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Office of the United States Trustee
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Erin Marie Schmidt,
for the United States Trustee
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	
	§	
Vision2Systems, LLC,	§	**Case No. 25-40583-MXM-11**
	§	
Debtor.	§	

United States Trustee's Motion to Convert to Chapter 7 under 11 U.S.C. § 1112(b), or in the Alternative, for the Appointment of a Chapter 11 Trustee under 11 U.S.C. § 1104(a)

TO THE HONORABLE MARK X. MULLIN, U.S. BANKRUPTCY JUDGE:

Lisa L. Lambert, the United States Trustee for Region 6 ("United States Trustee"), moves to convert the above-referenced Debtor to chapter 7 under 11 U.S.C. § 1112(b). In the alternative, the United States Trustee moves for an order directing the appointment of a chapter 11 trustee under 11 U.S.C. § 1104(a). The United States Trustee would respectfully show:

SUMMARY

Vision2Systems, LLC ("Debtor") used to provide online payment processing services to member churches but stopped operations in October 2024 after failing to turn over all reported donations to their church clients. The Debtor filed this case to liquidate its few remaining assets and centralize ongoing litigation, and not to reorganize or restart its business operations. The Debtor blames its cash flow problems on several outside factors including 1) advancing donations to member churches on transactions that were later reversed, 2) former payment processor Wells Fargo's failure to timely send error files to the Debtor in the proper format, and 3) over withholding settlement fees on donations funded by certain credit cards, rather than the Debtor's own failure to properly account for the donations.

As a result of these accounting irregularities, by the Petition Date, the Debtor and its two insiders, Paul Baldwin ("Mr. Baldwin") and Carl Tierney ("Mr. Tierney"), were embroiled in four separate lawsuits with member churches alleging, among other things, breach of fiduciary duty and financial mismanagement. Factual issues remain as to whether the plaintiffs in these lawsuits were underpaid as reflected in prepetition account statements, or whether a recent internal accounting and reconciliation conducted by the Debtor's insiders accurately reflects the Debtor's claim that certain churches owe more than $6 million.

Cause exists to convert this case to chapter 7 given that 1) the Debtor is no longer in business with neither income nor employees and 2) this case appears to be a bad faith filing. In the alternative, cause exists for the Court to direct appointment of a chapter 11 trustee given that 1) the Debtor's management committed fraud, engaged in gross mismanagement, or were just incompetent prior to the filing of the case and 2) conflicts of interest exist between the Estate and the insiders.

Jurisdiction

1. The Court has subject matter jurisdiction under 28 U.S.C. § 1334, 28 U.S.C. § 157(a)(1), and the standing order of reference. Conversion or dismissal under 11 U.S.C. § 1112(b) or the appointment of a chapter 11 trustee impacts case administration and therefore are core matters that the Court has the power to resolve. 28 U.S.C. § 157(b)(2)(A).

FACTS

Debtor files chapter 11 bankruptcy

1. On February 19, 2025, ("Petition Date"), the Debtor filed a voluntary chapter 11 petition in the Northern District of Texas, commencing case number 25-40583-MXM-11.

2. The Debtor is a for-profit business.

3. Messrs. Baldwin and Tierney are the Debtor's managers. ECF 1 at 5.

4. Neither Messrs. Baldwin nor Tierney are accountants.

5. Mr. Baldwin signed the Petition under penalty of perjury. ECF 1 at 4.

6. The United States Trustee has appointed an official committee of unsecured creditors ("UCC"). ECF 42 and 51.

7. Both Messrs. Baldwin and Tierney appeared and testified under oath at the original March 21, 2025, § 341 meeting ("First § 341") and continued April 4, 2025, continued § 341 meeting ("Second § 341").

2012-2024: Debtor processes online donations for churches

8. From 2012 through 2024, the Debtor provided member churches a digital platform through which congregants could donate funds to support their churches and ministries. ECF 5[1] at 2-3.

9. The Debtor's digital platform allowed congregants to donate funds online via credit card or other online cash apps; the Debtor's platform also allowed churches to immediately process congregants' checks and church envelopes after services. *Id.* at 2.

10. Clients entered into bifurcated services and account agreements as follows:

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[1] *Declaration of Paul Baldwin in Support of Debtor's Chapter 11 Petition and Requests for First Day Relief* [ECF 5].

a. A software agreement between the Debtor and client which permitted the client to use the Debtor's proprietary software and platform; and

b. A payment services agreement between the Debtor, client, and a financial institution ("Payment Processor") which, among other things, authorized the Debtor and Payment Processor to set up settlement accounts ("Settlement Account") in each member church's name.

11. Wells Fargo was the Payment Processor through October 2023, at which time the Debtor transitioned to a new Payment Processor. ECF 5 at 4.

12. Credit card settlements and ACH payments would initially be deposited into the client's Settlement Account pending final resolution of the funds.

13. Once payments were finalized, the Debtor would transfer funds from the Settlement Account into the client's designated deposit account, minus any fees.

14. To facilitate the immediate transfer of donations to churches, the Debtor used a "margin account" to cover the gap period between the receipt of congregants' payments and the actual transfer of funds from congregants' money sources to the Debtor's Wells Fargo account. ECF 5 at 3-4.

August 2022 – October 2024: Debtor discovers it has cash flow issues

15. In August 2022, Wells Fargo informed the Debtor that it was exiting the processing business and that the Debtor would need to find another Payment Processor. ECF 5 at 4.

