

Messenger

EDITION 5
SPRING 2013

FRANK M. PEES • CHAPTER 13 TRUSTEE
SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION

CASE LAW UPDATE

WHAT CAN BE CLAIMED EXEMPT PURSUANT TO OHIO REVISED CODE §2329.66?

In re: Zingale, 693 F.3d 704 (6th Cir. 2012) – Filed August 31, 2012.

Section 24 of the Internal Revenue Code (“IRC”) establishes a Child Tax Credit (“CTC”) of \$1,000.00 for every qualifying child. This credit is first used to offset tax liability after the application of other tax credits (i.e. the non-refundable portion). Any remaining portion of the CTC may be refundable as an additional child tax credit (i.e. the refundable portion).

In this Chapter 7 proceeding, Debtors were entitled to a total CTC of \$4,000.00, of which \$2,903.00 was used to offset Debtors’ tax liability and \$1,097.00 was refunded to the Debtors. Debtors sought to exempt the full \$4,000.00 of the CTC to which they were entitled on their Federal Tax Return. The Chapter 7 Trustee objected to the claimed exemption arguing that only the refundable portion of the Child Tax Credit could be exempted from Debtors’ anticipated tax return.

Pursuant to Ohio Revised Code §2329.66(A)(9)(g), a bankruptcy debtor may exempt a “payment” under §24 of the IRC. However, the Court determined that the non-refundable portion of the CTC was a credit only used to offset tax liability. Because the non-refundable portion of the CTC was not actually paid to the Debtors, it was not a payment pursuant to Ohio Revised Code §2329.66(A)(9)(g) and could not be claimed as exempt.

In re: Breece, 2013 Bankr. LEXIS 203 (6th Cir. B.A.P. 2013) – Filed January 18, 2013

Debtor and her grandmother jointly obtained legal title to a parcel of real property. Subsequently, Debtor and her grandmother created Gardinia Breeze, L.L.C., of which they were the only members. The legal title to the real estate was transferred to the LLC as the company’s only asset. After her grandmother’s passing, Debtor became the sole member of the

LLC. Debtor resided on the subject real estate and was personally liable for the debt secured by the mortgage of the subject real estate. As part of her Chapter 7 proceeding, Debtor claimed a homestead exemption in the residential real estate. The Chapter 7 Trustee objected. The Appellate Panel, reviewing Ohio Revised Code §1705.01, Ohio’s Limited Liability Company statute, concluded that it was unlikely that the Supreme Court of Ohio would allow a member of an LLC to claim an exemption in property owned by an LLC pursuant to Ohio’s homestead exemption. Ohio’s exemption statute allowed the debtor to exempt the debtor’s interest in property used as a residence. Because the debtor had no interest in the real property, the debtor could not claim an exemption therein. Additionally, because neither the real property nor any interest in the real property was property of the bankruptcy estate, the debtor could not claim a homestead exemption in the real property pursuant to 11 U.S.C. §522(b).



WHAT NEEDS TO BE INCLUDED WHEN CALCULATING DISPOSABLE INCOME?

In re: Scholz, 699 F.3d 1167 (9th Cir. 2012) – Filed November 15, 2012

Chapter 13 Debtors excluded Debtor husband’s receipt of an annuity under the Railroad Retirement Act (RRA) from their calculation of their current monthly income, citing the RRA’s anti-anticipation clause, 45 U.S.C. §231m(a).

The Chapter 13 Trustee objected to Debtors’ calculation of their current monthly income. The bankruptcy court overruled the Trustee’s Objection. The B.A.P. affirmed, finding that an RRA annuity was current monthly income but was not projected disposable income under 11 U.S.C. §1325(b).

On appeal, the 9th Circuit Court of Appeals, in reversing the B.A.P. decision, centered on the definition of the word “anticipated” as used in 11 U.S.C. §231m(a). As understood under trust law, the term “anticipated” refers to the premature receipt of payments due to the beneficiary of the annuity and including RRA annuity income as part of Debtors’ projected disposable income “does not ‘anticipate’ that income in the trust law sense of the term.” Rather, including RRA annuity income in Debtors’ projected disposable income allows a complete calculation of the amount of income Debtors will have available to pay creditors after deducting specified expenses. Thus, the Court held that 11 U.S.C. §231m(a) does not require the exclusion of RRA annuity income when calculating projected disposable income.

