

B25B (Official Form 25B) (12/08)

**United States Bankruptcy Court
Southern District of Florida**

In re Restoration House Empowerment Ministries International, Inc. Case No. 16-14093
Debtor(s) Chapter 11

Small Business Case under Chapter 11

**RESTORATION HOUSE EMPOWERMENT MINISTRIES INTERNATIONAL,
INC.'S DISCLOSURE STATEMENT, DATED SEPTEMBER 16, 2016**

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I. INTRODUCTION

This is the disclosure statement (the "Disclosure Statement") in the small business chapter 11 case of Restoration House Empowerment Ministries International, Inc. (the "Debtor"). This Disclosure Statement contains information about the Debtor and describes the Chapter 11 Plan of Reorganization (the "Plan") filed by Restoration House Empowerment Ministries International, Inc., on August 12, 2016. A full copy of the Plan is attached to this Disclosure Statement as Exhibit A. ***Your rights may be affected. You should read the Plan and this Disclosure Statement carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one.***

The proposed distributions under the Plan are discussed at pages 6-10 of this Disclosure Statement. General unsecured creditors are classified in Class III. If the Debtor is successful in selling its interest in an Option to Purchase, Class III will receive a distribution of 100% of their allowed claims, to be paid from the closing of the transaction. However, if the Debtor is unsuccessful in obtaining a purchaser for the Option, Class III unsecured creditors shall receive a distribution of 14.3% of their allowed claims, to be distributed over a one hundred twenty (120) month period at \$150.00 a month.

A. Purpose of This Document

This Disclosure Statement describes:

The Debtor and significant events during the bankruptcy case,
 How the Plan proposes to treat claims or equity interests of the type you hold (i.e., what you will receive on your claim or equity interest if the plan is confirmed),
 Who can vote on or object to the Plan,
 What factors the Bankruptcy Court (the "Court") will consider when deciding whether to confirm the Plan,
 Why the Proponent believes the Plan is feasible, and how the treatment of your claim or equity interest under the Plan compares to what you would receive on your claim or equity interest in liquidation, and
 The effect of confirmation of the Plan.

Be sure to read the Plan as well as the Disclosure Statement. This Disclosure Statement describes the Plan, but it is the Plan itself that will, if confirmed, establish your rights.

B. Deadlines for Voting and Objecting; Date of Plan Confirmation Hearing

The Court has not yet confirmed the Plan described in this Disclosure Statement. This section describes the procedures pursuant to which the Plan will or will not be confirmed.

1. *Time and Place of the Hearing to Confirm the Plan*

The hearing at which the Court will determine whether to confirm the Plan will take place on the date as indicated by the Court in an Order Approving Disclosure Statement once the Disclosure Statement is approved. However, the hearing will take place in Courtroom B, at the United States Bankruptcy Court for the Southern District of Florida, The Flagler Waterview Building, 1515 North Flagler Drive, Eighth Floor, West Palm Beach, FL 33401.

2. *Deadline For Voting to Accept or Reject the Plan*

If you are entitled to vote to accept or reject the plan, vote on the enclosed ballot and return the ballot in the enclosed envelope to the Clerk of the United States Bankruptcy Court for the Southern District of Florida, The Flagler Waterview Building, 1515 North Flagler Drive, Eighth Floor, West Palm Beach, FL 33401, as well as the Debtor, c/o Brett A. Elam, Esq., 105 S. Narcissus Avenue, Suite 802, West Palm Beach, FL 33401. See section IV.A. below for a discussion of voting eligibility requirements.

Your ballot must be received by the date indicated in the court's Order Approving Disclosure Statement, or it will not be counted.

3. *Deadline For Objecting to the Confirmation of the Plan*

Objections to the confirmation of the Plan must be filed with the Court and served upon the Debtor, c/o Brett A. Elam, Esq., 105 S. Narcissus Avenue, Suite 802, West Palm Beach, FL 33401 thirty (30) days prior to the scheduled confirmation hearing.

4. *Identity of Person to Contact for More Information*

If you want additional information about the Plan, you should contact the Debtor, c/o Brett A. Elam, Esq., 105 S. Narcissus Avenue, Suite 802, West Palm Beach, FL 33401.

C. Disclaimer

The Court has approved this Disclosure Statement as containing adequate information to enable parties affected by the Plan to make an informed judgment about its terms. The Court has not yet determined whether the Plan meets the legal requirements for confirmation, and the fact that the Court has approved this Disclosure Statement does not constitute an endorsement of the Plan by the Court, or a recommendation that it be accepted. The Court's approval of this Disclosure Statement is subject to final approval at the hearing on confirmation of the Plan.

II. BACKGROUND

A. Description and History of the Debtor's Business

The Debtor is a not for profit corporation, which operates a church in Palm Beach County, Florida. Since February 2007, the Debtor has operated as a not-for-profit organization and has operated a church located in Palm Beach County, Florida. As of the Petition Date, the Debtor operated a church located at 2923 South Federal Highway, Boynton Beach, FL 33435 ("Boynton Beach Location"). The Debtor operated from the Boynton Beach Location under a lease with the owner, Bethesda Tabernacle of the Christian and Missionary Alliance, Inc. ("Bethesda").

B. Insiders of the Debtor

The insiders of the Debtor are the following:

Bishop Anthony S. Mays;
Deborah Neal;
Bishop Carla Mays;
Ashanti Blue; and
Tiffany Mays.

C. Management of the Debtor Before and During the Bankruptcy

During the two years prior to the date on which the bankruptcy petition was filed, the officers, directors, managers or other persons in control of the Debtor (collectively the "Managers") were Anthony Mays, Deborah Neal, Carla Mays, Ashanti Blue, and Tiffany Mays.

The Managers of the Debtor during the Debtor's chapter 11 case have been the same as pre-petition. However, the only individuals who have taken an active role during the pendency of this case is Anthony Mays and Carla Mays.

After the effective date of the order confirming the Plan, the directors, officers, and voting trustees of the Debtor, any affiliate of the Debtor participating in a joint Plan with the Debtor, or successor of the Debtor under the Plan (collectively the "Post Confirmation Managers"), will be Anthony Mays and Carla Mays. The responsibilities and compensation of these Post Confirmation Managers are described in Section III(D)(2) of this Disclosure Statement.

D. Events Leading to Chapter 11 Filing

The Debtor operated a church prior to filing the instant Chapter 11 bankruptcy, which began operation in February 2007. On or around the beginning of 2014, the Debtor's congregation was growing, which resulted in the Debtor needing a new place to hold its worship services. On April 21, 2014, the Debtor executed a commercial lease with Bethesda for the Boynton Beach Location ("Commercial Lease"). The Commercial Lease was for a term of two (2) years, commencing May 1, 2014 and terminating May 31, 2016. As the Boynton Beach Location was a good location and size for the Debtor and its congregation, the Debtor inquired about purchasing the Boynton Beach Location at the time of the execution of the Commercial Lease.

Based upon the Debtor's intentions to ultimately purchase the Boynton Beach Location, the Commercial Lease contained an Option to Purchase ("Option"). Pursuant to the Option, upon execution, the Debtor was afforded the right to purchase the Boynton Beach Location for a purchase price of \$1,500,000.00 at sometime in the future. In exchange for the Option, the Debtor tendered \$100,000.00 towards the ultimate purchase price. In addition to the \$100,000.00 payment, \$3,000.00 of the monthly rental amount of \$10,106.66 would be credited against the agreed upon purchase price. In all, upon successful exercising of the Option, the Boynton Beach Location would be sold to the Debtor for a purchase price of \$1,328,000.00. Additionally, during the course of the Debtor's tenancy, an extra \$60,000.00 in renovations was done by the Debtor to the Boynton Beach Location in anticipation of purchasing the property.

On or about July 2015, the Debtor was contacted by the City of Boynton Beach about certain zoning restrictions related to the Boynton Beach Location. It was determined the Boynton Beach Location was not properly zoned for a church, and had not been properly zoned since 2012. Moreover, it was discovered Bethesda failed to obtain the appropriate business license in 2010, which would have allowed any entity occupying the premises, ie the Debtor, to continue to utilize the Boynton Beach Location as a church, despite the 2012 zoning change. All of which was concealed by Bethesda when the Commercial Lease and Option were executed by the Debtor.

Based upon the improper use of the Boynton Beach Location, as well as Bethesda's failure to obtain the appropriate business license in 2010, fines had been accruing against the Boynton Beach Location since 2010. These fines resulted in an enormous lien against the Boynton Beach Location. In turn, the value of the location was severely affected. Upon discovering the zoning restrictions and fines on the Boynton Beach Location, the Debtor demanded Bethesda return the \$100,000.00 deposit, the portion of the rent attributable to the Option, and the money spent in renovations. However, rather than return the funds which were supposedly being held in escrow, Bethesda declared a default in the Commercial Lease and instituted eviction proceedings against the Debtor. The eviction action was predicated on a manufactured default by Bethesda. However, prior to obtaining a Writ of Possession, the Debtor filed the instant Chapter 11 bankruptcy.

E. Significant Events During the Bankruptcy Case

Upon filing of the instant Chapter 11 bankruptcy, the Debtor gathered all of the required documents so the Schedules and Statement of Financial Affairs. Additionally, the Debtor closed its pre-petition bank accounts, and opened new debtor-in-possession bank accounts. After all of the information was gathered, the Debtor provided the information to its counsel, and the Schedules and Statement of Financial Affairs was prepared and reviewed. The Debtor sought an extension of time to file the Schedules and Statement of Financial Affairs. Ultimately, on April 16, 2016, the Debtor filed its Schedules and Statement of Financial Affairs (**DE#22**). Shortly thereafter, on April 18, 2016, the Debtor filed the remaining required documents, including the required Small Business Documents (**DE#29, DE#30, and DE#31**).

