

MESSENGER

FRANK M. PEES • CHAPTER 13 TRUSTEE
Southern District of Ohio, Eastern Division

Edition 1
October 2011

CASE LAW UPDATE

Supreme Court

Stern v. Marshall, 131 S. Ct. 2594 – Decided June 23, 2011

The Supreme Court held that the Bankruptcy Courts lacked constitutional authority to enter final judgments on state law counterclaims that are not resolved in the process of ruling on the creditor's proof of claim. In doing so, the Supreme Court affirmed the ruling of the Ninth Circuit Court of Appeals decision reversing the \$88 million judgment in favor of Vickie Lynn Marshall (a.k.a. Anna Nicole Smith) against E. Pierce Marshall for tortious interference with an expected gift from her late husband. The Supreme Court utilized a "public rights" test limiting non-Article III Courts to those cases "in which resolution of the claim at issue derives from a federal regulatory scheme, or in which resolution of the claim by an expert government agency is deemed essential to a limited regulatory objective within the agency's authority."

AmeriCredit Financial Services, Inc. v. Penrod – Petition for certiorari denied October 3, 2011

The Supreme Court denied the petition for certiorari in the Ninth Circuit case of *AmeriCredit Financial Services, Inc. v. Penrod*. As a result, there remains a split of authority in the Circuits regarding the issue of whether the "negative equity" in a car loan is purchase money for purposes of the hanging paragraph of §1325(a)(5). Based on the Supreme Court's denial of certiorari, the ruling of *Nuvell Credit Company, LLC v. Jamie Allen Westfall*, 599 F.3d 498 (6th Cir.), remains the controlling decision in the Sixth Circuit.

Sixth Circuit Court of Appeals

Dickson v. Countrywide Home Loans (In re: *Dickson*), 2011 Fed App. 0242P (6th Cir.), 2011 U.S. App. LEXIS 17830 – Decided August 26, 2011

Creditor obtained a default judgment converting a previously unencumbered manufactured home to an improvement to a parcel of real property, bringing the manufactured home within the terms of a mortgage contract and subjecting the manufactured home to foreclosure. The default judgment was entered 39 days prior to Debtor's bankruptcy filing. Finding that the five conditions of 11 USC §522(h) had been met, the Sixth Circuit Court of Appeals found that the Debtor had direct standing to seek the avoidance of the lien and that the creditor's lien was properly avoided pursuant to 11 USC §547(b).

Sixth Circuit Bankruptcy Appellate Panel

Hardesty v. CitiFinancial, Inc. (In re: *Roberts*), 414 Fed. Appx. 761 – Filed March 1, 2011

Chapter 7 Trustees sought to avoid the mortgages held with CitiFinancial based on the language of the acknowledgment on said mortgages. In affirming the Bankruptcy Court, the B.A.P. determined that the language "executed before me" was the substantial equivalent of the "acknowledged before me" language required by Ohio Revised Code §5301.01.

In re: Wengard, 453 B.R. 243; 2011 Bankr. LEXIS 2175 – Decided June 15, 2011

Prior to filing their bankruptcy, Chapter 7 Debtors entered into a contract to sell their home. Debtors did not disclose the pending sale on their petition and failed to list the sale as an executory contract under Schedule E. Both debtors claimed a homestead exemption in the property. Four days after filing their petition, Debtors closed on the sale of their home and moved into an apartment in Kansas. Debtors did not intend on using the proceeds from the sale of their home to purchase another home. In reversing the Bankruptcy Court, the B.A.P. held that Debtors still owned the home and were using the home as their principle residence as of the date of filing. Thus, the Debtors properly claimed the homestead exemption pursuant to Ohio Revised Code §2329.66(A)(1).

Bankruptcy Courts Within the Sixth Circuit

In re: Mains, 451 B.R. 428 (W.D. Mich) – Decided May 25, 2011

Confirmation of Debtors' Chapter 13 Plan was denied because the Bankruptcy Court determined that the case was not filed in good faith due to Debtors' failure to apply all of their social security income toward the repayment of creditors. Debtors sought motion for leave to appeal and a motion to stay further proceedings during the appeal. The Bankruptcy Court, after considering *Okoree-Baah*, 836 F.2d 1030 (6th Cir. 1988), *Caldwell I*, 851 F.2d 852 (6th Cir. 1988), and *Caldwell II*, 895 F.2d 1123 (6th Cir. 1990), determined that Debtors' likelihood of succeeding on appeal was not good and denied both of the Debtors' motions.

