

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Boy Scouts of America and  
Delaware BSA, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

**VERIFIED STATEMENT OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the chapter 11 cases (the “**Chapter 11 Cases**”) commenced by the above-captioned debtors on February 18, 2020, pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rule 2019**”), the Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) appointed in the Chapter 11 Cases of Boy Scouts of America and Delaware BSA, LLC (the “**Debtors**”), hereby submits this verified statement (the “**Verified Statement**”) and, in support thereof, states:

1. On February 18, 2020 (the “**Petition Date**”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.
2. On March 4, 2020 (the “**Formation Date**”), the Office of the United States Trustee for Region 3 appointed the five-member Creditors’ Committee (each a “**Member**”) consisting of: (i) Pension Benefit Guaranty Corporation, (ii) Girl Scouts of the United States of America, (iii) Roger A. Ohmstede, (iv) Pearson Education, Inc., and (v) Lion Brothers Company, Inc. *See* Dkt. No. 141.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, together with the last four digits of each Debtors’ federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, TX 75038.

3. The Creditors' Committee members hold unsecured claims against the Debtors' estates arising from a variety of obligations, transactions and relationships. In accordance with Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the names and addresses of, and the "nature and amount of all disclosable economic interests" held by each Creditors' Committee member in relation to the Debtors as of the date of this Verified Statement. The information set forth on **Exhibit A** is based upon information the Creditors' Committee members provided to counsel and is subject to change.

4. Nothing contained in this Verified Statement (including **Exhibit A** attached hereto) should be construed as a limitation upon, or waiver of, any Creditors' Committee member's right to assert, file and/or amend its claim(s) in accordance with applicable law and any orders entered in these Chapter 11 Cases.

5. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

6. The Creditors' Committee reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

*[Remainder of page intentionally left blank]*

Dated: April 24, 2020  
Wilmington, Delaware

Respectfully submitted,

**REED SMITH LLP**

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*Proposed Counsel to the Official Committee of  
Unsecured Creditors*

**EXHIBIT A**

**Names, Addresses and Nature of Disclosable Economic Interests of Creditors' Committee Members**

Name/Address	Nature and Amount of Disclosable Economic Interest
<p><b>Pension Benefit Guaranty Corporation</b> 1200 K. Street, NW Washington, D.C. 20005</p>	<p>Contingent, unliquidated claims in an amount greater than \$865,000,000 arising from pension obligations of the Debtors.</p>
<p><b>Girl Scouts of the United States of America</b> Attn: Jennifer Rochon 420 Fifth Avenue New York, NY 10018</p>	<p>Litigation claim, subject to a pending civil action in the United States District Court for the Southern District of New York, Case No. 18-10287, for (i) unsecured damages of at least \$6,800,000, plus damages subject to expert testimony and attorneys' fees and costs on account of prepetition infringing conduct; (ii) unliquidated damages for postpetition infringing conduct; and (iii) postpetition injunctive relief.</p>
<p><b>Roger A. Ohmstede</b> Rog.sandy@mac.com</p>	<p>Unsecured claim of at least \$512,590.29 arising from the Restoration Plan.</p>
<p><b>Pearson Education, Inc.</b> Attn: John Garry 221 River Street Hoboken, NJ 07030</p>	<p>Claims consisting of (i) an unsecured claim of at least \$685,707.72 for unpaid prepetition services; (ii) a post-petition administrative expense claim of at least \$244,966.60 for providing actual and necessary services to the estate, and (iii) a contract rejection damages claim.</p>
<p><b>Lion Brothers Company, Inc.</b> Attn: Susan J. Ganz 300 Red Brook Blvd Owings Mills, Maryland, 21117</p>	<p>Unsecured claim of at least \$355,795.41 on account of prepetition trade payables.</p>