After filing the required Schedules and Statement of Financial Affairs, the Debtor gather the required documents pursuant to the United States Trustee's Guidelines, and provided the documents to the the Assistant United States Trustee for the Southern District of Florida. Additionally, the Debtor appeared at the Initial Debtor Interview through its officer, Anthony Mays. During this time, on April 6, 2016, the Debtor sought to employ its counsel by filing an Application to Employ (**DE#11**). Just prior to the Debtor seeking to employ its counsel, Bethesda filed a Motion for Relief from Stay (**DE#10**) on April 4, 2016. The Motion was filed on negative notice. The Debtor filed its Objection to the Motion for Relief from Stay (**DE#32**) on April 25, 2016. After a short hearing, the Court granted Bethesda stay relief pursuant to the Order Granting Motion for Stay Relief (**DE#49**), which was entered June 14, 2016.

In an effort to move this matter forward and maximize its assets, the Debtor retained a realtor to market and sale the Option contained within the Commercial Lease. As such, the Debtor filed its Ex-Parte Motion to Employ Realtor **(DE#52)** on August 9, 2016. The Debtor sought to employ Barbara LeBrun and Aaron Brown of WPB Realty Partners, LLC d/b/a Keller Williams Coastal Partners. The Bankruptcy Court approved the employment of the realtors and entered its Ex-Parte Order Granting Debtor's Ex-Parte Motion to Employ Real Estate Broker **(DE#54)** on August 10, 2016. Subsequent to the entry of this Order, the realtors have met with the Debtor's principals and counsel, and have begun to market the Option to purchase the Boynton Beach Location. Upon finding a potential purchaser for Option, the Debtor intends to file the appropriate motion with the Bankruptcy Court to approve said transaction.

F. Projected Recovery of Avoidable Transfers

The Debtor has not yet completed its investigation with regard to prepetition transactions. If you received a payment or other transfer within 90 days of the bankruptcy, or other transfer avoidable under the Code, the Debtor may seek to avoid such transfer.

G. Claims Objections

Except to the extent that a claim is already allowed pursuant to a final non-appealable order, the Debtor reserves the right to object to claims. Therefore, even if your claim is allowed for voting purposes, you may not be entitled to a distribution if an objection to your claim is later upheld. The procedures for resolving disputed claims are set forth in Article V of the Plan.

H. Current and Historical Financial Conditions

The identity and fair market value of the estate's assets are listed in Exhibit B. The Debtor's most recent financial statements issued before bankruptcy, each of which was filed with the Court, are set forth in Exhibit C.

The most recent post-petition operating report filed since the commencement of the Debtor's bankruptcy case are set forth in Exhibit D.

III. SUMMARY OF THE PLAN OF REORGANIZATION AND TREATMENT OF CLAIMS AND EQUITY INTERESTS

A. What is the Purpose of the Plan of Reorganization?

As required by the Code, the Plan places claims and equity interests in various classes and describes the treatment each class will receive. The Plan also states whether each class of claims or equity interests is impaired or unimpaired. If the Plan is confirmed, your recovery will be limited to the amount provided by the Plan.

B. Unclassified Claims

Certain types of claims are automatically entitled to specific treatment under the Code. They are not considered impaired, and holders of such claims do not vote on the Plan. They may, however, object if, in their view, their treatment under the Plan does not comply with that required by the Code. As such, the Plan Proponent has not placed the following claims in any class:

1. Administrative Expenses

Administrative expenses are costs or expenses of administering the Debtor's chapter 11 case which are allowed under § 507(a)(2) of the Code. Administrative expenses also include the value of any goods sold to the Debtor in the ordinary course of business and received within 20 days before the date of the bankruptcy petition. The Code requires that all administrative expenses be paid on the effective date of the Plan, unless a particular claimant agrees to a different treatment.

The following chart lists the Debtor's estimated administrative expenses, and their proposed treatment under the Plan:

<u>Type</u>	<u>Estimated Amount Owed</u>	<u>Proposed Treatment</u>
Expenses Arising in the Ordinary Course of Business After the Petition Date		Paid in full on the effective date of the Plan, or according to terms of obligation if later
The Value of Goods Received in the Ordinary Course of Business Within 20 Days Before the Petition Date		Paid in full on the effective date of the Plan, or according to terms of obligation if later
Professional Fees, as approved by the Court.	Approximately \$15,000.00	Paid in full on the effective date of the Plan, or according to separate written agreement, or according to court order if such fees have not been approved by the Court on the effective date of the Plan
Clerk's Office Fees		Paid in full on the effective date of the Plan
Other administrative expenses		Paid in full on the effective date of the Plan or according to separate written agreement
Office of the U.S. Trustee Fees	Pursuant to the U.S. Trustee Guidelines	Paid in full on the effective date of the Plan
TOTAL		

2. *Priority Tax Claims*

Priority tax claims are unsecured income, employment, and other taxes described by § 507(a)(8) of the Code. Unless the holder of such a § 507(a)(8) priority tax claim agrees otherwise, it must receive the present value of such claim, in regular installments paid over a period not exceeding 5 years from the order of relief.

The following chart lists the Debtor's estimated § 507(a)(8) priority tax claims and their proposed treatment under the Plan:

<u>Description (name and type of tax)</u>	<u>Estimated Amount Owed</u>	<u>Date of Assessment</u>	<u>Treatment</u>												
CLASS I Palm Beach County Tax Collector 2014 tangible personal property tax	\$1,099.10	2014	<table> <tr> <td>Pmt interval</td> <td>Once a month</td> </tr> <tr> <td>Monthly payment</td> <td>\$30.23 per month</td> </tr> <tr> <td>Begin date</td> <td>Thirty (30) days from the Effective Date.</td> </tr> <tr> <td>End Date</td> <td>March 2021</td> </tr> <tr> <td>Interest Rate %</td> <td>18% per annum</td> </tr> <tr> <td>Total Payout Amount</td> <td>\$1,602.19</td> </tr> </table>	Pmt interval	Once a month	Monthly payment	\$30.23 per month	Begin date	Thirty (30) days from the Effective Date.	End Date	March 2021	Interest Rate %	18% per annum	Total Payout Amount	\$1,602.19
Pmt interval	Once a month														
Monthly payment	\$30.23 per month														
Begin date	Thirty (30) days from the Effective Date.														
End Date	March 2021														
Interest Rate %	18% per annum														
Total Payout Amount	\$1,602.19														

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CLASS II	\$729.20	2015	Pmt interval	Once a month
Palm Beach County Tax Collector 2015 tangible personal property tax			Monthly payment	\$20.06 per month
			Begin date	Thirty (30) days from the Effective Date.
			End Date	March 2021
			Interest Rate %	18% per annum
			Total Payout Amount	\$1,063.18

C. Classes of Claims and Equity Interests

The following are the classes set forth in the Plan, and the proposed treatment that they will receive under the Plan:

1. *Classes of Secured Claims*

Allowed Secured Claims are claims secured by property of the Debtor's bankruptcy estate (or that are subject to setoff) to the extent allowed as secured claims under § 506 of the Code. If the value of the collateral or setoffs securing the creditor's claim is less than the amount of the creditor's allowed claim, the deficiency will be classified as a general unsecured claim. There are no secured claims in this Estate.

2. *Classes of Priority Unsecured Claims*

Certain priority claims that are referred to in §§ 507(a)(1), (4), (5), (6), and (7) of the Code are required to be placed in classes. The Code requires that each holder of such a claim receive cash on the effective date of the Plan equal to the allowed amount of such claim. However, a class of holders of such claims may vote to accept different treatment. There are no priority unsecured claims in the Estate as referred to in this paragraph.

3. *Class of General Unsecured Claims*

General unsecured claims are not secured by property of the estate and are not entitled to priority under § 507(a) of the Code.

The following chart identifies the Plan's proposed treatment of Class III, which contain general unsecured claims against the Debtor:

Class #	Description	Impairment	Treatment
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Class #	Description	Impairment	Treatment
3	<p>General Unsecured Class -</p> <p>(This Class includes the unsecured claims in the Debtor's Estate. These claims include the claim if All Brite Car Wash, Inc., in the amount of \$18,000.00 and the claim of Bethesda Tabernacle of the Christian and Missionary Alliance, Inc., in the amount of \$107,837.74. However, the Debtor shall be objecting to the claim filed by Bethesda. If this claim is allowed, the total amount of Class III will be \$125,837.74. If the Bankruptcy Court sustains the Debtor's objection to the claim of Bethesda, the total of this Class shall be \$18,000.00).</p>	Impaired	<p>IF THE BANKRUPTCY COURT SUSTAINS THE DEBTOR'S OBJECTION TO PROOF OF CLAIM #3-1:</p> <p>If the Debtor obtains a successful purchaser for the Option, the Debtor shall pay Class III in full upon the closing of the transaction. This will result in a 100% distribution to this Class. This Class will not receive interest on their claims.</p> <p>If the Debtor is unable to obtain a purchaser for the Option, the Debtor shall pay this Class as follows:</p> <p>Monthly payment \$150.00</p> <p>Pmts Begin Thirty (30) days after the determination is made the Debtor is not going to be successful in selling the Option.</p> <p>Pmts End One Hundred Nineteen (119) months after the initial payment is made.</p> <p>Interest rate % 0.0% interest</p> <p>Estimated percent of claim paid 100.00%</p>

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Class #	Description	Impairment	Treatment
			<p data-bbox="1029 163 1284 405">IF THE BANKRUPTCY COURT OVERRULES THE DEBTOR'S OBJECTION TO PROOF OF CLAIM #3-1:</p> <p data-bbox="1029 436 1284 831">If the Debtor obtains a successful purchaser for the Option, the Debtor shall pay Class III in full upon the closing of the transaction. This will result in a 100% distribution to this Class. This Class will not receive interest on their claims.</p> <p data-bbox="1029 863 1284 1045">If the Debtor is unable to obtain a purchaser for the Option, the Debtor shall pay this Class as follows:</p> <p data-bbox="1029 1104 1385 1136">Monthly payment \$150.00</p> <p data-bbox="1029 1167 1521 1381">Pmts Begin Thirty (30) days after the determination is made the Debtor is not going to be successful in selling the Option.</p> <p data-bbox="1029 1413 1521 1562">Pmts End One Hundred Nineteen (119) months after the initial payment is made.</p> <p data-bbox="1029 1593 1451 1625">Interest rate % 0.0% interest</p> <p data-bbox="1029 1656 1385 1717">Estimated percent of claim paid 14.30%</p>

4. *Class of Equity Interest Holders*

Equity interest holders are parties who hold an ownership interest (i.e., equity interest) in the Debtor. In a corporation, entities holding preferred or common stock are equity interest holders. In a partnership, equity interest holders include both general and limited partners. In a limited liability company ("LLC"), the equity interest holders are the members. Finally, with respect to an individual who is a debtor, the Debtor is the equity interest holder. In this case, the Debtor is a not-for-profit organization. As such, the Equity Interest Holders would be the actual members of the Church, and all funds paid to this Class would remain with the Church. It would not be returned to any one individual.

