

United States Bankruptcy Court Northern District of West Virginia

Voluntary Petition

Name of Debtor (if individual, enter Last, First, Middle): Wild Goose Farm, LLC
Name of Joint Debtor (Spouse) (Last, First, Middle):

All Other Names used by the Debtor in the last 8 years (include married, maiden, and trade names):
All Other Names used by the Joint Debtor in the last 8 years (include married, maiden, and trade names):

Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN)/Complete EIN (if more than one, state all)
26-0672485

Street Address of Debtor (No. and Street, City, and State): 2935 and 2937 Shepherd Grade Road Shepherdstown, WV
ZIP Code: 25443

County of Residence or of the Principal Place of Business: Jefferson

Mailing Address of Debtor (if different from street address): 767 East Washington Street Charles Town, WV
ZIP Code: 25414

Location of Principal Assets of Business Debtor (if different from street address above):

Type of Debtor: Corporation (includes LLC and LLP)
Nature of Business: Other
Chapter of Bankruptcy Code Under Which the Petition is Filed: Chapter 11

Chapter 15 Debtors: Country of debtor's center of main interests:
Tax-Exempt Entity: Debtor is a tax-exempt organization under Title 26 of the United States Code (the Internal Revenue Code).
Nature of Debts: Debts are primarily business debts.

Filing Fee (Check one box): Full Filing Fee attached
Chapter 11 Debtors: Debtor is a small business debtor as defined in 11 U.S.C. § 101(51D).

Statistical/Administrative Information: Debtor estimates that funds will be available for distribution to unsecured creditors.
Estimated Number of Creditors: 1-49
Estimated Assets: \$1,000,001 to \$10 million
Estimated Liabilities: \$1,000,001 to \$10 million

THIS SPACE IS FOR COURT USE ONLY

Voluntary Petition

Name of Debtor(s):

Wild Goose Farm, LLC

(This page must be completed and filed in every case)

All Prior Bankruptcy Cases Filed Within Last 8 Years (If more than two, attach additional sheet)

Location

Where Filed: **Northern District of West Virginia**

Case Number:

12-00387-PMF

Date Filed:

3/21/12

Location

Where Filed:

Case Number:

Date Filed:

Pending Bankruptcy Case Filed by any Spouse, Partner, or Affiliate of this Debtor (If more than one, attach additional sheet)

Name of Debtor:

- None -

Case Number:

Date Filed:

District:

Relationship:

Judge:

Exhibit A

(To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 and is requesting relief under chapter 11.)

Exhibit A is attached and made a part of this petition.

Exhibit B

(To be completed if debtor is an individual whose debts are primarily consumer debts.)

I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter. I further certify that I delivered to the debtor the notice required by 11 U.S.C. §342(b).

X

Signature of Attorney for Debtor(s)

(Date)

Exhibit C

Does the debtor own or have possession of any property that poses or is alleged to pose a threat of imminent and identifiable harm to public health or safety?

Yes, and Exhibit C is attached and made a part of this petition.

No.

Exhibit D

(To be completed by every individual debtor. If a joint petition is filed, each spouse must complete and attach a separate Exhibit D.)

Exhibit D completed and signed by the debtor is attached and made a part of this petition.

If this is a joint petition:

Exhibit D also completed and signed by the joint debtor is attached and made a part of this petition.

Information Regarding the Debtor - Venue

(Check any applicable box)

- Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
- There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.
- Debtor is a debtor in a foreign proceeding and has its principal place of business or principal assets in the United States in this District, or has no principal place of business or assets in the United States but is a defendant in an action or proceeding [in a federal or state court] in this District, or the interests of the parties will be served in regard to the relief sought in this District.

Certification by a Debtor Who Resides as a Tenant of Residential Property

(Check all applicable boxes)

Landlord has a judgment against the debtor for possession of debtor's residence. (If box checked, complete the following.)