In re: Hersh, 2012 Bankr. LEXIS 5194 (Bankr. N.D. Ill. 2012) – Filed November 2, 2012

Following the initiation of divorce proceedings, Debtor filed a petition for relief under Chapter 13. Debtor received all of her income from her ex-husband pursuant to a divorce decree. On her original B22C and Schedule I, Debtor listed her income as “alimony, maintenance, and support payments” in the amount of \$3,500.00. Debtor’s original Schedule J listed total utility expenses of \$514 per month. In response to an objection by an unsecured creditor, Debtor filed an Amended B22C and an Amended Schedule I listing an additional \$1,487 in expenses paid for by her ex-husband. Debtor also filed an Amended Schedule J listing total utility expenses in the amount of \$714.15 per month.

At the confirmation hearing, Debtor testified that, in addition to the \$3,500.00 support

payment, her ex-husband regularly paid her mortgage in the amount of \$1,472.56 and her utilities, though said utility payments had been inconsistent since the filing of her petition. The Court determined that Debtor's Amended Schedule I understated her income by at least \$699.71; thus, creating a gross understatement of Debtor's projected disposable income to be paid to creditors. The Court granted Debtor 14 days to file an Amended Plan.

POST-PETITION ASSETS – WHAT IS PROPERTY OF THE ESTATE?

In re: Carroll, 2012 Bankr. LEXIS 5313 (Bankr. E.D.N.C. 2012) – Filed November 14, 2012

Debtors filed a petition under Chapter 13 on February 16, 2009. On December 23, 2011, Debtor husband's mother passed away leaving Debtors a \$100,000.00 inheritance. The Chapter 13 Trustee filed a Motion to Modify, arguing that the inheritance is property of the estate pursuant to 11 U.S.C. §1306(a)(1). Debtors argued otherwise contending that "the general language of §1306(a)(1) does not pull property expressly excluded by §541(a)(5) into the property of the estate." The court, citing its previous decision in *In re: Zeitchik*, 2011 Bankr. LEXIS 4588 (Bankr. E.D.N.C. Sept 23, 2011) and KEITH M. LUNDIN, CHAPTER 13 BANKRUPTCY, 3D ED. §47-2 (2000 & Supp. 2004), held that "§1306 extends the 180-day period in §541 to include any time between the commencement of the Chapter 13 case and the time the case is closed, dismissed or converted" and granted the Trustee's Motion to Modify.

In re: Adams, 481 B.R. 854 (Bankr. N.D. Miss. 2012) – Decided October 10, 2012

During the pendency of her Chapter 13 Bankruptcy, Debtor filed a personal injury/wrongful death cause of action arising from the care of her deceased mother. Defendants in state court sought dismissal pursuant to judicial estoppel because the Debtor had not disclosed her claim as an asset in the bankruptcy case. The state court referred to the bankruptcy court the question of whether the debtor had a duty to disclose her claim as an asset in her bankruptcy action. The bankruptcy court, citing 11 U.S.C. §1306 and the case of *Love v. Tyson Foods, Inc.*, 677 F.3d 258 (5th Cir. 2012), determined that Debtor's cause of action was property of the estate and that Debtor had a duty to disclose the asset to the bankruptcy court. The matter was referred back to the state court to determine whether judicial estoppel applied to preclude Debtor's cause of action.

POST-DISCHARGE COLLECTIONS AND RES JUDICATA

In re: Hann, 476 B.R. 344 (1st Cir. B.A.P. 2012) – filed August 7, 2012

Chapter 13 Debtor filed an Objection to the Proof of Claim filed by ECMC, a student loan

creditor, challenging the validity and the amount of said claim. Debtor asked the Court to disallow the claim, or, to allow it in an amount proved by the ECMC's payment history records. Debtor did not file an action seeking to discharge the student loan. ECMC neither responded to Debtor's objection nor attended the evidentiary hearing on said objection. After extensive testimony and evidence by the Debtor, the bankruptcy court entered an order allowing the student loan claim in the amount of \$0.00. Based on this order, ECMC received no payments through the bankruptcy.

After Debtor received her Chapter 13 discharge, ECMC began collection efforts including collection letters and attachment of Debtor's social security payments. Debtor re-opened her bankruptcy case and filed an adversary complaint against the creditor. Debtor was awarded \$9,134.72 for professional services and expenses as a remedial sanction for violation of the discharge injunction.

The 1st Circuit Bankruptcy Appellate Panel determined that the bankruptcy court's allowance of the student loan claim in the amount of \$0.00 was the equivalent of disallowing the claim. Because there was no claim, and hence no debt, res judicata applied and the bankruptcy court's order precluded ECMC from attempting any post-discharge collection. The bankruptcy court's order for sanctions was affirmed.