16. Over the next year, the Debtor "rework[ed] its software and integrations" in anticipation of switching to a new Payment Processor. *Id.*

17. During this time, the Debtor discovered that the margin account was "cover[ing]-up situations where transactions were reversed and money initially transferred to the Debtor's account, was subsequently withdrawn from its account in the clearance process." *Id.* at 3.

18. The Debtor hit another crisis point in October 2023 when, after switching to a new Payment Processor, the Debtor was not able to process check payments for two weeks. *Id.* at 4.

19. Several churches stopped using the Debtor's digital platform during this time, which in turn revealed "cash-flow shortfalls in settling transactions with its customer churches." *Id.* at 4.

20. Meanwhile, the Debtor also learned that it had incorrectly withheld American Express credit card processing fees when settling accounts with member churches, which led to "further complications in the accounting." *Id.* at 5.

21. Throughout this time, the Debtor was sending statements to several member churches indicating that the Debtor had not turned over all donations from their respective congregants.

22. The Debtor finally stopped doing business in October 2024.

October 2024 through January 2025: former member churches sue Debtor and insiders

23. As of the Petition Date, the Debtor was a defendant in four lawsuits:

a. *Saddleback Valley Community Church v. Vision2 Systems, et al.,* Case No. 3:24-cv-02700 (N.D. Tex.)("Saddleback Suit")

b. *The Crossing Church v. Vision2Systems, et al,* Case No. DC-24-18092 (116th Jud. District Court for Dallas County)("Crossing Church Suit").

c. *Resurrection Metropolitan Community Church v. Vision2Systems, LLC, et al,* Cause No. 2024-69700 (234th District Court Harrison County)("Resurrection Suit"); and

d. *Chrisian Fellowship Church v. Vision2Systems, LLC, et al,* Cause No. DC-25-00011 (68th District Court Dallas County)("Christian Fellowship Suit").

24. Northridge Church subsequently intervened as a plaintiff in the Crossing Church Suit. ECF 5 at 6.

25. Messrs. Tierney and Baldwin are also defendants in each of these lawsuits.

26. These four lawsuits allege, among other things, breach of contract, breach of fiduciary duty, unjust environment, and fraud. ECF 5 at 5-7.

October 2024 through March 2025: Mr. Tierney's account reconciliation

27. Before late 2024, the Debtor had sent statements to member churches indicating that the Debtor owed the churches money.

28. In late 2024, the Debtor informed Saddleback Valley Community Church that it had overpaid them and certain other churches.

29. From fall 2024 through March 2025, Mr. Tierney reviewed electronic case files to reconcile which churches have been overpaid or underpaid.

30. The Debtor now avers that it overpaid certain churches $6,360,317.00. ECF 61 at 41.

31. The Debtor has not engaged with an outside accountant or expert to review the Debtor's electronic case files.

Debtor's assets

32. The Debtor averred on Schedule A/B that, as of the Petition Date, it had no real estate and $121,388.34 in personal property. ECF 61 at 2.

33. The Debtor's personal property consists of $47,513.34 in cash; $5,200.00 in accounts receivables; $675.00 in office furniture; and $68,000.00 in future revenue from a contract with YourGiving, Inc. ECF 61 at 5; 8.

34. Some of the assets listed on Schedule A/B were valued either at zero or "unknown" value.

35. One of these assets are the Debtor's Settlement Accounts with former Payment Processor Texas Capital Bank, which have balances ranging from zero to $34,324.95.[2] ECF 61 at 3; 37-38.

36. When questioned at the April 4, 2025, § 341 meeting whether these balances belonged to the Debtors or its former clients, Mr. Tierney admitted that the Debtor is still determining whether the Debtor's bankruptcy estate has any interest in these funds.

37. The Debtor also scheduled potential causes of action of an "unknown" value against Wells Fargo and "contingent and unliquidated claims or causes of action" against its former member churches. ECF 61 at 6; 39-41.

38. At the First § 341, Mr. Tierney explained that the estimated amounts owed by these churches were not offset by the claims owed to them on Schedule E/F.

39. The Debtor further states that these claims against former member churches may be worth up to $6,360,317.00. ECF 61 at 6.

<u>Debtor's liabilities</u>

40. The Debtor averred on Schedules D and E/F that, as of the Petition Date, it had $2,208,074.74 in secured claims, no priority unsecured debt, and $5,875,948.41 in general unsecured claims. ECF 61 at 2.

41. Most of the creditors listed on Schedule E/F are former member churches who are owed unpaid donations.

<u>UST still investigating</u>

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[2] Most of the accounts have zero balances while the "Consolidated Treasury" account contains $34,324.95.

42. The United States Trustee is continuing his investigation into these facts and will supplement this Motion as necessary before the hearing.

ARGUMENT

Cause exists to convert case to chapter 7

Statutory Authority

43. Section 1112(b) of the Bankruptcy Code provides that, "[e]xcept as provided in . . . subsection (c) . . . the court shall convert a case under this chapter to a case under chapter 7 or dismiss a case under this chapter, whichever is in the best interests of creditors and the estate, for cause. . . ." 11 U.S.C. § 1112(b)(1). Under § 1112(c), the court cannot covert a case to chapter 7 if the debtor is a non-profit corporation, but the court must still dismiss the case if cause is established. *Id.* § 1112(c).