Class #	Description	Impairment	Treatment
4	Equity interest holders	Impaired	The Equity interest holders in the Debtor would be the actual members of the church. As the Debtor is a not-for-profit organization, the funds received by this Class would remain in the Debtor, and not be returned to one individual. As such, this Class shall receive any and all funds remaining after the successful sale of the Option and payment of all outstanding debts under any confirmed Chapter 11 Plan.

D. Means of Implementing the Plan1. *Source of Payments*

Payments and distributions under the Plan will be funded by the following:

As stated previously, the Debtor is currently marketing and advertising the Option in the open market. The Debtor, and its real estate professionals, estimate the value of the Debtor's interest in the Option is approximately \$600,000.00. However, giving a discount to this amount, a conservative estimate of the value of the Option is approximately \$400,000.00. If the Debtor is successful in its efforts, and a successful bidder is obtained at the conservative estimate of \$400,000.00, the Debtor shall utilize the proceeds from the sale of the Option to pay all payments under this proposed Chapter 11 Plan. The sale of the Option would be more than sufficient to cover all amounts due under the current proposed Chapter 11 Plan. The total amount of debt under this Plan, assuming the Bankruptcy Court sustains the Debtor's Objection to Proof of Claim #3-1, is \$19,828.30. As such, the proceeds from the sale of the Option would be more than adequate to pay this amount. Moreover, if the Debtor is unsuccessful in its Objection to Proof of Claim #3-1, the total amount of debt under the current proposed Chapter 11 Plan is \$127,666.04. As can be seen from the calculations, in either scenario, a successful sale of the Option by the Debtor, even at the conservative value, is more than adequate to satisfy the Debtor's obligations under the proposed Chapter 11 Plan.

However, if the Debtor is unsuccessful in obtaining a purchaser for the Option, the funds required to make the payments under the proposed Chapter 11 Plan shall be obtained from weekly tithes received from the Debtor's congregation.

2. *Post-confirmation Management*

The Post-Confirmation Managers of the Debtor, and their compensation, shall be as follows:

Name	Affiliations	Insider (yes or no)?	Position	Compensation
Anthony Mays	Current President	Yes	President	None
Carla Mays	Current Vice President	Yes	Vice President	None

E. Risk Factors

The proposed Plan has the following risks:

This Plan has the same inherent risks as any other Plan proposed in a Chapter 11 bankruptcy. The risks, which are unique to this case relate to the Option, which is contained within the Commercial Lease. Prior to the filing of the instant bankruptcy, the Debtor entered into a Commercial Lease for the Boynton Beach Location. The Commercial Lease contained an option to purchase the Boynton Beach Location. Pursuant to the terms of the Option, the Option was voidable upon any breach in the terms of the underlying Commercial Lease. Bethesda declared a default in the underlying Commercial Lease shortly after the Debtor determined the Boynton Beach Location was not properly zoned for its intended purpose, and Bethesda would be unable to tender clear title at any closing. In fact, Bethesda filed an action for eviction in the County Court for the Fifteenth Judicial Circuit in and for Palm Beach County, Florida. Moreover, Bethesda obtained a default final judgment in that action. However, the Debtor was not aware of said filing, and disputes the default. The risk associated with this Plan is derived from the uncertainty the Debtor would be able to actually market and sale the Option. If the Debtor is unable to sale the the Option, the payments under the Plan will take more time, and the percentage distribution will be greatly reduced. If the Debtor is unable to sale the Option, the funds to make the proposed Chapter 11 Plan payments would be derived from the tithes received by the Debtor on a weekly basis. The tithes received by the Debtor will be affected greatly by the economy, and will rise and fall as the economy does. This risk is inherent in all bankruptcies, and this filing is no different.

F. Executory Contracts and Unexpired Leases

The Plan, in Exhibit 5.1, lists all executory contracts and unexpired leases that the Debtor will assume under the Plan. Assumption means that the Debtor has elected to continue to perform the obligations under such contracts and unexpired leases, and to cure defaults of the type that must be cured under the Code, if any. Exhibit 5.1 also lists how the Debtor will cure and compensate the other party to such contract or lease for any such defaults.

If you object to the assumption of your unexpired lease or executory contract, the proposed cure of any defaults, or the adequacy of assurance of performance, you must file and serve your objection to the Plan within the deadline for objecting to the confirmation of the Plan, unless the Court has set an earlier time.

All executory contracts and unexpired leases that are not listed in Exhibit 5.1 will be rejected under the Plan. Consult your adviser or attorney for more specific information about particular contracts or leases.

If you object to the rejection of your contract or lease, you must file and serve your objection to the Plan within the deadline for objecting to the confirmation of the Plan.

The Deadline for Filing a Proof of Claim Based on a Claim Arising from the Rejection of a Lease or Contract is thirty (30) days from the entry of an Order approving said rejection. Any claim based on the rejection of a contract or lease will be barred if the proof of claim is not timely filed, unless the Court orders otherwise.

G. Tax Consequences of Plan

Creditors and Equity Interest Holders Concerned with How the Plan May Affect Their Tax Liability Should Consult with Their Own Accountants, Attorneys, And/Or Advisors.

IV. CONFIRMATION REQUIREMENTS AND PROCEDURES

To be confirmable, the Plan must meet the requirements listed in §§ 1129(a) or (b) of the Code. These include the requirements that: the Plan must be proposed in good faith; at least one impaired class of claims must accept the plan, without counting votes of insiders; the Plan must distribute to each creditor and equity interest holder at least as much as the creditor or equity interest holder would receive in a chapter 7 liquidation case, unless the creditor or equity interest holder votes to accept the Plan; and the Plan must be feasible. These requirements are not the only requirements listed in § 1129, and they are not the only requirements for confirmation.

A. Who May Vote or Object

Any party in interest may object to the confirmation of the Plan if the party believes that the requirements for confirmation are not met.

Many parties in interest, however, are not entitled to vote to accept or reject the Plan. A creditor or equity interest holder has a right to vote for or against the Plan only if that creditor or equity interest holder has a claim or equity interest that is both (1) allowed or allowed for voting purposes and (2) impaired.

In this case, if the Debtor is successful in obtaining a buyer for the Option, the Plan Proponent believes that Classes I, II, III, and IV are not impaired and that holders of claims in each of these classes are therefore not entitled to vote to accept or reject the Plan. In this scenario, there will be no Classes entitled to vote. However, if the Debtor is unsuccessful in obtaining a buyer for the Option, the Plan Proponent believes Classes I, II, III, and IV are impaired, and, therefore entitled to vote to accept or reject the Plan.

1. *What Is an Allowed Claim or an Allowed Equity Interest?*

Only a creditor or equity interest holder with an allowed claim or an allowed equity interest has the right to vote on the Plan. Generally, a claim or equity interest is allowed if either (1) the Debtor has scheduled the claim on the Debtor's schedules, unless the claim has been scheduled as disputed, contingent, or unliquidated, or (2) the creditor has filed a proof of claim or equity interest, unless an objection has been filed to such proof of claim or equity interest. When a claim or equity interest is not allowed, the creditor or equity interest holder holding the claim or equity interest cannot vote unless the Court, after notice and hearing, either overrules the objection or allows the claim or equity interest for voting purposes pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure.

The deadline for filing a proof of claim in this case was July 27, 2016.

2. *What Is an Impaired Claim or Impaired Equity Interest?*

As noted above, the holder of an allowed claim or equity interest has the right to vote only if it is in a class that is *impaired* under the Plan. As provided in § 1124 of the Code, a class is considered impaired if the Plan alters the legal, equitable, or contractual rights of the members of that class.

3. *Who is **Not** Entitled to Vote*

The holders of the following five types of claims and equity interests are *not* entitled to vote:

holders of claims and equity interests that have been disallowed by an order of the Court;

holders of other claims or equity interests that are not "allowed claims" or "allowed equity interests" (as discussed above), unless they have been "allowed" for voting purposes.

holders of claims or equity interests in unimpaired classes;

holders of claims entitled to priority pursuant to §§ 507(a)(2), (a)(3), and (a)(8) of the Code; and

holders of claims or equity interests in classes that do not receive or retain any value under the Plan;

administrative expenses.

Even If You Are Not Entitled to Vote on the Plan, You Have a Right to Object to the Confirmation of the Plan and to the Adequacy of the Disclosure Statement.

4. *Who Can Vote in More Than One Class*

A creditor whose claim has been allowed in part as a secured claim and in part as an unsecured claim, or who otherwise hold claims in multiple classes, is entitled to accept or reject a Plan in each capacity, and should cast one ballot for each claim.

B. Votes Necessary to Confirm the Plan

If impaired classes exist, the Court cannot confirm the Plan unless (1) at least one impaired class of creditors has accepted the Plan without counting the votes of any insiders within that class, and (2) all impaired classes have voted to accept the Plan, unless the Plan is eligible to be confirmed by "cram down" on non-accepting classes, as discussed later in Section [B.2.].