(Name of landlord that obtained judgment)

(Address of landlord)

- Debtor claims that under applicable nonbankruptcy law, there are circumstances under which the debtor would be permitted to cure the entire monetary default that gave rise to the judgment for possession, after the judgment for possession was entered, and
- Debtor has included with this petition the deposit with the court of any rent that would become due during the 30-day period after the filing of the petition.
- Debtor certifies that he/she has served the Landlord with this certification. (11 U.S.C. § 362(l)).

Voluntary Petition

Name of Debtor(s)

Wild Goose Farm, LLC

(This page must be completed and filed in every case)

Signatures

Signature(s) of Debtor(s) (Individual/Joint)

I declare under penalty of perjury that the information provided in this petition is true and correct.
[If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7.
[If no attorney represents me and no bankruptcy petition preparer signs the petition] I have obtained and read the notice required by 11 U.S.C. §342(b).

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

X _____
Signature of Debtor

X _____
Signature of Joint Debtor

Telephone Number (If not represented by attorney)

Date

Signature of a Foreign Representative

I declare under penalty of perjury that the information provided in this petition is true and correct, that I am the foreign representative of a debtor in a foreign proceeding, and that I am authorized to file this petition.

(Check only one box.)

I request relief in accordance with chapter 15 of title 11, United States Code. Certified copies of the documents required by 11 U.S.C. §1515 are attached.

Pursuant to 11 U.S.C. §1511, I request relief in accordance with the chapter of title 11 specified in this petition. A certified copy of the order granting recognition of the foreign main proceeding is attached.

X _____
Signature of Foreign Representative

Printed Name of Foreign Representative

Date

Signature of Attorney*

X /s/ Tate M. Russack _____
Signature of Attorney for Debtor(s)

Tate M. Russack (Pro Hac Pending) _____
Printed Name of Attorney for Debtor(s)

Russack Associates, LLC _____
Firm Name

100 Severn Avenue, Suite 101
Annapolis, MD 21403

Address

Email: tate@russacklaw.com

(410) 934-4350 _____
Telephone Number

March 13, 2015 _____
Date

*In a case in which § 707(b)(4)(D) applies, this signature also constitutes a certification that the attorney has no knowledge after an inquiry that the information in the schedules is incorrect.

Signature of Non-Attorney Bankruptcy Petition Preparer

I declare under penalty of perjury that: (1) I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110; (2) I prepared this document for compensation and have provided the debtor with a copy of this document and the notices and information required under 11 U.S.C. §§ 110(b), 110(h), and 342(b); and, (3) if rules or guidelines have been promulgated pursuant to 11 U.S.C. § 110(h) setting a maximum fee for services chargeable by bankruptcy petition preparers, I have given the debtor notice of the maximum amount before preparing any document for filing for a debtor or accepting any fee from the debtor, as required in that section. Official Form 19 is attached.

Printed Name and title, if any, of Bankruptcy Petition Preparer

Social-Security number (If the bankruptcy petition preparer is not an individual, state the Social Security number of the officer, principal, responsible person or partner of the bankruptcy petition preparer.)(Required by 11 U.S.C. § 110.)

Address

X _____
Date

Signature of bankruptcy petition preparer or officer, principal, responsible person, or partner whose Social Security number is provided above.

Names and Social-Security numbers of all other individuals who prepared or assisted in preparing this document unless the bankruptcy petition preparer is not an individual:

If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.

A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both. 11 U.S.C. §110; 18 U.S.C. §156.

Signature of Debtor (Corporation/Partnership)

I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

X /s/ Christopher B. Shultz _____
Signature of Authorized Individual

Christopher B. Shultz _____
Printed Name of Authorized Individual

Managing Member _____
Title of Authorized Individual

March 13, 2015 _____
Date

**United States Bankruptcy Court
Northern District of West Virginia**

In re Wild Goose Farm, LLC

Debtor(s)

Case No. _____

Chapter 11

STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION

I, **Christopher B. Shultz**, declare under penalty of perjury that I am the **Managing Member** of **Wild Goose Farm, LLC**, and that the following is a true and correct copy of the resolutions adopted by the Members of said company at a special meeting duly called and held on the 13th day of March 2015.