AN UPDATE ON "CHAPTER 20" CASES:

The split of authority continues regarding whether a Chapter 13 Debtor who is ineligible for a discharge may strip off a wholly unsecured junior lien. See *In re: Lindskog*, 480 B.R. 916 (September 28, 2012) (E.D. Wisc. 2012). In *Lindskog*, the Court determined that allowing a Debtor who is ineligible for a discharge to strip off the wholly unsecured junior lien would amount to a "de facto discharge" and would allow Debtors "to accomplish what was not allowed in the Chapter 7 and undermine Congressional intent."

But, what happens if your jurisdiction allows Chapter 13 Debtors who are ineligible for a discharge to strip off a wholly unsecured junior lien? What steps can be taken to strip off the lien and what treatment must be provided to the mortgage creditor?

See *In re: Renz*, 476 BR 382 (August 1, 2012) (Bankr. E.D.N.Y. 2012). In 2009, Debtors filed a Chapter 7 and received a discharge. Less than two years after filing the Chapter 7, Debtors filed a Chapter 13. Debtors, prior to the claims bar date, filed a Proof of Claim on behalf of Chase Mortgage, the holder of a wholly unsecured second mortgage in the amount of \$100,516.80. Debtors then obtained an order stripping off Chase's second mortgage and treating the debt to

Chase as an unsecured claim. Twelve days after obtaining the order stripping Chase's second mortgage, and subsequent to the claims bar date, Debtors filed a letter purporting to withdraw the Proof of Claim filed on behalf of Chase as well as an Amended Plan providing for a 100% dividend to general unsecured creditors. If approved, Debtors' amended plan would provide for no payments being made to Chase. The Trustee objected to Debtor's plan.

The Court denied confirmation of Debtors' plan holding that: (1) FRBP 3006 did not permit Debtors to withdraw the Proof of Claim filed on behalf of Chase; (2) pursuant to the "law of the case doctrine," Debtors must treat Chase's claim as an unsecured claim in the amount for which it was filed; and (3) Debtors' amended Chapter 13 Plan was not filed in good faith. Debtors were given 30 days to file an Amended Chapter 13 Plan.

However, *In re: Sweitzer*, 476 BR 468 (August 24, 2012) (Bankr. Md. 2012) held that when a mortgage creditor's in personam rights and claims against Debtors are discharged in a Chapter 7, those rights and claims cannot be "resurrected and allowed as an unsecured claim" simply because the creditor's in rem rights were stripped off in a subsequent Chapter 13. Citing *In re: Scantling*, 465 B.R. 671 (Bankr. M.D. Fla. 2012), the *Sweitzer* Court determined that the mortgage creditor was "left with neither in personam nor in rem rights against the debtors, and thus holds no allowable claim against the debtors or their property that would entitle it to receive distributions under the Chapter 13 plan in this case."

There are sure to be more cases on mortgage issues in "Chapter 20" cases, but what about other collateral when Debtors are ineligible for discharge? In the case of *In re: Hall*, 2012 Bankr. LEXIS 4902 (Bankr. M.D. Tenn. 2012), filed October 18, 2012, AmeriCredit Financial Services, Inc. possessed a lien on Debtors' 2006 Chevrolet Impala. Debtors, who were ineligible for a discharge, objected to the unsecured portion of the Proof of Claim of AmeriCredit on the basis that the unsecured portion of the claim was discharged in the prior Chapter 7. The Court found that, pursuant to 11 U.S.C. §1325(a)(5)(B), the holder of a lien retains the lien until either the underlying debt as determined under nonbankruptcy law is paid or the debt is discharged pursuant to 11 U.S.C. 328. As Debtors were ineligible for a discharge, AmeriCredit could not be forced to release its lien without receiving payment in full under applicable nonbankruptcy law. Therefore, AmeriCredit's entire claim, both secured and unsecured portions, was enforceable against the property and the Chapter 7 discharge was not a basis for disallowance of the unsecured portion of the claim.