1. Votes Necessary for a Class to Accept the Plan

A class of claims accepts the Plan if both of the following occur: (1) the holders of more than one-half (1/2) of the allowed claims in the class, who vote, cast their votes to accept the Plan, and (2) the holders of at least two-thirds (2/3) in dollar amount of the allowed claims in the class, who vote, cast their votes to accept the Plan.

A class of equity interests accepts the Plan if the holders of at least two-thirds (2/3) in amount of the allowed equity interests in the class, who vote, cast their votes to accept the Plan.

2. Treatment of Nonaccepting Classes

Even if one or more impaired classes reject the Plan, the Court may nonetheless confirm the Plan if the nonaccepting classes are treated in the manner prescribed by § 1129(b) of the Code. A plan that binds nonaccepting classes is commonly referred to as a "cram down" plan. The Code allows the Plan to bind nonaccepting classes of claims or equity interests if it meets all the requirements for consensual confirmation except the voting requirements of § 1129(a)(8) of the Code, does not "discriminate unfairly," and is "fair and equitable" toward each impaired class that has not voted to accept the Plan.

You should consult your own attorney if a "cramdown" confirmation will affect your claim or equity interest, as the variations on this general rule are numerous and complex.

C. Liquidation Analysis

To confirm the Plan, the Court must find that all creditors and equity interest holders who do not accept the Plan will receive at least as much under the Plan as such claim and equity interest holders would receive in a chapter 7 liquidation. A liquidation analysis is attached to this Disclosure Statement as Exhibit E.

D. Feasibility

The Court must find that confirmation of the Plan is not likely to be followed by the liquidation, or the need for further financial reorganization, of the Debtor or any successor to the Debtor, unless such liquidation or reorganization is proposed in the Plan.

1. Ability to Initially Fund Plan

The Plan Proponent believes that the Debtor will have enough cash on hand on the effective date of the Plan to pay all the claims and expenses that are entitled to be paid on that date.

2. Ability to Make Future Plan Payments And Operate Without Further Reorganization

The Plan Proponent must also show that it will have enough cash over the life of the Plan to make the required Plan payments.

You Should Consult with Your Accountant or other Financial Advisor If You Have Any Questions Pertaining to These Projections.

V. EFFECT OF CONFIRMATION OF PLAN**A. DISCHARGE OF DEBTOR**

Discharge. On the effective date of the Plan, the Debtor shall be discharged from any debt that arose before confirmation of the Plan, subject to the occurrence of the effective date, to the extent specified in § 1141(d)(1)(A) of the Code. However, the Debtor shall not be discharged from any debt imposed by the Plan. After the effective date of the Plan your claims against the Debtor will be limited to the debts imposed by the Plan.

B. Modification of Plan

The Plan Proponent may modify the Plan at any time before confirmation of the Plan. However, the Court may require a new disclosure statement and/or revoting on the Plan.

Upon request of the Debtor, the United States trustee, or the holder of an allowed unsecured claim, the Plan may be modified at any time after confirmation of the Plan but before the completion of payments under the Plan, to (1) increase or reduce the amount of payments under the Plan on claims of a particular class, (2) extend or reduce the time period for such payments, or (3) alter the amount of distribution to a creditor whose claim is provided for by the Plan to the extent necessary to take account of any payment of the claim made other than under the Plan.

C. Final Decree

Once the estate has been fully administered, as provided in Rule 3022 of the Federal Rules of Bankruptcy Procedure, the Plan Proponent, or such other party as the Court shall designate in the Plan Confirmation Order, shall file a motion with the Court to obtain a final decree to close the case. Alternatively, the Court may enter such a final decree on its own motion.

VI. OTHER PLAN PROVISIONS**A. Injunction Related to Discharge**

Except as otherwise expressly provided in the Plan, the Confirmation Order or a separate order of the Court, all Persons who have held, hold or may hold Claims against the Debtor are permanently enjoined, on and after the Effective Date, from (i) commencing or continuing in any manner any action or other proceeding of any kind with respect to any such Claim, (ii) enforcing, attaching, collecting or recovering by any manner or means of any judgment, award, decree or order against the Debtors on account of any such Claim, (iii) creating, perfecting or enforcing any Lien or asserting control of any kind against the Debtor or against the property or interests in property of the Debtor on account of any such Claim, and (iv) asserting any right of setoff, subrogation or recoupment of any kind against any obligation due from the Debtor or against the property or interests in property of the Debtor on account of any such Claim.

B. Injunction Against Interference with the Plan

Upon the entry of a Confirmation Order with respect to the Plan, all holders of Claims and Equity Interests and other parties in interest, along with their respective present or former employees, agents, officers, directors, or principals, shall be enjoined from taking any actions to interfere with the implementation or consummation of the Plan, except with respect to actions any such entity may take in connection with the pursuit of appellate rights.

C. Term of Bankruptcy Injunction or Stay

All injunctions or stays provided for in the Case under sections 105 or 362 of the Code, or otherwise, and in existence on the Confirmation Date, shall remain in full force and effect until the Effective Date.

B25B (Official Form 25B) (12/08) - Cont.

D. Retention of Jurisdiction

The Court shall have exclusive jurisdiction of all matters arising out of, and related to, the Case and the Plan pursuant to, and for the purposes of, sections 105(a) and 1142 of the Code and for, among other things, the following purposes:

- (a) to hear and determine pending applications for the assumption or rejection of executory contracts or unexpired leases, if any are pending, and the allowance of Claims resulting, therefrom;
- (b) to determine any and all adversary proceedings, motions, applications and contested matters, and other litigated matters pending on the Confirmation Date;
- (c) to hear and determine all Actions, including, without limitation, Actions commenced by the Debtors or any other party in interest with standing to do so, pursuant to sections 505, 542, 543, 544, 545, 547, 548, 549, 550, 551, and 553 of the Code, collection matters related thereto, and settlements thereof;
- (d) to hear and determine any objections to or the allowance, classification, priority, compromise, estimation or payments of any Administrative Claims, Claims or Equity Interests;
- (e) to ensure that Distributions to holders of Allowed Claims are accomplished as provided in the Plan;
- (f) to enter and implement such orders as may be appropriate in the event the Confirmation Order is for any reason stayed, revoked, modified or vacated;
- (g) to issue such orders in aid of execution and consummation of the Plan, to the extent authorized by section 1142 of the Code;
- (h) to consider any amendments to or modifications of the Plan, to cure any defect or omission, or to reconcile any inconsistency in the Plan, the Plan Supplement, or any order of the Court, including, without limitation, the Confirmation Order;
- (i) to hear and determine all applications for compensation and reimbursement of expenses of Professionals under sections 330, 331, and 503(b) of the Code;
- (j) to hear and determine disputes arising in connection with the interpretation, implementation or enforcement of the Plan;
- (k) to recover all Assets of the Debtors and Property of the Estate, wherever located;
- (l) to enforce the Plan, the Confirmation Order and any other order, judgment, injunction or ruling entered or made in the Case, including, without limitation, the discharge, injunction, exculpation and releases provided for in the Plan;
- (m) to take any action and issue such orders as may be necessary to construe, enforce, implement, execute, and consummate the Plan or to maintain the integrity of the Plan following consummation;

B25B (Official Form 25B) (12/08) - Cont.

- (n) to hear and determine matters concerning state, local and federal taxes in accordance with sections 346, 505, and 1146 of the Code (including, but not limited to, an expedited determination under section 505(b) of the Code of the tax liability of the Debtors for all taxable periods through the Effective Date for all taxable periods of the Debtors through the liquidation and dissolution of such entity);
- (o) to enter and implement orders and to take such other actions as may be necessary or appropriate to restrain interference by any Person or Entity with the consummation or implementation of the Plan, including, without limitation, to issue, administer, and enforce injunctions, releases, assignments, or indemnity obligations contained in the Plan and the Confirmation Order;
- (p) to hear any other matter not inconsistent with the Code; and
- (q) to enter a final decree closing the Case; provided however, that nothing in the Plan shall divest or deprive any other court or agency of any jurisdiction it may have over the Reorganized Debtor under applicable environmental laws.

/s/ Anthony S. Mays

Restoration House Empowerment Ministries International, Inc.

[Signature of the Plan Proponent]

/s/ Brett A. Elam

Brett A. Elam 576808

[Signature of the Attorney for the Plan Proponent]

EXHIBITS

B25A (Official Form 25A) (12/11)

**United States Bankruptcy Court
Southern District of Florida
West Palm Beach Division**

In re <u>Restoration House Empowerment Ministries International, Inc.</u>	Case No. <u>16-14093</u>
Debtor(s)	Chapter <u>11</u>

Small Business Case under Chapter 11

**RESTORATION HOUSE EMPOWERMENT MINISTRIES INTERNATIONAL, INC.'S
PLAN OF REORGANIZATION, DATED SEPTEMBER 16, 2016**

**ARTICLE I
SUMMARY**

This Plan of Reorganization (the "Plan") under chapter 11 of the Bankruptcy Code (the "Code") proposes to pay creditors of **Restoration House Empowerment Ministries International, Inc.** (the "Debtor") from the sale of the Debtor's interest in an Option to Purchase contained in a Commercial Lease for the real property located at 2923 South Federal Highway, Boynton Beach, FL 33435; or, in the alternative, from the weekly tithes received by the Debtor from the parishioners.

This Plan provides for no class of secured claims; two (2) classes of unsecured priority claims; one (1) class of unsecured claims; and one (1) class of equity security holders. Unsecured creditors holding allowed claims will receive distributions, which the proponent of this Plan has valued at approximately one hundred (100) cents on the dollar, if the Debtor is successful in obtaining a purchaser for its interest in the Option. However, if the Debtor is unsuccessful in obtaining a purchaser for the Option, the proponent believes unsecured creditors holding allowed claims will receive distributions, which the proponent of this Plan has valued at approximately fourteen and three one thousandths (14.3) cents on the dollar. This Plan also provides for the payment of administrative and priority claims.

