jim, I just want to point out for everybody that on the top of the slide here  
14 there's our website address there for more information, and for questions again there. If you want  
15 to write that down, it'll be on every slide.

16 **STANG:** Thank you, John. So what is the plan? First of all, understand it is a proposed plan.  
17 It is not "the" plan. There is only one out there, but it's been proposed. It has not been approved  
18 by the court, and actually, there's not been a hearing on any aspect of the Boy Scout case since  
19 the plan was filed. So we don't even have the off-the-cuff comments coming from the judge. So  
20 just keep that in mind.

21 And for those of you who are really gluttons for punishment, if you want to read the plan, go to  
22 the Omni site. Type in Omni Management Boy Scouts. You'll come up to the Omni site. Omni is  
23 the court designated company that maintains the docket of the court. And under dockets, go to  
24 document 2293. That is the amended plan. It's fairly long, it's very technical, but if you want to

1 try it, give it a go.

2 So what the plan does is it takes creditors and puts them into groups. So there will be a group of  
3 creditors who provided goods and services to the Boy Scouts. There will be a group, we call  
4 them classes, there will be a class or group of creditors, let's say J.P. Morgan, and J.P. Morgan  
5 holds a mortgage on different properties belonging to BSA. There may be one or two other  
6 classes. We're gonna actually go through them in a few minutes to show you what I'm talking  
7 about in a very Boy Scout centered way. But abuse survivors will be in a group.

8 The plan will tell each group how it is going to be treated under the plan, and how you're gonna  
9 get paid. And we are--one of the things that's really amazing about the Boy Scout plan is it  
10 doesn't tell you how your claim is gonna get paid. It is to be followed, if you will, document to  
11 be followed on how your proof of claim will be evaluated, how a dollar amount will be put to  
12 that proof of claim, and once a dollar amount is put to the proof of claim, what actual dollars will  
13 you get. That process is referred to sometimes as a trust distribution process, because a trust will  
14 be established to hold the money and the property, and to then effectuate the process on how  
15 your claim is evaluated. But when you read the plan that's on file, and when you read the  
16 disclosure statement, it ain't there, folks. So that's part of the having to take a deep breath about  
17 this, and why this is at best a proposed plan.

18 And then there is the asset strategy. The Boy Scouts are proposing to give to the trust, which is  
19 the mechanism for reducing things to cash and getting money out to you, they're giving them the  
20 Norman Rockwell collection. They're giving them something called Scout University. They're  
21 giving some cash. So it's a combination of property and cash. And so those assets have to be  
22 turned into money, and in the plan we'll talk about how that's done. Now, we'll talk about local  
23 councils in a minute, but that's what the plan does. It is a proposed resolution of the claims in  
24 each class. So John, let's move on.

1 So these are the classes. So you'll see, just to explain some of the terminology, you have other  
2 priority claims. The bankruptcy gives claims some priority over others. For example, wage  
3 claims come first in the distribution of money. Not surprisingly, tax claims come first in the  
4 distribution of money. How does the plan treat those claims? They are, next column, unimpaired,  
5 which means that the plan does not change anyone's rights. They will be paid as required by  
6 other, be it state law or federal law. And because they are unimpaired, they don't get to vote yes  
7 or no on the plan, because they don't have any skin in the game. They're not affected by the  
8 plan. They were affected by the bankruptcy and they weren't paid, but under the plan they will  
9 be in full.

10 The next category--and by the way, these classes are the classes in the plan, so if you're looking  
11 for any one in particular to see how they're treated, you go by class number. The next is other  
12 secured claims. That would be if they owned a house and there was a mortgage on it. What do  
13 you do with that mortgage payment? It's unimpaired. Again, they don't vote. Classes 3A, 3B, 4A  
14 and 4B are J.P. Morgan. J.P. Morgan had different extensions of credit and loans to the Boy  
15 Scouts. They have cut a deal with the Boy Scouts, therefore they are impaired. The plan and the  
16 deal affects them, and they are entitled to vote.

17 Now, specifically with J.P. Morgan, which has a very substantial claim, the Tort Claimants  
18 Committee, I believe it was done today, or if not today it will be done by the end of the week,  
19 has filed a pleading with the bankruptcy court telling the court that we think there are problems  
20 with J.P. Morgan's mortgage. That it should not be treated as a secured creditor on certain  
21 property, and that the effect of knocking out its mortgage for a secured claim would be to free up  
22 more money for everybody else. We can't bring that lawsuit against J.P. Morgan without the  
23 courts giving us the green light, and the motion that we either filed or are going to file is asking  
24 the court to give us the green light to do that.

