

**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 THE ESTATE OF GREGORY M. HIRSCH 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**” or “**MLG**”), and files this *Motion for Examination and Document Production by The Probate Estate of Gregory M. Hirsch Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure* (the “**Motion**”), seeking an Order authorizing the examination of The Probate Estate of Gregory M. Hirsch 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 an asset case. [Doc. No. 1 at Page 3 of 50].

6. The Petition and Schedules show Gregory M. Hirsch as the owner of Master Lending Group, LLC (Doc No. 1).

Relief Requested

7. Trustee requests authority to examine the Probate Estate of Gregory Hirsch with respect to the financial affairs of the Debtor.

8. Trustee requests an order from the Court requiring the Probate Estate of Gregory Hirsch to produce, on or before February 16, 2024 to the Trustee, any and all records and items listed on Appendix “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, an examination of the documents requested herein 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.

Specific Allegations

11. The Trustee has obtained documents showing that checks made payable to Master Lending Group, LLC were deposited into other bank account(s) owned or controlled by Gregory M. Hirsch.

12. The Trustee has obtained documents showing that Master Lending Group, LLC funds were used to pay premiums on life insurance policies owned by or insured on the life of Gregory M. Hirsch.

WHEREFORE, Trustee respectfully requests that this Court:

- (a) Enter an order directing the Probate Estate of Gregory M. Hirsch to produce the documents and items requested herein as Appendix "A"; and
- (b) Grant such other and further relief as the Court may deem just and proper.

Respectfully submitted this 16th day of January, 2024.

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

APPENDIX “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

Financials:

For the period of January 1, 2015 to January 15, 2023:

- (1) all bank statements, deposit slips, canceled checks, and signature cards for any account over which Gregory Hirsch has or had signatory authority, including investment accounts (including but not limited to Raymond James and Coinbase);
- (2) all credit card statements for accounts on which Gregory Hirsch was an authorized user; and
- (3) any personal financial statements or loan applications submitted by Gregory Hirsch.

Tax Returns:

Federal and State Income Tax Returns whether filed as Married Filing Jointly or Married Filing Separately for the years of 2014 to 2021 for Gregory Hirsch.

Life Insurance:

For the period of January 1, 2021 to January 15, 2024:

A list of all life insurance policies owned by Gregory M. Hirsch or insured on the life of Gregory M. Hirsch, including: Name of Insurance Company, Policy Number, Amount of Death Benefit, and Status of Proceeds.

A list of all life insurance policies paid for by Gregory M. Hirsch out of any personal or business funds, including but not limited to the funds of Master Lending Group, LLC, Low Country Development, LLC, and Hirsch & Co., including: Name of Insurance Company, Policy Number, Amount of Death Benefit, and Status of Proceeds.

Copies of the Sale Agreements with Trelog, Inc. for the sale of New York Life Insurance Policies with Death Benefits of:

- \$7,000,000 New York Life – Sold to Trelog, Inc. for approximately \$3,575,000 on or around February 10, 2023;
- \$5,000,000 New York Life – Sold to Trelog, Inc. for approximately \$2,500,000 on or around February 14, 2023; and
- \$2,500,000 New York Life – Sold to Trelog, Inc. for approximately \$1,375,000 on or around February 14, 2023.

Cell Phone and Records:

Production of the cellular phone records and any communication applications for the device used by Gregory M. Hirsch for any and all communications with investors in the two (2) years prior to his death, such records being stored electronically or otherwise.

Any and all communications (written or otherwise), between Gregory Mr. Hirsch and the following individuals, business partners and/or investors, including but not limited to withdrawal of all or a portion principal from January 1, 2022 to August 3, 2023:

- Randy Chu
- Alena Chu
- Mai Chu
- Jonathan Chu
- Vanessa Jones
- Michael Jones
- James Jones
- Chris Williams
- Robert Isaacson
- Dean Flake
- Motti Locker
- David Kahn
- Lewis and/or Julie Mazzo
- James C. Wilson, Jr.
- Sheri Simon
- Nicole Chu
- Frederick and Renie Halperin
- David Klugman
- Jeff Notrica

7 18th Street, Tybee Island, Georgia 31328 (the “Property”):

Any and all documents related to the real estate transactions involving the Property for the period of January 1, 2017 to January 15, 2024.

10 Whitaker, LLC

Closing Statement on the Sale of 10 Whitaker Street, Savannah, GA 31401

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
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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 the Probate Estate of Gregory M. Hirsch 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:

Thomas J. Ratcliffe, Jr.
Executor of the Estate of Gregory Hirsch
103 North Main Street
Hinesville, GA 31313

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

James F. Banter
James-Bates-Brannan-Groover-LLP
231 Riverside Drive
Macon, GA 31201

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

This the 16th day of January, 2024.

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

Prepared by:
TIFFANY E. CARON, ESQ.
GA BAR No. 745089
CHAPTER 7 TRUSTEE
P.O. BOX 711
WEST PALM BEACH, FL 33402
404-647-4917
TIFFANY.CARON@HOTMAIL.COM

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**ORDER FOR EXAMINATION AND PRODUCTION OF DOCUMENTS
PURSUANT TO BANKRUPTCY RULE 2004**

Upon the motion filed by the Trustee pursuant to Bankruptcy Rule 2004,

IT IS HEREBY ORDERED that the Probate Estate of Gregory M. Hirsch shall produce to the Trustee the documents listed in Appendix A on or before February 16, 2024 or as otherwise agreed upon by the parties.

END OF DOCUMENT

Prepared by:

/s/ Tiffany E. Caron
TIFFANY E. CARON, ESQ.
GA BAR NO. 745089
CHAPTER 7 TRUSTEE

P.O. Box 711
WEST PALM BEACH, FL 33402
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