All creditors and equity security holders should refer to Articles III through VI of this Plan for information regarding the precise treatment of their claim. A disclosure statement that provides more detailed information regarding this Plan and the rights of creditors and equity security holders has been circulated with this Plan. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)**

**ARTICLE II
CLASSIFICATION OF CLAIMS AND INTERESTS**

- 2.01 Class 1. The allowed priority tax claim of the Palm Beach County Tax Collector, entitled to priority under § 507(a)(8) in the amount of \$1,099.10.
- 2.02 Class 2. The allowed priority tax claim of the Palm Beach County Tax Collector, entitled to priority under § 507(a)(8) in the amount of \$729.20.
- 2.03 Class 3. All unsecured claims allowed under § 502 of the Code.
- 2.04 Class 4. Equity interests of the Debtor.

ARTICLE III
TREATMENT OF ADMINISTRATIVE EXPENSE CLAIMS,
U.S. TRUSTEES FEES, AND PRIORITY TAX CLAIMS

3.01 Unclassified Claims. Under section §1123(a)(1), administrative expense claims, "gap" period claims in an involuntary case allowed under § 502(f) of the Code, and priority tax claims are not in classes.

3.02 Administrative Expense Claims. Each holder of an administrative expense claim allowed under § 503 of the Code, and a "gap" claim in an involuntary case allowed under § 502(f) of the Code, will be paid in full on the effective date of this Plan (as defined in Article VII), in cash, or upon such other terms as may be agreed upon by the holder of the claim and the Debtor.

3.03 Priority Tax Claims. Each holder of a priority tax claim will be paid specify terms of treatment consistent with § 1129(a)(9)(C) of the Code. However, based upon the creditor pool in the instant case, the holder of priority tax claims shall be included in the Class delineation. Class I and Class II contain creditors holding priority tax claims.

3.04 United States Trustee Fees. All fees required to be paid by 28 U.S.C. §1930(a)(6) (U.S. Trustee Fees) will accrue and be timely paid until the case is closed, dismissed, or converted to another chapter of the Code. Any U.S. Trustee Fees owed on or before the effective date of this Plan will be paid on the effective date.

ARTICLE IV
TREATMENT OF CLAIMS AND INTERESTS UNDER THE PLAN

4.01 Claims and interests shall be treated as follows under this Plan:

Class	Impairment	Treatment
Class I - Priority Claim of the Palm Beach County Tax Collector	Impaired	This Class contains the priority tax claim of the Palm Beach County Tax Collector in the amount of \$1,099.10. This amount shall be paid once a month at \$30.23 per month, and shall receive 18% interest per annum. The payments will begin thirty (30) days from the Effective Date and end in March 2021. This Class shall receive payments totaling \$1,602.19.
Class II - Priority Claim of the Palm Beach County Tax Collector	Impaired	This Class contains the priority tax claim of the Palm Beach County Tax Collector in the amount of \$729.20. This amount shall be paid once a month at \$20.06 per month, and shall receive 18% interest per annum. The payments will begin thirty (30) days from the Effective Date and end in March 2021. This Class shall receive payments totaling \$1,063.18.

B25A (Official Form 25A) (12/11) - Cont.

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Class 3 - General Unsecured Creditors	<p>This Class is not impaired if the Debtor is successful in obtaining a buyer for its interest in the Option.</p> <p>This Class shall be impaired if the Debtor is unsuccessful in obtaining a buyer for its interest in the Option.</p>	<p>If the Debtor is successful in obtaining a buyer for the Option, the holders of allowed unsecured claims shall be paid in full from the closing of the sale of the Option.</p> <p>If the Debtor is unsuccessful in obtaining a buyer for its interest in the Option, the holders of allowed unsecured claims shall be paid \$150.00 per month for a term of one hundred twenty (120) months. This Class shall receive a total of \$18,000.00, and each holder of an allowed unsecured claim shall receive its pro rata share of the total amount received by the Class. This Class shall not receive interest on its claim, and will receive approximately 14.3% of its allowed claim. However, if the Debtor's objection to Proof of Claim #3-1, filed by Bethesda Tabernacle of the Christian Ministry and Alliance, Inc., is sustained, the Class shall receive 100% of their allowed unsecured claim over the period of one hundred twenty (120) months.</p>
Class 4 - Equity Security Holders of the Debtor	Impaired	This Class consists of the actual members of the Debtor's congregation, as the Debtor is a not-for-profit corporation. Whatever amount is remaining after payment of the allowed claims under this Plan shall be returned to the Debtor for future use for its congregation.

ARTICLE V
ALLOWANCE AND DISALLOWANCE OF CLAIMS

5.01 Disputed Claim. A disputed claim is a claim that has not been allowed or disallowed by a final non-appealable order, and as to which either: (i) a proof of claim has been filed or deemed filed, and the Debtor or another party in interest has filed an objection; or (ii) no proof of claim has been filed, and the Debtor has scheduled such claim as disputed, contingent, or unliquidated.

5.02 Delay of Distribution on a Disputed Claim. No distribution will be made on account of a disputed claim unless such claim is allowed by a final non-appealable order.

B25A (Official Form 25A) (12/11) - Cont.

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5.03 Settlement of Disputed Claims. The Debtor will have the power and authority to settle and compromise a disputed claim with court approval and compliance with Rule 9019 of the Federal Rules of Bankruptcy Procedure.

ARTICLE VI
PROVISIONS FOR EXECUTORY CONTRACTS AND UNEXPIRED LEASES

6.01 Assumed Executory Contracts and Unexpired Leases.

(a) The Debtor assumes the following executory contracts and/or unexpired leases effective upon the the date of the entry of the order confirming this Plan:

Name of Other Parties to Lease or Contract	Description of Contract or Lease
Bethesda Tabernacle of the Christian Ministry and Alliance, Inc.	Option to Purchase real property located at 2929 South Federal Highway, Boynton Beach, FL 33435, contained within the real property Commercial Lease dated April 21, 2014.

(b) The Debtor will be conclusively deemed to have rejected all executory contracts and/or unexpired leases not expressly assumed under section 6.01(a) above, or before the date of the order confirming this Plan, upon the the date of the entry of the order confirming this Plan. A proof of a claim arising from the rejection of an executory contract or unexpired lease under this section must be filed no later than thirty (30) days after the date of the order confirming this Plan.

ARTICLE VII
MEANS FOR IMPLEMENTATION OF THE PLAN

The Debtor is currently marketing and advertising the Option in the open market. The Debtor, and its real estate professionals, estimate the value of the Debtor's interest in the Option is approximately \$600,000.00. However, giving a discount to this amount, a conservative estimate of the value of the Option is approximately \$400,000.00. If the Debtor is successful in its efforts, and a successful bidder is obtained at the conservative estimate of \$400,000.00, the Debtor shall utilize the proceeds from the sale of the Option to pay all payments under this proposed Chapter 11 Plan. The sale of the Option would be more than sufficient to cover all amounts due under the current proposed Chapter 11 Plan. The total amount of debt under this Plan, assuming the Bankruptcy Court sustains the Debtor's Objection to Proof of Claim #3-1, is \$19,828.30. As such, the proceeds from the sale of the Option would be more than adequate to pay this amount. Moreover, if the Debtor is unsuccessful in its Objection to Proof of Claim #3-1, the total amount of debt under the current proposed Chapter 11 Plan is \$127,666.04. As can be seen from the calculations, in either scenario, a successful sale of the Option by the Debtor, even at the conservative value, is more than adequate to satisfy the Debtor's obligations under the proposed Chapter 11 Plan.

ARTICLE VIII
GENERAL PROVISIONS

8.01 Definitions and Rules of Construction. The definitions and rules of construction set forth in §§ 101 and 102 of the Code shall apply when terms defined or construed in the Code are used in this Plan.

8.02 Effective Date of Plan. The effective date of this Plan is the first business day following the date that is fourteen days after the entry of the order of confirmation. If, however, a stay of the confirmation order is in effect on that date, the effective date will be the first business day after the date on which the stay of the confirmation order expires or is otherwise terminated.

8.03 Severability. If any provision in this Plan is determined to be unenforceable, the determination will in no way limit or affect the enforceability and operative effect of any other provision of this Plan.

B25A (Official Form 25A) (12/11) - Cont.

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8.04 Binding Effect. The rights and obligations of any entity named or referred to in this Plan will be binding upon, and will inure to the benefit of the successors or assigns of such entity.

8.05 Captions. The headings contained in this Plan are for convenience of reference only and do not affect the meaning or interpretation of this Plan.

8.06 Controlling Effect. Unless a rule of law or procedure is supplied by federal law (including the Code or the Federal Rules of Bankruptcy Procedure), the laws of the State of Florida govern this Plan and any agreements, documents, and instruments executed in connection with this Plan, except as otherwise provided in this Plan.

8.07 Corporate Governance. Upon Confirmation, the Reorganized Debtor shall be authorized to include in its charter, Articles of Incorporation, or By-laws a provision prohibiting the issuance of nonvoting equity securities, and providing, as to the several classes of securities possessing voting power, an appropriate distribution of such power among such classes, including, in the case of any class of equity securities having a preference over another class of equity securities with respect to dividends, adequate provisions for the election of directors representing such preferred class in the event of default in the payment of such dividends.

ARTICLE IX **DISCHARGE**

9.01 Discharge. On the effective date of the Plan, the Debtor shall be discharged from any debt that arose before confirmation of the Plan, subject to the occurrence of the effective date, to the extent specified in § 1141(d)(1)(A) of the Code, except that the Debtor shall not be discharged of any debt (i) imposed by the Plan, (ii) of a kind specified in § 1141(d)(6)(A) if a timely complaint was filed in accordance with Rule 4007(c) of the Federal Rules of Bankruptcy Procedure, or (iii) of a kind specified in § 1141(d)(6)(B). After the effective date of the Plan your claims against the Debtor will be limited to the debts described in clauses (i) through (iii) of the preceding sentence.