UPDATES FROM PRE-CONFIRMATION

IT'S ALL BECOMING CRYSTAL CLEAR

Our Chapter 13 website provides procedural and administrative information to help with your Chapter 13 filings. Come visit us at www.ch13.org to learn about all things Pees including:

- Office related cancellations
- Dates and times for orientation, financial management and voluntary seminars
- Best Practices Handbook including Attorney Checklist, procedural notes from each department, phone extensions, fax numbers, email addresses and websites
- Trustee position statements regarding debtors in business, mortgage conduit payments, mortgage modifications and treatment of long-term student loans
- Docketing website information

Additionally, the following fillable pdf forms are now available on the website:

- Applications to Incur Debt (NEW)
- Debtor(s) Certification Regarding Issuance of Discharge Order
- Mandatory Chapter 13 Plan
- Proof of Claim
- Small Business Handbook
- Stipulation of Value and/or Interest
- Wage Order (NEW)
- Web access agreement
- Motion to Approve Loan Modification (NEW)

YOU WANT THE TRUTH?

HB 479

Governor Kasich signed HB 479 (aka The Ohio Legacy Trust Act) on December 20, 2012. Among other changes, the bill raises the homestead exemption from \$21,625 to \$125,000. ORC §2329.66(A)(1)(a). The homestead exemption is limited to "one parcel or item of real or personal property that the person or dependent of the person uses as a residence" with the term "parcel" being defined as "one tract of property as identified on the records of the auditor of the county in which the property is located." ORC §2329.66(A)(1)(c).

The effective date of HB 479 is March 27, 2013. For the full text of HB 497, please visit http://www.legislature.state.oh.us/bills.cfm?ID=129_HB_479

EXEMPTIONS

The Ohio and Federal Exemptions changed effective April 1, 2013. The changes are as follows:

Ohio Exemption Changes:

Exemption	Old Amount	New Amount
Homestead	\$125,000	\$132,900
Motor Vehicle	\$3,450	\$3,675
Cash on Hand	\$425	\$450
Household - Individual Items	\$550	\$575
Household - Aggregate Value	\$11,525	\$12,250
Jewelry	\$1,450	\$1,550
Tools of the Trade	\$2,175	\$2,325
Personal Injury	\$21,625	\$23,000
Wildcard - Personal Property	\$1,150	\$1,225

Federal Exemption Changes:

Exemption	Old Amount	New Amount
Homestead	\$21,625	\$22,975
Motor Vehicle	\$3,450	\$3,675
Household	\$550 (per item) \$11,525 (total)	\$575 (per item) \$12,250 (total)
Jewelry	\$1,450	\$1,550
Wildcard	\$1,150 \$10,825 (homestead carryover)	\$1,225 \$11,500 (homestead carryover)
Trade	\$2,175	\$2,300
Life Insurance	\$11,525	\$12,250
Personal Injury	\$21,625	\$22,975

The Census Bureau's Median Family Income Data was updated for cases filed on or after April 1, 2013. For a complete listing of these changes, please go to <http://www.justice.gov/ust/eo/bapcpa/meanstesting.htm>.

DEBT LIMITS

For cases filed on or after April 1, 2013, and for the three years thereafter, the new debt limits are as follows: unsecured debt \$383,175 and secured debt \$1,149,525. The new debt limits are a \$22,700 increase over the old unsecured debt limit of \$360,475 and a \$68,125 increase over the old secured debt limit of \$1,081,400.



HELLO FROM THE ACCOUNTING DEPARTMENT

The last six months of 2012 have been a continuing effort to get Trust funds to the correct Trustee. We are continuing to make headway. Please insure your clients and employers understand their correct Trustee. We continue to receive funds for Trustee Norman and other Trustees, which are new cases and were not involved in the split from October 2011. We are currently forwarding those funds to their correct Trustee. This increases time by at least one week for payments to be reflected on cases. We continue to work persistently to notify employers and debtors of address corrections for Trustee payments.

Please remember the Lockbox address for Frank M. Pees, Trustee is as follows:

**Chapter 13 Trustee
P.O. Box 710795
Columbus, OH 43271-0795**

We are pleased to tell you that our Audit went extremely well, perfect to be exact. So we will continue to provide you with outstanding service. If you have any suggestions or comments for the accounting department please do not hesitate to contact our office. Thank you for your continued support and cooperation.



POST-CONFIRMATION

Just a note: If you have a client who is employed by Nationwide Insurance, please remember that there are a few different divisions, namely Nationwide Mutual and Nationwide Life. When filing the initial wage order, please don't hesitate to contact us if you should need addresses or information.

Our policy on Notices of Postpetition Mortgage Fees, Expenses and Charges is as follows:

If the mortgage is currently being paid outside, we will not file a response or pay the debt unless the Notice is for an escrow advance. If the Notice is for post-petition real estate taxes and/or insurance, we will file a Notice of Intention to Pay an Additional Claim. If no objection/motion is filed by the Debtor, we will pay as a supplemental claim through the plan. If this causes a length problem, a Motion to Dismiss may be filed.