44. Section 1112(b) places the initial burden of establishing "cause" on the movant. *Id.*; *see also In re Briggs-Cockerham, L.L.C.*, No. 10-34222-BHJ-11, 2010 WL 4866874 at *4 (Bankr. N.D. Tex. Nov. 23, 2010). If cause is established, the burden shifts to the debtor to prove that he or she falls within the § 1112(b)(2) "unusual circumstances" exception to § 1112(b)(1)'s mandatory conversion. 11 U.S.C. § 1112(b)(2).

Continuing loss to or diminution of the estate and the absence of any likelihood of reorganization

45. The Court may convert a case to chapter 7 for "substantial or continuing loss to or diminution of the estate and the absence of a reasonable likelihood of reorganization." 11 U.S.C. § 1112(b)(2)(4)(A). If the movant establishes cause for conversion or dismissal under § 1112(b)(4)(A), "conversion or dismissal becomes mandatory because § 1112(b)(2) does not provide an exception to conversion or dismissal for cause found under § 1112(b)(4)(A)." *In re Ford Steel, LLC,* 629 B.R. 871, 879 (Bankr. S.D. Tex. 2021).

46. "[C]ourts have held that post-petition negative cash flow and an inability to pay current expenses evidence the continuing losses required section 1112(b)(4)(A)." *In re Sakon,* 617 B.R. 7, 15 (Bankr. Conn. 2020)(holding that first and second prongs of § 1112(b)(2)(4) were met given that debtor's monthly income not sufficient to pay post-petition expenses and because debtor had no operating business).

47. The Debtor filed chapter 11 bankruptcy with only $47,513.34 in its Chase Bank operating account. ECF 61 at 8. While the Debtor listed amounts in its Settlement Accounts, it is not clear whether these funds belong to the estate or member churches. Meanwhile, the Debtor's only source of revenue might be $68,000.00 in future revenue from YourGiving.Inc. ECF 61 at 5. These funds will dwindle as the Debtor accrues obligations for such expenses as professional fees for both Debtor's and UCC's counsel and United States Trustee quarterly fees. It is also not clear any plan will be able to meet the "best interest of creditors" test under 11 U.S.C. § 1129(a)(7). Meanwhile, the Debtor has no reasonable likelihood of reorganization given that it stopped operating in October 2024 and has no employees. The Debtor is not seeking to restart its business, but to collect on outstanding accounts receivables and/or pursue chapter 5 causes of action, core functions of chapter 7 trustees. Cause exists to convert this case to chapter 7.

<u>Lack of good faith</u>

48. This case should also be converted for lack of good faith. A lack of good faith in filing a Chapter 11 case constitutes cause for conversion of the case under 11 U.S.C. §1112(b)(1). *Humble Place Joint Venture v. Fory (In re Humble Place Joint Venture),* 936 F.2d 814 (5th Cir. 1991). The Fifth Circuit observed that the Bankruptcy Code is "endowed with requirements of good faith in the construction of many of its provisions," and "[e]very bankruptcy statute since 1898 has incorporated literally, or by judicial interpretation, a standard of good faith for the commencement,

prosecution, and confirmation of bankruptcy proceedings." *Little Creek Dev. Co. v. Commonwealth Mortgage Corp. (In re Little Creek Dev. Co.)*, 779 F.2d 1068, 1071-72 (5th Cir. 1986).

49. Like the *Little Creek* debtor, the Debtor has no ongoing business, no employees, no cash flow, and "no available sources of income to sustain a plan of reorganization." 779 F.2d at 1073. As of the Petition Date, the Debtor was fighting four separate lawsuits in which the plaintiffs were alleging, among other things, breach of fiduciary duty, fraud, and conversion. Questions arise as to the accuracy of the Debtor's most recent reconciliation of its accounts given that it was done by Mr. Tierney, who is a co-defendant in these lawsuits and therefore also subject to these serious allegations. Creditors and the estate would benefit from conversion of the case to chapter 7 so that an independent trustee may independently verify this reconciliation and, if necessary, pursue chapter 5 causes of action.

<u>In the alternative, cause exists for the appointment of a chapter 11 trustee</u>

50. Section 1112(b)(1) provides that the Court may also direct the appointment of a chapter 11 trustee for cause if "in the best interests of creditors and the estate." 11 U.S.C. § 1112(b)(1). Should the Court determine that conversion of this case to chapter7 is not in the best interests of creditors or the estate, the Court should direct the appointment of a chapter 11 trustee both for cause and because such appointment is in the best interests of creditors and the estate under 11 U.S.C. § 1104(a)(1) and (a)(2).

51. Section 1104(a) provides in pertinent part:

> (a) At any time after the commencement of the case but before confirmation of a plan, on request of a party in interest or the United States trustee, and after notice and a hearing, the court shall order the appointment of a trustee—
>
> (1) for cause, including fraud, dishonesty, incompetence, or gross mismanagement of the affairs of the debtor by current management, either

> before or after the commencement of the case, or similar cause, but not including the number of holders of securities of the debtor or the amount of assets or liabilities of the debtor; or
>
> (2) if such appointment is in the interests of creditors, any equity security holders, and other interests of the estate, without regard to the number of holders of securities of the debtor or the amount of assets or liabilities of the debtor.