1 So while the proposed plan offers a proposed settlement with JPM, the position of the Tort  
2 Claimants Committee is that that settlement should not be approved, that J.P. Morgan has more  
3 to give, if you will, or give up, and that the settlement should not be approved. But under the  
4 plan, the settlement is set forth and they are entitled to vote on the plan.

5 Convenience claims are just claims that are too small to hassle with. And so if someone's owed,  
6 say, under \$1,000, I don't know exactly the number in the plan, but usually it's a relatively small  
7 amount, and so if you're willing to reduce your claim to \$1,000, or whatever the cutoff number  
8 is, you just get that payment and you're done. And it's impaired, because you reduced your claim  
9 to that amount.

10 General unsecured claims would be the people who make the uniforms, the people who make the  
11 badges, everybody really except people who suffered personal injury. There is a proposal to pay  
12 them. The proposal is that they get paid somewhere between 75% and 100% of what they are  
13 owed, and because the plan affects how they are paid, they are impaired, and they get to vote.

14 Non-abuse litigation claims is mostly personal injury other than abuse. Tragically, scouts were  
15 killed or injured at scout events, and so they are treated differently than the abuse claims.

16 They're impaired. They get to vote.

17 Number eight is us, the direct abuse claims. As I said before, the plan does very little to tell you  
18 how the claims are going to get treated. I was once told by someone, "Creditors have two  
19 questions, how much and when." The plan does not tell us the answer to either of those  
20 questions, so on its face we think the plan should be rejected. We have an idea of what they are  
21 going to propose in more detail, and we're not happy with that either. So under the plan you all  
22 would get to vote, because you're impaired. You're not going to be turning the clock back and  
23 going back to your state court proceedings. And for those that you didn't file in state court, you  
24 know, your rights are impacted, so you're gonna get to vote.

1 Indirect abuse claims, it's a little technical, but they're also affected by the plan. And then the  
2 last is interest in Delaware BSA. That was a company they established to try to get their case in  
3 front of a Delaware judge, because they weren't happy with the prospects of, I guess, a judge in  
4 Texas. It doesn't vote. It's a technical issue. You don't have to bother with it. Class 8 is what you  
5 need to be concerned about. And the reason I went over these other classes was just to show you  
6 how this works in terms of the structure, that some people are unimpaired by the plan, and some  
7 people are impaired by the plan. So John, let's go to the next slide.

8 So again, where's the money coming from? Debtors committed certain monies. The local  
9 councils number is aspirational, again, \$300 million, not \$300,000. And anything the chartered  
10 organizations is, you know, not even an aspirational number at this point. It's aspirational  
11 meaning what the Boy Scouts think might be put in. But it's gonna get transferred to a trust, so  
12 that the survivors can be the ones dealing with and be responsible for and have control over how  
13 these properties are going to be liquidated to cash.

14 So there will be some cash. It's not a lot. There will be some personal property. Think about the  
15 Norman Rockwell paintings. Real property. Think about Scout U, but not the High Adventure  
16 facilities. They are not proposing that creditors get paid from a liquidation of any of the High  
17 Adventure facilities. And then rights under insurance policies. As I said before, three sources, but  
18 all of them come with insurance to one degree or another.

19 The trust will in effect become the insured party under the insurance policies. So if an insurance  
20 company says, "I'd like to pay you X dollars and in effect tear up the insurance policies," that is  
21 a decision that will be made by the trust. If the insurance companies say, "We don't owe any  
22 money, because the Boy Scouts lied on an insurance application that said they had no history of  
23 sexual abuse," if anyone could really even believe such an application, it would be the trust that  
24 would push back and say, "No. That's not a defense to your obligation to pay under the

1 insurance policy.” So that’s what the rights under insurance policies means. It goes to a trust, and  
2 for many purposes think about the trust now being as the insured, as opposed to BSA being the  
3 insured.

4 Who’s gonna run the trust? Undecided. The plan and the disclosure statement don’t name who it  
5 will be, but there will be someone. That trustee will have an advisory committee that will have  
6 advisory powers, thus an advisory committee, but also have controls. Because you don’t want to  
7 have a trustee who’s going out and making decisions without controls by survivor  
8 representatives themselves. The trustee can hire professionals. For example, if the insurance  
9 companies are gonna get sued because they are improperly denying coverage on claims, the  
10 trustee will hire what we call an insurance coverage lawyer. As you can see, there’s a lot of  
11 property here to administer. It could be many millions of dollars. Someone needs to properly  
12 manage that money so that we get the best rate of return given the fiduciary duty the trustee has  
13 to ensure the safety of the money. And then there’s the process of evaluating the claims. And the  
14 trustee may have some experience in that, but he might hire someone who is truly an expert in  
15 evaluating how much a certain kind of abuse claim is worth. So that’s what the trust concept is.

