

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

In re:

COMPLEX BUSINESS LITIGATION
DIVISION

CRYSTAL CRUISES LLC, a California
limited liability company,

Case No. 2022-002742-CA-01
Lead Case

CRYSTAL HOLDINGS U.S., LLC, a
Delaware limited liability company,

Case No. 2022-002757-CA-01

CRYSTAL AIRCRUISES, LLC, a Florida
limited liability company, and

Case No. 2022-002758-CA-01

Assignors,
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

ASSIGNEE'S OBJECTION TO CLAIM OF TRAVEL PLANNERS INTERNATIONAL

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING

PLEASE TAKE NOTICE that, Pursuant to section 727.111(4), Florida Statutes, the assignee may disallow improper claims of creditors, and the Court may consider these actions without further notice or hearing unless a party in interest files an objection within 21 days from the date this paper is served. If you object to the relief requested in this paper, you must file your objection with the Clerk of the Court of Miami-Dade County at 73 W. Flagler Street, Room 133, Miami, FL 33130, and serve a copy on the assignee's attorney, Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Blvd., Ste. 300, Orlando, FL 32801, and any other appropriate person.

If you file and serve an objection within the time permitted, the Court shall schedule a hearing and notify you of the scheduled hearing.

If you do not file an objection within the time permitted, the assignee and the Court will presume that you do not oppose the granting of the relief requested in the paper.

COMES NOW, Mark C. Healy, Assignee in the above-captioned Assignment proceeding (the “Assignee”), pursuant to Section 727.113 and 727.109(4), files this Objection to Claim of Travel Planners International (“TPI” or “Claimant”), and asserts as follows:

BACKGROUND

1. On February 10, 2022, the Crystal Cruises, LLC (the “Assignor”) executed and delivered, and the Assignee accepted, an irrevocable Assignment for the benefit of creditors to the Assignee (the “Assignment”). On February 11, 2022, a *Petition Commencing Assignment for the Benefit of Creditors* was filed by the Assignee for the Assignor, thereby commencing the following assignment for the benefit of creditors case pursuant to Chapter 727 of the Florida Statutes, in this Court: *In re Crystal Cruises LLC*, Case No. 2022-002742-CA-01 (the “Assignment Case”).

2. Prior to the Assignment, Assignor engaged in the business of travel and entertainment business, including operating ocean, river, and expedition cruises and conducting related activities around the world (the “Business”).

3. The Assignee's address and telephone number are c/o Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Boulevard, Orlando, Florida 32801 and (407) 966-2680.

4. Pursuant to § 727.112(2), *Florida Statutes*, all proofs of claims shall be filed by delivering the claims to the Assignee within 120 days from the filing of the Assignment.

5. In this case, all claims were required to be filed by June 11, 2022 (the “Bar Date”).

6. This Honorable Court has the power to allow or disallow claims against the estate and determine their priority. *See* § 727.109(4), *Florida Statutes*.

OBJECTION TO CLAIM

7. TPI delivered Claim No. 1143 in the amount of U.S. Dollars \$144,595.97 (the “Claim”) via U.S. Mail to the Assignee on April 15, 2022, a true and correct copy of which Claim is attached hereto as Exhibit “A”.

8. Assignee has reviewed the claim and all documentation provided by the Claimant. Of the \$144,595.97 claimed, only \$47,549.42 is confirmed as actually owed by Crystal Cruises and confirmed as commissions paid. The remaining amount of the Claim is objected to as the documentation provided, and the documentation of Crystal Cruises does not support that the commissions were actually earned by Claimant. As such, the Assignee objects to \$97,046.55 of the claim and agrees to the \$47,549.42.

WHEREFORE, the Assignee respectfully requests the Court enter an order sustaining his Objection to Ruis’ Claim, DENYING \$97,046.55 of the Claim and granting any such further relief that this Court may deem just and proper.

DATED this 20th day of December 2023.

NARDELLA & NARDELLA, PLLC
Co-General Counsel for Assignee
135 W. Central Blvd., Ste. 300
Orlando, FL 32801
(407) 966-2680

By: /s/ Paul N. Mascia

Michael A. Nardella, Esq.

