

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

**In re:**

**The Cliffs Club & Hospitality Group, Inc., et  
al.,<sup>1</sup> d/b/a The Cliffs Golf & Country Club,**

**Debtors.**

**CHAPTER 11**

**Case No. 12-01220**

**Jointly Administered**

**DECLARATION AND DISCLOSURE STATEMENT OF CHUCK SEELEY, ASA  
ON BEHALF OF HERITAGE GLOBAL VALUATIONS**

I, Chuck Seeley, ASA, hereby state and declare as follows:

1. I am a Managing Director in the firm of Heritage Global Valuations, an appraisal and valuation firm that maintains an office at 745 Chastain Road, Suite 1140-216, Kennesaw, Georgia 30144.

2. I am duly authorized to make this Declaration on behalf of Heritage Global Valuations, and I make this Declaration pursuant to the Order Authorizing Debtors to Retain and Compensate Professionals Used in the Ordinary Course of Business entered in these cases. The facts set forth in this Declaration are personally known to me, and, if called as a witness, I could and would testify thereto.

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<sup>1</sup> The Debtors, followed by the last four digits of their respective taxpayer identification numbers and Chapter 11 case numbers, are as follows: The Cliffs Club & Hospitality Group, Inc. (6338) (12-01220); CCHG Holdings, Inc. (1356) (12-01223); The Cliffs at Mountain Park Golf & Country Club, LLC (2842) (12-01225); The Cliffs at Keowee Vineyards Golf & Country Club, LLC (5319) (12-01226); The Cliffs at Walnut Cove Golf & Country Club, LLC (9879) (12-01227); The Cliffs at Keowee Falls Golf & Country Club, LLC (3230) (12-01229); The Cliffs at Keowee Springs Golf & Country Club, LLC (2898) (12-01230); The Cliffs at High Carolina Golf & Country Club, LLC (4293) (12-01231); The Cliffs at Glassy Golf & Country Club, LLC (6559) (12-01234); The Cliffs Valley Golf & Country Club, LLC (6486) (12-01236); Cliffs Club & Hospitality Service Company, LLC (9665) (12-01237).

3. Heritage Global Valuations has been engaged by The Cliffs Club & Hospitality Group, Inc. and/or its affiliated debtors in the above-captioned chapter 11 cases (collectively, the “Debtors”), to provide the following services: provide a desktop valuation of select IT (information technology) equipment.

4. To the best of my knowledge, information, and belief formed after reasonable inquiry, (a) neither I nor Heritage Global Valuations holds or represents any interest adverse to the Debtors or their estates with respect to the matters on which Heritage Global Valuations is to be employed; and (b) neither I, nor any other partner in or professional employed by Heritage Global Valuations is a relative of the bankruptcy judge presiding in these cases or of the United States Trustee for this region.

5. Neither I nor any partner in or professional employed by Heritage Global Valuations has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the partners and regular employees of Heritage Global Valuations.

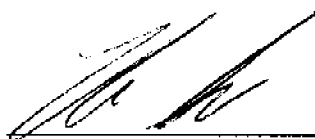
6. The Debtors owe Heritage Global Valuations \$0.00 for services rendered prior to February 28, 2012 (the “Petition Date”).

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7. Heritage Global Valuations is holding \$0.00 as a retainer from proceeds paid to Heritage Global Valuations by one or more of the Debtors prior to the Petition Date. Absent further order of the Court, Heritage Global Valuations will not apply such retainer to any amounts owing for services rendered prior to the Petition Date.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on March 29, 2012, at Kennesaw, Georgia.



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Chuck Seeley, ASA