16 John, next slide, please.

17 So what happens to Class 8? As I said to you, the trust distribution procedures aren’t in there, but  
18 the TCC professionals, and other professionals representing abuse survivors, have a lot of  
19 experience in what we call mass tort cases. Think about asbestos. Think about all the products  
20 you see, lawsuit solicitations at 1:00 in the morning: RoundUp, pelvic mesh, opioids. Those are  
21 mass tort cases. Mass in the sense of a lot of people affected.

22 So what often happens is a chart is made of values for the injury suffered. So here we have  
23 penetration claims, oral sex claims, masturbation claims, groping claims. Those are the  
24 classifications that were on the claim form you filled out. So we don’t have values set for those,

1 but this is what you could envision. And folks, please, we don't have these procedures set down.  
2 I'm giving you examples of what could happen, that there will be six or seven classes of abuse,  
3 and there will be dollar amounts opposite each classification. And so depending on how  
4 thoroughly your claim is evaluated, and the credibility of the claim, you might get, say, 50% of  
5 the matrix value. If you go through a more I'll say stringent process of a review of your claim,  
6 you might be able to get a maximum of 75%. And if you decided you were gonna go to court and  
7 really--you might get 100% of that value if you went, or even potentially more. But that's what  
8 the matrix does. It's meant to give you some values so that you can make a decision how far you  
9 want to go with your case, assuming that you meet certain credibility criteria and qualifications.  
10 Now, that's the dollar amount assigned to your claim. It doesn't mean you're getting that much  
11 money. You might. But it depends on how much is in the trust, and it depends how much we're  
12 getting from the insurance companies. And the trust has work to do, both in the litigation to get  
13 that money in and also to evaluate the claims. And so your claim might have a matrix value of \$1  
14 million, but that doesn't guarantee you'll get \$1 million. That depends on the performance of the  
15 trust.

16 Some people have asked, "Is the statute of limitations gonna affect my claim?" And the answer  
17 is it might. The matrix will tell you whether or not, given where the abuse occurred, what  
18 discount, if any, and I want to really emphasize if any, will be attributed to that. You know, the  
19 insurance companies are paying based on what they think their risk is if they had to go to court,  
20 and there are some states where they think that risk is pretty low, because the statute of  
21 limitations is a very difficult thing to overcome. And then there are some people who were  
22 abused in states where the statute of limitations doesn't even exist. That doesn't mean that we  
23 will discount them on the basis of that description. It means that the parties putting the money in  
24 are thinking about that. And believe me, they are thinking about it. They are talking about it.

1 And so there are lots of different ways to look at the survivor community. Statute of limitations  
2 is just one of them. The TCC is committed that all--we use the term valid claims. That really  
3 means honest claims, because sadly, and I've had this experience, there are some people that get  
4 in the system. But for the credible and honest claims, we are committed, no matter where the  
5 abuse occurred, that people get some compensation. So I'm not trying to forecast to you too  
6 much about this, but I want you to know that this matrix I've described will have different  
7 adjustment factors to reflect some of the reality of the litigation that revolves around abuse  
8 claims. So John, let's go on to the next slide.

9 I talked about the trustee bringing litigation. I think that bullet point is self-explanatory, and the  
10 other one also, the trustee will be liquidating whatever non-cash property he or she gets. Next.  
11 I think I've touched upon this. The disclosure statement, again, is meant to give you information.  
12 It will summarize the plan. It should tell you what the process is for your claim being treated. It  
13 should give you some idea of what your recovery could be. And it will explain to you the risks of  
14 this entire thing working. So that's what the disclosure statement is, and for those of you who  
15 want to look at that as presented, the docket number is 2294 on the Omni site. John, next.

16 Voting. The bankruptcy court has to find, I don't know, I think there are, like, 16 or 17, maybe  
17 there are a few more, things that are right about the plan in order for it to get approved. The  
18 lawyers sometimes call the approval process confirmation. It's the same thing. Bankruptcy court  
19 confirmation of the plan, bankruptcy court approval of the plan, same thing.

