

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

In re:

AFH AIR PROS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10356 (PMB)

(Jointly Administered)

**DECLARATION OF SYDNEY REITZEL, ON BEHALF OF KURTZMAN
CARSON CONSULTANTS LLC D/B/A VERITA GLOBAL, REGARDING
THE SOLICITATION AND TABULATION OF BALLOTS CAST ON
THE SECOND AMENDED CHAPTER 11 PLAN OF LIQUIDATION OF
AFH AIR PROS, LLC AND ITS DEBTOR AFFILIATES**

I, Sydney Reitzel, hereby declare as follows under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Director of Kurtzman Carson Consultants LLC d/b/a Verita Global (“Verita”) located at 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, CA 90245. I am over the age of 18 years and am not a party to the above-captioned action. I do not have a direct interest in the above-captioned chapter 11 cases and should be considered an impartial party.

2. I submit this voting declaration (the “Declaration”) with respect to the solicitation and tabulation of votes cast on the *Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and Its Debtor Affiliates* [Docket No. 478] (the “Plan”).² Except as otherwise noted,

¹ The last four digits of AFH Air Pros, LLC’s tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at <https://www.veritaglobal.net/AirPros>. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Plan or the Solicitation Procedures Order (as defined herein).



all facts set forth herein are based upon my personal knowledge that I acquired from individuals under my supervision, and/or my review of the relevant documents. I am authorized to submit this Declaration on behalf of Verita. If I were called upon to testify, I could and would testify competently as to the facts set forth herein.

3. In accordance with the *Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC DBA Verita Global as Claims, Noticing, Solicitation, and Administrative Agent Effective as of the Petition Date* [Docket No. 39] (the “Verita Retention Order”) and the *Order (A) Approving the Disclosure Statement on an Interim Basis, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan, (C) Approving the Form of Ballot and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time, and Place for the Hearing on Final Approval of the Disclosure Statement and Confirmation of the Plan and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures and Deadlines* [Docket No. 477] (the “Solicitation Procedures Order”), Verita was appointed as the Debtors’ administrative advisor and authorized to assist the Debtors with, *inter alia*, soliciting, receiving, reviewing, determining the validity of, and tabulating Ballots cast on the Plan by Holders of Claims in the Voting Classes (as defined herein). Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject proposed Chapter 11 plans, including plans of reorganization.

4. As set forth in the Solicitation Procedures Order, the Court established June 23, 2025, as the record date (the “Voting Record Date”) for determining which Holders of Claims within the Voting Classes were entitled to vote on the Plan. Under the Plan, only Holders of Claims in Class 3 (Prepetition Lender Secured Claims) and Class 4 (General Unsecured Claims) (collectively, the “Voting Classes”) were entitled to vote to accept or reject the Plan.

5. In accordance with the Solicitation Procedures Order, Verita caused to be served the (a) Combined Hearing Notice on the parties listed in the creditor matrix and all other parties entitled to receive such notice pursuant to the Solicitation Procedures Order; (b) Solicitation Packages on Holders of Claims in the Voting Classes as of the Voting Record Date; and (c) Non-Voting Packages on Holders of Claims in Class 1 (Other Priority Claims) and Class 2 (Other Secured Claims). There were no Holders of Claims or Interests in the following Non-Voting Classes: Class 5 (Subordinated Claims), Class 6 (Intercompany Claims), and Class 7 (Interests in the Debtors). Verita filed the *Certificate of Service of Solicitation Materials* at Docket No. 564 and the *Supplemental Certificate of Solicitation Materials* at Docket No. 596.

6. The procedures for the solicitation and tabulation of votes on the Plan are outlined in the Solicitation Procedures Order. Verita relied on the Debtors' Schedules of Assets and Liabilities and the register of filed proofs of claim, to identify and solicit Holders of Claims and Interests in the Voting and Non-Voting Classes. In addition, Verita consulted with the Debtors and their counsel, as appropriate, to ensure compliance with the Solicitation Procedures Order.

