

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:

**GLOBAL EMPOWERMENT MINISTRIES,
INC.**

Debtor.

**GLOBAL EMPOWERMENT MINISTRIES,
INC.**

Movant,

v.

**CRIMSON PORTFOLIO, LLC,
SUSQUEHANNA COMMERCIAL FINANCE,
LIFTFORWARD, INC., U.S. BANK
EQUIPMENT A DIVISION OF U.S. BANK
N.A, AND SHERYLL MANERSON**

Respondents.

CHAPTER 11

CASE NO. 17-63234-JRS

CONTESTED MATTER

NOTICE OF HEARING ON DEBTOR'S MOTION TO USE CASH COLLATERAL

PLEASE TAKE NOTICE that on August 4, 2017, Debtor filed a Motion Requesting Order Authorizing the Use of Cash Collateral ("Motion").

PLEASE TAKE FURTHER NOTICE that the Court shall hold a hearing on the Motion on August 22, 2017, at 1:30 p.m. in the United States Courthouse, Courtroom 1404, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303.

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on

whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is Clerk, United States Bankruptcy Court, 1340 Russell Federal Building, 75 Ted Turner Drive SW, Atlanta, GA 30303. You must also mail a copy of your response to the undersigned at the address stated below.

This 4th day of August, 2017.

JONES & WALDEN, LLC

/s/ Leslie Pineyro

Leslie Pineyro
Georgia Bar No. 969800
Proposed Attorneys for Debtor
21 Eighth Street, NE
Atlanta, Georgia 30309
(404) 564-9300

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Respondents.

CONTESTED MATTER

**MOTION REQUESTING ENTRY OF ORDER AUTHORIZING
THE USE OF CASH COLLATERAL**

COMES NOW Global Empowerment Ministries, Inc. ("Debtor") and hereby files this "Motion Requesting Entry of Order Authorizing the Use of Cash Collateral" (the "Motion"). In support of the Motion, Debtor shows the Court as follows:

Jurisdiction

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory predicate for the relief requested herein is 11 U.S.C. §§ 105(a), and 363.

Background

2. On July 31, 2017 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (as amended, modified, or supplemented the "Bankruptcy Code").

3. Debtor is a Georgia non-profit corporation who operates a church out of its Real Property. Debtor additionally leases portions of its Real Property to third party tenants. Debtor's Real Property is located 1836 Rockbridge Road, Stone Mountain, GA 30087 ("Rockbridge Property") and 1813 Pounds Avenue, Stone Mountain, GA 30087 ("Pounds Road Property") (Collectively, the Rockbridge Property and the Pounds Road Property are referred to herein as the "Real Property").

4. Debtor generates \$7,350.00 in monthly rental income (the "Rental Income") from leasing portions of the Rockbridge Property to the following three tenants:

- i. Meskaye Hezunan, Medhane Alem, Ethiopian Orthodox Tewahedo Church \$3,000.00 per month;
- ii. Paradise for Living Services, Inc. \$3,300.00 per month; and
- iii. Church of All Nations \$750 per month.

5. Debtor additionally generates approximately \$16,000.00 per month of income from parish tithes or offerings.

6. Pursuant to Bankruptcy Code Sections 1107 and 1108, Debtor continues to operate its business as a debtor-in-possession. Debtor is currently a debtor-in-possession and seeking to restructure and reorganize and is taking any and all actions necessary to preserve, protect, and maximize the value of the estate and effectively reorganize.

6. In order to effectively reorganize, Debtor must have access to cash to pay its operating expenses in connection with the church and the Real Property. If Debtor does not have the authority to use its available cash to pay its operating expenses, including personnel, utilities and general maintenance, the Debtor's going concern value will be significantly harmed and the estate and creditors will be negatively affected.