"Whereas, it is in the best interest of this corporation to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Christopher B. Shultz, Managing Member** of this Company, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a Chapter 11 voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that **Christopher B. Shultz, Managing Member** of this Company, is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Christopher B. Shultz, Managing Member** of this Company, is authorized and directed to employ _____ and the law firm of _____ to represent the corporation in such bankruptcy case."

Date March 13, 2015Signed /s/ Christopher B. Shultz
Christopher B. Shultz

**United States Bankruptcy Court
Northern District of West Virginia**

In re Wild Goose Farm, LLC

Debtor(s)

Case No.

Chapter 11

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

Following is the list of the debtor's creditors holding the 20 largest unsecured claims. The list is prepared in accordance with Fed. R. Bankr. P. 1007(d) for filing in this chapter 11 [or chapter 9] case. The list does not include (1) persons who come within the definition of "insider" set forth in 11 U.S.C. § 101, or (2) secured creditors unless the value of the collateral is such that the unsecured deficiency places the creditor among the holders of the 20 largest unsecured claims. If a minor child is one of the creditors holding the 20 largest unsecured claims, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See 11 U.S.C. § 112; Fed. R. Bankr. P. 1007(m).

(1)	(2)	(3)	(4)	(5)
<i>Name of creditor and complete mailing address including zip code</i>	<i>Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted</i>	<i>Nature of claim (trade debt, bank loan, government contract, etc.)</i>	<i>Indicate if claim is contingent, unliquidated, disputed, or subject to setoff</i>	<i>Amount of claim [if secured, also state value of security]</i>
Appalachian Surveys, PLLC P. O. Box 342 Charles Town, WV 25414	Appalachian Surveys, PLLC P. O. Box 342 Charles Town, WV 25414			5,400.00
Dewberry & Davis, LLC 1503 Edwards Ferry Road, Suite 200 Leesburg, VA 20176-6680	Dewberry & Davis, LLC 1503 Edwards Ferry Road, Suite 200 Leesburg, VA 20176-6680	architectural and engineering services		94,827.89
Kable Excavating, LLC 322 West Washington Street Charles Town, WV 25414	Kable Excavating, LLC 322 West Washington Street Charles Town, WV 25414	excavating and site preparations		300,000.00
Mid Atlantic Farm Credit, ACA 45 Aileron Court Westminster, MD 21158-0770	Mid Atlantic Farm Credit, ACA 45 Aileron Court Westminster, MD 21158-0770	Wild Goose Farm - 163 acres located at 2985 and 2987 Shepherd Grade Road, Shepherdstown, WV 25433. Property includes two houses, a barn and developab	Disputed	3,300,000.00 (2,540,000.00 secured)
William Caperton and Susan Caperton 5270 Valley Road Berkeley Springs, WV 25411	William Caperton and Susan Caperton 5270 Valley Road Berkeley Springs, WV 25411	Wild Goose Farm - 163 acres located at 2985 and 2987 Shepherd Grade Road, Shepherdstown, WV 25433. Property includes two houses, a barn and developab		1,000,000.00 (2,540,000.00 secured) (3,300,000.00 senior lien)
Yumkas, Vidmar & Sweeney, LLC 10211 Wincopin Circle, Suite 500 Columbia, MD 21044	Yumkas, Vidmar & Sweeney, LLC 10211 Wincopin Circle, Suite 500 Columbia, MD 21044	legal fees		76,000.00

**United States Bankruptcy Court
Northern District of West Virginia**

In re Wild Goose Farm, LLC
Debtor

Case No. _____

Chapter 11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with Rule 1007(a)(3) for filing in this chapter 11 case.

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Charles C. Schultz 2935 Shephard Grade Road Shepherdstown, WV 25443			25% ownership
Christopher B. Shultz 2935 Shephard Grade Road Shepherdstown, WV 25443			75% ownership

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the Managing Member of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date March 13, 2015

Signature /s/ Christopher B. Shultz
Christopher B. Shultz
Managing Member

Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C §§ 152 and 3571.