7. In accordance with the Solicitation Procedures, Verita reviewed, determined the validity of, and tabulated the Ballots submitted to Vote on the Plan. Each Ballot submitted to Verita was date-stamped, scanned, assigned a Ballot number, entered into Verita's voting database, and processed. To be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation Procedures, (b) executed by the relevant Holder entitled to vote on the Solicited Plan (or such Holder's representative), (c) returned to Verita via an approved method of delivery set forth in the Solicitation Procedures unless the delivery method requirement was waived by the Debtors, and (d) received by Verita on or before the Voting Deadline (i.e., July

28, 2025, at 4:00 p.m. (ET) (prevailing Eastern Time)), which was established by the Solicitation Procedures Order.

8. All validly executed Ballots cast by Holders of Claims in the Voting Classes received by Verita on or before the Voting Deadline were tabulated as outlined in the Solicitation Procedures Order. A true and correct copy of the final tabulation summary of the votes cast by Holders of Claims in the Voting Classes through timely and properly completed Ballots received by Verita on or before the Voting Deadline is attached hereto as Exhibit A. The detailed Ballot reports for all Voting Classes are attached hereto as Exhibit A-1 and Exhibit A-2.

9. A report of all Ballots received, but not included in the final tabulation prepared by Verita and the reasons for exclusion of such Ballots, is attached hereto as Exhibit B.

10. Verita reviewed and documented which Holders of Claims or Interests elected to opt out of the Third-Party Release. A report of all Holders who elected to opt out of the Third-Party Release is attached hereto as Exhibit C. For the avoidance of doubt, this Declaration does not certify the validity or enforceability of any opt-out elections received, including those reported on Exhibit C, but rather is providing these opt-out election results for reporting and informational purposes only.

11. To the best of my knowledge, information, and belief, I declare under penalty of perjury that the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true and correct.

Executed on August 1, 2025

/s/ Sydney Reitzel
Sydney Reitzel
Verita

Exhibit A

Exhibit A
Ballot Tabulation Summary

Class	Class Description	Unacceptable Votes	Members Voted	Members Accepted	Members Rejected	Members Abstained	% Members Accepted	% Members Rejected	Total \$ Voted	\$ Accepted	\$ Rejected	\$ Abstained	% \$ Accepted	% \$ Rejected	Status
3	Prepetition Lender Secured Claims	0	2	2	0	0	100.00	0.00	\$9,280,000.00	\$9,280,000.00	\$0.00	\$0.00	100.00	0.00	Accept
4	General Unsecured Claims	2	21	17	4	2	80.95	19.05	\$128,338,786.84	\$128,056,589.05	\$282,197.79	\$51,879.92	99.78	0.22	Accept

Exhibit A-1

Exhibit A-1

Class 3 Ballot Detail

Prepetition Lender Secured Claims

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote	Opt Out of Third Party Release?
07/28/2025	209	CO Finance LVS XXII LLC	*	Accept	
07/28/2025	210	OC III LVS LXI LP	*	Accept	

**Per the Stipulation filed at Docket No. 595, the aggregate Class 3 voting amount for the ballots returned by CO Finance LVS XXII LLC and OC III LVS LXI LP is \$9,280,000.00.*

