

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

SOUTHERN DISTRICT OF FLORIDA

Case number (if known) \_\_\_\_\_ Chapter 11

Check if this an amended filing

Official Form 201

**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name The Property Advocates, P.A.

2. All other names debtor used in the last 8 years  
 Include any assumed names, trade names and doing business as names  
FKA The Strems Law Firm

3. Debtor's federal Employer Identification Number (EIN) 26-3531714

4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	<u>2525 Ponce De Leon Blvd, Suite 600</u> <u>Coral Gables, FL 33134</u> Number, Street, City, State & ZIP Code	_____ P.O. Box, Number, Street, City, State & ZIP Code
	<u>Miami-Dade</u> County	_____ Location of principal assets, if different from principal place of business Number, Street, City, State & ZIP Code

5. Debtor's website (URL) https://www.thepropertyadvocates.com

6. Type of debtor

Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

Partnership (excluding LLP)

Other. Specify: \_\_\_\_\_

Debtor The Property Advocates, P.A. Case number (if known) \_\_\_\_\_  
 Name

**7. Describe debtor's business**

A. Check one:

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Railroad (as defined in 11 U.S.C. § 101(44))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- Clearing Bank (as defined in 11 U.S.C. § 781(3))
- None of the above

B. Check all that apply

- Tax-exempt entity (as described in 26 U.S.C. §501)
- Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5411

**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

- Chapter 7
- Chapter 9
- Chapter 11. Check **all** that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- A plan is being filed with this petition.
- Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

Chapter 12

**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- No.
- Yes.

If more than 2 cases, attach a separate list.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

Debtor The Property Advocates, P.A. Case number (if known) \_\_\_\_\_  
Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?  No  Yes.

List all cases. If more than 1, attach a separate list

Debtor \_\_\_\_\_ Relationship \_\_\_\_\_  
 District \_\_\_\_\_ When \_\_\_\_\_ Case number, if known \_\_\_\_\_

11. Why is the case filed in this district? *Check all that apply:*  
 Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.  
 A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?  No  Yes.  
 Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** *(Check all that apply.)*

- It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
 What is the hazard? \_\_\_\_\_
- It needs to be physically secured or protected from the weather.
- It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- Other \_\_\_\_\_

**Where is the property?** \_\_\_\_\_

Number, Street, City, State & ZIP Code

**Is the property insured?**

- No
- Yes. Insurance agency \_\_\_\_\_  
 Contact name \_\_\_\_\_  
 Phone \_\_\_\_\_

**Statistical and administrative information**

13. Debtor's estimation of available funds. *Check one:*  
 Funds will be available for distribution to unsecured creditors.  
 After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

<input checked="" type="checkbox"/> 1-49	<input type="checkbox"/> 1,000-5,000	<input type="checkbox"/> 25,001-50,000
<input type="checkbox"/> 50-99	<input type="checkbox"/> 5001-10,000	<input type="checkbox"/> 50,001-100,000
<input type="checkbox"/> 100-199	<input type="checkbox"/> 10,001-25,000	<input type="checkbox"/> More than 100,000
<input type="checkbox"/> 200-999		

15. Estimated Assets

<input type="checkbox"/> \$0 - \$50,000	<input checked="" type="checkbox"/> \$1,000,001 - \$10 million	<input type="checkbox"/> \$500,000,001 - \$1 billion
<input type="checkbox"/> \$50,001 - \$100,000	<input type="checkbox"/> \$10,000,001 - \$50 million	<input type="checkbox"/> \$1,000,000,001 - \$10 billion
<input type="checkbox"/> \$100,001 - \$500,000	<input type="checkbox"/> \$50,000,001 - \$100 million	<input type="checkbox"/> \$10,000,000,001 - \$50 billion
<input type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> More than \$50 billion

16. Estimated liabilities  \$0 - \$50,000  \$1,000,001 - \$10 million  \$500,000,001 - \$1 billion

Debtor **The Property Advocates, P.A.** Case number (if known) \_\_\_\_\_

Name

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> \$50,001 - \$100,000    | <input checked="" type="checkbox"/> \$10,000,001 - \$50 million | <input type="checkbox"/> \$1,000,000,001 - \$10 billion  |
| <input type="checkbox"/> \$100,001 - \$500,000   | <input type="checkbox"/> \$50,000,001 - \$100 million           | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million          | <input type="checkbox"/> More than \$50 billion          |
-