20 One of the things the court looks at is how did creditors vote on the plan. And again, voting is by  
21 class. Remember I talked about those classes earlier? So you will get a package that includes the  
22 plan disclosure statement and ballot. There is a negotiation going on right now over who actually  
23 will vote your ballot. You have the right to vote your claim, you, the survivor. But there's also a  
24 process being negotiated where your attorney can vote your claim. It is very important that you

1 be in touch. Now, that hasn't started yet, folks. Remember, the disclosure statement hasn't even  
2 been heard by the court yet. The plan solicitation package is not in the mail. But as this process  
3 moves on, it will be in the mail. And the question is, who's it gonna go to, you or your lawyer?  
4 And who is gonna actually sign the ballot, you or your lawyer? You make the decision on  
5 whether to accept or reject, but because there are so many survivors, there needs to be some  
6 ability for lawyers, if their client wants them to, to sign the ballot.

7 So if you have an attorney, you should be talking to that attorney about how the balloting process  
8 is gonna work insofar as who's gonna actually vote the plan. But again, you make the decision. If  
9 you're not represented by a lawyer, the plan solicitation package will go to you individually. And  
10 as I said, the court holds a confirmation hearing where Judge Silverstein will have to find that the  
11 requirements of the Bankruptcy Code are satisfied.

12 Voting is only one aspect of the plan approval process. But as I said, in the history of Chapter 11  
13 cases revolving around sexual abuse, no court has ever approved a plan that was solidly opposed  
14 by the abuse survivors. John, next.

15 Okay. There will be a deadline for returning the ballot. More to come on that. Like I said, we're  
16 gonna have these every week. We'll be keeping you advised as to how this whole balloting  
17 process is progressing. John, let's go to the next slide.

18 So we decided to give you a timeline, because everyone wants to know. Remember the two  
19 questions, how much and when? We wanted to give you an idea of when. Now, the chart you're  
20 about to see are the dates that are the absolute minimum time periods, and so let's go to the next  
21 slide, John.

22 So the plan was filed on March 1. The earliest the court could approve the disclosure statement,  
23 not the plan, because remember, you haven't even voted yet, is April 17. That could be a month,  
24 two months, three months further out, but this is the minimum time period we're talking about.

1 And then you've got the 17th, if the court did approve the disclosure statement, the packages go  
2 out the 29th. And then this will be posted on our website, and you can study it, but as you can  
3 see, the packages go out on a certain date, voting is due a certain date, objections to the plan are  
4 due a certain date, on June 28. Confirmation hearing, remember, that's an approval hearing, July  
5 26.

6 And then if the court were to approve the plan, and if there are no appeals, certain things happen,  
7 like the deed to the Scouting U gets transferred to the trust. The Norman Rockwell paintings are  
8 transferred, if not physically then by title, to the trust. So there are just some kind of gears  
9 meshing in place that will happen after the court approves the plan. Remember, these are not the  
10 dates that this will necessarily happen. We wanted to show you the timeline that the debtors have  
11 proposed, so you can get a sense of how long at a minimum these periods could be. John, let's  
12 keep going.

13 **LUCAS:** That's the last slide, Jim.

14 **STANG:** Oh, the last slide. Everyone sighs a sigh of relief. So I think that is really it on the  
15 plan and disclosure statement process. It is early, folks. None of this is in concrete. And if you  
16 have questions, use our Q&A, the website, the email address, or call your attorney. John, back to  
17 you.

18 **HUMPHREY:** Yeah, thanks, Jim. So if you didn't hear it kind of loud and clear, that  
19 timeline that Jim put up was the happy path. If you're a baseball fan, I would probably say we're  
20 in the third or fourth inning, and it's gonna take some time. And it's highly unlikely that we're  
21 gonna do the happy path, so be patient. Jim said you can read the plan. I wouldn't suggest it. I  
22 went through it. There's not enough detail. It'd be like you having a trip from Delaware to  
23 California, and none of the directions were in the map on how you got there. And so, you know,  
24 from the TCC's perspective, a total non-starter.

1 And then the last comment I'll make on the voting, the TCC does feel very strongly about  
2 individual claimants voting, so that will be our position, but we may lose that battle depending  
3 on how the judge sees it. So with that, I'd like to turn it over to John Lucas to talk about the  
4 claims data so far.