11 U.S.C. § 1104(a).

Cause exists for appointment of a chapter 11 trustee

52. Through section 1104(a)(1) of the Bankruptcy Code, Congress has mandated that a chapter 11 debtor-in-possession, who acts as a fiduciary of the bankrupt estate, be an *honest broker. See Wolf v. Weinstein*, 372 U.S. 633, 651 (1963) (willingness of courts to leave debtors in possession "is premised upon an assurance that the officers and managing employees can be depended upon to carry out the fiduciary responsibilities of a trustee"); *In re V. Savino Oil and Heating Co*., 99 B.R. 518, 526 (Bankr. E.D.N.Y. 1989) ("The willingness of Congress to leave a debtor-in-possession is premised on an expectation that current management can be depended upon to carry out the fiduciary responsibilities of a trustee. And if the debtor-in-possession defaults in this respect, [s]ection 1104(a)(1) [of the Bankruptcy Code] commands that stewardship of the reorganization effort must be turned over to an independent trustee.") (cited with approval in *In re Marvel Entm't Group, Inc*., 140 F.3d 463, 474 (3d Cir. 1998)).

53. Section 1104(a)(1) allows the United States Trustee to move the Court, as it has done in the instant motion, for the appointment of a trustee.[3] If "current management" is found to have

[3] Section 1104(e) of the Bankruptcy Code provides that the United States trustee "shall move for the appointment of a trustee under subsection (a) if there are reasonable grounds to suspect that current members of the governing body of the debtor, the debtor's chief executive officer, or members of the governing body who selected the debtor's chief executive or chief financial officer, participated in actual fraud, dishonesty, or criminal conduct in the management of the debtor or the debtor's public financial reporting." 11 U.S.C. § 1104(e).

engaged in "fraud, dishonesty, incompetence, or gross mismanagement" due to acts or omissions which occurred prior to the Petition Date, this Court, pursuant to section 1104(a)(1), must direct the appointment of a trustee. *See In re Sharon Steel Corp.*, 871 F.2d 1217, 1226 (3d Cir. 1989) ("[11 U.S.C. § 1104](a)(1) requires the bankruptcy court, upon motion, to appoint a trustee when the movant has proved 'cause,' which the statute defines to include incompetence and gross mismanagement.").[4] Furthermore, pre-petition conduct alone may provide the basis for a court to appoint a trustee. *See In re Rivermeadows Assocs., Ltd.*, 185 B.R. 615, 619 (Bankr. D. Wyo. 1995) (holding that even though there was no evidence of a post-petition breach of fiduciary duty, pre-petition conduct of debtor's management warranted appointment of a trustee under § 1104(a)(1)).

54. The Debtor filed for bankruptcy because of serious internal accounting issues. On the Petition Date, the Debtor and its insiders were co-defendants in four lawsuits alleging fraud, breach of fiduciary duty, and/or gross mismanagement. By its own admission, the Debtor learned as early as late 2022 that it had been overpaying some member churches while underpaying others. However, the Debtor did not complete its reconciliation of accounts until after the Petition Date, when it alleged on Schedule A/B that it overpaid more than $6 million to certain member churches. Before this time, the Debtor's own account statements to member churches indicated underpayments. Meanwhile, this reconciliation was completed internally by

[4] While the Fifth Circuit in *Cajun Electric* did not specifically address the evidentiary burden issue, it ultimately affirmed the district court's opinion below finding that a movant must meet the "clear and convincing evidence" standard for appointment of a chapter 11 trustee. *In re Cajun Elec. Power Co-op, Inc.,* 191 B.R. 659, 692 (M.D. La.), *overturned* 69 F.3d 746 (5th Cir. 1995), *withdrawn in part on rehearing,* 74 F.3d 599 (5th Cir. 1996)(withdrawing section IV and adopting reasoning of dissent in prior opinion), *cert denied,* 519 U.S. 808 (1996). In light, however, of Supreme Court precedent and section § 1104(e) of the Bankruptcy Code, the better view is that the appropriate burden of proof should be "preponderance of the evidence." *See Tradex Corp. v. Morse*, 339 B.R. 823, 829-32 (D. Mass. 2006) (citing *Grogan v. Garner*, 498 U.S. 279, 286 (1991)).

Debtor's insider and co-defendant Carl Tierney without the benefit of an outside auditor or consultant to oversee the audit.

55. At best, the Debtor's current management were incompetent or grossly mismanaged the Debtor's business. At worst, they committed fraud. The Court need find only incompetency, gross mismanagement, <u>or</u> fraud to direct appointment of a chapter 11 trustee under § 1104(a)(1).

<u>Management conflicted</u>

56. "Cause" to appoint a trustee may be a reason other than the enumerated factors. *Oklahoma Ref. Co. v. Blaik (In re Oklahoma Ref. Co.)*, 838 F.2d 1133, 1136 (10th Cir. 1988); *cf. Little Creek Dev. Corp. v. Commonwealth Mortg. Corp. (In re Little Creek Dev. Corp.)*, 779 F.2d 1068, 1072 (5th Cir. 1986) (defining "cause" in context of dismissal statute).

57. Courts have appointed trustees when the debtor's insiders have conflicts of interest arising from the sale of the debtor's assets. In *Cajun Electric*, the Fifth Circuit affirmed the appointment of a trustee, in part, because the co-operative members were interested in purchasing part or all of Cajun Electric's assets. *Cajun Elec. Power Cooperative, Inc. v. Central Louisiana Elec. Co., Inc. (In re Cajun Elec. Power Cooperative, Inc.)*, 69 F.3d 746, 751 (5th Cir. 1995) (Garza, J., dissenting), *adopted as majority opinion on reh'g,* 74 F.3d 599 (5th Cir. 1996). The Fifth Circuit held that "a trustee may be the only effective way to pursue reorganization" when the management has cross-purposes. *Cajun Elec.*, 69 F.2d at 751.