In re: Meade, 2011 Bankr. LEXIS 455 (S.D. Ohio – J. Perlman) – Decided February 11, 2011

Above median income debtors contended that they were not required to sustain a sixty month plan because their monthly disposable income (as calculated per 11 USC §1325(b)(3)) is a negative number. The Court, citing *Baud v. Carroll*, 634 F.3d 327 (6th Cir. 2011) and 11 USC §1325(b)(4)(A)(ii), held that as Debtors' current monthly income exceeded the "median family income" as set forth on Debtors' B22C form, regardless of Debtors' monthly disposable income, Debtors' plan must be for sixty months. The Court, citing

In re: Seafort, 437 B.R. 204 (BAP 6th Cir. 2010) and *Hamilton v. Lanning*, 130 S. Ct. 2464 (2010), also held that “the repayment of a 401(k) loan during the life of a Chapter 13 plan is a certain enough change in circumstance to cause resulting income to be included in the calculation of a debtor’s projected disposable income.

In re: Hurtt, 2011 Bankr. LEXIS 1478 (E.D. Ky) – Decided April 21, 2011

The Trustee asserted that Debtors’ case should be dismissed because Debtors’ noncontingent, liquidated, unsecured debts exceeded the debt limits imposed by 11 USC §109(e). In reaching his position, the Trustee calculated the unsecured portion of the debts listed by the Debtors on Schedule D of their petition. Debtors contended that, in looking at Debtors’ petition, all creditors included on Schedule D were secured at the time of filing. Case law supported the Trustee’s position to make a calculation of secured versus unsecured debt when it was so evident from the face of the schedules. See *In re: Pearson*, 773 F.2d 757 (6th Cir. 1985); *In re: Fuson*, 404 B.R. 872 (Bankr. S.D. Ohio 2008); and *In re: McClaskie*, 92 B.R. 285 (Bankr. S.D. Ohio 1988). Debtors’ case was dismissed for exceeding the unsecured debt limit of 11 USC §109(e). Similar decisions have recently reached by Judge Hoffman in the case of *In re: Young* (11-50970) and Judge Preston in the case of *In re: Kemp* (11-56374).

Emerging Issue

Can a Debtor strip wholly unsecured junior liens on real estate when said Debtor is not eligible for a discharge pursuant to 11 USC §1328(f)?

In re: Fisette, 2011 Bankr. LEXIS 3178 (B.A.P. 8th Cir.) – Decided August 29, 2011

Debtor seeks to strip wholly unsecured liens on real estate despite being ineligible for a discharge pursuant to 11 USC §1328(f). The lower courts have been split on this issue with the apparent majority position being that the lien is removed only upon the entry of the debtor’s discharge. *In re Gerardin*, 447 B.R. 342 (Bankr. S.D. Fla. 2011); *In re Erdmann*, 446 B.R. 861 (Bankr. N.D. Ill. 2011); *In re Victorio*, ___ B.R. ___, 2011 Bankr. LEXIS 2704, 2011 WL 2746054 (Bankr. S.D. Cal. 2011); *In re Fenn*, 428 B.R. 494 (Bankr. N.D. Ill. 2010); *In re Lindskog*, 451 B.R. 863 (Bankr. E.D. Wis. 2011); *In re Mendoza*, No. 09-22395 HRT, 2010 Bankr. LEXIS 664, 2010 WL 736834 (Bankr. D. Col. Jan. 21, 2010); *In re Blosser*, No. 07-28223-svk, 2009 Bankr. LEXIS 1049, 2009 WL 1064455 (Bankr. E.D. Wis. Apr. 15, 2009) and *In re Jarvis*, 390 B.R. 600, 604-06 (Bankr. C.D. Ill. 2008).

