

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

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| IN RE: |) | |
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| BROCK P. TUCY, |) | CHAPTER 11 |
| MAPLE PARK PROPERTIES, INC., |) | CASE NO. 09-22152-WCH |
| Debtors |) | CASE NO. 10-15698-WCH |
| _____ |) | (Jointly Administered) |

AMENDED DISCLOSURE STATEMENT WITH RESPECT TO CHAPTER 11 PLAN OF
BROCK P. TUCY AND MAPLE PARK PROPERTIES, INC.

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AMENDED DISCLOSURE STATEMENT TO THE DEBTOR'S PLAN OF
REORGANIZATION BOTH DATED OCTOBER 15, 2010

I. INTRODUCTION

A. General

This Disclosure Statement (the "Disclosure Statement") describes Brock P. Tucy ("Tucy") (Tucy is sometimes referred to in this document as the "Debtors") and Maple Park Properties, Inc. ("Maple Park") (Maple Park is sometimes referred to in this document as the "Debtors"), the operation of the business, the Plan of Reorganization (the "Plan") and the expectations for future operations.

On December 16, 2009 (the "Petition Date"), Brock P. Tucy filed a voluntary petition for relief under Chapter 11, Title 11, United States Code, known as the Bankruptcy Code (the "Code"). On May 26, 2010, Maple Park Properties, Inc. filed a voluntary petition for relief under Chapter 11, Title 11, United States Code, known as the Bankruptcy Code (the "Code"). The Chapter 11 cases are pending in the United States Bankruptcy Court for the District of Massachusetts in Boston, Massachusetts (the "Court"). On May 28, 2010, pursuant to a motion filed by Maple Park, the Court entered an order Jointly Administering the two cases. During the case, Tucy and Maple Park maintained its business of owning and operating a family recreational park in East Wareham, Massachusetts as Debtors-in-Possession under Sections 1107 and 1108 of the Code.

The Plan contemplates that Tucy and Maple Park (“Debtors”) will continue its business of owning and operating a family recreational park. From cash on hand and future revenues, Debtors propose to pay their administrative creditors, priority tax claims, and secured creditors to the extent of the value of the collateral securing their claims. It also proposes to pay its unsecured creditors one hundred (100%) percent dividend payable in 60 monthly installments, the first installment to be 30 days after confirmation.

Creditors and parties in interest are advised that this is only a brief summary of the Plan and they should carefully read and evaluate the terms of the Plan described below.

B. Attachments to Disclosure Statement

Accompanying this Disclosure Statement is a copy of:

1. Plan of Reorganization of Brock P. Tucy and Maple Park Properties, Inc. dated October 15, 2010, annexed as Exhibit A;
2. Consolidated Financial Forecasts for Brock Tucy and Maple Park, annexed as Exhibit B.
3. Forecast to Actuals April through November 2010, annexed as Exhibit C.

II. DESCRIPTION OF THE PLAN

THE FOLLOWING IS A SUMMARY OF THE SIGNIFICANT ELEMENTS OF THE PLAN. THIS DISCLOSURE STATEMENT IS QUALIFIED IN ITS ENTIRETY BY REFERENCE TO THE MORE DETAILED INFORMATION SET FORTH IN THE PLAN AND THE ATTACHMENTS TO IT.

A. Treatment of Allowed Administrative Claims

Allowed Administrative Claims will be paid in cash, in full, on the later of the Effective Date or the date they are allowed by an Order of the Bankruptcy Court. Ordinary trade debt incurred in the course of the Chapter 11 case will be paid on an ongoing basis in accordance with the ordinary business practices and terms between the Debtors and its trade creditors. The payments contemplated by the Plan will be conclusively deemed to constitute full satisfaction of Allowed

Administrative Claims. Administrative Claims include any post-petition fees and expenses allowed to professionals employed upon Court authority to render services to the Debtors during the course of the Chapter 11 case. In this case, two professionals were employed: Norman Novinsky, Esquire as counsel to Tucz and Maple Park and Verdolino & Lowey, P.C. as accountants to Tucz and Maple Park. In order to be compensated, all professionals will have to apply to the Court for compensation and they will be paid that amount which the Court allows. It is estimated that administrative fees may be approximately \$70,000, but that is only an estimate by the Debtors and actual fees may be higher than as represented to this Disclosure Statement. This Disclosure Statement was prepared and submitted approximately sixty (60) days prior to the date anticipated for Confirmation and considerably more work by counsel for the Debtors may have been rendered to the Debtors by the time of Confirmation.