58. Two circuits have held that "cause" exists when appointing a chapter 11 trustee "is the only effective way to pursue reorganization." *Cajun Elec. Power Coop., Inc. v. Central La. Elec. Coop., Inc. (In re Cajun Elec. Power Coop., Inc.),* 74 F.3d 599, 600 (5th Cir.) (adopting on rehearing the opinion of dissent in 69 F.3d 746, 751), cert. denied, 519 U.S. 808 (1996); *see also In re Marvel Entertainment Group, Inc*., 140 F.3d 463 (3d Cir. 1998) (adopting reasoning of *Cajun Electric* and

affirming appointment of trustee when acrimony between debtor's management and creditors undermined any ability to prosecute bankruptcy case). While *Cajun Electric* and *Marvel* have factual distinctions, both *Cajun Electric* and *Marvel* focused on the underlying problem that exists in this case: this case can proceed properly through the chapter 11 process only if a chapter 11 trustee is appointed.

59. The Debtor's insiders are conflicted from directing the Debtor's affairs because of the profound mistrust between its principals and the Debtor's creditors. As previously noted, member churches have filed lawsuits against the Debtor and its insiders alleging fraud, breach of fiduciary trust, and gross mismanagement. After years of sending statements indicating that the Debtor had underpaid member churches, the Debtor and its insiders now allege that these same creditors owe the Debtor money from overpayments after conducting an internal audit without the benefit of an outside accountant or consultant. An independent trustee would be better positioned to review the Debtor's reconciliation and, if necessary, pursue such overpayments.

60. Cause also exists for the appointment of an independent trustee given conflicts of interest between the Debtor and its former insiders given that the bankruptcy estate may have causes of action against former insiders for gross mismanagement, incompetence, or fraud.

<u>Appointment of a trustee is required if such appointment is in the interests of creditors, equity security holders, and the estate.</u>

61. Appointment of a chapter 11 trustee is also in the best interests of creditors, equity security holders, and other interests of the estate. The Court should direct the appointment of a chapter 11 trustee to serve the "interests of creditors, any equity security holders, and other interests of the estate." 11 U.S.C. §1104(a)(2).

62. It is in the best interests of creditors to have an independent trustee assume control over the estate. Relations between the Debtor and its former customers are acrimonious. A neutral trustee can determine how best to proceed in investigating the Debtor's pre-petition transactions to determine whether the Debtor overpaid its customers and, if so, how best to pursue any pre-petition transfers. A chapter 11 trustee would assist in maximizing estate proceeds for the benefit of creditors. Therefore, it is in the best interests of creditors and the estate to appoint a chapter 11 trustee.

CONCLUSION

The United States Trustee respectfully requests that the Court convert this case to chapter 7. In the alternative, the United States Trustee seeks appointment of a chapter 11 trustee. The United States Trustee further respectfully requests that the Court grant any other relief to which he might be entitled.

DATED: April 11, 2025

Respectfully submitted,

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Certificate of Conference

On April 11, 2025, I reached out to Debtor's counsel Jason Kathman; UCC's counsel Thomas Berghman; and Saddleback Church's counsel Hudson Jobe to confer on the relief requested in this Motion. Mr. Kathman informed me that the Debtor is opposed to the requested relief. I had not heard back from either Messrs. Berghman or Jobe at the time this Motion was filed and therefore do not know their clients' positions.

/s/ Erin Marie Schmidt
Erin Marie Schmidt

Certificate of Service

I certify that I sent copies of this motion on April 11, 2025, via email to all parties entitled to receive ECF notice in this case and via first class U.S. Mail, postage prepaid, to the parties listed on the attached mailing matrix.

/s/ Erin Marie Schmidt
Erin Marie Schmidt

Label Matrix for local noticing
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Case 25-40583-mxm11
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Alive Wesleyan
136 Chastain Road
Central, SC 29630-9760

All For One Church
418 Monroe Highway
Lancaster, SC 29720-6556

Ankeny FUMC
206 SW Walnut
Ankeny, IA 50023-3043

Antioch Community Church
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Pearland, TX 77581-5663

Antioch Galveston
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Galveston, TX 77551-5518

Antioch School of Urban Ministry
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Avalon Church
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El Paso, TX 79904-4505

Blackhawk Church
5405 Heron Trail
Middleton, WI 53562-5218

Bridgepointe Christian Church
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605 S 5th Street
Norfolk, NE 68701-5279

Christ Presbyterian Church
6901 Normandale
Edina, MN 55435-1599

Christ Reformed Church
1621 North Main Street
Anderson, SC 29621-4736

Christ's Church of Oronogo
22145 Kafir Road
Oronogo, MO 64855-9141

Christian Fellowship Church
4100 Millersburg Road
Evansville, IN 47725-7367

Christian Fellowship Church
c/o Dustin T. Gaines
Gaines, Goodspeed & Juba, P.C.
2201 Spinks Road, Suite 208
Flower Mound, TX 75022-4451