Florida Bar No. 051265

Paul N. Mascia, Esq.

Florida Bar No. 0489670

mnardella@nardellalaw.com

pmascia@nardellalaw.com

kcooper@nardellalaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on December 20, 2023, which will serve upon all parties and interested persons of record in this action; on claimant Travel Planners International, 1740 Fennell Street, Maitland, FL 32751; and via email to erwingh@tpionline.com and cbl44@jud11.flcourts.org pursuant to CBL Rule 2.2.

By: /s/ Paul N. Mascia
Paul N. Mascia

EXHIBIT “A”

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

1143

In Re:

CRYSTAL CRUISES, LLC
a California Limited Liability company.

Assignor,

Case No.: 2022-002742 CA 01

To:

MARK C. HEALY,

Assignee,



PROOF OF CLAIM

TO RECEIVE ANY DIVIDEND IN THIS PROCEEDING, YOU MUST COMPLETE THIS PROOF OF CLAIM AND DELIVER IT TO THE ASSIGNEE NO LATER THAN:
JUNE 11, 2022
THE ASSIGNEE'S NAME AND ADDRESS ARE AS FOLLOWS:
Mark C. Healy, Assignee
MICHAEL MOECKER & ASSOCIATES, INC.
1885 Marina Mile Blvd., Suite 106
Fort Lauderdale, FL 33315
(954) 252-1560 · (954) 252-2791 Fax No.
Info@Moecker.com

1. CREDITOR NAME (Your name):
ADDRESS:
TELEPHONE NUMBER:
E-MAIL ADDRESS:

Travel Planners International
1740 Fennell Street
HAULAN FL 32751
407-331-3888
Erwingh@TPonline.com

Please be sure to notify us if you have a change of address.

2. BASIS FOR CLAIM:
 Goods Sold
 Services Performed
 Money Loaned

Wages, Salaries and Compensations
 Taxes
 Shareholder
 Secured Creditor
 Other: COMMISSIONS (TRAVEL AGENCY)

3. DATE DEBT WAS INCURRED:

02-11-2022

4. AMOUNT OF CLAIM:

\$144595.97

5. SUPPORTING DOCUMENTS: Attach copies of supporting documents, such as promissory notes, purchase order, invoices, itemized statement of running accounts, court judgments, or evidence of security interests. If the documents are not available, explain. If the documents are voluminous, attach a summary.