Liens

7. Upon Debtor's information and belief, Crimson Portfolio, LLC ("Crimson") asserts a first priority lien upon Debtor's Real Property as evidenced by the Security Deed recorded in the records of the land records of Cobb County in Deed Book 49064, Page 6 *et seq.* modified pursuant to the Modification Agreement dated September 17, 2012 recorded in said land records at Deed Book 51647, Page 0910 *et seq.* (collectively the "Security Deed") and assigned to Crimson pursuant to the Transfer and Assignment dated April 28, 2016 recorded in said land records at Deed Book 54296, Page 645 *et seq.* Additionally, upon Debtor's information and belief, Crimson asserts an interest in the Rental Income generated by the Real Property which constitutes cash collateral as defined in §363 of the Bankruptcy Code pursuant to the Assignment of Leases and Rents dated September 5, 2008, recorded in said land records at Deed Book 49064, Page 0015 *et. seq.* Debtor is not aware of any security interest in Debtor's tithe or offerings income held by Crimson or any UCC financing statement in favor of Crimson or its predecessors in interest. Debtor files this Motion requesting permission to use all cash collateral generated by the Real Property, i.e. the Rental Income. Debtor shows that Crimson does not hold a lien or security interest in Debtor's other income, including its income from tithes or offerings. Additionally, Sheryll Manerson holds a security interest in Debtor's tangible personal property, but such does not extend to Debtor's cash collateral.

8. Debtor is aware of three UCC Financing Statements referencing Global Empowerment Ministries, Inc. as debtor, but Debtor has no relationship with the purported holders of the UCC Financings Statements and does not now and never has owed any obligations to such purported holders.

- a. LiftForward, Inc., UCC 031-2016-000435;
- b. Susquehanna Commercial Finance, UCC 007-2016-005991; and
- c. U.S. Bank Equipment a division of U.S. Bank N.A. UCC 007-2016-006138.

9. Based upon a review of records and financing statements, it does not appear that any other party asserts an interest in Debtor's Cash Collateral generated from the Real Property or otherwise. The filing of this Motion shall not be deemed a waiver of and Debtor expressly reserves any and all of its rights, remedies and defenses under the Bankruptcy Code, including, but not limited to, its rights to object to and dispute any asserted liens, security interests and debts.

Relief Requested

10. By this Motion, Debtor requests that the Court enter an order authorizing Debtor's use of cash collateral generated from the Real Property.

Basis for Relief

11. Section 363(c)(2) provides that a debtor in possession may not use cash collateral unless an entity that has an interest in such cash collateral consents or the court approves the use of such cash collateral. Section 363(p) provides that at a hearing on the use of cash collateral, the entity asserting an interest in the cash collateral has the burden of proof on the issue of the validity, priority, or extent of such interest, and the debtor-in-possession has the burden of proof on the issue of adequate protection. Rule 4001(b)(2) provides that the Court may not hold a final hearing on a motion to use cash collateral earlier than 14 days after

service of the motion, but may authorize the use of cash collateral prior to a final hearing as necessary to avoid immediate and irreparable harm to the estate pending a final hearing.

12. Debtor requests the Court enter an Order authorizing Debtor to use cash collateral generated from Real Property: (a) in accordance with the budget attached hereto as Exhibit "A" the line items of which Debtor may modify by no more than ten percent (10%) except that Debtor may pay the actual amount owed to any utility, taxing authority or insurance company, and (b) for payment of U.S. Trustee fees, or (c) for other matters pursuant to orders entered by this Court after appropriate notice and hearing.

13. Debtor has an immediate need to continue its operations and to protect the interests of the estate. Without the use of cash collateral and the ability to operate, Debtor will not be able to operate its church and retain its tenants, which are necessary to the continuity of Debtor's operations and effective reorganization.

14. The entry of an Order granting Debtor's Motion to use cash collateral generated by the Real Property will minimize disruption of the Debtor's operations and is in the best interests of Debtor's estate and its creditors. Therefore, it is in the interest of no one for any interruption to occur during Debtor's reorganization.