Christian Heritage Academy
17297 Glacier Way
Rosemount, MN 55068-1474

Christian Life Center
3406 Rex Road
Rex, GA 30273-1039

Church and Ministry Compliance
Consulting
7601 Burnet Road
Austin, TX 78757-1204

Church for All Nations
6540 Templeton Gap Road
Colorado Springs, CO 80923-1268

Church of God Ministries
2902 Enterprise Drive
Anderson, IN 46013-9667

Church of the Rock
1091 Fairfax Road
Saint Albans, VT 05478-6267

City First Church
5950 Spring Creek Road
Rockford, IL 61114-6448

Coastal Virginia Church
a/k/a Glad Tidings Church
301 S. Newtown Road
Norfolk, VA 23502-5719

Community Bible Church
2477 North Loop 1604 E
San Antonio, TX 78232-1700

Community Shares of Greater Milwaukee
1845 N. Farwell Avenue, Suite 102
Milwaukee, WI 53202-1715

Concord Church
6808 Pastor Bailey Drive
Dallas, TX 75237-2647

Countryside Christian
3635 NE Highway K4
Topeka, KS 66617-3816

Courtney Baptist Church
3341 Courtney Church Road
Yadkinville, NC 27055-8743

Covenant Church
2660 E. Trinity Mills Road
Carrollton, TX 75006-2345

CrossPoint Community Church
1301 12th Street
Modesto, CA 95354-0734

Crosspoint Pearland
1134 Old Alvin Road
Pearland, TX 77581-2508

Cuyahoga Valley Church
5055 E. Wallings Road
Broadview Heights, OH 44147-1500

Cypress Growth Capital, LLC
c/o Richard Dahlson
Jackson Walker L.L.P.
2323 Ross Avenue, Suite 600
Dallas, TX 75201-2725

Damascus Road Community Church
12826 Old National Pike
Mount Airy, MD 21771-5904

Deborah the Brave Ministries
P.O. Box 635
Roswell, NM 88202-0635

Dream Centers of Michigan
6600 Rochester Road
Troy, MI 48085-1352

Eastlake
10057 Broad River Road
Irmo, SC 29063-2362

Encounter Church
8081 East Orchard Road, Suite 135
Greenwood Village, CO 80111-2675

Eternal Kingdom International
2130 Commerce Street
Dallas, TX 75201-4306

Evangelical Alliance Mission
400 S. Main Place
Carol Stream, IL 60188-2407

Evergreen Ministries
4512 48th Avenue
Hudsonville, MI 49426-9407

FBC Beverly Hills
4950 N. Lecanto Hwy
Beverly Hills, FL 34465-2402

Faith Community Church
1040 Paperjack Drive
New Richmond, WI 54017-2463

Faith Lutheran
6000 Morris Road
Flower Mound, TX 75028-3709

Family Community Church
478 Piercy Road
San Jose, CA 95138-1105

Fellowship Ashevill
P.O. Box 16918
Asheville, NC 28816-0918

Firm Foundation Youth Homes
2100 Main Street
Madison, MS 39110-9114

First Baptist Church Canadian, TX
706 Main Street
Canadian, TX 79014-2706

First Baptist Church of Madison
2100 Main Street
Madison, MS 39110-9114

First Baptist Church of Madison
c/o Gene D. Berry
P.O. Box 1631
944 Highway 51, Suite 3 (39110)
Madison, MS 39110-8499

First Baptist Church of Madison, Inc
P.O. Box 1631
P.O. Box 1631
Madison, MS 39130-1631

First Baptist Jenks
11701 S Elm Street
Jenks, OK 74037-2094

First Baptist of Hernado Beach
4446 Shoal Line Blvd
Hernando Beach, FL 34607-2958

First Christian Church
7601 E. Shea Blvd
Scottsdale, AZ 85260-5551

First UMC of Pinellas Park
9025 49th Street North
Pinellas Park, FL 33782-5227

First Unitarian Society
900 University Bay Drive
Madison, WI 53705-2249

Focus International
2130 N. Oliver Avenue
Wichita, KS 67208-2504

Franciscan Friars
420 East 156th Street
Bronx, NY 10455-1232

Franklin First Methodist
303 South Main Street
Franklin, OH 45005-2227

Freedom Gateway Center
31590 Grand River Avenue
Farmington, MI 48336-4232

GPIWE Limited Partnership, LP
Attn: Director of Leasing
5601 Granite Parkway, Suite 1200
Plano, TX 75024-6746

Good Life Church
52645 Office Park Blvd
Bradenton, FL 34203

Grace Chapel
3279 Southall Road
Franklin, TN 37064-6240

Grace Church Napa Valley
3765 Solano Avenue
Napa, CA 94558-2760

Grace Fellowship
4305 19th Avenue
Kearney, NE 68845-8259

Grove Level Baptist
2802 Cleveland Hwy
Dalton, GA 30721-8009

Hanna United Methodist Church
101 W. Hooper Street
Hanna, IN 46340

Harvest Pointe Community Church
P.O. Box 1321 Charles Town
Charles Town, WV 25414-7321

Helena First Assembly of God
2210 Dodge Avenue
Helena, MT 59601-0838

Holy Family Catholic Church
1110 Kabel Drive
New Orleans, LA 70131-3518

Holy Family Catholic Church, Kansas City
20 W 9th St., Ste. 200
20 W 9th St
Kansas City, MO 64105-1704