**United States Bankruptcy Court
Northern District of West Virginia**

In re Wild Goose Farm, LLC

Debtor(s)

Case No.

Chapter

11

VERIFICATION OF CREDITOR MATRIX

I, the Managing Member of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: March 13, 2015

/s/ Christopher B. Shultz

Christopher B. Shultz/Managing Member

Signer/Title

Wild Goose Farm, LLC
767 East Washington Street
Charles Town, WV 25414

Tate M. Russack, Esquire
Russack Associates, LLC
100 Severn Avenue, Suite 101
Annapolis, MD 21403

Appalachian Surveys, PLLC
P. O. Box 342
Charles Town, WV 25414

Arthur M. Standish, Esquire
Steptoe & Johnson, PLLC
P. O. Box 1588
Charleston, WV 25326-1588

Dewberry & Davis, LLC
1503 Edwards Ferry Road, Suite 200
Leesburg, VA 20176-6680

Kable Excavating, LLC
322 West Washington Street
Charles Town, WV 25414

Kenneth J. Barton, Jr., Esquire
Austin M. Hovermale, Esquire
Steptoe & Johnson, PLLC
1250 Edwin Miller Boulevard, Suite 300
Martinsburg, WV 25404

Mid Atlantic Farm Credit, ACA
45 Aileron Court
Westminster, MD 21158-0770

Seeger Faughnan & Mendicino PC
21335 Ridgetop Circle, Suite 110
Dulles, VA 20166

William Caperton and Susan Caperton
5270 Valley Road
Berkeley Springs, WV 25411

Yumkas, Vidmar & Sweeney, LLC
10211 Wincopin Circle, Suite 500
Columbia, MD 21044

**United States Bankruptcy Court
Northern District of West Virginia**

In re Wild Goose Farm, LLC

Debtor(s)

Case No.

Chapter

11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Wild Goose Farm, LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

None [*Check if applicable*]

March 13, 2015

Date

/s/ Tate M. Russack

Tate M. Russack (Pro Hac Pending)

Signature of Attorney or Litigant

Counsel for Wild Goose Farm, LLC

Russack Associates, LLC

100 Severn Avenue, Suite 101

Annapolis, MD 21403

(410) 934-4350

tate@russacklaw.com

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

IN RE:

Wild Goose Farm, LLC , SS NO. 26-0672485

_____, SS NO. _____

Debtor(s).

DECLARATION RE: ELECTRONIC FILING

PART I - DECLARATION OF PETITIONER(S):

I (We) Christopher B. Shultz and _____, the undersigned debtor(s) [OR corporate officer, partner, or member]: (1) hereby consent(s) to the electronic filing of the petition and other other pleadings and documents herein; (2) hereby acknowledge(s) having reviewed the information contained in the petition and schedules; (3) under penalty of perjury do(es) now declare that the information contained in the petition and schedules is true and correct; and (4) hereby designate(s) the attorney listed herein as my (our) agent to receive service of process and service of all pleadings in all proceedings, including adversary actions and contested matters, pursuant to Bankruptcy Rule 7004(b)(8), in this Court arising in this case. This designation shall expire upon entry of the final decree.

PART II - DECLARATION OF ATTORNEY:

The debtor(s) signed this Declaration before I submitted the petition, schedules and statements. I will give the debtor(s) a copy of all pleadings and information to be filed with, or received from, the United States Bankruptcy Court, and have complied with all other requirements in the most recent General Orders, Administrative Procedures and this Court's Local Rules.

Dated: March 13, 2015

Dated: March 13, 2015

/s/ Christopher B. Shultz

/s/ Tate M. Russack

Christopher B. Shultz
Debtor

Tate M. Russack (Pro Hac Pending)
Attorney for Debtor(s)
100 Severn Avenue, Suite 101
Annapolis, MD 21403
(410) 934-4350