15. Notice pursuant to Federal Rule of Bankruptcy Procedure 4001(b) is being sent to all parties required by such rule. Specifically, notice of this Motion and any hearing thereon shall be provided to each Respondent, the United States Trustee and the Debtor's creditors.

16. Debtor requests that the Court approve the expenditures listed in Exhibit "A" which are reasonably necessary for the continued operation of Debtor's business affairs.

17. Debtor has attached a proposed Cash Collateral Order as Exhibit "B."

WHEREFORE, for all of the above reasons, Debtor requests that the Court:

(a) authorize the Debtor to pay the expenses and other expenditures reasonably necessary for the continued operation of the Debtor's Business to avoid immediate and irreparable harm to the estate; and

(b) grant the Debtor such other and further relief as may be just and equitable.

RESPECTFULLY SUBMITTED this 4th day of August, 2017.

JONES & WALDEN, LLC

s/ Leslie M. Pineyro

Leslie M. Pineyro

Georgia Bar No. 969800

Leon S. Jones

Georgia Bar No. 003980

Attorneys for Debtor

21 Eighth Street, NE

Atlanta, Georgia 30309

(404) 564-9300

(404) 564-9301 Facsimile

lpineyro@joneswalden.com

ljones@joneswalden.com

Exhibit "A"

Exhibit "A"
Global Empowerment Ministries - Monthly Budget

Income		Monthly Totals
Rental Income		
MeskayeHezunan MedhaneAlem, Ethiopian Orthodox Tewahedo Church	\$ 3,000.00	
Paradise for Living Services, Inc	\$ 3,300.00	
Church of All Nations	\$ 750.00	
Total Rental Income	\$	7,050.00
Tithes/Offerings	\$	16,000.00
TOTAL INCOME		\$ 23,050.00

Expense	Pay Cycles	Monthly Totals
Employee		
Pastor Keith D. Lawrence	First & Third Sunday	\$ 7,500.00
Total		
Contractors		
Organist	Second & Fourth Sunday	\$ 1,300.00
Choir Director	Second & Fourth Sunday	\$ 866.00
Drummer	Second & Fourth Sunday	\$ 520.00
Custodian	Second & Fourth Sunday	\$ 300.00
Security Officer	Second & Fourth Sunday	\$ 455.00
Total		\$ 10,941.00

Comcast		\$ 250.00
Bank Fees		\$ 40.00
Century Fire Alarm		\$ 90.00
DeLage Landen Copier		\$ 212.90
Milner (copies)	Quarterly	\$ 300.00
Crystal Springs		\$ 30.00
Guide One Insurance Bldg Insurance		\$ 1,455.17
Guide One Insurance Workers Comp	Quarterly	\$ 532.25
Gwinnett Water Bill		\$ 250.00
Lawn Care		\$ 400.00
(Bereavment/Benevolence/		\$ 400.00
Supplies/ Communion/Building maintenance		\$ 600.00
Parish Soft (Partnership Giving Software)		\$ 64.00
Payroll (Employer) Taxes		\$ 133.87
Payroll Fee (Intuit Payroll Company)		\$ 39.99
Republic Trash		\$ 460.00
Social Media (Alfred Thomas)		\$ 224.19
Walton EMC		\$ 2,000.00
Century Fire Alarm		\$ 90.00
US Trustee (paid quarterly)		\$ 216.67
Crimson Adequate Protection Payment		\$ 3,670.00
		\$ 11,459.04
Total Monthly Bills		\$ 22,400.04

Exhibit “B”

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Respondents.

CHAPTER 11

CASE NO. 17-63234-JRS

CONTESTED MATTER

**ORDER GRANTING DEBTOR'S MOTION REQUESTING
AUTHORIZATION TO USE CASH COLLATERAL**

THIS MATTER came before the Court on August 22, 2017, at 1:30 p.m. for hearing on the Debtor's "*Motion Requesting Entry of Order Authorizing the Use of Cash Collateral*", filed on August 4, 2017 (the "Motion"). The Court, having considered the Motion, the Budget filed by the

Debtor, the presentation of counsel and all other matters of record, finds as follows:

A. On July 31, 2017 (the "Petition Date"), Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Georgia, commencing this Bankruptcy Case (the "Case").