Holy Spirit Parish
2230 Lake Michigan NW Drive
Grand Rapids, MI 49504-5999

Hope for the City
1001 New Beginnings Drive
Henderson, NV 89011-1606

Immanuel Baptist Church
17935 S. Moonlight Road
Gardner, KS 66030-9432

Impacting Your World Ministries
2901 Chapel Avenue W
Cherry Hill, NJ 08002-1632

Internal Revenue Service
MC 5027 Dal
1100 Commerce Street
Dallas Texas 75242-1100

Jacob's Porch
45 E. 13th Avenue
Columbus, OH 43201-1807

John Davidson Ministries
700 Plaza Drive, Suite A
Secaucus, NJ 07094-3604

Johnson Ferry Baptist Church
955 Johnson Ferry Road
Marietta, GA 30068-4266

Jones Memorial United Methodist Church
2504 Almeda Genoa Road
Houston, TX 77047-4512

Kingdom Community International
10855 Quail Roost Road
Bahama, NC 27503-9294

Koinonia Church
1110 Kabel Drive
New Orleans, LA 70131-3518

Legacy Christian Academy
112 Ridgewood Avenue
Keene, NH 03431-2875

Life Church
6224 Old Pasco Road
Wesley Chapel, FL 33544-3434

Light of the World
3650 17th Street
Sarasota, FL 34235-8102

Love Gospel Assembly
2323 Grand Concourse
Bronx, NY 10468-6801

Love Runs
49555 N. Territorial Road
Plymouth, MI 48170-8200

Lutheran Campus Ministry at Northwestern
8331 Mayflower Drive North
Chesterfield, VA 23235-5113

Lutheran Church of the Redeemer
731 Peachtree Street Northeast
Atlanta, GA 30308-1281

Maranatha Chapel
10752 Coastwood Road
San Diego, CA 92127-2400

McLean Bible Church
8925 Leesburg Pike
Vienna, VA 22182-1742

Menlo Church
1111 University Drive
Menlo Park, CA 94025-4423

Mercy Culture
1701 Oakhurst Scenic Drive
Fort Worth, TX 76111-1544

Mesa Church
7682 Mitchell North 205
Irvine, CA 92614

Messiah Lutheran
1550 S. Poseyville Road
Midland, MI 48640-9599

Mitchell Road Presbyterian Church
207 Mitchell Road
Greenville, SC 29615-2644

Mitchell Road Presbyterian Church
c/o Mark Bakker
104 South Main Street, Suite 900
Greenville, SC 29601-2742

Mobberly Baptist Church
625 East Loop 281
Longview, TX 75605-5004

Mount of Olives
24772 Chrisanta Drive
Mission Viejo, CA 92691-4813

New Creations in Christ
41750 Ranch Las Palmas
Rancho Mirage, CA 92270-5511

North Hills Church
3100 E. Birch Street
Brea, CA 92821-6250

North Sound Church
404 Bell Street
Edmonds, WA 98020-3122

NorthRidge Church
c/o Kyle Carney
Carney Law PLLC
9800 Hillwood Parkway, Suite 140
Fort Worth, TX 76177-1532

Novum Institute
1025 Bunn Drive
Princeton, NJ 08540-1969

Oaks Church
777 S. Interstate 35 E
Red Oak, TX 75154-6221

Official Committee of Unsecured Creditors
c/o Thomas Berghman
MUNSCH HARDT KOPF & HARR, P.C.
500 N. Akard Street, Suite 4000
Dallas, Texas 75201-6605

One Church Home
P.O. Box 717
Fairview, TN 37062-0717

One Hope Fellowship
18203 Hillingdon Lane
Tomball, TX 77377-8277

Our Calling
500 S. Haskell Avenue
Dallas, TX 75223-2628

Our Savior Lutheran Church
98-1098 Moanalua Road
Aiea, HI 96701-4699

Overcommer Ministry
P.O. Box 691
Walterboro, SC 29488-0007

Palms Baptist Church
5285 Adobe Road
Twentynine Palms, CA 92277-1805

Park Cities Presbyterian Church
4124 Oak Lawn Avenue
Dallas, TX 75219-3136

Park Community Church
1001 N. Crosby Street
Chicago, IL 60610-2403

Parkside Chapel
3200 East Walnut Avenue
Keller, TX 76248

Paul G. Baldwin
3500 White River Drive
Plano, TX 75025-6611

Peacable Primate Sanctuary
6415 N. 800 West
Winamac, IN 46996-8280

Perimeter Church
919 NE 96th Street
Kansas City, MO 64155-2159

Pine Grove Baptist Church
7454 Highlands Road
Franklin, NC 28734-3517

Preston Trail Community Church
8055 Independence Parkway
Frisco, TX 75035-4614

Real Life Community
16765 Lookout Road
Selma, TX 78154-3809

Real Life Vocational Technical Institute
16765 Lookout Road
Selma, TX 78154-3809

Redemption Church Foothills
13456 Glenoaks Blvd
Sylmar, CA 91342-2048

Restoration Church
2320 Vanderbilt Beach Road
Naples, FL 34109-2779

Resurrection Metropolitan
Community Church
2025 West 11th Street
Houston, TX 77008-6320

Resurrection Metropolitan Community
c/o Aaron Heckaman
Bailey Cowan Heckaman PLLC
1360 Post Oak Boulevard, Suite 2300
Houston, TX 77056-3130