However, in what appears to be the first appellate court to address the issue, the 8th Circuit B.A.P. joined a growing minority of cases that hold that nothing in the Bankruptcy Code conditions a Chapter 13 Debtor’s ability to modify a wholly unsecured creditor’s lien under §1322(b)(2) on his eligibility for a discharge. See also *In re Davis*, 47 B.R. 738, 2011 WL 1237638 (Bankr. D. Md. 2011); *In re Jennings*, Nos. 11-50570-CRM, 10-88514-CRM, 2011 Bankr. LEXIS 2693, 2011 WL 2909888 (Bankr. N.D. Ga. Jul. 11, 2011) [*17]; *In re Okosisi*, 451 B.R. 90 (Bankr. D. Nev. 2011); *In re Fair*, 450 B.R. 853 (E.D. Wis. 2011); *In re Waterman*, 447 B.R. 324 (Bankr. D. Colo. 2011); *In re Tran*, 431 B.R. 230 (Bankr. N.D. Cal. 2010); and *In re Hill*, 440 B.R. 176 (Bankr. S.D. Cal. 2010).

PRE-CONFIRMATION

We are proud to unveil our new website

- Mr. Pees has a new website which can be accessed through a link on the www.13network.com site or directly at www.ch13.org. Please use this site for current information about the education programs, dockets, attorney and debtor services, forms, etc.



You can also follow us on Twitter to get up to the minute information. Our Twitter username is @columbusch13.

The Split

- Our office formally split on Oct. 1, 2011. As a result of that split, approximately 3900 cases were transferred to Mr. Norman. These include Judge Hoffman’s cases filed on or after Jan. 1, 2009 and Judge Caldwell’s odd numbered cases filed on or after Jan. 1, 2011.
- The UST has assigned Mr. Pees the 1st, 3rd and 5th (if needed) Wednesdays of the month to hold §341 Meetings. The cases will be comprised of all of Judge Preston’s cases and Judge Caldwell’s even numbered cases filed on or after Jan. 1, 2011.
- As a result of the split, several of our dearest friends and

colleagues left to be a part of Mr. Norman’s office. Many of the remaining staff was realigned to fill the spots vacated by their absence.

- The pre-confirmation department extends its thanks and appreciation to David Thompson, who has taken a position as plan analyst at Mr. Norman’s office, Monty Johnson, who is now working in the post-confirmation department and Marje Armstrong, who is now an internal auditor. The department also welcomes Angela Chiles as its new assistant. The Input and Scheduling department extends well wishes to Brenda Chapman who also joined Mr. Norman’s office.

Legal Issues

- In order for a case to be recommended for confirmation, all below median income cases must propose a plan that will last a minimum of 36 months and all above median cases must propose a plan that will last 60 months. This is effective for all plans filed on or after Nov.1, 2011.
- All vehicles payments, whether lease or loan, are to be paid through the plan regardless of whether or not they are long-term debts.
- If a mortgage proof of claim is filed with any arrearage amount, the plan must provide for the ongoing mortgage payments to be paid via conduit.

- If an unsecured claim is filed, the debtor must amend their schedules and the Plan.