B. Since the Petition Date, Debtor has operated as a debtor-in-possession under Sections 1107 and 1108 of the Bankruptcy Code.

C. Debtor is a Georgia non-profit corporation.

D. Debtor's Real Property is located at 1836 Rockbridge Road, Stone Mountain, GA 30087 (the "Rockbridge Property") and 1813 Pounds Avenue, Stone Mountain, GA 30087 (the "Pounds Road Property"). The Rockbridge Property and the Pounds Road Property are collectively referred to herein as the "Real Property." Debtor operates a church out of its Real Property. Debtor additionally leases portions of its Rockbridge Property to third party tenants.

E. Upon Debtor's best information and belief, the Respondents may assert an interest in Debtor's Cash Collateral as detailed in the Motion. Debtor asserts that based upon a review of records and financing statements, it does not appear that any other party asserts an interest in Debtor's Cash Collateral.

F. Specifically, Crimson asserts a lien upon Debtor's Real Property as evidenced by the Security Deed recorded in the records of the Superior Court of Cobb County in Deed Book 49064, Page 6 *et seq.* modified pursuant to the Modification Agreement dated September 17, 2012 recorded in said land records at Deed Book 51647, Page 0910 *et seq.* (collectively the "Security Deed") and assigned to Crimson pursuant to the Transfer and Assignment dated April 28, 2016 recorded in said land records at Deed Book 54296, Page 645 *et seq.* (The Security Deed and associated pre-petition loan documents shall be referred to herein as the "Crimson Loan Documents.") Additionally, upon Debtor's information and belief, Crimson asserts an interest in the Rental Income generated from the Real Property, which constitutes cash

collateral as defined in §363 of the Bankruptcy Code pursuant to the Assignment of Leases and Rents dated September 5, 2008 recorded in said land records at Deed Book 49064, Page 0015 *et. seq.* (The Real Property, Rental Income and collateral as otherwise described in the Crimson Loan Documents, shall be referred to herein as the “Crimson Collateral”).

G. Sheryll Manerson holds a security interest in Debtor’s tangible personal property, but such does not extend to Debtor’s cash collateral.

H. Debtor is aware of three UCC Financing Statements referencing Global Empowerment Ministries, Inc. as debtor, but Debtor has no relationship with the purported holders of the UCC Financings Statements and does not now and never has owed any obligations to such purported holders.

- a. LiftForward, Inc., UCC 031-2016-000435;
- b. Susquehanna Commercial Finance, UCC 007-2016-005991; and
- c. U.S. Bank Equipment a division of U.S. Bank N.A. UCC 007-2016-006138.

I. Debtor shows that it requires the use of Cash Collateral to pay its operating expenses.

J. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. The Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Notice has been properly given in light of the circumstances in order to avoid irreparable harm to the Debtor’s estate.

For the reasons stated on the record, and the Court being otherwise informed, it is hereby ORDERED that:

1. The aforesaid findings, enumerated in paragraphs A through J above, are hereby incorporated into this Order as if fully set forth herein.
2. Debtor shall have the right to use the Cash Collateral consisting of the Rental Income on the terms of this Order.
3. Debtor is authorized to use Cash Collateral reasonably required in the ordinary

course of Debtor's business and in Debtor's business judgment and for other amounts allowed or awarded pursuant to orders entered by this Court after appropriate notice and hearing, except further provided that Debtor shall not pay any amounts unless actually incurred.