B. Designation and Description of Classes under the Plan

1. Class One: Tax Claims. Class One consists of all Allowed Priority Tax Claims, as scheduled or as filed and allowed by the Court, or whatever kind or nature which are not included in any other Class hereof. Real estate taxes due to the Town of Wareham in the amount of \$114,117 shall be paid in full over 60 months with interest at 12%.

2. Class Two: Secured Claim of Digital Federal Credit Union. Class Two consists of those claims of Digital Federal Credit Union ("Digital"), a creditor whose claims are secured by all assets of both Debtors except for a 12 acre parcel which is secured by Peter D'Angelo. Digital shall receive payments of interest only commencing thirty days after confirmation at the rate of 5% per annum with a balloon to be paid in the 61st month.

3. Class Three: Claims of Peter D'Angelo. Class Three consists of the secured claim of Peter D'Angelo which is secured by a first mortgage on a twelve acre parcel which has a value of \$500,000. Peter D'Angelo shall receive interest payments only commencing thirty days after confirmation at the rate of 5% per annum with a balloon payment on the 61st month.

4. Class Four: Unsecured Claims of Peter D'Angelo. Class Four consists of the unsecured claim of Peter D'Angelo in the \$1,300,000. Peter D'Angelo shall receive payments of interest only commencing on the 61st month with a balloon payment on the 120th month.

5. Class Five: Unsecured Claims of Brock Tucz. Class Five consists of all Allowed Unsecured Claims of Brock Tucz, as scheduled or as filed and allowed by the Court, of whatever kind or nature which are not included in any other Class hereof, including, without limitation, claims based on the rejection of executory contracts or unexpired leases, and claims for damages to person or property based on strict liability, negligence or breach of a warranty, express or implied, relative to services rendered or products delivered by the Debtors. The Debtors' unsecured debt is approximately \$37,000.

6. Class Six: Unsecured Claims of Maple Park Properties, Inc. Class Six consists of all Allowed Unsecured Claims of Maple Park Properties, Inc., as scheduled or as filed and allowed by the Court, of whatever kind or nature which are not included in any other Class hereof, including without limitation, claims based on the rejection of executory contracts or unexpired leases, and claims for damages to person or property based on strict liability, negligence or breach of a warranty, express or implied, relative to services rendered or products delivered by the Debtors. The Debtors' unsecured debt is approximately \$317,082.

7. Class Seven: Equity Interests. Class Six consists of all Equity Interests of partners as scheduled or as filed and allowed by the Court, of whatever kind or nature which are not included in any other Class hereof. The Debtor, Brock P. Tucz, is the sole trustee and beneficiary of BKT Realty Trust and Glen Charlie Realty Trust which holds title to approximately 590 acres of land on Glen Charlie Road, East Wareham, Massachusetts. The property has been developed as a recreational vehicle resort community. Three hundred thirty-two acres have been developed and contain various buildings and improvements for 332 developed sites for recreational vehicles. The 590 acre parcel also contains 27.4 acres of cranberry bogs as well as 5 million yards of sand available for excavation. Thirty percent of Brock Tucz's beneficial interest in BKT Realty Trust and Glen Charlie Realty Trust shall be transferred to the investor, Wellcome Trust Investments, LLC, in consideration of \$650,000. Brock Tucz is also the 100% shareholder of Maple Park

Properties, Inc. Thirty percent of the shares of stock in Maple Park Properties, Inc. shall also be transferred to the investor, Wellcome Trust Investments, LLC. Brock Tucz shall retain a 70% beneficial interest in BKT Realty Trust and Glen Charlie Realty Trust and 70% shareholder of Maple Park Properties, Inc.