6. SIGNATURE: Sign and print name and title, if any, of the creditor or other person authorized to file this claim:

DATED: 04-15-2022

BY: [Signature]
Signature of Claimant or Representative

Erwing Hernandez
Print Name and Title Here

Included Adjustments: No

Submitted On	Invoice #	Agent Name	Vendor Name
Apr 04, 2022 02:58 AM	603030	Eric Forbes	Crystal Cruises-DO NOT SELL
Apr 04, 2022 02:56 AM	603029	Eric Forbes	Crystal Cruises-DO NOT SELL
Apr 04, 2022 02:51 AM	603028	Eric Forbes	Crystal Cruises-DO NOT SELL
Dec 15, 2021 03:04 PM	544853	Jimmy Chip Barker	Crystal Cruises-DO NOT SELL
Dec 09, 2021 03:52 PM	542880	Annette Moskop	Crystal Cruises-DO NOT SELL
Dec 08, 2021 04:13 PM	541259	Jimmy Chip Barker	Crystal Cruises-DO NOT SELL
Dec 02, 2021 03:59 PM	539344	Marianne Herring	Crystal Cruises-DO NOT SELL
Nov 23, 2021 06:07 PM	535229	Charles Greenberg	Crystal Cruises-DO NOT SELL
Nov 22, 2021 04:47 PM	534729	Melisa Keiser	Crystal Cruises-DO NOT SELL
Nov 18, 2021 03:28 PM	533553	Effie Walthall	Crystal Cruises-DO NOT SELL
Nov 06, 2021 03:49 PM	527946	Jimmy Chip Barker	Crystal Cruises-DO NOT SELL
Nov 03, 2021 03:22 PM	526421	Donalyn Bratton	Crystal Cruises-DO NOT SELL
Nov 03, 2021 03:16 PM	526417	Donalyn Bratton	Crystal Cruises-DO NOT SELL
Nov 02, 2021 05:11 PM	525677	Maria Sierra	Crystal Cruises-DO NOT SELL
Nov 02, 2021 02:53 PM	505070	Rose Alston	Crystal Cruises-DO NOT SELL
Nov 02, 2021 12:14 PM	525431	Eric Forbes	Crystal Cruises-DO NOT SELL
Nov 02, 2021 12:11 PM	525430	Eric Forbes	Crystal Cruises-DO NOT SELL
Nov 02, 2021 12:09 PM	525428	Eric Forbes	Crystal Cruises-DO NOT SELL
Oct 14, 2021 09:53 AM	517610	Gaylord Merow	Crystal Cruises-DO NOT SELL
Oct 14, 2021 04:41 AM	517558	Gaylord Merow	Crystal Cruises-DO NOT SELL
Oct 10, 2021 06:41 PM	515711	Michael Berman	Crystal Cruises-DO NOT SELL
Oct 07, 2021 06:03 PM	514983	Christopher Louder	Crystal Cruises-DO NOT SELL
Oct 06, 2021 08:47 PM	514607	Christopher Louder	Crystal Cruises-DO NOT SELL
Oct 04, 2021 04:42 PM	513274	Kimberly Monahan	Crystal Cruises-DO NOT SELL
Oct 04, 2021 04:40 PM	513273	Kimberly Monahan	Crystal Cruises-DO NOT SELL
Oct 04, 2021 04:39 PM	513272	Kimberly Monahan	Crystal Cruises-DO NOT SELL
Oct 04, 2021 02:55 PM	513240	Gabriela Aragon	Crystal Cruises-DO NOT SELL
Oct 04, 2021 02:54 PM	513238	Gabriela Aragon	Crystal Cruises-DO NOT SELL
Oct 04, 2021 11:26 AM	513126	Maria Sierra	Crystal Cruises-DO NOT SELL
Oct 04, 2021 11:24 AM	513124	Maria Sierra	Crystal Cruises-DO NOT SELL
Sep 29, 2021 01:04 PM	511298	Jeffrey Haynes	Crystal Cruises-DO NOT SELL
Sep 29, 2021 12:55 PM	511293	Jeffrey Haynes	Crystal Cruises-DO NOT SELL
Sep 02, 2021 06:25 PM	501767	Elizabeth Buttle	Crystal Cruises-DO NOT SELL
Aug 19, 2021 03:27 PM	496220	Donalyn Bratton	Crystal Cruises-DO NOT SELL
Aug 07, 2021 01:17 PM	491879	Cora Simpson	Crystal Cruises-DO NOT SELL
Jul 30, 2021 12:55 PM	488807	Mary Kay Capuano	Crystal Cruises-DO NOT SELL
Jul 23, 2021 05:54 PM	485590	Joan Kilberg	Crystal Cruises-DO NOT SELL
Jul 23, 2021 05:53 PM	485587	Joan Kilberg	Crystal Cruises-DO NOT SELL
Jul 23, 2021 05:53 PM	485586	Joan Kilberg	Crystal Cruises-DO NOT SELL
Jul 11, 2021 12:33 PM	439127	Melisa Keiser	Crystal Cruises-DO NOT SELL
Jul 11, 2021 12:33 PM	439137	Melisa Keiser	Crystal Cruises-DO NOT SELL