Exhibit A-2

Class 4 Ballot Detail

General Unsecured Claims

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote	Opt Out of Third Party Release?
07/03/2025	188	10 to 1 Public Relations	\$10,250.00	Accept	
07/10/2025	190	Best Postcard Inc	\$102,145.76	Accept	Yes
07/20/2025	197	Cindy Collins	\$12,500.00	Accept	
07/28/2025	214	CO Finance LVS XXII LLC	**	Accept	
07/24/2025	203	Dallas Plumbing Company	\$280,900.00	Accept	Yes
07/14/2025	193	First Insurance	\$276,751.78	Accept	
07/18/2025	196	FLORIDA BREAKER and LED	\$4,718.45	Accept	
07/23/2025	200	Honey Bucket	\$425.76	Accept	
07/14/2025	192	Ignite Sports, LLC	\$14,210.00	Accept	
07/28/2025	213	LaGrange Airforce Heating and Air, LLC	\$1.00	Accept	Yes
07/28/2025	212	McDowell Knight Roedder and Sledge, LLC	\$70,192.52	Accept	
07/09/2025	189	Merchants Bonding Company Mutual	\$238,000.00	Reject	Yes
07/28/2025	215	OC III LVS LXI LP	**	Accept	
07/25/2025	205	Pacific Plumbing	\$412.37	Reject	Yes
07/24/2025	202	Since 1903 Corporation	\$280,900.00	Accept	Yes
07/28/2025	208	Susan Stencil	\$118,878.95	Accept	Yes
07/10/2025	191	United Bearing Company	\$8,488.00	Accept	
07/15/2025	195	Vestis Services, LLC fka ARAMARK Uniform and Career Apparel, LLC	\$19,785.42	Reject	Yes
07/24/2025	201	WEEKLEY BROTHERS DAVIE PRO RODEO	\$31,520.83	Accept	
07/28/2025	211	West Georgia Indoor Comfort	\$685,502.00	Accept	
07/25/2025	206	Zachary Byrne	\$24,000.00	Reject	Yes

***Per the Stipulation filed at Docket No. 595, the aggregate Class 4 voting amount for the ballots returned by CO Finance LVS XXII LLC and OC III LVS LXI LP is \$126,159,204.00.*

Exhibit B

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote	Opt Out of Third Party Release?	Class	Reason Excluded
07/15/2025	194	Capital Finance Opportunities 1901C, LLC	\$1.00	Abstain	Yes	4 - General Unsecured Claims	Abstained from Voting
07/29/2025	216	Kroll LLC	\$876,660.04	Abstain	Yes	4 - General Unsecured Claims	Abstained from Voting & Late Filed
07/23/2025	199	Stephanies Cleaning Service	\$412.90	Accept		4 - General Unsecured Claims	Not Signed
07/25/2025	204	UniFirst Corporation	\$51,878.92	Abstain	Yes	4 - General Unsecured Claims	Abstained from Voting

Exhibit C

Opt Out Elections

Date Filed	Ballot / Opt Out No.	Creditor Name	Voting Amount	Vote	Opt Out of Third Party Release?	Class
07/10/2025	190	Best Postcard Inc	\$102,145.76	Accept	Yes	4 - General Unsecured Claims
07/15/2025	194	Capital Finance Opportunities 1901C, LLC	\$1.00	Abstain	Yes	4 - General Unsecured Claims
07/28/2025	207	Continental Casualty Company and National Fire Insurance of Hartford, With Their North American Insurance Affiliates	N/A	N/A	Yes	Non-Voting Unimpaired
07/24/2025	203	Dallas Plumbing Company	\$280,900.00	Accept	Yes	4 - General Unsecured Claims
07/29/2025	216***	Kroll LLC	\$876,660.04	Abstain	Yes	4 - General Unsecured Claims
07/28/2025	213	LaGrange Airforce Heating and Air, LLC	\$1.00	Accept	Yes	4 - General Unsecured Claims
07/09/2025	189	Merchants Bonding Company Mutual	\$238,000.00	Reject	Yes	4 - General Unsecured Claims
07/25/2025	205	Pacific Plumbing	\$412.37	Reject	Yes	4 - General Unsecured Claims
07/24/2025	202	Since 1903 Corporation	\$280,900.00	Accept	Yes	4 - General Unsecured Claims
07/28/2025	208	Susan Stencil	\$118,878.95	Accept	Yes	4 - General Unsecured Claims
07/25/2025	204	UniFirst Corporation	\$51,878.92	Abstain	Yes	4 - General Unsecured Claims
07/15/2025	195	Vestis Services, LLC fka ARAMARK Uniform and Career Apparel, LLC	\$19,785.42	Reject	Yes	4 - General Unsecured Claims
07/25/2025	206	Zachary Byrne	\$24,000.00	Reject	Yes	4 - General Unsecured Claims

***Ballot submitted after the voting deadline.