If the mortgage is being paid as a conduit through the plan, we will treat Notices for escrow advances the same as in a direct pay case. For most Notices for phone fees, inspection fees, late fees, attorney fees, etc., we will file a Motion/Order to Disallow.



(CEC members voting during the Annual Membership Meeting)

CREDIT EDUCATION COALITION UPDATE

CEC CONDUCTS A "REAL" ELECTION AT THE ANNUAL MEMBERSHIP MEETING

The Credit Education Coalition's Annual Meeting turned out to be an even bigger whirlwind than usual this year. Because fourteen members were vying for ten positions on the Board of Trustees, an actual written vote was required to determine the outcome. Three members (Marshall Cohen, John Kennedy, and Shannon Treynor) were elected once again, after having been absent from the Board for a period of time. In addition, three first-time Board members are ready to participate for a two-year term: Katherine Brewer, Laura Nesbitt, and Courtney Perdue. Congratulations to all and thank you for your dedication to CEC!

CREDIT EDUCATION COALITION 2013 OFFICERS AND BOARD OF TRUSTEES

President: Matthew Thompson, *Nobile & Thompson Co LPA*

President Elect: Michael A. Cox, *Guerrieri Cox and Associates*

Secretary: Eden Sarver, *Attorney at Law*

Treasurer: Nannette J. B. Dean, *Dean Law Co. LLC*

Trustees:

Robert Bergman, *Bergman & Yiangou*

Katherine B. Brewer, *Jump Legal Group LLC*

Christal Caudill, *The Caudill Law Group LLC*

Marshall D. Cohen, *Marshall D. Cohen Co LLC*

Robert Ellis, *Ellis & Ellis*

Athena Inembolidis, *Athena Legal LLC*

Mark Jump, *Jump Legal Group LLC*

John W. Kennedy, *Office of Chapter 13 Trustee Jeffrey P. Norman*

Amy M. Levine, *Amy M. Levine & Assocs.*

Kathy Mills, *Office of Chapter 13 Trustee Frank M. Pees*

James Mong, *Attorney at Law*

Laura Nesbitt, *Jump Legal Group LLC*

Courtney Perdue, *Fesenmyer Law Offices*

David Powell, *Office of Chapter 13 Trustee Frank M. Pees*

Christopher Spiroff, *Spiroff Law Office*

Shannon M. Treynor, *Attorney at Law*

Crystal Zellar, *Zellar & Barclay Attorneys at Law, Inc.*

Don Mains, *Honorary Trustee*

Frank M. Pees, *Trustee Emeritus*



Follow us on
Twitter to get up
to the minute
information. Our
Twitter username is
@columbusch13

If you want to join the Credit Education Coalition as a new member, or if you need to become current on your dues, please make your check payable to CEC and forward the check (along with your name and address) to: CEC, PO Box 694, Worthington OH 43085. Individual memberships are \$50 per year, or \$25 per year if you are a government employee. Questions? Call Meg Murphy at (614) 436-6700, ext. 124.

CEC WINTER SEMINAR 2013

JUDICIAL TOWN HALL PRESENTATION

Mark Your Calendars!

Hon. Charles M. Caldwell, Hon. John E. Hoffman, Jr.,
Hon. C. Kathryn Preston, Chapter 13 Trustee Frank M. Pees



The Credit Education Coalition's Fall Consumer Bankruptcy Seminar will be held November 8, 2013 at Quest Business Centers. CEC will be offering ethics, professionalism, and substance abuse instruction in addition to a variety of other sessions. CEC's officers and Board members are in the beginning stages of planning the seminar. If you have suggestions, please convey them to either a Board member and/or to Meg Murphy. Please save the date now and plan to get your CLE credits on November 8th!



Members of the Judicial Liaison Committee: Keith Brown, Deputy, U.S. Bankruptcy Court; MaryAnne Wilsbacher, Assistant U.S. Trustee; Amy L. Bostic, Luper Neidenthal & Logan



FINANCIAL MANAGEMENT SEMINARS 2013

MUST BRING PHOTO ID AND CASE NUMBER

FREE! This is the post-filing course required for discharge at the end of your case. You are required to complete this course one time only. **EMAIL REGISTRATION TO debtores@ch13.org OR CALL (614) 436-6700 EXT. 112** with name, case number, phone number, date of seminar, attorney's last name, and name of Trustee. Dates and times are subject to change.