C. Treatment of Claims Under the Plan.

1. Claims not considered impaired under 11 U.S.C. §1124.

Administrative expenses are not impaired under this Plan and will be paid either in full on the Effective Date, provided that no stay of the Confirmation Order is then in effect, or upon such payment schedules as may be, or may have been, agreed upon between the holder thereof and the Debtors. Ordinary trade debt incurred in the course of the Chapter 11 case will be paid by the Debtors on an ongoing basis in accordance with the ordinary business practice and terms between the Debtors and the trade creditor.

Administrative expenses shall include all quarterly fees owing to the U.S. Trustee through the filing of the Application for Final Decree. The Debtors are current upon its Quarterly Fee payments and the balance projected to be due upon Confirmation shall be paid to the U.S. Trustee upon the Effective Date of Confirmation. Pursuant to the provisions of 28 U.S.C. § 1930 as amended by Pub.L.No. 104-99 (1996) the Debtors shall provide the United States Trustee with Post-Confirmation monthly operating reports and make quarterly payments of the United States Trustee's fees until the case is closed. The Debtors will be responsible for timely payment of fees incurred pursuant to 28 U.S.C. § 1930(a)(6). After the Effective Date the Debtors will file with the United States Trustee with a monthly financial report for each month (or portion thereof) the case remains open. The Debtors shall pay all quarterly fees owing to the U.S. Trustee until the Chapter 11 proceeding is closed by the issuance of a Final Decree by the court.

The monthly financial report shall include the following:

- a. A Statement of all disbursements made during the course of the month, whether or

not pursuant to the plan;

- b. A summary, by class, of amounts distributed or property transferred to each recipient under the plan, and an explanation of the failure to make any distributions or transfers of property under the plan;
- c. Debtors' projections as to their continuing ability to comply with the terms of the plan;
- d. A description of any other factors which may materially affect the Debtors' ability to consummate the plan; and
- e. An estimated date when an application for final decree will be filed with the Court (in the case of the final monthly report, the date the decree was filed).

Claims in Class One: Class One consists of real estate taxes due to the Town of Wareham in the amount of \$114,117 shall be paid over 60 months with interest at 12%.

D. Claims Considered impaired under 11 U.S.C. § 1124.

(1) Class Two: Claim of Digital Federal Credit Union. Class Two consists of those claims of Digital Federal Credit Union ("Digital"), a creditor whose claims are secured by a first mortgage in all real estate except for a 12 acre parcel and a first lien on all assets of Maple Park. Digital's secured claim shall be allowed in the amount of \$5,049,933.97.

Debtors shall pay interest only in monthly payments on the outstanding balance at 5%. The entire balance shall be paid in full 61 months from the Effective Date of this plan.

The holder of the Digital claim shall retain its liens and security interests in the Debtors' assets until payment in full of the Digital Allowed Secured Claim. Upon payment in full of the Digital Allowed Secured Claim: (1) all credit agreements, notes, mortgages, security agreements, invoices, contracts, agreements and any other documents or instruments evidencing the Digital Allowed Secured Claim, together with any and all liens and security interests securing the same, shall be canceled, discharged and released without further act or action by the holder of the Digital Allowed Secured Claim under any applicable agreement, law, regulation, order or rule, (2) the obligations of the Debtors thereunder shall be deemed canceled, discharged and released, and (3) all of the right, title and interest of the holder of the Digital Allowed Secured Claim under such

mortgages, deeds of trust, liens or other security interests, including any rights to any Collateral thereunder, will revert to the Reorganized Debtors pursuant to the Plan. Upon payment in full of the Digital Allowed Secured Claim, the holder of the Digital Allowed Secured Claim shall record a discharge of its liens and security interests upon the request of the Reorganized Debtors.

(2) Class Three: Secured Claim of Peter D'Angelo. Class Three consists of the secured claim of Peter D'Angelo whose claim is by a first mortgage in a 12 acre parcel. The secured claim of Peter D'Angelo shall be allowed in the amount of \$500,000. The Allowed Secured Claim of Peter D'Angelo in the face amount of \$500,000 will accrue interest at an annual interest rate of 5%. Interest payments only will commence 13 months from date of confirmation with a balloon payment on the 61st month.