4. To the extent provided by 11 U.S.C. §361(2) as adequate protection for the Debtor's use of Cash Collateral pursuant to this Order, Debtor will provide as follows:

- a. Adequate Protection Payments: Debtor will pay monthly adequate protection payments to Crimson in the amount of \$3,670.00 per month commencing on September 5, 2017 and continuing by the 5th day of each subsequent month (or the next business day if the 5th day falls on a day that is not a business day) until a plan of reorganization is confirmed by the Court, which such amount shall be adequate protection for Crimson's interest in the Crimson Collateral. Debtor will send such payments to Crimson Portfolio, LLC, c/o Sabal Financial Group, L.P., 465 North Halstead Street, Suite 130, Pasadena, CA 91107, unless Crimson provides written notice of a different payment address.
- a. Replacement Liens: Respondents shall have a replacement lien and security interest in all property acquired by Debtor after the Filing Date as to which such Respondent held valid and perfected liens or security interests in pre-petition collateral, including Cash Collateral, on the Filing Date consisting of (i) the same type and nature of property or (ii) the proceeds of such Respondent's pre-petition collateral to the extent of any diminution in value of such pre-petition collateral as a result of the use of Cash Collateral; such liens being to the same validity and priority as the liens that Respondents held on the Filing Date in such pre-petition collateral. Notwithstanding anything to the contrary, the replacement security interest and liens granted herein will not extend to any recoveries resulting from avoidance actions brought pursuant to the Bankruptcy Code or from settlements of potential avoidance power claims asserted on behalf of the estate.

5. This Order is without any prejudice to Respondents, including but not limited to their rights to: (i) seek dismissal of this Case, and (ii) contest the nature, extent, validity or priority of any lien or security interest; and the entry of this Order is not to be interpreted as an agreement by Respondents to support or oppose the filing of the Debtor's bankruptcy petition, any plan of reorganization or disposal of assets under Section 363 of the Bankruptcy Code, or any other proposed treatment of Respondents' asserted claim(s).

6. This Order is also entered without prejudice to the claims, rights, and actions that: (A) Debtor may have to challenge the nature, validity, or extent of the liens or debts asserted by Respondents; and (B) Respondents may assert in any action by Debtor to challenge the nature, validity, or extent of the liens or debts it may assert.

7. Notwithstanding anything to the contrary within Bankruptcy Rule 4001(b)(2) or any other rule of similar import, this Order shall be effective immediately upon its entry.

[End of Order]

Prepared and presented by:
JONES & WALDEN, LLC

/s/ Leslie M. Pineyro
Leslie M. Pineyro
Georgia Bar No. 969800
21 Eighth Street, NE
Atlanta, Georgia 30309
(404) 564-9300 Telephone
(404) 564-9301 Facsimile
Proposed Counsel for the Debtor

Distribution List:

Melissa J. Davey, Stites & Harbison PLLC, 303 Peachtree Street, N.E., 2800 SunTrust Plaza
Atlanta, GA 30308

Office of the United States Trustee, 362 Richard B. Russell Federal Bldg, 75 Ted Turner Drive,
S.W., Atlanta, Georgia 30303

LiftForward, Inc., Jeffrey Rogers, President & CEO, 261 Madison Ave, New York NY 10016-
0000

Sheryll Manerson, 3318 Chinaberry Lane, Snellville GA 30039-0000

Susquehanna Commercial Finance, 2 Country View Road, Suite 300, Malvern PA 19355-0000

Susquehanna Commercial Finance, a division of Branch Banking & Trust Company, Kelly S.
King, CEO, 200 W 2nd St, Winston Salem NC 27101-0000

U.S. Bank Equipment, a division of U.S. Bank N.A., 1310 Madrid Street, Marshall MN 56258-
0000

Andrew Cecere, President & CEO, U.S. Bank, N.A., 425 Walnut Street, Cincinnati, OH 45202

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CASE NO. 17-63234-JRS

CONTESTED MATTER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date I caused a true and correct copy of the foregoing "Motion Requesting Entry of Order Authorizing the Use of Cash Collateral" to be served on all parties listed below and on the attached matrix via United States mail with sufficient postage affixed:

Melissa J. Davey
Stites & Harbison PLLC
303 Peachtree Street, N.E.
2800 SunTrust Plaza
Atlanta, GA 30308

Office of the United States Trustee
362 Richard B. Russell Federal Bldg
75 Ted Turner Drive, S.W.
Atlanta, Georgia 30303

LiftForward, Inc.
Jeffrey Rogers, President & CEO
261 Madison Ave
New York NY 10016-0000

Sheryll Manerson
3318 Chinaberry Lane
Snellville GA 30039-0000

Susquehanna Commercial Finance
2 Great Valley Pkwy, Suite 300
Malvern PA 19355-0000

Susquehanna Commercial Finance, a division
of Branch Banking & Trust Company
Kelly S. King, CEO
200 W 2nd St
Winston Salem NC 27101-0000

U.S. Bank Equipment, a division of U.S. Bank
N.A.
1310 Madrid Street
Marshall MN 56258-0000

Andrew Cecere, President & CEO
U.S. Bank, N.A.
425 Walnut Street
Cincinnati, OH 45202

This 4th day of August, 2017.

JONES & WALDEN, LLC

s/ Leslie M. Pineyro

Leslie M. Pineyro
Georgia Bar No. 969800
Leon S. Jones
Georgia Bar No. 003980
Attorneys for Debtor
21 Eighth Street, NE
Atlanta, Georgia 30309
(404) 564-9300
(404) 564-9301 Facsimile
lpineyro@joneswalden.com
ljones@joneswalden.com

Label Matrix for local noticing
113E-1
Case 17-63234-jrs
Northern District of Georgia
Atlanta
Fri Aug 4 13:51:41 EDT 2017
Crimson Portfolio, LLC
c/o Sabal Financial Group, LP
4675 MacArthur Court, Ste 1550
Newport Beach, CA 92660-2042

Christopher Carr
Attorney General of Georgia
40 Capitol Square, SW
Atlanta, GA 30334-9057

Crimson Portfolio, LLC
Corporation Service Co, Reg Ag
251 Little Falls Drive
Wilmington, DE 19808-1674

Georgia Department of Labor
Mark Butler, Commissioner
148 Andrew Young Int. Ste 900
Atlanta, GA 30303-1733

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

Georgia Dept. of Labor
Suite 910
148 Andrew Young Inter. Blvd., NE
Atlanta GA 30303-1751

Global Empowerment Ministries, Inc.
3076 Turman Circle
Decatur, GA 30033-3259

Gwinnett Co Tax Commissioner
Richard Steele, Commissioner
75 Langley Drive
Lawrenceville, GA 30046-6935

Internal Revenue Service
P. O. Box 7346
Philadelphia, PA 19101-7346

Jeff Sessions US Attny General
950 Pennsylvania Avenue, NW
Washington, DC 20530-0009

John A. Horn, U.S. Attorney
600 Richard B. Russell Bldg
75 Ted Turner Drive, S.W.
Atlanta, GA 30303-3308

Keith and Cheryl Lawrence
1144 Holly Avenue
Atlanta, GA 30338-4942

Lynne Riley
State of Georgia Revenue Commi
1800 Century Blvd, N.E.
Atlanta, GA 30345-3202

M. Van Stephens II, Chief Asst
Gwinnett Co Attorney Office
75 Langley Dr., Rm 3W700 West
Lawrenceville, GA 30046-6935

Office Of the Chief Co. IRS
William Paul, Chief Counsel
1111 Constitution Ave
Washington, DC 20224-0001

Secretary of the Treasury
15th & Pennsylvania Avenue, NW
Washington, DC 20200

Steven Mnuchin
Secretary of the Treasury
15th & Pennsylvania Ave, NW
Washington, DC 20200

U. S. Securities and Exchange Commission
Office of Reorganization
Suite 900
950 East Paces Ferry Road, NE
Atlanta, GA 30326-1382