Debtor The Property Advocates, P.A. Case number (if known) \_\_\_\_\_  
Name

**Request for Relief, Declaration, and Signatures**

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 2023  
MM / DD / YYYY

**/s/ Hunter Patterson**  
 Signature of authorized representative of debtor  
 Title President

**Hunter Patterson**  
 Printed name

**18. Signature of attorney**

**/s/ Paul N. Mascia**  
 Signature of attorney for debtor

Date August 25, 2023  
MM / DD / YYYY

**Paul N. Mascia**  
 Printed name

**Nardella & Nardella, PLLC**  
 Firm name

**135 W. Central Blvd  
 Suite 300  
 Orlando, FL 32801**  
 Number, Street, City, State & ZIP Code

Contact phone 407-966-2680 Email address pmascia@nardellalaw.com

**489670 FL**  
 Bar number and State

**RESOLUTIONS OF THE BOARD OF DIRECTORS  
OF THE PROPERTY ADVOCATES, P.A.**

**WHEREAS** the Board of Directors (the “Board”) of The Property Advocates, P.A. (the “Company”) held a special meeting of the Board on August 17, 2023, to review the operational and financial condition of the Company its assets, liabilities and liquidity, and various alternatives available thereto, and the impact of the foregoing on the Company’s business, clients, creditors and other parties in interest;

**WHEREAS**, the Board has received, reviewed and considered the recommendations of, and had an opportunity to consult with, the management of the Company and the Company’s legal and financial advisors as to various strategic alternatives available to the Company including the relative risks and benefits of pursuing a bankruptcy proceeding under chapter 11 of title 11 of the United States Code;

**WHEREAS**, the Board has determined in the exercise of its business judgment that it is in the best interests of the Company, its creditors, and other parties in interest, that the Company seek relief under the provisions of chapter 11 of the Bankruptcy Code; and

**WHEREAS**, the Board wishes to authorize the officers of the Company to take all necessary actions in connection with the execution and filing of the petition, schedules, and other documents that they deem necessary or proper in connection with such proceedings under Chapter 11 of the Bankruptcy Code; and

**WHEREAS**, the Board has additionally reviewed, in connection with its consideration of whether to file a case under Chapter 11 of the Bankruptcy Code, the desirability of engaging an independent third party to serve as a Chief Restructuring Officer (the “CRO”) with the limited scope of reviewing and potentially prosecuting potential claims or positions of the Company concerning Scott Strem’s exit from the company and related transactions that may present a direct conflict for the company’s current shareholders Hunter Patterson and Christopher Narchet (the “Shareholders”), which include but may not be limited to, potential “claw back” claims against such Shareholders (the “CRO Matter”); and

**WHEREAS, WHEREAS**, the Board has determined in the exercise of its business judgment to engage Mr. Phillip Von Kahle, President of Moecker & Associates, to serve as CRO for the Company with respect to the limited scope set forth above.

**NOW, THEREFORE, BE IT RESOLVED**, that after consultation with the Company’s legal and financial advisors, in the judgment of the Board, it is desirable and in the best interests of the Company, its creditors, and other parties in interest, that a petition be promptly filed by the Company in the United States Bankruptcy Court for the Southern District of Florida (the “Bankruptcy Court”) seeking relief under the provisions of chapter 11 of the Bankruptcy Code and that Mr. Phillip Von Kahle with Moecker and Associates, P.A., be engaged as CRO for the limited scope set forth herein; and be it further,

**RESOLVED**, that the Board hereby authorizes, directs and empowers the current officers of the Company (an "Authorized Person"), acting alone or in combination to execute, deliver, file and perform in the name and on behalf of the Company, all petitions, schedules, motions, lists, applications, pleadings, orders and other documents (the "Chapter 11 Filings") (with such changes therein and additions thereto as the Authorized Person may deem necessary, appropriate or advisable, the execution and delivery of any of the Chapter 11 Filings by such Authorized Person with any changes thereto to be conclusive evidence that such Authorized Person deemed such changes to meet such standard); and be it further

**RESOLVED**, that any Authorized Person be, and hereby is, authorized, empowered, and directed, with full power of delegation, in the name and on behalf of the Company, to take and perform any and all further acts and deeds that such Authorized Person deems necessary, appropriate, or desirable in connection with the Company's chapter 11 case (the "Chapter 11 Case") or the Chapter 11 Filings (other than such acts and deeds that are within the scope of the CRO's engagement set forth above), including without limitation,(i) the payment of fees, expenses and taxes such Authorized Person deems necessary, appropriate, or desirable including, but not limited to, the retainer(s) or consideration for any professional(s) retained by the Company with respect to the Chapter 11 Case, and (ii) negotiating, executing, delivering, performing and filing any and all additional documents, schedules, statements, lists, papers, agreements, certificates and/or instruments (or any amendments or modifications thereto) in connection with, or in furtherance of, the Chapter 11 Case with a view to the successful prosecution of such Chapter 11 Case (such acts to be conclusive evidence that such Authorized Person deemed the same to meet such standard); and be it further