5 **STANG:** John, I just want to interject something before John Lucas goes. Every creditor has  
6 the right to vote their own ballot. If the court says lawyers can sign, she's not saying creditors  
7 can't sign. So wherever she comes out on whether attorneys can sign a reject ballot with tens of  
8 pages of names to follow, if you want to sign your ballot, you get to. There will be no  
9 circumstance where you will be required to give that authority over to a lawyer. So I just wanted  
10 to put that in there, John.

11 **HUMPHREY:** Thank you for the clarification, Jim. Appreciate that.

12 **STANG:** John Lucas, you're up.

13 **LUCAS:** Okay. Thank you, everybody. John Lucas, as John and Doug and Jim mentioned.  
14 Hello. We spoke before, I think, on some of the other Town Halls.

15 As Jim said earlier in his remarks, and I'll sort of maybe get a little bit more into the details to try  
16 to sort of flesh out what's out there in the claims, but, you know, as we all know there are a lot of  
17 claims. And so we're trying to sort of categorize it in certain ways to try to give some meaning  
18 and some different types of definition to the claims, so that people can sort of see what the  
19 playing field looks like.

20 And so as Jim said, there are a lot of claims that were filed. In fact, we estimate that there's about  
21 101,000, a little bit more than 101,000 claims that are filed. Of that group of claims there are  
22 many duplicates. There are many that have been amended and superseded, and there are some  
23 that have been filed on behalf of the same claimant by more than one law firm, or even the  
24 survivor, his or herself. And so when you back out all of the duplicates and the amended and

1 superseded, we estimate that there's about 83,800 claims of unique claims, and so that's where  
2 things start.

3 And so from there, and I'm gonna put up a document here on the screen, and I can sort of walk  
4 you through it, and this document is already up on the tcbbsa.com website. And so this will give  
5 sort of an overview of what I'm gonna show you here, and it's sort of what I just said. But there  
6 are four exhibits, and each exhibit breaks down claims. And so we'll go to exhibit 1.

7 And so exhibit 1 breaks down the claims of when the abuse occurred in which year, and so this is  
8 the first year of abuse that's alleged in the claim. And as you can see, there are, and I'm just  
9 trying to scroll up and down so everybody can see, oddly enough there's a claim that's listed  
10 there in 1905, and the reason why I'm pointing that out is for a couple of reasons. BSA didn't  
11 exist in 1905. I think it's unlikely that there was a claim in 1905 because of that. And I think that  
12 the way the claim process is working, the information is being extracted out of the claims and it's  
13 getting put into an Excel spreadsheet, and there's some administrative errors happening. And the  
14 TCC is bringing this to the attention of the BSA and the BSA's professionals, and making sure  
15 that the information extraction or exportation is administratively consistent and correct. And so  
16 probably what happened there is that claim is probably 1995 or 1985.

17 **STANG:** John, I would like to point out the problem isn't so much that the Boy Scouts didn't  
18 exist in 1905, but that person would be 116 years old.

19 **LUCAS:** If we could all have his or her genes. So down there at the bottom there are  
20 approximately 1,500 claims that do not allege a date as to when the abuse occurred. And so we  
21 have recently sent out emails to many of the parties who are represented by counsel alerting them  
22 to this fact that, "Hey, your claim does not allege a period in time when the abuse occurred."  
23 And we're encouraging people to amend the claim to the extent that that information is not  
24 present in the claim. Moving on.

1 This slide here shows how many claims are filed in which state or jurisdiction that the abuse  
2 occurred in. And as you can see on top there, there are approximately 9300 claims in California.  
3 You go down and there are 990 claims in Kentucky. There are 5200 claims in Texas, 17 claims  
4 in Mexico, and so we go on and we have sort of outlined where the claims are falling in.  
5 And so, as you can see, there's a row here that's called ZZ, and in 3600 claims there wasn't a  
6 location put, and there's also YY, which is unknown. There's 3500 claims that there wasn't a  
7 location inserted into the proof of claim. And so to the extent that your claim does not identify  
8 the location of the abuse, then we're encouraging people to amend the claim. And there's an  
9 instruction form on how to amend your claim on the tcbbsa.com website.

10 **STANG:** John, this is Jim. I'd like to interject for just a moment. For those of you that have  
11 been at prior Town Halls, you have heard me and John talk at length about the need to go back  
12 and check your claim form to make sure it is complete. This is the best example of the problem. I  
13 cannot figure out, if I don't know where the abuse occurred, I can't figure out whether a statute  
14 of limitations hurts you or helps you. I can't figure out, and we'll get to local councils in a  
15 moment, which local council you might even have been at. This is something that we think  
16 should be easily cured. It would help all survivors, everyone, to get this information filled out. I  
17 cannot speak too strongly about this. This is an easy fix, folks. Please fix it. It's making our job  
18 extremely difficult with this many claims missing this basic information.