Jul 11, 2021 12:31 PM	439139 Melisa Keiser	Crystal Cruises-DO NOT SELL
Jul 11, 2021 12:28 PM	479866 Melisa Keiser	Crystal Cruises-DO NOT SELL
Jul 11, 2021 12:22 PM	479864 Melisa Keiser	Crystal Cruises-DO NOT SELL
Jul 11, 2021 12:18 PM	479851 Melisa Keiser	Crystal Cruises-DO NOT SELL
Jul 08, 2021 03:36 PM	479021 Joyce Winterstein	Crystal Cruises-DO NOT SELL
Jul 07, 2021 11:49 AM	478150 Joyce Winterstein	Crystal Cruises-DO NOT SELL
Jun 30, 2021 06:20 PM	475983 Sandra Woodling	Crystal Cruises-DO NOT SELL
May 26, 2021 01:37 PM	459456 Melisa Keiser	Crystal Cruises-DO NOT SELL
May 17, 2021 04:27 PM	455845 Paul McNeill	Crystal Cruises-DO NOT SELL
May 17, 2021 04:25 PM	455843 Paul McNeill	Crystal Cruises-DO NOT SELL
May 17, 2021 04:23 PM	455841 Paul McNeill	Crystal Cruises-DO NOT SELL
Apr 30, 2021 03:37 PM	449332 Charles Greenberg	Crystal Cruises-DO NOT SELL
Apr 30, 2021 03:33 PM	449330 Charles Greenberg	Crystal Cruises-DO NOT SELL
Apr 30, 2021 03:28 PM	449327 Charles Greenberg	Crystal Cruises-DO NOT SELL
Apr 08, 2021 07:39 PM	441302 Jean Palmby	Crystal Cruises-DO NOT SELL
Apr 07, 2021 05:15 PM	440785 Georgana Monighetti	Crystal Cruises-DO NOT SELL
Apr 07, 2021 10:24 AM	440582 Jean Palmby	Crystal Cruises-DO NOT SELL
Apr 06, 2021 07:46 PM	440230 Jean Palmby	Crystal Cruises-DO NOT SELL
Apr 05, 2021 07:20 PM	439823 Jean Palmby	Crystal Cruises-DO NOT SELL
Dec 18, 2020 01:30 AM	413107 Jonathan Hecker	Crystal Cruises-DO NOT SELL
Dec 09, 2020 01:30 AM	411815 Rose Alston	Crystal Cruises-DO NOT SELL
Dec 01, 2020 01:30 AM	410625 Bernard Kaplan	Crystal Cruises-DO NOT SELL
Mar 25, 2019 08:00 PM	213578 Julie Benario	Crystal Cruises-DO NOT SELL

Client	Passenger	Confirmation #
Stephanie Mary Johnson Meehan	Stephanie Mary Johnson Meehan	2314821
Eric Robert Forbes	Eric Robert Forbes	2314820
Albert Forbes	Albert Forbes	2314825
Judith Hertan	Judith Hertan	2329258
George Eichner	George Eichner	2305633
Michael Smith	Michael Smith	2329113
Linda Forina	Linda Forina	2322859
Wendy Mazzoni	Wendy Mazzoni	2325918
Leah Crowley	Leah Crowley	2326882
John Longdin	John Longdin	2313767
Judith Hertan	Judith Hertan	2324754
William Mino	William Mino	2323347
Jeffrey Scott MIno	Jeffrey Scott MIno	2323420
Michael May	Michael May	2320537
Rose Alston	Rose Alston	2310259
Albert Forbes	Albert Forbes	2314825
Eric Robert Forbes	Eric Robert Forbes	2314820
Stephanie Mary Johnson Meehan	Stephanie Mary Johnson Meehan	2314821
Gaylord Lewis Merow	Gaylord Lewis Merow	2315383
David John Davies	David John Davies	2315387
Samuel Norman Reiken	Samuel Norman Reiken	2315837
Nancy Wells	Nancy Wells	2317679
Marsha Deane	Marsha Deane	2317678
Delores Sharpe	Delores Sharpe	2314840
John Forbes	John Forbes	2314833
Walter Scott Noble	Walter Scott Noble	2314830
Nancy Jaimes	Nancy Jaimes	2317215
Robert Schenck	Robert Schenck	2317222
Peggy Williams	Peggy Williams	2311883
Michael May	Michael May	2304572
John Fishpaw	John Fishpaw	2286347
Peter Halper	Peter Halper	2296342
Frederick Keroff	Frederick Keroff	2295413
Jeffrey Scott Mino	Jeffrey Scott Mino	2308092
Ronald M Atlas	Ronald M Atlas	2305866
Charles M Ambrosio	Charles M Ambrosio	2305232
gary h lefferts	gary h lefferts	2292534
gary h lefferts	gary h lefferts	2292534
gary h lefferts	gary h lefferts	2292534
Constance Brown	Constance Brown	2284522
Katherine Henke	Katherine Henke	2284522