ARTICLE X
OTHER PROVISIONS

10.01 Injunction Related to Discharge. Except as otherwise expressly provided in the Plan, the Confirmation Order or a separate order of the Court, all Persons who have held, hold or may hold Claims against the Debtor are permanently enjoined, on and after the Effective Date, from (i) commencing or continuing in any manner any action or other proceeding of any kind with respect to any such Claim, (ii) enforcing, attaching, collecting or recovering by any manner or means of any judgment, award, decree or order against the Debtors on account of any such Claim, (iii) creating, perfecting or enforcing any Lien or asserting control of any kind against the Debtor or against the property or interests in property of the Debtor on account of any such Claim, and (iv) asserting any right of setoff, subrogation or recoupement of any kind against any obligation due from the Debtor or against the property or interests in property of the Debtor on account of any such Claim.

10.02 Injunction Against Interference with the Plan. Upon the entry of a Confirmation Order with respect to the Plan, all holders of Claims and Equity Interests and other parties in interest, along with their respective present or former employees, agents, officers, directors, or principals, shall be enjoined from taking any actions to interfere with the implementation or consummation of the Plan, except with respect to actions any such entity may take in connection with the pursuit of appellate rights.

Respectfully submitted,

By: /s/ Anthony S. Mays

Anthony S. Mays

The Plan Proponent

By: /s/ Brett A. Elam

Brett A. Elam 576808

Attorney for the Plan Proponent

**RESTORATION HOUSE EMPOWERMENT
MINISTRIES INTERNATIONAL, INC.**

Fair Market Value

Assets

Value

**Option to Purchase real property
Located at 2923 South Federal Highway
Boynton Beach, FL 33435**

\$600,000.00

Total

\$600,000.00

RHEMI CHURCH
BALANCE SHEET
As of March 31, 2016

	TOTAL
ASSETS	
Current Assets	
Bank Accounts	
Checking	-41,247.19
Total Bank Accounts	\$ -41,247.19
Other current assets	
Deposit	34,842.28
Uncategorized Asset	1,000.00
Total Other current assets	\$35,842.28
Total Current Assets	\$ -5,404.91
TOTAL ASSETS	\$ -5,404.91
LIABILITIES AND EQUITY	
Liabilities	
Total Liabilities	
Equity	
Retained Earnings	
Net Income	-5,404.91
Total Equity	\$ -5,404.91
TOTAL LIABILITIES AND EQUITY	\$ -5,404.91

Saturday, Apr 16, 2016 06:18:42 PM PDT GMT-4 - Accrual Basis

4/18/2016

Report: Statement of Cash Flows

RHEMI CHURCH
STATEMENT OF CASH FLOWS
January 1 - April 16, 2016

Case No.: 16-14093 EPK

	TOTAL
OPERATING ACTIVITIES	
Net Income	-822.84
Adjustments to reconcile Net Income to Net Cash provided by operations:	
Deposit	-44,193.93
Uncategorized Asset	-1,000.00
Total Adjustments to reconcile Net Income to Net Cash provided by operations:	<u>-45,193.93</u>
Net cash provided by operating activities	<u>\$ -46,016.77</u>
FINANCING ACTIVITIES	
Opening Balance Equity	9,207.20
Net cash provided by financing activities	<u>\$9,207.20</u>
Net cash increase for period	<u>\$ -36,809.57</u>
Cash at end of period	<u>\$ -36,809.57</u>

Saturday, Apr 16, 2016 06:20:37 PM PDT GMT-4

4/18/2016

Report: Income by Customer Summary

RHEMI CHURCH
INCOME BY CUSTOMER SUMMARY
January 1 - April 16, 2016

Case No.: 16-14093 EPK

	INCOME	EXPENSES	NET INCOME
RHEMI		39,590.33	\$39,590.33
TOTAL	\$0.00	\$39,590.33	\$39,590.33

Saturday, Apr 16, 2016 06:15:42 PM PDT GMT-4 - Accrual Basis

B 25C (Official Form 25C) (12/08)

UNITED STATES BANKRUPTCY COURT

District of _____

In re Restoration House Empowerment Min.

Case No. 3191614093

Debtor

Small Business Case under Chapter 11

SMALL BUSINESS MONTHLY OPERATING REPORT

Month: July 1-31, 2016

Date filed: _____

Line of Business: Religious Church

NAISC Code: _____

IN ACCORDANCE WITH TITLE 28, SECTION 1746, OF THE UNITED STATES CODE, I DECLARE UNDER PENALTY OF PERJURY THAT I HAVE EXAMINED THE FOLLOWING SMALL BUSINESS MONTHLY OPERATING REPORT AND THE ACCOMPANYING ATTACHMENTS AND, TO THE BEST OF MY KNOWLEDGE, THESE DOCUMENTS ARE TRUE, CORRECT AND COMPLETE.

RESPONSIBLE PARTY:



Original Signature of Responsible Party

Anthony S. Mays

Printed Name of Responsible Party

Questionnaire: (All questions to be answered on behalf of the debtor.)

	Yes	No
1. IS THE BUSINESS STILL OPERATING?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. HAVE YOU PAID ALL YOUR BILLS ON TIME THIS MONTH?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. DID YOU PAY YOUR EMPLOYEES ON TIME?	N/A <input type="checkbox"/>	<input type="checkbox"/>
4. HAVE YOU DEPOSITED ALL THE RECEIPTS FOR YOUR BUSINESS INTO THE DIP ACCOUNT THIS MONTH?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. HAVE YOU FILED ALL OF YOUR TAX RETURNS AND PAID ALL OF YOUR TAXES THIS MONTH?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. HAVE YOU TIMELY FILED ALL OTHER REQUIRED GOVERNMENT FILINGS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. HAVE YOU PAID ALL OF YOUR INSURANCE PREMIUMS THIS MONTH?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. DO YOU PLAN TO CONTINUE TO OPERATE THE BUSINESS NEXT MONTH?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. ARE YOU CURRENT ON YOUR QUARTERLY FEE PAYMENT TO THE U.S. TRUSTEE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. HAVE YOU PAID ANYTHING TO YOUR ATTORNEY OR OTHER PROFESSIONALS THIS MONTH?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. DID YOU HAVE ANY UNUSUAL OR SIGNIFICANT UNANTICIPATED EXPENSES THIS MONTH?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. HAS THE BUSINESS SOLD ANY GOODS OR PROVIDED SERVICES OR TRANSFERRED ANY ASSETS TO ANY BUSINESS RELATED TO THE DIP IN ANY WAY?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. DO YOU HAVE ANY BANK ACCOUNTS OPEN OTHER THAN THE DIP ACCOUNT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B 25C (Official Form 25C (12-08))

14. HAVE YOU SOLD ANY ASSETS OTHER THAN INVENTORY THIS MONTH?
15. DID ANY INSURANCE COMPANY CANCEL YOUR POLICY THIS MONTH?
16. HAVE YOU BORROWED MONEY FROM ANYONE THIS MONTH?
17. HAS ANYONE MADE AN INVESTMENT IN YOUR BUSINESS THIS MONTH?
18. HAVE YOU PAID ANY BILLS YOU OWED BEFORE YOU FILED BANKRUPTCY?

TAXES

DO YOU HAVE ANY PAST DUE TAX RETURNS OR PAST DUE POST-PETITION TAX OBLIGATIONS?

IF YES, PLEASE PROVIDE A WRITTEN EXPLANATION INCLUDING WHEN SUCH RETURNS WILL BE FILED, OR WHEN SUCH PAYMENTS WILL BE MADE AND THE SOURCE OF THE FUNDS FOR THE PAYMENT.

*(Exhibit A)***INCOME**

PLEASE SEPARATELY LIST ALL OF THE INCOME YOU RECEIVED FOR THE MONTH. THE LIST SHOULD INCLUDE ALL INCOME FROM CASH AND CREDIT TRANSACTIONS. *(THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)*

	TOTAL INCOME	\$ 5695.99
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SUMMARY OF CASH ON HAND

Cash on Hand at Start of Month	\$ 304.17
Cash on Hand at End of Month	\$ (2069.76)

PLEASE PROVIDE THE TOTAL AMOUNT OF CASH CURRENTLY AVAILABLE TO YOU	TOTAL	\$ (2069.76)
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*(Exhibit B)***EXPENSES**

PLEASE SEPARATELY LIST ALL EXPENSES PAID BY CASH OR BY CHECK FROM YOUR BANK ACCOUNTS THIS MONTH. INCLUDE THE DATE PAID, WHO WAS PAID THE MONEY, THE PURPOSE AND THE AMOUNT. *(THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)*

	TOTAL EXPENSES	\$ 7765.75
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*(Exhibit C)***CASH PROFIT**

INCOME FOR THE MONTH <i>(TOTAL FROM EXHIBIT B)</i>	\$ 5695.99
EXPENSES FOR THE MONTH <i>(TOTAL FROM EXHIBIT C)</i>	\$ 7765.77
<i>(Subtract Line C from Line B)</i>	CASH PROFIT FOR THE MONTH
	\$ (2069.76)

B 25C (Official Form 25C) (12-08)

UNPAID BILLS

PLEASE ATTACH A LIST OF ALL DEBTS (INCLUDING TAXES) WHICH YOU HAVE INCURRED SINCE THE DATE YOU FILED BANKRUPTCY BUT HAVE NOT PAID. THE LIST MUST INCLUDE THE DATE THE DEBT WAS INCURRED, WHO IS OWED THE MONEY, THE PURPOSE OF THE DEBT AND WHEN THE DEBT IS DUE. (THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)

TOTAL PAYABLES \$ 0.00

(Exhibit D)

MONEY OWED TO YOU

PLEASE ATTACH A LIST OF ALL AMOUNTS OWED TO YOU BY YOUR CUSTOMERS FOR WORK YOU HAVE DONE OR THE MERCHANDISE YOU HAVE SOLD. YOU SHOULD INCLUDE WHO OWES YOU MONEY, HOW MUCH IS OWED AND WHEN IS PAYMENT DUE. (THE U.S. TRUSTEE MAY WAIVE THIS REQUIREMENT.)

