

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

Jointly Administrated

Re D.A. 1190 and 1194

**PCVA CLAIMANTS' OBJECTION TO THE ADEQUACY OF DEBTORS'
DISCLOSURE STATEMENT IN SUPPORT OF AMENDED CHAPTER 11 PLAN OF
REORGANIZATION**

On April 13, 2021, the Debtors filed a Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC (Dist. No. 2192) ("the Plan"), and on April 14, 2021, the Debtors filed a Disclosure Statement for the Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ("the Disclosure Statement") (Dist. No. 2194).

The Claimants represented by Pina Cochran Venturis Anzola PLLC (the "PCVA Claimants")¹ are survivors of childhood sexual abuse who each filed a Sexual Abuse Survivor Proof of Claim. As reflected in their individual proof of claim, the story of each of these survivors is unique, including how they were sexually abused, how the abuse affected them, and the circumstances that led to the abuse. As a group, their proofs of claim reflect abuse that occurred every year from the early 1940s to 2019. The sexual abuse they suffered includes fondling, masturbation, oral copulation, and anal penetration, and many of them report either physical violence or threats of physical violence to them or their loved ones. Declaration of Jovon Anzola in Support of PCVA Claimants' Objection to the Adequacy of the Debtors' Disclosure Statement in Support of Amended Chapter 11 Plan of Reorganization ("Anzola Decl.") at ¶ 4.

¹ An attached Appendix A, which lists the Sexual Abuse Survivor Proof of Claim numbers for the PCVA Claimants.