Procedural Issues

- If the debtor is self-employed Schedule I should list the gross income. Schedule J should list all business expenses.
- Pre-confirmation amendments are considered effective as of the filing date of the petition. Therefore, an amended plan increasing plan payments may result in a payment deficiency.
- If confirmation of a case extends beyond the bar date, the case will be rerun based on claims as filed.
- The department will be updating their pre-confirmation recommendations (pink sheets) within the next few weeks. The initial review of the case will take place at least one week prior to the §341 Meeting. Prior to receiving the pre-341 recommendation, payment stubs, tax returns, etc. should be sent to Angela at angela@ch13.org. Once the pre-recommendation is received by debtor counsel, any correspondence or documents should be emailed to the case administrator. In an effort to expedite the confirmation process, case administrators can be contacted prior to the §341 Meeting of Creditors.
- The Trustee uses the docketing website as a communication tool to disseminate important information in a timely manner. In order to receive mass mailings, etc. from our office, access the docketing website at <http://dockets.ch13.org> and create a user I.D. Make sure that you enter an email address when prompted. Check the safety settings on your computer or phone to verify that emails originating from the docketing website do not end up in your spam folder.
- If the Trustee has filed an Objection to Confirmation and amendments do not cure all deficiencies, but do not create new ones, our office does not file a new or amended Objection to Confirmation. However, the docketing website is updated to reflect the changes along with the date of the last review. If amendments are filed that cure all the deficiencies noted on our Objection to Confirmation, but create new deficiencies, a new or amended objection is filed.
- If you know that your case will not be in posture for confirmation by the confirmation date, you may email the Trustee's Office at continued@ch13.org 10 days prior to the confirmation hearing date. Please include the Judge and the original confirmation date on your subject line. In the body of the email, please include the case no., debtor's name, your name, reason for continuance and, if any pending creditor objections, the fact that the creditor attorney agreed to the continuance. Also, let us know an approximation of the date you need in order to get the case ready to confirm; one case per email. If the case has not had more than 2 prior continuances and the payments are current, the Trustee's office will continue the case.
- If the Trustee notes that a case is in posture for confirmation, remember to check the docketing website to ascertain when the notice time tolls. If the time does not toll until after the confirmation date, you may want to request a continuance 10 days prior to the hearing.
- Pursuant to the PII directive which deals with privacy regulations, the attorney view of the docketing website cannot include both the case number and debtor name. If you are having difficulty finding your cases, please use the sort feature in the dark blue row at the top of the charts.

Requesting a Rescheduled Meeting of Creditors

We have a new method for requesting a rescheduled §341 Meeting of Creditors! Simply send your request to resets341@ch13.org (for Trustee Frank M. Pees cases only). As always, be sure to state the reason the original meeting was not held. As soon as the debtor's first plan payment has been posted on our system, we will process your request. **Feel free to check our website at www.13network.com for the payment information.**

If there are any known, scheduled commitments that might interfere with a possible Meeting of Creditors reset date (e.g., vacation, trial date), please state the problematic dates in your request. We will do our best to try to accommodate your situation.

Remember:

In order to allow time for processing, please submit requests no later than 11 days prior to the date of the original confirmation hearing (because confirmation dockets are set 10 days prior to the hearing).

If you have any questions regarding the reset request procedure, contact Meg Murphy, Input/Scheduling Supervisor, at (614) 436-6700, x124, or Bobbie Schilling, Scheduling Coordinator, at x120.

ACCOUNTING

This past year has been a big year for the accounting department. The Lockbox continues to be an enormous help to our department. The security of the Trust Funds and our office is of the utmost importance to the Trustee.

As you know the Trustees' office has been split. This in turn means the Receipts have been split. This presents a challenge to both our office and Mr. Normans' office.

Please keep in mind when counseling your Clients how the cases were split so that their payments will be sent to the correct Trustee at their respective Lockboxes.

Once again we would like to remind you of the process which takes place at our bank in the lockbox area. Mail is delivered seven days a week, several times a day 365 days a year. On a daily basis the payments are processed into our account. They operate three shifts in a 24-hour day to expedite processing our deposits. Those deposits are then posted on a secure private network for our accounting department to post. This is done on a daily basis in our office Monday through Friday. Once the Bank receives the check we will have it posted within 12 hours depending on the day of the week. Please understand this time frame does not include the time it takes to get through the United States Postal Service.

POST-CONFIRMATION

We'd like to extend our heartfelt gratitude to the members of the post-confirmation team who have now joined Mr. Norman's office; Tina Williamson, Tammy Evans, Anita Melick, Tim Adams, Michelle Czarniecki, Heather Roark, Karen Stover and Jeannie Bohlander. We wish them the very best in their new endeavors.

In efforts to streamline, our office has combined three departments to form the Post-Confirmation Case Administration Department. Our 5 Case Administrators will now handle wage orders and arrearage issues in addition to the management of the cases. All inquiries relating to wage orders, arrears and case management should be directed as follows:

Case numbers ending in

0 & 1	Mandy Ballinger - mandy@ch13.org
2 & 3	Betsy Weber - betsy@ch13.org
4 & 5	Cindy Levingston - cindy@ch13.org
6 & 7	Cathy Matthews - cathy@ch13.org
8 & 9	Lucy Thomas - lucy@ch13.org
Supervisor	Shelley Haydock - shelley@ch13.org

Just a few reminders

- Initial wage orders are to be filed by debtors' counsel. Our office will continue to file post-petition wage orders resulting from a step pay in the plan or modification if applicable.
- At the 341 meeting, please inform the hearing officer of the desire of your clients as from whom the wage deduction will be taken. If the deduction is to be split in a joint case, please provide the details to the hearing officer as well.