Date Created: 04/11/2022

Ticket Number	Start Date	Total Fare	Expec. Comm	Rcvd. Comm	Agent Share	Status
-	01/08/22	\$8,839.00	\$1,260.00	\$0.00	\$1,134.00	Pending
-	01/08/22	\$8,839.00	\$1,212.64	\$0.00	\$1,091.38	Pending
-	01/08/22	\$8,012.00	\$1,080.32	\$0.00	\$972.29	Pending
-	12/01/22	\$12,484.00	\$1,781.78	\$0.00	\$1,781.78	Pending
-	04/29/22	\$14,122.00	\$2,013.50	\$0.00	\$2,013.50	Pending
-	01/17/22	\$19,827.14	\$2,834.16	\$0.00	\$2,834.16	Pending
-	11/16/22	\$23,386.00	\$3,138.56	\$0.00	\$2,667.78	Pending
-	07/17/22	\$7,099.00	\$1,200.00	\$0.00	\$1,080.00	Pending
-	06/05/22	\$11,032.00	\$1,947.96	\$0.00	\$1,947.96	Pending
-	01/22/22	\$4,845.78	\$649.46	\$0.00	\$649.46	Pending
-	07/28/22	\$19,136.00	\$2,208.58	\$0.00	\$2,208.58	Pending
-	07/31/22	\$24,750.00	\$3,800.00	\$0.00	\$3,420.00	Pending
-	07/31/22	\$9,738.00	\$1,398.08	\$0.00	\$1,258.27	Pending
-	05/02/22	\$14,812.26	\$2,476.50	\$0.00	\$2,228.85	Pending
-	04/28/22	\$9,688.00	\$1,527.92	\$0.00	\$1,375.13	Pending
-	01/08/22	\$8,012.00	\$1,080.32	\$0.00	\$972.29	Pending
-	01/08/22	\$8,839.00	\$1,212.64	\$0.00	\$1,212.64	Pending
-	01/08/22	\$8,839.00	\$1,212.64	\$0.00	\$1,091.38	Pending
-	01/17/22	\$122,347.84	\$16,835.42	\$0.00	\$12,626.57	Pending
-	01/17/22	\$122,347.84	\$16,835.42	\$0.00	\$12,626.57	Pending
-	09/19/22	\$9,779.90	\$1,383.40	\$0.00	\$1,245.06	Pending
-	06/02/22	\$8,136.00	\$1,200.96	\$0.00	\$1,140.91	Pending
-	06/02/22	\$8,328.00	\$1,231.68	\$0.00	\$1,170.10	Pending
-	10/05/22	\$7,592.44	\$1,109.78	\$0.00	\$998.80	Pending
-	10/05/22	\$11,074.28	\$1,585.30	\$0.00	\$1,426.77	Pending
-	10/05/22	\$11,074.28	\$1,585.30	\$0.00	\$1,426.77	Pending
-	02/12/22	\$4,428.00	\$607.68	\$0.00	\$607.68	Pending
-	02/12/22	\$4,428.00	\$607.68	\$0.00	\$607.68	Pending
-	01/29/22	\$16,794.08	\$2,396.88	\$0.00	\$2,157.19	Pending
-	01/29/22	\$35,259.36	\$5,237.72	\$0.00	\$4,713.95	Pending
-	06/02/22	\$9,516.00	\$1,421.00	\$0.00	\$1,278.90	Pending
-	06/02/22	\$16,520.00	\$2,695.00	\$0.00	\$2,425.50	Pending
-	05/21/22	\$32,256.00	\$5,633.28	\$0.00	\$5,069.95	Pending
-	07/19/22	\$11,046.00	\$1,575.36	\$0.00	\$1,417.82	Pending
-	01/05/22	\$8,442.00	\$1,174.08	\$0.00	\$1,056.67	Pending
-	12/04/22	\$10,818.00	\$1,871.64	\$0.00	\$1,684.48	Pending
-	08/15/22	\$31,108.00	\$4,617.28	\$0.00	\$4,155.55	Pending
-	08/15/22	\$0.00	\$4,617.28	\$0.00	\$4,155.55	Pending
-	08/15/22	\$0.00	\$4,617.28	\$0.00	\$4,155.55	Pending
-	06/05/22	\$12,170.50	\$2,115.08	\$0.00	\$2,115.08	Pending
-	06/05/22	\$12,170.50	\$0.00	\$0.00	\$0.00	Pending