19 And I'll tell you. Forget about our job. The insurance companies thrive on this. How can this be  
20 a valid claim if the person is not even telling us where the abuse occurred? Maybe we understand  
21 you don't remember the perp's name, or you never knew his last name, but you don't know  
22 where the--oh, this claim must be fraudulent. We have to throw out 3600 claims. So it's not just  
23 our job. We're trying to make this work. You need to help us on this. We can't fill this  
24 information in for you. Thank you, John.

1 **LUCAS:** Yeah, and Jim I want to add on something. Again, not to pile on too much, but  
2 some of you might be scratching your head and you're saying, "Well, Jim, what are you talking  
3 about? I put Texas down on the claim." And many of you did, I think, do something like that.  
4 But there's a specific section in the proof of claim and it says, "Where did the abuse occur?" And  
5 it's important that, you know, if Texas happens to be the location, that you put Texas in that  
6 section.  
7 You know, I know that many people inserted a narrative, and it might say that it happened in,  
8 you know, Corpus Christi, Texas, or something like that, and it's put there. It's important that it's  
9 in the right section. And I'll move on here, and I'll explain maybe in a little bit more of a  
10 different example about why it's important.  
11 So this exhibit here describes or breaks up the claims that implicate different local councils. And  
12 as you can see here at the top, there are just under 40,000 claims that do not identify a local  
13 council. And so I came across an example the other day where somebody emailed me and they  
14 said, "What are you talking about? I identified my local council. Here's my proof of claim, and  
15 look at it." And this is what happened on that claim. The first question was, "What troop were  
16 you associated with?" And then counsel for that survivor said, "Troop 67 in Madison,  
17 Wisconsin, the Winnebago Council." And it was all in the same thing, and it was a perfect  
18 answer. I should say it was a very thorough answer. But they needed to break up the answer and  
19 put the local council in the local council part, and put the sponsoring organization in the  
20 sponsoring organization part, and put the location in the location part. And so sometimes too  
21 many answers are going in one spot when they need to be distributed elsewhere in the proof of  
22 claim.  
23 So obviously, you know, we're showing here that there are over 1400 claims against Michigan  
24 Crossroads, over 1300 claims against the Greater New York Council. Obviously this is an

1 undercount if there are a little over 39,000 that haven't been implicated or per a proof of claim  
2 form haven't been assigned a local council. And just so you know, as you'll scroll down here,  
3 this part of the schedule is about 16 pages. Greater New York Council will pop up elsewhere,  
4 because it is, you know, there might be a claim where somebody says, "Greater New York  
5 Council and Greater Los Angeles Council," and so that will count as one. And so there will be  
6 different instances, and so I know that the Greater New York Council has probably about 75  
7 more than the 1300 that are showing here.

8 And last here, let me just scroll through really quickly, the last exhibit, and it is a long exhibit, it  
9 is the exhibits that implicate sponsoring or chartered organizations. And it is many, many pages  
10 long, and I'll just show you the first page here. And it shows, you know, Methodist Church,  
11 Baptist Church, Catholic Church, Latter Day Saints, U.S. Air Force base, Boys & Girls Club,  
12 Lions Club, or different police departments and fire departments or park associations, so on and  
13 so forth, and those are outlined there. And also, as you can see, there are about 48,000 claims  
14 that have not listed a sponsoring organization.

15 **HUMPHREY:** And John, you said earlier that all this data is gonna be out at the  
16 tcbsa.com website?

17 **LUCAS:** It's there right now, John.

18 **HUMPHREY:** Great. So folks, we are bumping up against the top of the hour, and we  
19 told you we were gonna try to keep it to an hour, so here's what I'm gonna do. We've got some  
20 questions that have been submitted. I'm gonna read the questions, and if those questions'  
21 answers interest you, you can hang around and listen to the recording. I mean, you can listen to  
22 us talk about them, or you can come back and listen to the recording at a later time. So we're  
23 probably gonna go another 10 minutes. I hope that's okay.