The Lockbox for Frank M. Pees

Chapter 13 Trustee
P.O. Box 71-0795
Columbus, OH 43271-0795

Overnight or Express Mail should be mailed to

Chapter 13 Trustee Lockbox #0795
Dept OH1-0471
370 S. Cleveland Avenue
Westerville, OH 43081

REMEMBER *overnight or Express Mail cannot be mailed to a Post Office Box.*

The Lockbox for Jeffrey P. Norman

Jeffrey P. Norman, Trustee
P.O. Box 1718
Memphis, TN 38101-1718

We continually strive to enhance and improve our accounting system to better serve our clients. Your comments are appreciated.

If you have any questions or comments please contact Sandra Hootman, Accounting Supervisor for Frank M. Pees at ext. 130.

- Please note that a response must be filed to the Trustee's Motion to Dismiss if you would like the hearing to be held. If a response is not filed, an Order of Dismissal will be submitted to the court for approval. Also, the filing of a Motion to Modify after our Motion to Dismiss does not constitute a response.
- Please note that it is not necessary to send the Trustee mortgage payment change information as our office unable to process this information prior to it being filed with the court.

Miscellaneous post-petition issues will be continued to be handled as follows:

Applications to Incur Debt & Debtor's Motion to Modify/Motions to Sell, etc:

Susan Cockerill - susan@ch13.org

Notice of Intention to Pay Claims & Trustee's Motion to Modify:

Stacie Roberts - stacie@ch13.org

Supervisor:

Don Mains - don@ch13.org

PLEASE BE SURE to review the Notice of Intention to Pay Claims regarding not timely filed claims on real estate and vehicles. Resolving these issues earlier in the plan, may avoid future filings of Motions to Modify due the case may not be meeting applicable commitment period.

CLOSING

We're happy to announce a new member of our Closing Team, Marje Armstrong. Marje had been a member of the Pre-Confirmation Department for the last 4 ½ years, but has now made the transition to her new home in the Closing Department. All inquiries regarding cases about to complete, paid in full, dismissed or converted should be directed as follows:

Case numbers ending in

1 through 5 Marje Armstrong - marje@ch13.org
6 through 9 & 0 Andrea Speelman - andrea@ch13.org
Supervisor Shelley Haydock - shelley@ch13.org

Important reminder!

It is mandatory for the Financial Management Certificate and the Debtors Certification Regarding Issuance of Discharge Order to be filed in order for the debtor(s) to receive their Discharge. Recently, many cases have been closed by the court without discharge to the absence of the filing of these documents. The Debtors Certification Regarding Issuance of Discharge Order can be found on our website at www.ch13.org.

DEBTOR ORIENTATION

The Orientation Program is held every Monday night at 130 E. Wilson Bridge Rd, Suite 100, Worthington, Ohio at 6 p.m. Those debtors assigned to Mr. Frank M. Pees can attend Orientation on the 1st and 3rd Mondays of the month. Those debtors assigned to Mr. Jeffrey P. Norman can attend Orientation on the 2nd and 4th Mondays of the month.

Please note that if a federal holiday falls on a Monday, the Orientation Program will be held on Tuesday evening at 6 p.m. that week.

A morning orientation program is held on the first Monday morning of each month at 10 a.m. for debtor(s) who are unable to attend in the evening. If the office is closed on Monday, the morning orientation will be held the following Monday morning at 10 a.m.

There is no need for the debtor(s) to register for the program but it is important for them to sign-in upon arrival. For those cases filed in Zanesville, the orientation program is offered as part of the Financial Management course.

FINANCIAL MANAGEMENT SEMINAR

2011 Financial Management Seminar

Email registration to debtored@ch13.org or call 614-436-6700 ext. 112 and provide name, case number, last name of attorney and date of seminar you will attend.

