

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANAH DIVISION**

In Re:	§	Case No.: 23-40569-EJC
	§	
MASTER LENDING GROUP, LLC,	§	(Chapter 7)
	§	
Debtor	§	

**MOTION FOR EXAMINATION AND DOCUMENT PRODUCTION
BY WORKMEN’S CIRCLE CREDIT UNION PURSUANT TO BANKRUPTCY
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

COMES NOW, Tiffany E. Caron, as Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estate of Master Lending Group, LLC (“**Debtor**”), and files this *Motion for Examination and Document Production by Workmen’s Circle Credit Union Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure* (the “**Motion**”), seeking an Order authorizing the examination of Workmen’s Circle Credit Union (“**WCCU**”) under Rule 2004 of the Federal Rules of Bankruptcy Procedure, and in support thereof respectfully shows this Court as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409(a).

Background

2. On July 6, 2023 (the “**Petition Date**”), Debtor initiated this case by filing a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (the “**Bankruptcy Code**”).

3. Trustee was thereafter appointed and remains the duly acting Chapter 7 trustee in this case.

4. At the commencement of the Bankruptcy Case, a bankruptcy estate was created pursuant to 11 U.S.C. § 541(a) (the “**Bankruptcy Estate**”), and that Bankruptcy Estate includes all Debtor’s legal or equitable interests in property as of the commencement of the bankruptcy case and any interest in property that the estate acquires after commencement of the bankruptcy case. 11 U.S.C. § 541(a)(1) and (7) (2018). Trustee is the sole representative of the Bankruptcy Estate. 11 U.S.C. § 323(a) (2018).

5. Debtor filed this case as asset case. [Doc. No. 1 at Page 3 of 50].

6. The Section 341 Meeting of Creditors (the “**341 Meeting**”) is schedule for August 9, 2023.

Relief Requested

7. Trustee requests authority to examine WCCU with respect to the financial affairs of the Debtor. Trustee requests that the examination commence on September 7, 2023 at 10:00 AM or at such other mutually agreeable time, at the Office of the United States Trustee, 33 Bull Street, Suite 400, Savannah, GA 31401, by Zoom video conference, or at such other mutually agreeable place.

8. Trustee also requests an order from the Court requiring WCCU to produce, on or before September 7, 2023 at 10:00 a.m. at the Office of the United States Trustee, 33 Bull Street, Suite 400, Savannah, GA 31401, or some other mutually agreeable time and place, for review by counsel for Trustee, any and all records and items listed on Exhibit “A,” (the “**Documents**”) attached hereto and incorporated herein by reference.

Basis for Relief

9. Rule 2004 provides that any party in interest, including a creditor, may examine any other entity about the financial affairs of a debtor. Fed. R. Bankr. P. 2004.

10. Because Trustee is a party in interest, it is well within the Court's discretion to grant the relief requested in this Motion. Indeed, such an examination is necessary for Trustee to evaluate fully the interest of the Bankruptcy Estate, if any, along with the circumstances that led to the bankruptcy filing of the Debtor.

WHEREFORE, Trustee respectfully requests that this Court:

(a) Enter an order authorizing Trustee to conduct the examination of WCCU and directing WCCU to produce the documents and items requested herein at a mutually agreeable time and place; and

(b) Grant such other and further relief as the Court may deem just and proper.

Respectfully submitted this 2nd day of August, 2023.

Respectfully submitted,

/s/ Tiffany E. Caron

Tiffany E. Caron

Ga. Bar # 745089

Attorney for Trustee

P.O. Box 711
West Palm Beach, FL 33402
404.647.4917
Tiffany.caron@hotmail.com

EXHIBIT “A”

Definitions

- A. As used herein, the term “**Document**” is intended to have the broadest permissible meaning under the Federal Rules of Civil Procedure and shall mean any written, printed, recorded, taped, electromagnetically recorded or encoded, electronically stored, graphic or other matter of every type and description that is or has been in the possession, custody, or control of you or any of your agents and attorneys, or of which you have knowledge, and shall include without limitation, the following: letters, correspondence, affidavits, declarations, statements, books, articles, reprints, resolutions, minutes, communications, messages, e-mails, electronic communications, electronically stored information, notes, loan documents, collateral documents, stenographic or handwritten notes, memoranda, diaries, contracts, subcontracts, bids, worksheets, drafts, agreements, records, resumes, invoices, receipts, bills, cancelled checks, financial statements, audit reports, tax returns, calendars, schedules, summaries, studies, calculations, estimates, diagrams, sketches, drawings, plans, photographs, tapes, videotapes, movies, recordings, transcriptions, work orders, computer print-outs, computer disks, data processing cards, data storage cards, and the like; and where originals of such documents are not available or are not in your possession, custody or control, every copy of every such document; and every copy of every such document where such copy is not an identical copy of the original or where such copy contains any commentary or notation whatsoever which does not appear on the original.
- B. As used herein, the term “**Debtor**” or “**MLG**” shall refer to Master Lending Group, LLC.
- C. As used herein, the term “**Petition Date**” shall refer to July 6, 2023.

Document and Information Request

All electronic and paper Documents regarding any investments in MLG whether in hard copy or stored on any WCCU computer or server

All email, Outlook files, and Documents sent to Gregory Hirsch at the email address greg@cpa-ht.com or other email address in connection with investments in MLG.

All emails, Outlook files, and Documents of any officer, director, board member or employee of WCCU sent to Angela Dietz at email address Angela@cpa-ht.com in connection with her work in connection with MLG.

All emails, Outlook files, and Documents sent to former Hirsch & Tucker, LLC employee Dean Emerson Flake in connection with his work with MLG.

All emails, Outlook files, and Documents of any employee, officer, director or board member of WCCU who had any contact with investors in MLG in connection with their investment(s) in Promissory Notes or interest payments from MLG.

All invoices for services provided in connection with self-directed IRA investments in MLG.

All correspondence with MLG Promissory Note owners regarding their investment in MLG.

All marketing materials on self-directed IRA investments sent to Promissory Note holders in MLG.

All Promissory Notes issued by MLG sent to WCCU.

All checks from WCCU payable to MLG.

The Trustee is agreeable to review and discuss this Document production to ease or limit the burden on WCCU. Please contact the Trustee's forensic accountant, Gregory Hays at ghays@haysconsulting.net or (404) 926-0051 to discuss.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

IN THE MATTER OF:)
)
Master Lending Group, LLC,) CHAPTER 7 CASE NO.: 23-40569-EJC
)
)
DEBTOR)

CERTIFICATE OF SERVICE

This is to certify that I have this date served the foregoing, **Motion for Examination of and Document Production by Workmen’s Circle Credit Union under Rule 2004 of the Federal Rules of Bankruptcy Procedure**, through CM/ECF or by depositing same in the United States Mail with sufficient postage affixed thereon, to those addressed below:

Judson C. Hill
Gastin & Hill
Gastin & Hill, P O Box 8012
Savannah, GA 31412

Office of the U.S. Trustee
33 Bull Street, Suite 400
Savannah, GA 31401

Via Certified Mail to:
Workmen’s Circle Credit Union
Attn: Donna A. Smith, Registered Agent
527 Stephenson Avenue, Suite 2
Savannah, GA 31405-5922

And all other creditors and parties in interest receiving notice through the Court’s CM/ECF Filing System.

This the 2nd day of August, 2023.

/s/ Tiffany E. Caron
TIFFANY E. CARON, Trustee/Petitioner

Prepared by:
TIFFANY E. CARON, ESQ.

GA BAR NO. 745089
CHAPTER 7 TRUSTEE
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