The holder of the claim of Peter D'Angelo shall retain its liens and security interests in the Debtors' assets until payment in full of the Peter D'Angelo Allowed Secured Claim. Upon payment in full of the Peter D'Angelo Allowed Secured Claim: (1) all credit agreements, notes, mortgages, security agreements, invoices, contracts, agreements and any other documents or instruments evidencing the Peter D'Angelo Allowed Secured Claim, together with any and all liens and security interests securing the same, shall be canceled, discharged and released without further act or action by the holder of the Peter D'Angelo Allowed Secured Claim under any applicable agreement, law, regulation, order or rule, (2) the obligations of the Debtors thereunder shall be deemed canceled, discharged and released, and (3) all of the right, title and interest of the holder of the Peter D'Angelo Allowed Secured Claim under such mortgages, deeds of trust, liens or other security interests, including any rights to any Collateral thereunder, will revert to the Reorganized Debtors pursuant to the Plan. Upon payment in full of the Peter D'Angelo Allowed Secured Claim, the holder of the Peter D'Angelo Allowed Secured Claim shall record a discharge of its lien and security interests upon the request of the Reorganized Debtors.

(3) Class Four: Unsecured Claims of Peter D'Angelo. Class Four consists of all Allowed Unsecured Claims of Peter D'Angelo as scheduled or as filed and allowed by the Court. Class Four claimant shall receive 100% with no payments until 61 months after confirmation. Interest does not accrue months 1 – 60. Interest payments at the rate of 5% will commence month

61 – 120 with a balloon payment on month 120.

(4) Class Five: Unsecured Claims of Brock Tucey. Class Five consists of all Allowed Unsecured Claims of Brock Tucey, as scheduled or as filed and allowed by the Court, of whatever kind or nature which are not included in any other Class hereof, including, without limitation, claims based on the rejection of executory contracts or unexpired leases, and claims for damages to person or property based on strict liability, negligence or breach of a warranty, express or implied, relative to services rendered or products delivered by the Debtors. The Debtors' unsecured debt is approximately \$37,000.

(5) Class Six: Unsecured Claims of Maple Park Properties, Inc. Class Six consists of all Allowed Unsecured Claims of Maple Park Properties, Inc., as scheduled or as filed and allowed by the Court, of whatever kind or nature which are not included in any other Class hereof, including without limitation, claims based on the rejection of executory contracts or unexpired leases, and claims for damages to person or property based on strict liability, negligence or breach of a warranty, express or implied, relative to services rendered or products delivered by the Debtors. The Debtors' unsecured debt is approximately \$317,082.

(6) Class Seven: Equity Interests. Class Seven Consists of all Allowed Interests, as scheduled or filed and allowed by the Court, of whatever kind or nature which are not included in any other Class hereof. On the Effective Date, Brock Tucey will transfer 30% of his beneficial interest in BKT Realty Trust and Glen Charlie Realty Trust and 30% of his shares in Maple Park Properties, Inc. to Wellcome Trust Investments, LLC.

E. Means for Implementation of the Plan.

On Confirmation, all property of Tucey and Maple Park, tangible and intangible, including, without limitation, licenses, furniture, fixtures and equipment, will revert, free and clear of all claims and interests except as provided in the Plan, to Tucey and Maple Park.

All quarterly disbursement fees, arising under 23 U.S.C. § 1930 ("Quarterly Fees"), accrued prior to confirmation shall be paid in full, on or before the date of confirmation of the Debtors' plan,

by the Debtors or any successor to the Debtors. All Quarterly Fees which accrue post-confirmation shall be paid in full on a timely basis by the Debtors or any successor to the Debtors prior to the Debtors' case being closed, converted or dismissed.

Funding for implementation of the plan shall be derived from an investor who has agreed to invest \$650,000 in exchange for thirty percent ownership in the real estate and twenty-five percent of the ownership interest in Maple Park Properties, Inc.