24 Question number one. If mediation is not successful, what happens? How will that affect

1 payments? We are actually in a mediation right now. Question two. How do the professionals get  
2 paid? Question three. How does plan voting work? Can one or two survivors derail it all? I think  
3 Jim's talked a lot about that. We've talked about what happens with respect to claims outside the  
4 statute of limitations, so I don't think we need to address that one. What would a liquidation look  
5 like? Many of you are interested in that. And then when should survivors hire personal counsel?  
6 I think the answer to that is now. But I'm gonna take those one at a time, and we're gonna go for  
7 about another 5 or 10 minutes. So feel free to jump off and come back and listen to the  
8 recording.

9 Jim, if mediation is not successful, what happens? How will that affect payments?

10 **STANG:** The mediation process is an effort to try to reach a consensual resolution to  
11 streamline the timeline and to streamline the expenses. But if the Boy Scouts cannot reach an  
12 agreement with the abuse survivors, it can still go forward with its own plan of reorganization.  
13 And as I've said before, well actually, I'm not sure I said this, but maybe it's evident, that plan  
14 was not the result of a negotiation with us. There were discussions. There are some aspects of the  
15 plan that do reflect our input, but that is not a negotiated document from the way I think of one.  
16 And so if we don't have a mediated resolution, the Boy Scouts might still try to get their plan  
17 approved, and during the timeline work to try to reach a resolution. But failure of the mediation  
18 does not stop the bankruptcy process from going forward.

19 **HUMPHREY:** Okay. Doug, this one's for you. Since the TCC was responsible for  
20 actually hiring all of our professionals, could you answer the question on how do the  
21 professionals get paid?

22 **KENNEDY:** Sure. The payment for professionals, for all professionals. comes through the  
23 bankruptcy plan. So it isn't a factor of individual victims getting billed or anything like that. It's  
24 part of the plan, the payment of all the professionals. And I know that oftentimes in bankruptcy it

1 gets to a spot where people start saying, “Well, all this money is going to all these professionals.”  
2 And I think, John, you’d agree that we really want every victim to know that these professionals  
3 are working incredibly hard, and have just done an amazing amount of work. Without a doubt we  
4 hired the very best professionals, not only Jim and John, but also our insurance professionals and  
5 our financial consultants as well. And it’s not often that...

6 **HUMPHREY:** And you guys should know...

7 **KENNEDY:** I was just gonna say, John, it’s a cost of doing business, but it does not get billed  
8 to individual victims.

9 **HUMPHREY:** Yeah, and, you know, all of that is part of the public record. Every  
10 professional had to submit an application, and we do have a very rigorous finance committee that  
11 reviews every single bill from every one of the professionals before it gets to us.

12 **KENNEDY:** That’s what I was gonna say. Yeah, we have three or four victims, members of the  
13 TCC, that review bills every single month.

14 **STANG:** And John, I would add that for the Pachulski firm 10% of our billing is going  
15 directly to the settlement trust. That was something we agreed on and were happy to offer at the  
16 time we were retained.

17 **HUMPHREY:** Yeah, thank you for that. You’ve already talked about how the plan voting  
18 works, but the following question, can one or two survivors derail it?

19 **STANG:** Not on a voting basis. The court will look at two things. How did the class of  
20 creditors vote? And the class will have approved the plan if two-thirds of those voting say yes.  
21 So, you know, one or two people will not on the vote aspect derail the plan.

22 Now, each creditor does get to insist that they be paid through the plan at least as much as they  
23 would get if the Boy Scouts liquidated. That is a creditor by creditor objection. It cannot be  
24 overridden by the vote of the class. And that is something that, honestly, the TCC and other

1 survivor groups are focused very much on. What is the value of BSA? What is the value of the  
2 claims against parties getting released under the plan? And how does that compare to what  
3 they're offering?

4 **HUMPHREY:** I think you really did a deep dive earlier on the statute of limitations, so I  
5 think I'll skip that one. What would a liquidation look like?

6 **STANG:** So under the Bankruptcy Code there are--I'm sorry. Let me just start over. The  
7 Bankruptcy Code has different chapters. There's Chapter 7, which you've heard about. That is a  
8 liquidation. There's Chapter 11. That's what we're in. It has its different rules from Chapter 7.  
9 You have Chapter 13. Some people may have heard about those in bankruptcy advertising.  
10 Chapter 7 is a liquidation of the company. An independent trustee is appointed, and that trustee  
11 liquidates the company. Creditors are not allowed to put a non-profit entity like the Boy Scouts  
12 into a Chapter 7 bankruptcy. That's why for all the creditors that existed at the beginning of this  
13 just before the bankruptcy, no creditor group could put the Boy Scouts into bankruptcy. You're  
14 just not allowed to. Once they're in bankruptcy, Chapter 11, the court cannot convert the case to  
15 a liquidation bankruptcy over the objection of the Boy Scouts.