**RESOLVED**, that the law firm of Nardella & Nardella, PLLC, located at 135 W Central Blvd, Suite 300, Orlando, FL 32801, is hereby retained as attorneys for the Company in the Chapter 11 Case, and be it further,

**RESOLVED**, that Phillip Von Kahle is hereby appointed to serve as the CRO of the Company, effective as of Von Kahle's engagement letter to the Company dated July 25, 2023, to serve within the limited scope set forth herein; and be it further,

**RESOLVED**, that any and all past actions heretofore taken by an Authorized Person, any director, or any member of the Company in its name and on behalf thereof, in furtherance of any or all of the preceding resolutions be, and the same hereby are, ratified, confirmed, and approved in all respects; and be it further,

**RESOLVED**, that each Authorized Person, each of whom may act without the joinder of any of the others, be, and each of them individually hereby are, authorized and directed, in the name and on behalf of the Company, to take or cause to be taken all such further actions, including without limitation, negotiating, signing, executing, acknowledging, certifying, attesting, delivering, accepting, recording and filing (with such changes as such Authorized Person shall approve, and delivery thereof or the take such other action to be conclusive evidence of such approval) the Chapter 11 Case, the Chapter 11 Filings, and the retention of advisors and all such further documents, agreements, certificates and instruments and paying all fees, taxes and other expenses or payments, as such Authorized Person's sole discretion, may determine to be necessary, appropriate or desirable in order to fulfill the intent and accomplish the purposes of

the foregoing resolutions, such determination to be conclusively evidenced by the taking of any such further action; and be it

**RESOLVED, FURTHER**, that any actions taken by any Authorized Person, for or on behalf of the Company, prior to the date hereof that would have been authorized by these resolutions but for the fact that such actions were taken prior to the date hereof be, and they hereby are, authorized, adopted, approved, confirmed and ratified in all respects as the actions and deeds of the Company.

**BOARD OF DIRECTORS FOR  
THE PROPERTY ADVOCATES,  
P.A.**

DATE: August 17, 2023



Hunter Patterson

August 17, 2023



Cecile Mendizabal

August 17, 2023



Christopher Narchet

August 17, 2023



Fill in this information to identify the case:

Debtor name The Property Advocates, P.A.  
United States Bankruptcy Court for the: SOUTHERN DISTRICT OF FLORIDA  
Case number (if known) \_\_\_\_\_

Check if this is an amended filing

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

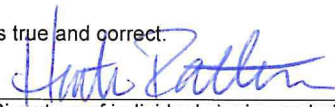
I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- Schedule A/B: Assets—Real and Personal Property (Official Form 206A/B)
- Schedule D: Creditors Who Have Claims Secured by Property (Official Form 206D)
- Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 206E/F)
- Schedule G: Executory Contracts and Unexpired Leases (Official Form 206G)
- Schedule H: Codebtors (Official Form 206H)
- Summary of Assets and Liabilities for Non-Individuals (Official Form 206Sum)
- Amended Schedule
- Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders (Official Form 204)
- Other document that requires a declaration \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/25/2023

X 

Signature of individual signing on behalf of debtor

Hunter Patterson

Printed name

President

Position or relationship to debtor

**Fill in this information to identify the case:**

Debtor name The Property Advocates, P.A.  
 United States Bankruptcy Court for the: SOUTHERN DISTRICT OF FLORIDA  
 Case number (if known): \_\_\_\_\_

Check if this is an amended filing

**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Law Office of Hernan Hernandez 5900 Hiatus Road Fort Lauderdale, FL 33321		Judgment for legal fees	Disputed			\$29,988.90
Brenda Oramas 8258 SW 148 PLACE Miami, FL 33193		Judgment for legal fees	Disputed			\$10,295.50
Gregory Saldamando c/o Craig Lewis, Esq Blilie Law 235 Lincoln Rd, Ste. 310 Miami Beach, FL 33139		Lawsuit. 2023-018868-CA-01, Miami-Dade County, Florida	Disputed			\$230,150.23
Luis Mena, Esq. 9700 S. Dixie Highway, Suite 600 Miami, FL 33156		Judgment for legal fees as expert witness	Disputed			\$13,020.00
Michael Patrick c/o Sean McCleary, Esq. 100 N Tampa St Ste 2050 Tampa, FL 33602		lawsuit. Case No. 23-007728 CA	Disputed			\$665,285.57
NextPointe, Inc. 1400 NW 107th Ave Ste 200 Miami, FL 33172		Vendor				\$4,893.00
Scot Stremms c/o Eduardo F Rodriguez EFR Law Firm 800 S. Douglas Road, Ste. 350 Miami, FL 33134		Promissory Note	Unliquidated Disputed			\$35,589,785.00