F. Provision for Disputed Claims.

Debtors may object to the allowance of any Claims within 90 days of the Effective Date by filing an objection with the Bankruptcy Court and serving a copy thereof on the holder of the Claim in which event the Claim objected to will be treated as a Disputed Claim under the Plan. If and when a Disputed Claim is finally resolved by allowance of the Claim in whole or in part, Debtors will make any payments in respect of such Allowed Claim in accordance with the Plan.

III. INFORMATION PERTAINING TO DEBTORS

A1. Background Regarding the Debtor, Brock Tucey.

Brock Tucey is the sole trustee and beneficiary of BKT Realty Trust and Glen Charlie Realty Trust. Brock Tucey is also the 100% shareholder of Maple Park Properties, Inc. and the sole officer and director and general manager of Maple Park Properties, Inc.

A2. Background Regarding the Debtor, Maple Park Properties, Inc.

Maple Park Properties, Inc. is a Massachusetts corporation which is the managing company for the recreational vehicle park. Maple Park also is the owner of 1,355 shares of stock in Ocean Spray.

B. Officers, Directors and Shareholders.

Brock P. Tucey is the sole trustee and beneficiary of BKT Realty Trust and Glen Charlie Realty Trust which holds title to approximately 590 acres of land on Glen Charlie Road, East Wareham, Massachusetts. Brock P. Tucey is also the sole Officer, Director and Shareholder of

Maple Park Properties, Inc.

C. Problems and Corrections.

Revenues are derived from several sources.

- a. Income is derived from the RV Campgrounds. This consists of yearly seasonal renters as well as daily renters.
- b. Income is derived from the sale of cranberries. There is a contract in place with Ocean Spray.
- c. Income is derived from the sale of the coarse material. There is a contract in place for the purchase of coarse material at the price of \$3.00 per yard with a minimum commitment of 40,000 yards per year. There is up to 600,000 yards of material in the park portion and 5,000,000 yards in the rear portion. In addition, the Debtors are exploring the feasibility of setting up a separate company which will sell the coarse material at a higher price of \$5.00 per yard.

Due to the down turn in the economy, the Debtors were unable to make current payments with Digital Federal Credit Union. Once the Digital Federal Credit Union commenced foreclosure proceedings, there was additional loss of revenue.

D. Post-Petition Performance.

Debtors for the months of April through November 2010 have met their projections, see Exhibit C. The only issue was with the sale of the sand and gravel. The contract with the previous purchaser had to be terminated by the Court due to non-performance. As a result, the Debtors did not meet the sales projections of the sand and gravel.

A new contract has been approved by this Court. As a result, income is beginning to come in from the sale of the material.

Further, Debtors are exploring the feasibility to set up their own company for the sale of the material.

THE DEBTORS HAVE OBTAINED AN INVESTOR WHO IS WILLING TO INVEST

\$650,000 IN EXCHANGE FOR 30 PERCENT OF THE OWNERSHIP INTEREST IN THE REAL ESTATE AND 30 PERCENT OF THE OWNERSHIP INTEREST IN MAPLE PARK PROPERTIES, INC.

The sum of \$300,000 will be placed in an interest-bearing escrow account. The purpose of this sum is to guarantee payments to the creditors.

The remaining \$300,000 will be used as follows:

1. Payment of administrative costs in the amount of approximately \$70,000.
2. Add forty new sites at the cost of \$1,800 per site.
3. Completion of the recreational ball fields and handicap rest rooms \$11,000.
4. Completion of the Island Teiki bar \$8,500.
5. Improvements to the recreational hall, foundation and decking \$61,000.
6. Installation of Wi-Fi Internet at \$50,000.
7. Improvement of cranberry bogs \$40,000.
8. Balance of funds for working capital.

The Debtors believe that with the economy improving and with the improvements to the property as well as additional sites, there will be sufficient funds to pay all creditors 100%.