Light refreshments are provided at the Worthington/Columbus location.

WORTHINGTON/COLUMBUS

Office of Chapter 13 Trustee Frank M. Pees
130 E. Wilson Bridge Road Suite 100
Worthington, OH, 43085

MAY

Sat., May 11, 9-11:30AM
 Tues., May 21, 9-11:30AM
 Thurs., May 30, 6:30-9PM

JUNE

Tues., Jun. 4, 9-11:30AM
 Sat., Jun. 8, 9-11:30AM
 Thurs., Jun. 13, 6:30-9PM

JULY

Sat., Jul. 13, 9-11:30AM
 Thurs., Jul. 25, 6:30-9PM
 Tues., Jul. 30, 9-11:30AM

AUGUST

Sat., Aug. 17, 9-11:30AM
 Tues., Aug. 20, 9-11:30AM
 Thurs., Aug. 29, 6:30-9PM

SEPTEMBER

Sat., Sept. 14, 9-11:30AM
 Tues., Sept. 17, 9-11:30AM
 Thurs., Sept. 26, 6:30-9PM

OCTOBER

Sat., Oct. 5, 9-11:30AM
 Thurs., Oct. 10, 6:30-9PM
 Tues., Oct. 22, 9-11:30AM

NOVEMBER

Thurs., Nov. 14, 6:30-9PM
 Tues., Nov. 19, 9-11:30AM
 Sat., Nov. 23, 9-11:30AM

DECEMBER

Tues., Dec. 3, 9-11:30AM
 Thurs., Dec. 12, 6:30-9PM
 Sat., Dec. 14, 9-11:30AM



ZANESVILLE

Holiday Inn
1101 Spring Street
Zanesville, Ohio 43701
(ALL Classes Thurs. 1:45-4:15PM)

Zanesville Orientation/Financial Management class has moved to the Holiday Inn Express, 1101 Spring Street.
The class is held from 1:45 pm – 4:15 pm on the same day as the §341 Meetings of Creditors.

May 16
 June 20
 July 18
 August 15
 September 19
 October 17
 November 21
 December 19

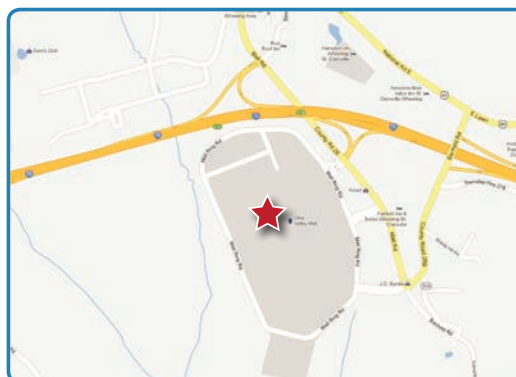
ST. CLAIRSVILLE

Ohio Valley Mall Community Room
St. Clairsville, Ohio 43950

Use Mall back entrance
 between Crafts 2000 and Sears

(All Classes Fri 1:45-4:15PM)
 Jun. 21, 2013
 Aug. 16, 2013

Additional dates to be determined



MACER SEMINARS

Worthington/Columbus
Office of Chapter 13 Trustee Frank M. Pees
130 E. Wilson Bridge Road, Suite 100
Worthington, OH, 43085

FREE! Light refreshments are provided.

EMAIL REGISTRATION TO debtor@ch13.org OR CALL 614.436.6700 EXT. 112 with name, case number, phone number, date of seminar, last name of attorney, and name of Trustee.



BUILDING A SPENDING PLAN

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

Thurs., Aug. 8, 6:30-8:30PM
Sat., Aug. 10, 9-11AM



BUYER BEWARE

Guest speaker from Ohio Attorney General's Office will present information about Ohio consumer laws, current scams to avoid, work-at-home opportunities, filing complaints, researching companies before hiring, and much more.

Thurs., Oct. 24, 6:30-8:30PM
Sat., Oct. 26, 9-11AM



CREDIT REPORTS & RE-ESTABLISHING CREDIT

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

Thurs., Jun. 27, 6:30-8:30PM
Sat., Jun. 29, 9-11AM

Thurs., Dec. 5, 6:30-8:30PM
Sat., Dec. 7, 9-11AM

Debtor Education Thought for the Month

"Everything that can be counted does not necessarily count; everything that counts cannot necessarily be counted." -Albert Einstein



Messenger



EDITION 5
SPRING 2013

FRANK M. PEES • CHAPTER 13 TRUSTEE
SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION

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

MEG MURPHY

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