Rolling Hills Church
800 White Rock Road
El Dorado Hills, CA 95762-5524

Saddleback Valley Community Church
1 Saddleback Pkwy
Lake Forest, CA 92630-8700

Saddleback Valley Community Church
c/o J. Robin Lindley and Laura Gleen
Buck Keenan, LLP
2229 San Felipe, Suite 1000
Houston, TX 77019-5674

Saddleback Valley Community Church
c/o Kyle Thomas Carney
Carney Law PLLC
9800 Hillwood Parkway, Suite 140
Fort Worth, TX 76177-1532

Santa Maria Foursquare Church
709 N. Curryer Street
Santa Maria, CA 93458-3607

Saratoga Federated
20390 Park Place
Saratoga, CA 95070-5955

Second First Church
318 N. Church Street
Rockford, IL 61101-1006

Shell Lake Full Gospel Church
W8212 Sand Road
Shell Lake, WI 54871-8860

Shelter Cove Community Church
4242 Coffee Road
Modesto, CA 95357-0808

Springhead Baptist Church
719 R Folsom Road #R
Adel, GA 31620-9793

St. John Armenian Apostolic
275 Olympia Way
San Francisco, CA 94131-1136

St. Joseph Catholic Church
206 SW Walnut
Ankeny, IA 50023-3043

St. Louis King of France Catholic Church
7601 Burnet Road
Austin, TX 78757-1204

St. Paul's Church By The Lake
7100 North Ashland Avenue
Chicago, IL 60626-2502

Statesboro First United Methodist Church
P.O. Box 2048
Statesboro, GA 30459-2048

Syvan Abbey UMC
2817 Sunset Point Road
Clearwater, FL 33759-1606

Tabernacle Baptist Church
P.O. Box 123
Pickton, TX 75471-0123

Tennessee Independent Baptists
P.O. Box 2854
Brentwood, TN 37024-2854

Texas Capital Bank
c/o Chuck Serafino
Waddell Serafino
1717 Main Street, 25th Floor
Dallas, TX 75201-4612

The Chapel of Hickory
410 26th Avenue NE
Hickory, NC 28601-1528

The Crossing Church
10130 Tuscany Ridge
Tampa, FL 33619-5014

The Crossing Church
c/o Byron K. Henry and Joshua D. Wahl
Scheef & Stone, L.L.P.
2600 Network Boulevard, Suite 400
Frisco, TX 75034-6010

The Diocese of Pensacola-Tallahassee
11 North B Street
Pensacola, FL 32502-4601

The Garden Mission
1779 Tall Tree Drive E
Jacksonville, FL 32246-7285

The Gathering
218 Eglin Pkwy NE
Fort Walton Beach, FL 32547-2857

The Hidding Place
1029 Elm Road
Halethorpe, MD 21227-3935

The Way - Woodstock Church
7745 Main Street
Woodstock, GA 30188-1691

The Well Community Church
2044 E. Nees Avenue
Fresno, CA 93720-0233

Toledo Church of Christ
2740 W. Central Avenue
Toledo, OH 43606-3452

Triangle Center
559 Jones Franklin Road
Raleigh, NC 27606-7622

U.S. Small Business Administration
10737 Gateway West, #300
El Paso, TX 79935-4910

United Church of Jesus Christ
3936 Bronxwood Avenue
Bronx, NY 10466-4515

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

United Way of Albany County
2204 Orrington Avenue
Evanston, IL 60201-2818

United Way of Butler County
710 E. Garfield Street, Suite 240
Laramie, WY 82070-3986

United Way of Greater Milwaukee
225 W. Vine Street
Milwaukee, WI 53212-3935

United Way of Greater Philadelphia
and Southern New Jersey
1709 Benjamin Franklin Pkwy
Philadelphia, PA 19103-1208

United Way of Laramie
1007 E. Lincolnway
Cheyenne, WY 82001-4843

University of Mary Hardin-Baylor
900 College Street
Belton, TX 76513-2599

Valley Bible Church
1477 Willow Avenue
Hercules, CA 94547-3807

Valley Bible Church
3021 S. Sullivan Road
Veradale, WA 99037-9053

Valley Church
4343 Fuller Road
West Des Moines, IA 50265-5319

Victory Life Church
3412 W. University Blvd
Durant, OK 74701-2985

Vieux Carre Baptist
711 Dauphine Street
New Orleans, LA 70116-3016

Vine Church
2501 Gallows Road
Dunn Loring, VA 22027-1311

Water from the Rock
402 N.L. Robinson Drive
Arlington, TX 76011-7484

West Park Baptist Church
4004 West Lake Ida Road
Delray Beach, FL 33445-2339

Woodside Bible Church
6600 Rochester Road
Troy, MI 48085-1352

World Changers
2500 Burdett Road
College Park, GA 30349-4208

Camber Jones
Spencer Fane
2144 E. Republic Road
Suite B300
Springfield, MO 65804-4880

Jason Patrick Kathman
Spencer Fane LLP
5700 Granite Parkway, Suite 650
Plano, TX 75024-6812

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)CGC Royalty Investments IV, LP

(u)Church of God Ministries, Inc.

(u)The Official Committee of Unsecured Credit

(d)Dallas County
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
3500 Maple Avenue
Suite 800
Dallas, TX 75219-3959

(d)NorthRidge Church
49555 N. Territorial Road
Plymouth, MI 48170-8200

(u)Carl Tierney

(u)Megan Clontz

(u)Paul Baldwin

End of Label Matrix

Mailable recipients	213
Bypassed recipients	8
Total	221