IV. VOTING AND CONFIRMATION

A. General Requirements.

In order to confirm a Plan, the Code requires that the Bankruptcy Court make a series of determinations concerning the Plan, including that: (1) the Plan has classified Claims in a permissible manner; (2) the Plan complies with the technical requirements of Chapter 11 of the Code; (3) the proponent of the Plan has proposed the Plan in good faith; (4) the disclosures concerning the Plan as required by Chapter 11 of the Code have been adequate and have included information concerning all payments made or promised by the Debtors in connection with the Plan; (5) the Plan has been accepted by the requisite vote of creditors, except, as explained below, to the extent that "cram-down" is available under Section 1129(b) of the Code; (6) the Plan is "feasible" (that is, there is a reasonable prospect that the Debtors will be able to perform its obligations under

the Plan and continue to operate its business without further financial reorganization, except if the Plan contemplates a liquidation of the Debtors' assets); and (7) the Plan is in the "best interests" of all creditors (that is, that creditors will receive at least as much under the Plan as they would receive in a Chapter 7 liquidation). To confirm the Plan, the Bankruptcy Court must find that all of these conditions are met. Thus, even if the creditors of the Debtors accept the Plan by the requisite number of votes, the Bankruptcy Court must make independent findings respecting the Plan's feasibility and whether it is in the best interests of the Debtors' creditors before it may confirm the Plan. The Debtors believe that its Plan fulfills all of the statutory conditions of Section 1129 of the Code. The statutory conditions to confirmation are more fully discussed immediately below.

B. Classification of Claims and Interests.

The Code requires that a plan of reorganization place each creditor's claim in a class with other claims which are "substantially similar." The Debtors believe that its Plan meets the classification requirements of the Code.

C. Voting.

As a condition to Confirmation, the Code requires that each impaired class of claims accept the Plan. The Code defines acceptance of a Plan by a class of claims as acceptance by holders of two-thirds in dollar amount and a majority in number of claims of that class, but for that purpose the only ballots counted are those of the creditors who are allowed to vote and who actually vote to accept or to reject the Plan. Persons who are considered "insiders," as that term is defined in Section 101 of the Code, may vote, but its vote is not counted in determining acceptance of the Plan.

Classes of claims that are not "impaired" under the Plan are deemed to have accepted the Plan. Acceptances of the Plan are being solicited only from those persons who hold Allowed Secured and Unsecured Claims that are impaired under the Plan. An Allowed Claim is "impaired" if the legal, equitable, or contractual rights attaching to the Allowed Claims of the class are modified, other than by curing defaults and reinstating maturity or by payment in full in cash. You should review the Plan of Reorganization for the definition of an Allowed Claim. A claim to which an objection is filed is not an Allowed Claim. However, the Court may allow such a claim for

purposes of voting on the Plan. If you have not received an objection to your claim prior to Confirmation of the Plan and you have received a ballot for purposes of voting on the Plan, then most likely your claim is an Allowed Claim. If you have a question, you should consult your own attorney.

D. Best Interests of Creditors.

Notwithstanding acceptance of the Plan by creditors of each class, in order to confirm the Plan the Bankruptcy Court must independently determine that the Plan is in the best interests of all classes of creditors impaired by the Plan. The “best interests” test requires that the Bankruptcy Court find that the Plan provides to each member of each impaired class of claims a recovery which has a value at least equal to the value of the distribution which each such creditor would receive if the Debtors were liquidated under Chapter 7 of the Code. Please see the discussion of liquidation value below.

V. LIQUIDATION VALUATION

To calculate what creditors would receive if the Debtors were to be liquidated, the Bankruptcy Court must first determine the aggregate dollar amount that would be generated from the Debtors’ assets if the Chapter 11 case were converted to a Chapter 7 case under the Code and the assets were liquidated by a trustee in bankruptcy (the “Liquidation Value”). The Liquidation Value would consist of the net proceeds from the disposition of the assets of the Debtors.

The Liquidation Value available to general creditors would be reduced by (a) the claims of secured creditors, and (b) by the costs and expenses of the liquidation, as well as other administrative expense of the Debtors’ estate. The Debtors’ costs of liquidation under Chapter 7 would include the compensation of a trustee, as well as of counsel and of other professionals retained by the trustee; disposition expenses; all unpaid expenses incurred by the Debtors during the Chapter 11 case (such as compensation for attorneys) which are allowed in the Chapter 7 proceeding; litigation costs; and claims arising from the operation of the Debtors’ business during the pendency of the Chapter 11 reorganization and Chapter 7 liquidation cases.