- You are required to complete this course only one time during your entire bankruptcy case.
- Choose only one date. Dates and times are subject to change.
- Seminar is free and light refreshments are provided.
- Must bring picture ID and case number.

Dates and Locations - Columbus

Chapter 13 Trustee's Office
130 E. Wilson Bridge Rd., Suite 200
Worthington, OH 43085

October

- Tuesday, October 25: 9-11:30 a.m.
- Saturday, October 29: 9-11:30 a.m.

November

- Thursday, November 10: 6:30-9 p.m.
- Saturday, November 19: 9-11:30 a.m.
- Tuesday, November 22: 9-11:30 a.m.

December

- Thursday, December 1: 6:30-9 p.m.
- Saturday, December 3: 9-11:30 a.m.
- Tuesday, December 6: 9-11:30 a.m.

Dates and Locations - Zanesville

Muskingum County Library Auditorium
220 North 5th Street
Zanesville, OH 43701

October

- Thursday, October 20: 1:45-4:15 p.m.

November

- Thursday, November 17: 1:45-4:15 p.m.

December

- Thursday, December 15: 1:45-4:15 p.m.

Financial Management Classes are offered monthly. The 2012 dates will be available in December, 2011, and can be viewed on Trustee Pees' home page of www.13network.com



New Edition to the Debtor Education Department

In September, 2011, Ashley Daubenmire (ext. 163) joined the Trustee's office as a part-time employee in the Debtor Education Department. Ashley issues Financial Management certificates, registers debtors for seminars, and is responsible for web access to the website. Ashley is a graduate of Ohio Dominican University with a Bachelors in Criminal Justice. She is also a Registered Victim Advocate in the State of Ohio. Ashley was a former victim advocate with Mothers Against Drunk Driving. Ashley is a creative artist who loves painting and enjoys baking cupcakes!

2011 MACER SEMINARS

- Seminars are free and refreshments are provided.
- Additional voluntary seminars offered to individuals in this district.
- Classes are held at the Trustee's Office, 130 E. Wilson Bridge Road, Suite 100, Worthington, OH 43085.
- Choose only one date per seminar. Dates and times are subject to change.
- Email registration to debtored@ch13.org or call 614-436-6700 ext. 112 and provide name, case number and date of seminar you will attend.

Debtor Education Thought for the Month

"Life is what happens while you are waiting for your plans to work out."



Seminars

Credit Reports & Re-Establishing Credit

Learn how to obtain, read and dispute credit reports. Guest speakers from credit lending community will share information about lending practices and what to expect now and after bankruptcy.

Dates and Times

- Wednesday, December 14, 2011: 7-9 p.m.
- Saturday, December 17, 2011: 9-11 a.m.

Dates in June and December 2012 will be available in December 2011.

Building a Spending Plan

Learn the basics of cash flow and how to track your spending. We provide pencils, calculators and quiet time; bring a list of your monthly expenses and pay stubs or income statements.

Dates in February and August 2012 will be available in December 2011.

Buyer Beware: Your Rights Under Ohio Consumer Laws

Learn about your rights under Ohio consumer laws, current scams to avoid, how to research companies before hiring them, work-at-home opportunities and much more.

Dates in April and October 2012 will be available in December 2011.