TOTAL RECEIVABLES \$ 0.00

(Exhibit E)

BANKING INFORMATION

PLEASE ATTACH A COPY OF YOUR LATEST BANK STATEMENT FOR EVERY ACCOUNT YOU HAVE AS OF THE DATE OF THIS FINANCIAL REPORT OR HAD DURING THE PERIOD COVERED BY THIS REPORT.

(Exhibit F)

EMPLOYEES

NUMBER OF EMPLOYEES WHEN THE CASE WAS FILED?	0
NUMBER OF EMPLOYEES AS OF THE DATE OF THIS MONTHLY REPORT?	0

PROFESSIONAL FEES**BANKRUPTCY RELATED:**

PROFESSIONAL FEES RELATING TO THE BANKRUPTCY CASE PAID DURING THIS REPORTING PERIOD?	\$ 365.00
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TOTAL PROFESSIONAL FEES RELATING TO THE BANKRUPTCY CASE PAID SINCE THE FILING OF THE CASE?	\$ 9801.00
--	------------

NON-BANKRUPTCY RELATED:

PROFESSIONAL FEES NOT RELATING TO THE BANKRUPTCY CASE PAID DURING THIS REPORTING PERIOD?	\$ 0.00
--	---------

TOTAL PROFESSIONAL FEES NOT RELATING TO THE BANKRUPTCY CASE PAID SINCE THE FILING OF THE CASE?	\$ 0.00
--	---------

B 25C (Official Form 25C) (12/98)

PROJECTIONS

COMPARE YOUR ACTUAL INCOME AND EXPENSES TO THE PROJECTIONS FOR THE FIRST 180 DAYS OF YOUR CASE PROVIDED AT THE INITIAL DEBTOR INTERVIEW.

	Projected	Actual	Difference
INCOME	\$ 5358.00	\$ 5695.99	\$ 341
EXPENSES	\$ 5413.00	\$ 7765.75	\$ (2352.75)
CASH PROFIT	\$ (55)	\$ (2069.76)	\$ (2124.76)

TOTAL PROJECTED INCOME FOR THE NEXT MONTH:	\$ 5358
TOTAL PROJECTED EXPENSES FOR THE NEXT MONTH:	\$ 5413
TOTAL PROJECTED CASH PROFIT FOR THE NEXT MONTH:	\$ (55)

ADDITIONAL INFORMATION

PLEASE ATTACH ALL FINANCIAL REPORTS INCLUDING AN INCOME STATEMENT AND BALANCE SHEET WHICH YOU PREPARE INTERNALLY.

PROFIT AND LOSS REPORT

for

RESTORATION HOUSE EMPOWERMENT MINISTRIES INTL

JULY 01, 2016 thru JULY 31, 2016

Case 3191614093

INCOME:

07/05 Cash Deposit	338.00
07/05 Stripe CC Deposit	224.11
07/07 Stripe CC Deposit	1585.16
07/11 Cash Deposit	213.00
07/12 Stripe CC Deposit	243.05
07/13 Stripe CC Deposit	301.06
07/18 Cash Deposit	270.00
07/19 Cash Deposit	600.00
07/19 Cash Deposit	100.00
07/20 Stripe CC Deposit	1066.16
07/21 Stripe CC Deposit	97.09
07/22 Stripe CC Deposit	97.40
07/25 Cash Deposit	128.00
07/27 Stripe CC Deposit	432.96
TOTAL DEPOSITS-INCOME:	5695.99

Expenses:

07/05 Chk #800 Randy Coggins Ministries	500.00
07/06 Chk #810 Chester Campbell C-Keys(Class)	250.00

07/07 Chk # 819 Reimbursement Hosp Refreshment Betsy Kitchen	60.00
07/08 Chk #816 Reimbursement Fathers Day A. Randolph	268.56
07/08 Chk #817 Reimbursement for Launch Svc Refreshments A. Randolph	85.00
07/08 Withdrawal	200.00
07/11 Cinemark (Bldg Lease)	3500.00
07/11 Publix	103.05
07/11 Overdraft	35.00
07/11 Chk #818 Reimbursement Refreshments Hosp. Bill Ceasar	60.00
07/12 Overdraft	35.00
07/12 Chk #815 Reimbursement Hospitality-J. Trottman	50.96
07/13 Chk#995002 U.S. Trustee	365.00
07/18 Chk #104 Brandon Spiker Ministries	900.00
07/19 Overdraft	35.00
07/21 Chk 820 Evangelism and Outreach	60.00
07/26 Extra Space Storage	363.18
07/26 Debit	500.00
07/27 Planning Center	195.00
07/29 Chk #176 Outreach Refreshments (I Got Sole)	200.00
TOTAL EXPENSES:	7765.75
 INCOME AFTER EXPENSES:	 (2069.76)

Signed: Anthony S. Map



Close Window

Check Images

Print this page

Account: x6636 - CHAPTER 11 CHECKING

Check Number: 176

Date Posted: 7/29/2016

Amount: \$200.00

Zoom In Zoom Out

RESTORATION HOUSE EMPOWERMENT MINIS,
DIP # 16-14093 - EPK
1291 SW 28TH AVE
BOYNTON BEACH FL 33426

7/29/16 Date

176
83-1482/670
3591

Pay to the
Order of

Cash

\$200.00

Two hundred and 00/100

Dollars



For I got sole refreshments Anthony S. Mayo

⑆067014822⑆ 4329226636⑆ 0176

067014822

0176

4329226636

DLR FL*****

\$200.00

Cash Check

R/T# 540590135

Security Features exposed to the public

- Matching account and ID
- The security watermark
- Microprint
- The words "USA"
- Photo Safe Deposit

Do not cash if:

- Any of the features listed above are missing or appear altered
- Fugitive ink on back looks grey or has disappeared
- See if stains and colored spots appear on both front and back

Seq: 150
Batch: 137571
Date: 07/29/16

CHECK HERE IF MOBILE DEPOSIT
DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

ENDORSE HERE
Boles A. Jackson



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Account: x6636 - CHAPTER 11 CHECKING

Check Number: 104

Date Posted: 7/20/2016

Amount: \$900.00

Zoom In Zoom Out

RESTORATION HOUSE EMPOWERMENT MINIS.
DIP # 16-14093 - EPK
 1291 SW 28TH AVE
 BOYNTON BEACH FL 33426

104
 63-1482/570
 3551

Date July 18, 2016

Pay to the Order of Brandon Spiker Ministries \$ 900.00
Nine Hundred ^{00/100} and ^{00/100} no ^{00/100} cents Dollars

TD Bank
 America's Most Convenient Bank®

For Ministry + Teaching Anthony S. Mayd

⑆067014822⑆ 4329226636⑆ 0104

3589843087

SEEK HERE TO MOBILE DEPOSIT

Brandon Spiker

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

0818

TD BANK, NATIONAL ASSOCIATION
578 E. WOOLBRIGHT ROAD
BOYNTON BEACH, FL 33435
60-1482/970

Date

R. H. E. M. I.
2625 E. Federal Hwy
Boynton Beach, FL 33435
(561) 244-9989
Pharm Nation™ "no deals for the Supermarket"

PAY TO THE
ORDER OF

Willie Caesar
Sixty dollars and

\$ 60.⁰⁰
~~100~~ DOLLARS

PROTECTION AGAINST FRAUD



Carla May

Match

⑆067014822⑆ 4329226636⑈ 0818

Willie Caesar

Details on Back

Intuitive CheckLock™ Secured Check



America's Most Convenient Bank®

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Account: x6636 - CHAPTER 11 CHECKING

Check Number: 995002

Date Posted: 7/13/2016

Amount: \$365.00

[Zoom In](#) [Zoom Out](#)

DOCUMENT CONTAINS COLORED BACKGROUND ON WHITE PAPER. VOID FEATURE, SIMULATED WATERMARK (REVERSE SIDE), MICRO PRINT BORDER

Account: 3191614093 PLEASE POST THIS PAYMENT FOR OUR MUTUAL CUSTOMER **\$365.00**

Please Direct Any Questions To 309/111

RESTORATION HOUSE EMPOWERMENT MINISTRIES
1291 SW 28TH AVE
BOYNTON BEACH, FL 33435

Online Bill Payment Processing Center
(800) 243-2508 **0000995002**

June 30, 2016

TD BANK NA
05119 4029965 005131 005131 0000100001 005119

Pay **THREE HUNDRED SIXTY FIVE AND 00/100** DOLLARS

\$ *******365.00**

TO THE ORDER OF U S TRUSTEE
51 SW 1ST AVE STE 900
MIAMI FL 33130 1625

Void After 180 DAYS.
Signature On File
This check has been authorized by your depositor

⑆995002⑆ ⑆01⑆ ⑆03093⑆ ⑆4329226636⑆ ⑆79

95888227

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⑆0410-3601-7<
US TREAS DG-ECP
20160712

FOR DEPOSIT ONLY TO THE
ACCOUNT OF THE PAYEE BELOW THIS LINE
STATEMENTS ARE NOT VALID FOR DEPOSIT USE

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

TD BANK, NATIONAL ASSOCIATION
678 E. WOOLBRIGHT ROAD
BOYNTON BEACH, FL 33435
954-442-8870

0815

MEMO
2025 S Federal Hwy
Boynton Beach, FL 33435
(954) 244-8888
Robert Nelson - an eagle by the Supernatural™