Once the percentage recoveries in liquidation of secured creditors, priority claimants,

general creditors and equity security holders are ascertained, the value of the distribution available out of the Liquidation Value is compared with the value of the property offered to each of the classes of claims under the Plan to determine if the Plan is in the best interests of each creditor and equity security holder.

The following table suggests a likely liquidation scenario for the Debtors under Chapter 7 of the Code.

Brock Tucy

| Source and Application of Funds | Amount | Assumptions |
|---|---------------|---------------------------------|
| Auction of land and buildings | \$7,000,000 | Auction value fair market value |
| Auction costs | \$50,000 | |
| Digital | \$5,100,000 | |
| Peter D'Angelo secured claim | \$500,000 | |
| Chapter 7 Trustee commission and counsel fees | \$100,000 | Estimated |
| Chapter 11 administrative expenses | \$50,000 | Estimated |
| Capital gain taxes | \$1,750,000 | Estimated |
| | \$0 Net | |

Maple Park

| Source and Application of Funds | Amount | Assumptions |
|--|---------------|--|
| Auction of equipment | \$75,000 | 25% of Fair Market Value |
| Stock in Ocean Spray | \$33,375 | |
| Chapter 7 Trustee | \$10,000 | Estimated cost of Trustee's commission and counsel fees. |
| | \$98,375 Net | |

The Debtors estimate that unsecured creditors would receive a minimal dividend in liquidation. The Debtors believe that the Plan will provide a dividend of 100 percent. The Debtors believe that the Plan is in the best interests of all creditors. Thus, a conversion to Chapter 7 with the additional costs noted above would provide less of a return to the creditors.

VI. FEDERAL INCOME TAX CONSEQUENCES

Implementation of the Plan may result in federal income tax consequences to holders of Allowed Claims. Tax consequences to a particular creditor may depend on the particular circumstances or facts regarding the claim of the creditor.

THE DEBTORS MAKE NO REPRESENTATIONS REGARDING THE PARTICULAR TAX CONSEQUENCES OF CONFIRMATION AND CONSUMMATION OF THE PLANS AS TO ANY CREDITOR. EACH PARTY AFFECTED BY THE PLAN SHOULD CONSULT HER, HIS OR ITS OWN TAX ADVISORS REGARDING THE SPECIFIC TAX CONSEQUENCES OF THE PLAN WITH RESPECT TO A CLAIM.

VII. FEASIBILITY

The Bankruptcy Code requires as a condition to Confirmation that the Bankruptcy Court find that liquidation of the Debtors or the need for further reorganization is not likely to follow after Confirmation. The Debtors depend on recurring income from the operation of the recreational vehicle park, sale of cranberries and gravel and it has prepared financial projections and related schedules which are attached hereto as Exhibit B. Those projections show that the Debtors are capable of operating well into the future and generating sufficient funds to perform its obligations in the Plan and continuing without the need for further financial reorganization.

VIII. DISCLAIMERS

THE CONTENT OF THIS DISCLOSURE STATEMENT HAS BEEN APPROVED BY THE BANKRUPTCY COURT AS PROVIDING ADEQUATE INFORMATION TO CREDITORS SO THAT THEY MAY HAVE SUFFICIENT INFORMATION TO VOTE ON THE PLAN. NO REPRESENTATIONS CONCERNING THE DEBTORS, INCLUDING THOSE RELATING TO ITS FUTURE BUSINESS OPERATIONS, OR THE VALUE OF ITS ASSETS, ANY PROPERTY, AND CREDITORS' CLAIMS, INCONSISTENT WITH ANYTHING CONTAINED HEREIN HAVE BEEN AUTHORIZED. NEITHER THE DEBTORS NOR THE CREDITORS COMMITTEE WARRANT OR REPRESENT THAT THE INFORMATION CONTAINED HEREIN IS COMPLETE OR WITHOUT OMISSIONS. THE BANKRUPTCY COURT'S APPROVAL OF THIS DISCLOSURE STATEMENT DOES NOT CONSTITUTE A RECOMMENDATION FOR OR AGAINST THE PLAN.