CEC'S FALL SEMINAR

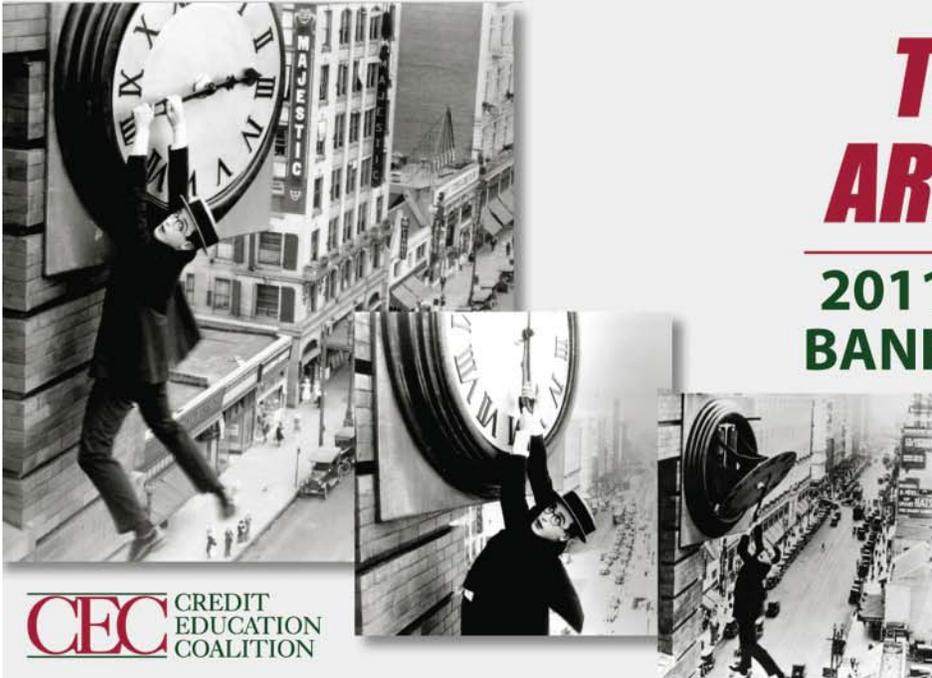
The Credit Education Coalition's Fall Consumer Bankruptcy Seminar will be held:

When: Friday, November 4, 2011

Where: Quest Business Centers

**8405 Pulsar Place
Columbus, OH 43240**

***In case you have not yet registered, we have provided a registration form in this newsletter!
If you have any questions at all about the seminar, contact your favorite CEC Board Member, or contact
Meg Murphy at (614) 436-6700, ext. 124 or meg@ch13.org.***



TIMES, THEY ARE A CHANGIN

2011 FALL CONSUMER BANKRUPTCY SEMINAR

**NOVEMBER
4, 2011
Quest Business
Centers**

CEC CREDIT
EDUCATION
COALITION

CREDIT EDUCATION COALITION
2011 FALL CONSUMER BANKRUPTCY SEMINAR – November 4, 2011

**Registration is also
available online at
[www.credited.org!](http://www.credited.org)**

REGISTRATION

Name of Firm/Company _____

Address _____

Telephone _____ E-Mail _____

Name(s) of Person(s) Attending _____

ADMISSION

** Fees include materials & Lunch*

***CEC MEMBERS** \$165/person

***NON-MEMBERS** \$195/person

Registration fee includes materials (notebook) and lunch

..... SPECIAL PRICING FOR NON-ATTORNEY STAFF MEMBERS

\$75/person

NOTE: This special price (for non-attorney staff members) includes materials (notebook) only.

AMOUNT ENCLOSED _____

Number of People for Lunch

CLE CREDIT – This course has been approved by the Supreme Court of Ohio Commission on Continuing Legal Education for 6.50 total CLE hours, with 1.0 hour of Ethics, 1.0 hour of Professionalism, and 0.50 hour Substance Abuse instruction.

Please fax or return this form by November 2, 2011 to:

Attention: Meg Murphy, Credit Education Coalition, P.O. Box 694, Worthington, OH 43085.

FAX # (614) 436-0190; PH # (614) 436-6700 x124

Cancellations, Substitutions and Refunds

If you are unable to attend the seminar, please contact Meg Murphy, C.E.C. Coordinator at (614) 436-6700 ext. 124. Registration fees will be refunded up until November 2, 2011. Substitutions are permitted. All refunds are subject to a service charge of \$30.00



M

ESSENGER

FRANK M. PEES • CHAPTER 13 TRUSTEE
Southern District of Ohio, Eastern Division

Edition 1
October 2011

Messenger is a quarterly publication of the Chapter 13 Trustee's Office. Submissions for possible publication in Messenger can be emailed to Mandy Ballinger, mandy@ch13.org.

Frank M. Pees

Chapter 13 Trustee

Mandy Ballinger

Editor and Designer

Meg Murphy

C.E.C. Coordinator

FRANK M. PEES • CHAPTER 13 TRUSTEE

130 E. Wilson Bridge Rd. Suite 200

Worthington, Ohio 43085