-	06/05/22	\$12,518.50	\$2,177.72	\$0.00	\$2,177.72 Pending
-	06/05/22	\$15,618.00	\$2,342.70	\$0.00	\$2,342.70 Pending
-	06/05/22	\$14,518.00	\$2,537.64	\$0.00	\$2,537.64 Pending
-	06/05/22	\$1.00	\$5,321.43	\$0.00	\$5,321.43 Pending
-	04/16/22	\$8,324.00	\$956.52	\$0.00	\$860.87 Pending
-	04/16/22	\$8,324.00	\$956.52	\$0.00	\$860.87 Pending
-	04/28/22	\$19,094.00	\$2,781.00	\$0.00	\$2,502.90 Pending
-	06/05/22	\$15,618.00	\$2,735.64	\$0.00	\$2,735.64 Pending
-	11/15/22	\$7,598.00	\$1,023.68	\$0.00	\$1,023.68 Pending
-	11/15/22	\$11,468.00	\$1,642.88	\$0.00	\$1,642.88 Pending
-	11/15/22	\$8,316.00	\$1,138.56	\$0.00	\$1,138.56 Pending
-	07/17/22	\$10,390.00	\$1,400.00	\$0.00	\$1,260.00 Pending
-	07/17/22	\$12,690.00	\$1,500.00	\$0.00	\$1,350.00 Pending
-	07/17/22	\$12,382.00	\$1,500.00	\$0.00	\$1,350.00 Pending
-	06/14/22	\$4,089.00	\$582.24	\$0.00	\$582.24 Pending
-	04/16/22	\$37,553.82	\$5,533.42	\$0.00	\$4,980.08 Pending
-	12/12/22	\$9,218.94	\$959.57	\$0.00	\$959.57 Pending
-	06/14/22	\$7,528.00	\$1,060.48	\$0.00	\$1,060.48 Pending
-	12/12/22	\$10,208.00	\$920.00	\$0.00	\$920.00 Pending
-	04/03/22	\$7,590.00	\$1,151.68	\$0.00	\$1,036.51 Pending
-	03/01/22	\$7,367.00	\$1,074.72	\$0.00	\$967.25 Pending
-	01/05/22	\$11,382.00	\$1,644.48	\$0.00	\$1,644.48 Pending
-	02/02/22	\$50,112.00	\$7,137.92	\$0.00	\$7,137.92 Pending
		\$1,029,845.46	\$161,068.36	\$0.00	\$144,595.97

Norma Castellon

From: info @Moecker.com
Sent: Monday, April 18, 2022 10:57 AM
To: Norma Castellon
Subject: FW: Crystal Cruises, LLC
Attachments: Crystal Cruises CustomReport (002).xlsx; Crystal_Letter_04152022.pdf

Importance: High

From: Erwing Hernandez
Sent: Friday, April 15, 2022 3:48 PM
To: notices @moecker.com <notices@moecker.com>; info @Moecker.com <info@moecker.com>
Cc: Dennis Aguilar <DennisA@tpionline.com>
Subject: RE: Crystal Cruises, LLC
Importance: High

Dear Sir or Madam,

I am attaching the POC as a Travel Agency.

Please let me know if you need anything else.