THIS DISCLOSURE STATEMENT MAY NOT BE RELIED UPON FOR ANY PURPOSE OTHER THAN TO DETERMINE HOW TO VOTE ON THE PLAN, AND

NOTHING CONTAINED IN IT WILL CONSTITUTE AN ADMISSION OF ANY FACT OR LIABILITY BY ANY PARTY, OR BE ADMISSIBLE IN ANY PROCEEDING INVOLVING THE DEBTORS OR ANY OTHER PARTY, OR BE DEEMED CONCLUSIVE ADVICE ON THE TAX OR OTHER LEGAL EFFECTS OF THE REORGANIZATION ON HOLDERS OF CLAIMS.

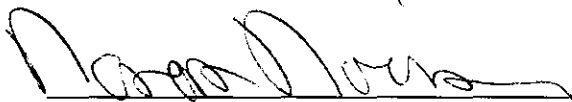
THE STATEMENTS CONTAINED IN THIS DISCLOSURE STATEMENT ARE MADE AS OF THIS DATE UNLESS ANOTHER TIME IS SPECIFIED, AND NEITHER DELIVERY OF THIS DISCLOSURE STATEMENT NOR ANY EXCHANGE OF RIGHTS MADE IN CONNECTION WITH THIS DISCLOSURE STATEMENT WILL, UNDER ANY CIRCUMSTANCES, CREATE AN IMPLICATION THAT THERE HAS BEEN NO CHANGE IN THE FACTS SINCE THE DATE OF THE DISCLOSURE STATEMENT AND THE MATERIALS RELIED UPON IN PREPARATION OF THIS DISCLOSURE STATEMENT WAS COMPLIED.

IX. CONCLUSION

The Bankruptcy Court has determined that this Disclosure Statement is adequate and contains information sufficient for holders of Claims to make an informed judgment in exercising its right to vote on the Plan. The Plan is the result of an effort by the Debtors to provide creditors with a meaningful dividend. An alternative to the Plan is liquidation which will, in all likelihood, reduce significantly the return to creditors on their Allowed Claims. The Debtors believe that the Plan is clearly preferable to liquidation.

A BALLOT IS ENCLOSED WITH THIS DISCLOSURE STATEMENT. YOU SHOULD VOTE TO ACCEPT OR REJECT THE PLAN ON THAT BALLOT AND RETURN IT AS FOLLOWS: BALLOTS SHOULD BE SENT TO NORMAN NOVINSKY, ESQUIRE, 1350 BELMONT STREET, SUITE 105, BROCKTON, MASSACHUSETTS 02301.

BROCK P. TUCY, DEBTOR,
BY HIS ATTORNEY,



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MAPLE PARK PROPERTIES, INC., DEBTOR,
BY ITS ATTORNEY,



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DATED: December 14, 2010

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

| | | |
|------------------------|---|------------------------|
| _____) | | |
| IN RE: |) | |
| |) | |
| BROCK P. TUCY, ET AL., |) | CHAPTER 11 |
| |) | CASE NO. 09-22152-WCH |
| Debtor |) | CASE NO. 10-15698-WCH |
| _____) | | (Jointly Administered) |

CERTIFICATE OF SERVICE RE
AMENDED DISCLOSURE STATEMENT WITH RESPECT TO CHAPTER 11 PLAN OF
BROCK P. TUCY AND MAPLE PARK PROPERTIES, INC. AND
PLAN OF REORGANIZATION DATED OCTOBER 15, 2010

I, the undersigned, do hereby certify that on this 14th day of December, 2010, I did serve the Amended Disclosure Statement with Respect to Chapter 11 Plan of Brock P. Tucy and Maple Park Properties, Inc. and Amended Plan of Reorganization, by mailing copies of same by first-class mail, postage prepaid, or by electronic notice, to the parties indicated on the attached Notice List.


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NOTICE LIST

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