Debtor **The Property Advocates, P.A.**  
Name \_\_\_\_\_

Case number (if known) \_\_\_\_\_

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Small business Admin 409 3rd St., SW Washington, DC 20416		PPP loan	Disputed			\$1,219,750.00

Law Office of Hernan Hernandez  
5900 Hiatus Road  
Fort Lauderdale, FL 33321

Allied Engineering  
8203 SW 124th Street  
Miami, FL 33156

Bananas Group Inc.  
15600 SW 288th St Ste 310  
Homestead, FL 33033

Boyar And Freeman, P.A.  
5551 N. University Dr., Suite 102  
Pompano Beach, FL 33067

Brenda Oramas  
8258 SW 148 PLACE  
Miami, FL 33193

Brian L Tannebaum, P.A.  
1 SE 3rd Ave  
Suite 2410  
Miami, FL 33131

Christopher A Narchet  
c/o David Gay, Esq.  
2 Miami Central  
700 NW 1st Avenue, Ste. 1200  
Miami, FL 33136-4118

CORELOGIC SPATIAL SOLUTIONS, LLC,  
1825-A Kramer Lane  
Austin, TX 78758

Crown Castle Fiber LLC  
PO Box 28730  
Atlanta, GA 30374

Digital Revolution LLC  
Reputations Resolutions  
333 W Hampden Ave  
Suite #1020  
Englewood, CO 80110

Fairway East Kennedy Owner, LLC  
PO Box 746117  
Atlanta, GA 30374

Fairway East Kennedy Owner, LLC  
Attn: Managing Director  
800 N. Magnolia Ave  
Suite 1625  
Orlando, FL 32803

GreatAmerica Financial Services  
PO Box 660831  
Dallas, TX 75266

Gregory Saldamando  
c/o Craig Lewis, Esq  
Blilie Law  
235 Lincoln Rd, Ste. 310  
Miami Beach, FL 33139

Hunter David Patterson  
c/o R. Scott Shuker, Esq.  
121 S. Orange Ave, Ste. 1120  
Orlando, FL 32801

Legacy Parking Company  
255 S. Orange Ave  
Suite 106  
Orlando, FL 32801

Luis Mena, Esq.  
9700 S. Dixie Highway, Suite 600  
Miami, FL 33156

Michael Patrick  
c/o Sean McCleary, Esq.  
100 N Tampa St Ste 2050  
Tampa, FL 33602

More Tech Business  
8133 N.W. 66 Street  
Miami, FL 33166

NextPointe, Inc.  
1400 NW 107th Ave Ste 200  
Miami, FL 33172

Prisa Ponce de Leon, LLC  
Hines Holdings  
PO Box 978529  
Dallas, TX 75397

Regus  
Presidential Circle  
4000 Hollywood Boulevard Hills  
suite 555-S  
Hollywood, FL 33021

Scot Stremms  
c/o Eduardo F Rodriguez  
EFR Law Firm  
800 S. Douglas Road, Ste. 350  
Miami, FL 33134

Seven One Seven Parking  
1523 N. Franklin Street  
Tampa, FL 33602

Small business Admin  
409 3rd St., SW  
Washington, DC 20416

Smart Technologies of Florida  
PO Box 660831  
Dallas, TX 75266

State of California  
Franchise Tax Board  
P.O. Box 942857  
Sacramento, CA 94257

SWVP Orlando Office, LLC  
Attn: Legal Department  
12770 El Camino Real, Ste. 200  
San Diego, CA 92130

Ver, Ploeg & Marino  
100 S.E. Second Street, Suite 3300  
Miami, FL 33131

JP Morgan Chase Bank  
P.O. Box 9001022  
Louisville, KY 40290

JP Morgan Chase Bank  
P.O. Box 734007  
Dallas, TX 75373

JP Morgan Chase Bank  
Attn: Cristina Ice  
1450 Brickell Ave, 15th Floor  
Miami, FL 33131