Erwing Hernandez, CTA & CTC
Senior Vice President
Travel Planners International
Phone: 407-331-3888 ext. 8210
www.TravelPlannersInternational.com



PARTNER
OF THE MONTH

Celebrity **X** Cruises®

From: notices @moecker.com <notices@moecker.com>
Sent: Thursday, March 10, 2022 8:35 AM
To: info @Moecker.com <info@moecker.com>
Subject: Crystal Cruises, LLC

CAUTION: This email originated from outside the organization. Unless you confirm the email is safe, or can confirm the sender is safe and you were expecting it, do not click on any links or open any attachments.

Dear Travel Agent Creditor:

You are receiving this email because you have been identified as a travel agency that may have a potential claim against Crystal Cruises LLC (“Crystal Cruises”) for a cruise that was not completed or you may be our point of contact for a client that is owed money for a cruise that was not completed because you booked the cruise for them but they paid for it.

On February 10, 2022, Crystal Cruises ceased operations. On February 11, 2022, Crystal Cruises (along with two of its affiliates, Crystal Aircruises LLC and Crystal Holdings U.S. LLC) commenced an Assignment for the Benefit of Creditors proceeding in Circuit Court in Miami-Dade County, Florida (the “ABC Case”). All future cruises have been canceled and no cruise will be rescheduled in the future.

If you or your client are owed money from Crystal Cruises for a cruise or cruises that were not completed, you must file a claim in order to participate in any distribution that may be made to creditors in the ABC Case. The vendor claim form, the customer claim form and the notice of assignment are attached. Please read both documents carefully. Please note that if you also have a separate claim for commissions, please submit a separate claim using the vendor claim form. You may wish to consult your own advisors or counsel with respect to your rights. When you complete the claim form, please check all applicable boxes and provide all information in the spaces provided that apply to you. Also, please attach any documents you have that explain or support your claim. This information may or may not include items such as payment confirmation(s), booking confirmation(s), invoices and evidence of payment. If these documents are not available, please attach a summary of the cruise(s) you booked with reservation ID’s and the amounts paid so we can verify those amounts.

If you are filling out the consumer claim form for one of your clients, please attach any documents you have that explain or support their claim. This information may or may not include items such as payment confirmation(s), booking confirmation(s), evidence of coupon, and evidence of payment. If these documents are not available, please attach a summary of the cruise(s) you booked with reservation ID’s and the amounts paid so we can verify those amounts. Your client may have also been issued coupons for future cruise credits. You need to provide information with the claim form regarding any coupons you or they may have and supporting documentation for amounts claim they are due in connection with the coupon(s) you have. **IF YOU ARE SUBMITTING A CLAIM ON BEHALF OF YOUR CLIENT PLEASE MAKE SURE THEY ARE NOT SUBMITTING A SEPARATE CLAIM FOR THE SAME ITEMS. PLEASE ALSO MAKE SURE THEIR NAME IS ON THE FORM AS THE CUSTOMER AND MAKE SURE THEY SIGN THE FORM.**

Additional sources of repayment may be available to you or your client to recover amounts owed. If you or your client pursue these methods and receive funds you must update the claim to reflect these payments. Please email your completed claim form to info@moecker.com or you can send a hard copy to Crystal Cruise Claims, 1885 Marina Mile Blvd., Suite 106, Ft. Lauderdale, FL 33315. It is not necessary to send the claim both by email and regular mail. One of these methods is sufficient. You can also go to the website maintained by the Assignee, crystalcruiseclaims.com, to receive updates about the ABC Case, copies of pleadings and court orders in the ABC case, and general information about assignment for the benefit of creditors cases and the ABC Case. Please visit this website frequently to get updates on the ABC Case. If you need to speak to someone, please request a call back by sending an email to info@moecker.com. It may take several days for you to receive a call back. You have until June 11, 2022, to file a claim. Please make sure your claim includes all relevant information and documents. Again, you must file a claim in order to be eligible to receive a distribution.

Mark Healy

Assignee for the Benefit of Creditors of Crystal Cruises LLC, Crystal Aircruises LLC, and Crystal Holdings
U.S. LLC
Michael Moecker & Associates

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