16 And so if the plan fails, the Boy Scouts voluntarily could go to a Chapter 7. That's not gonna  
17 happen. Or the case could be dismissed if the court found that a plan could not be confirmed. At  
18 that point everyone goes into their own directions, and if you get a judgment against the Boy  
19 Scouts, and you can find something to execute against, that means to enforce your judgment,  
20 then you go do that. So there is no bankruptcy liquidation option for the Boy Scouts, unless they  
21 voluntarily go into it.

22 **HUMPHREY:** Okay. Thanks. And then the last question we had was when should  
23 survivors hire a personal counsel?

24 **STANG:** Okay. This has always been the question of the Town Hall. In the first one I kinda

1 skipped, dodged it, whatever you want to call it. We are getting to a point. We're not there yet,  
2 folks. You're not being asked to vote on the plan. But we're getting to the point where decisions  
3 are gonna have to be made by you regarding your claim. How long, Jim? I think it'll be at least  
4 two months. It could be longer. But it's not tomorrow. So you don't have to hit the phone tonight  
5 to the first phone number you find.

6 I believe it is critical that you retain someone who has experience in the representation of child  
7 sex abuse victims. The TCC and the other creditor groups have bankruptcy lawyers up the  
8 wazoo. We're not gonna let the bankruptcy process hurt survivors. So I think the focus should be  
9 on an abuse attorney, as opposed to finding yourself a bankruptcy attorney. That abuse attorney  
10 has a Roll-a-Dex, if people still have Roll-a-Dexes, of other lawyers' names, and they'll find a  
11 bankruptcy attorney. They can call John Lucas. Don't call me. They can call John. We have  
12 Q&A. We get back to people. We do return phone calls.

13 And so where do you find these names? If you go into your browser and type "child abuse  
14 attorney Boy Scouts," there are still attorneys who are advertising on the Internet who have  
15 experience. Unfortunately there's some people who advertise who don't have experience. That's  
16 for you to figure out. When you call, you're not required to hire the first lawyer you call. You  
17 only hire a lawyer when you have signed a retainer agreement. And so talk to the person who  
18 answers the phone. That may not be an attorney. You should find out are you talking to a call  
19 center? Are you talking to a paralegal? Are you talking to an attorney? And if it's an attorney, is  
20 that the attorney who's gonna work on your case? You are a consumer of legal services. Be  
21 informed about it.

22 And then find out what that person is going to do for you, but also what they're not going to do  
23 for you. Because some lawyers will say, "I'm gonna do X, but I'm not gonna do Y." And then  
24 you'll find out how much it's gonna cost. Most of the attorneys who are representing abuse

1 survivors are doing it on a contingency fee basis, which means a percentage of your recovery.  
2 So there are Internet resources. There are state bar and local bar association resources. And be an  
3 informed consumer of the legal services that you're retaining.

4 **KENNEDY:** And Jim, can I just add too that it's important for any victims that are considering  
5 legal action, bankruptcy is also separate from what might happen in a state as well. So make sure  
6 when you talk to an attorney, make sure you're all on the same wavelength whether or not you're  
7 discussing the bankruptcy process or filing suit in a state, whether they'll do both of those or one  
8 of those. Don't assume that both of those happen at the same time, because they don't.

9 **HUMPHREY:** Thanks, Doug. And thank you, panelists, tonight. So we went about 10  
10 minutes over, but I thought the content was really rich tonight, a lot of detail. You guys might  
11 need to take some notes, look at it again. Remember that we will try to be here the second  
12 Tuesday of every month. You can go to the TCC BSA website to stay up with recordings and  
13 things we publish. Please send questions to [bsasurvivors@pszjlaw.com](mailto:bsasurvivors@pszjlaw.com). And once again, hang in  
14 there. Be tough. Be patient. And we're working for you. Have a good evening. Thanks a lot.

15 **LUCAS:** Good night.

16 **KENNEDY:** Good night, everyone.

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2 I hereby certify that the foregoing is a true and correct transcription of the audiotape labeled  
3 GMT20210312-010010\_BSA-TCC-Ma\_1920x992.

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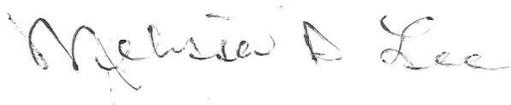
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Melissa D. Lee

10 Date

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