DATE

PAY TO THE ORDER OF Jaye Trotman \$ 50.96

fifty dollars and 96/100 DOLLARS

PROTECTED AGAINST FRAUD

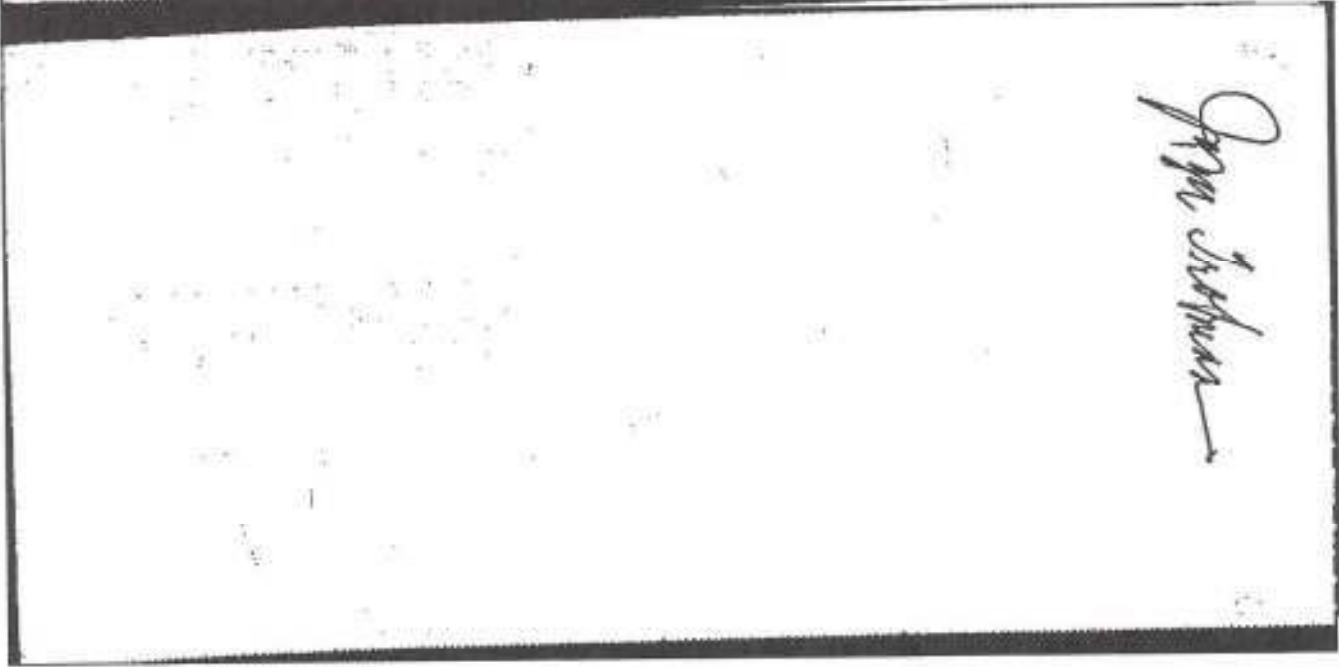
Memo

Carla Amey

⑆067014822⑆ 4329226636⑆ 0815

Details on Back

Secure Check





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Account: x6636 - CHAPTER 11 CHECKING

Check Number: 817

Date Posted: 7/8/2016

Amount: \$85.00

Zoom In Zoom Out



20160708627190868149 03 1518

Regions Bank >062000019<

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Regions Bank >062000019<

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0235789719



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Print this page

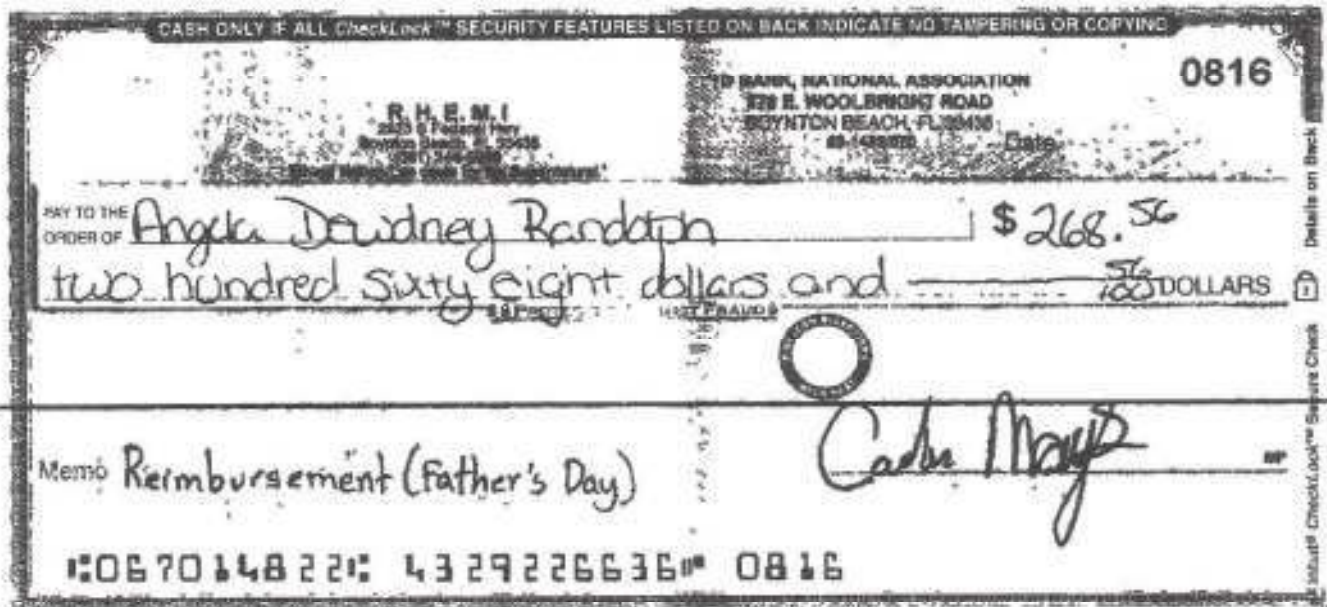
Account: x6636 - CHAPTER 11 CHECKING

Check Number: 816

Date Posted: //8/2016

Amount: \$268.56

Zoom In Zoom Out



20160708627190868150 03 1518

Regions Bank >062000019<

20160708627190868150 03 1518
Regions Bank >062000019<

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TD BANK, NATIONAL ASSOCIATION
678 E. WOOLBRIGHT ROAD
BOYNTON BEACH, FL 33435
88-1482470

0819

R. H. E. M. I.
2923 E. Federal Hwy
Boynton Beach, FL 33435
351-744-5000

Date

PAY TO THE
ORDER OF

Betsy Kitchens

\$ 60.00

Sixty dollars and

00/100 DOLLARS

PROTECTED AGAINST FRAUD



Canta Macej

MEMO

⑆067014822⑆ 4329226636⑈ 0819

Seq: 00050 07/06/16
 BAT: 380047 CC: 0750100425
 WT: 0000 WTP Batch: 380047
 01/19/16 14:40:23
 R/1# 540590135
 Account 229037702178
 Entry NFL CC 0109425 TL 00014
 Tran 00160 07/06/2016 15:06

Betsy Kitchens
229037702178

CASH ONLY # ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

TD BANK, NATIONAL ASSOCIATION
579 E. WOOLBRIGHT ROAD
BOYNTON BEACH, FL 33435
888-1482-6779

0810

R. H. E. M. I.
2523 S. Federal Hwy
Boynton Beach, FL 33435
(561) 744-5989
"Check History" app codes for the Supplemental™

Date

PAY TO THE ORDER OF

Chester Campbell
Two Hundred Fifty

\$ 250.00

~~250~~ DOLLARS

PROTECT AGAINST FRAUD



Anthony S. May

Tech Training

⑆067014822⑆ 4329226636⑈ 0810

Seq: 150
Batch: 317093
Date: 07/05/16

Seq: 00150 07/05/16
BAT: 317093 CC: 0750109429
WT: 01 LTPS: Jacksonville
BC: Sunshine Square BC FL5-456

898049778314
Chester Campbell



America's Most Convenient Bank®

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Account: x6636 - CHAPTER 11 CHECKING

Check Number: 800

Date Posted: 7/5/2016

Amount: \$500.00

[Zoom In](#) [Zoom Out](#)

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

R. H. E. M. I.
3623 S. Federal Hwy
Boynton Beach, FL 33435
(561) 264-3688
FDIC Member FDIC

TD BANK, NATIONAL ASSOCIATION
578 E. WOODSFRIGHT ROAD
BOYNTON BEACH, FL 33435
88-1482978

0800

Date *July 3, 2016*

PAY TO THE ORDER OF *Randy Leggens II* \$1500.00

Five Hundred ~~XXX~~ DOLLARS

Evangelism - Ministry

Anthony S. Maple

⑆067014822⑆ 4329226636⑆ 0800



United States Bankruptcy Court
Southern District of Florida

In re Restoration House Empowerment Ministries International, Inc.
 Debtor(s)

Case No. 16-14093
 Chapter 11

LIQUIDATION SUMMARY

Description	Total Amount	Real Property	Personal Property
Total Property Value	600,000.00	0.00	600,000.001
Less:			
Schedule D. Secured Claims	0.00	0.00	0.00
Schedule C. Exemptions	0.00	0.00	0.00
Interest in Nonexempt Property	600,000.00	0.00	600,000.00
Less:			
Estimated Chapter 7 Admin Expenses	43,575.00		
Schedule E. Priority Claims	0.00		
Available to General Unsecured	556,425.00		
Total General Unsecured	125,837.74		
Percent Distribution	100%		

Details:

Unsecured from Schedule D	0.00	0.00	0.00
Unsecured from Schedule E	0.00		
Unsecured from Schedule F	18,000.00		
Unsecured from Proofs of Claim filed	107,837.74		
11 §326 Trustee Compensation on \$600,000.00	43,575.00		
Add'l Trustee Cost as 0% of §326 Fee	0.00		
Additional Admin Expense	0.00		
Total Estimated Admin Expense	43,575.00		

1 This value comes from the estimated value of the Option to Purchase 2923 South Federal Highway, Boynton Beach, FL 33435. Pursuant to the Debtor's Schedule B, there were two (2) other assets, a deposit in the amount of \$100,000.00, and a cause of action against Bethesda Tabernacle of the Christian Ministry and Alliance, Inc., in the amount of \$206,500.00. Both assets are related to the Option to Purchase, and would not be pursued if the Debtor is successful in obtaining a buyer for the Option. Accordingly, neither asset is included in the Liquidation Analysis.