

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

In re:) Chapter 13
)
JEFFREY ROBERT WRIGHT,) Bankruptcy No. 04-43298
)
Debtor.)

OBJECTIONS OF THE UNITED STATES
OF AMERICA TO THE CONFIRMATION OF THE
DEBTOR'S CHAPTER 13 PLAN AND MOTION TO DISMISS

THE UNITED STATES OF AMERICA, Internal Revenue Service ("IRS"), by and through its attorneys, Thomas B. Heffelfinger, United States Attorney for the District of Minnesota and Roylene A. Champeaux, Assistant United States Attorney, submits the following objections to the Confirmation of Chapter 13 Plan proposed by this debtor and Motion to Dismiss:

1. The confirmation hearing is scheduled for September 2, 2004, at 10:30 a.m. at U.S. Bankruptcy Court, Courtroom 7 West, U.S. Courthouse, 300 South Fourth Street, Minneapolis, Minnesota 55415.

2. The Court has jurisdiction over these objections pursuant to 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005 and Local Rule 1070-1. This is a core proceeding. The petition commencing this Chapter 13 case was filed June 10, 2004. This case is now pending in this court.

3. These objections and Motion to Dismiss arise under 11 U.S.C. §§ 1322(a)(2); 1325(a)(3) and (6); and 1307(c) and Fed.

R. Bankr. P. 3015. These objections are filed under Fed. R. Bankr. P. 9013 and 9014 and Local Rules 3015-3, 3020-1 and 3020-3.

4. The United States, IRS, has an unsecured priority claim of \$33,703.23 and an unsecured general claim of \$106,684.14 against this debtor. The total claim is \$140,387.37, as set forth in the filed Proof of Claim of the IRS, a copy of which is attached hereto as Exhibit A.

5. This is the debtor's fourth Chapter 13 filing since March 1994. The IRS filed objections to confirmation in each of the debtor's three prior cases. The IRS objections were resolved in the first two cases and the last case was dismissed on the motion of the IRS. The debtor filed his first Chapter 13 petition, Bankruptcy No. 94-31105, on March 9, 1994. This case was dismissed on December 11, 1996 on the motion of the Chapter 13 Trustee. The debtor remained in this bankruptcy case for approximately 2 $\frac{3}{4}$ years. The debtor then filed a second Chapter 13 petition on August 8, 1997, Bankruptcy No. 97-35306, that was dismissed on the motion of the Chapter 13 Trustee on April 3, 1998. The debtor then filed a third Chapter 13 petition on June 23, 1999, Bankruptcy No. 99-33244, that was dismissed March 10, 2000 on the motion of the United States. See Declaration of Roylene A. Champeaux attached hereto as Exhibit B.

6. The amount of the debtor's federal tax debt increased with each bankruptcy filing as follows:

IRS Proof of Claim in 1994 case	\$ 15,229.98
IRS Proof of Claim in 1997 case	\$ 36,938.81
IRS Proof of Claim in 1999 case	\$ 50,908.22
IRS Proof of Claim in instant case	\$140,387.37

See Exhibit B.

7. At the First Meeting of Creditors the debtor admitted that he had incurred the current federal tax debt by having intentionally inflated the number of exemptions claimed on his W-4 so as to minimize federal tax withholding. The debtor admitted that he increased the amount of his withholding only a few weeks prior to the First Meeting of Creditors and was already "behind" in federal tax withholding for the 2004 federal tax year.

8. The United States submits that the debtor's conduct in manipulating his federal income tax withholding over nearly ten years to avoid paying federal income taxes coupled with the four Chapter 13 filings constitutes bad faith such that this Plan should be denied confirmation and the case dismissed. The United States submits that the instant case was filed after the IRS levied on the debtor's wages. (See Debtor's Statement of Financial Affairs at paragraph three.)

9. The Plan is not feasible and does not comply with 11 U.S.C. § 1325(a)(6) in that the debtor will not be able to make all of the payments under the Plan and comply with the Plan as evidenced by the debtor's failure to complete with the last three Chapter 13 Plans.

WHEREFORE, for the foregoing reasons, the United States prays that the Chapter 13 Plan filed by this debtor be denied confirmation and that the case be dismissed as having been filed in bad faith.

Date: August 2, 2004

THOMAS B. HEFFELFINGER
United States Attorney

/e/ Roylene A Champeaux
By: ROYLENE A CHAMPEAUX
Assistant United States Attorney
Attorney ID Number 154805
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
(612) 664-5685

Attorneys for the United States
of America, IRS

VERIFICATION

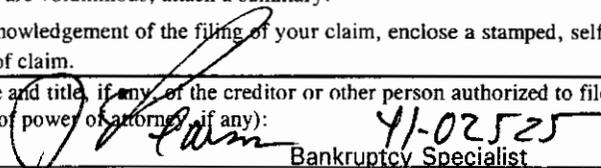
I, Jane E. Pearson, a Bankruptcy Specialist for the Internal Revenue Service, the movant named in the foregoing Chapter 13 Bankruptcy for Jeffrey Robert Wright, Bankruptcy No. 04-43298, declares under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

Dated: July 26, 2004

Signed:



JANE E. PEARSON
BANKRUPTCY SPECIALIST

UNITED STATES BANKRUPTCY COURT		DISTRICT OF MINNESOTA	PROOF OF CLAIM
Name of Debtor JEFFREY ROBERT WRIGHT		Case Number 04-43298	
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A "request" of payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.			
Name of Creditor (The person or other entity to whom the debtor owes money or property): Department of the Treasury - Internal Revenue Service		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case. <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.	
Name and address where notices should be sent: Internal Revenue Service Internal Revenue Service 316 North Robert Street Stop 5700STP St. Paul, MN 55101 Telephone number: (651) 312-7993 Creditor #:5951141		THIS SPACE IS FOR COURT USE ONLY	
Account or other number by which creditor identifies debtor: see attachment		Check here <input type="checkbox"/> replaces a previously filed claim, dated: _____ if this claim <input type="checkbox"/> amends	
1. Basis for Claim <input type="checkbox"/> Goods sold <input type="checkbox"/> Services performed <input type="checkbox"/> Money loaned <input type="checkbox"/> Personal injury/wrongful death <input checked="" type="checkbox"/> Taxes <input type="checkbox"/> Other _____ <input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. § 1114(a) <input type="checkbox"/> Wages, salaries, and compensation (fill out below) Last four digits of SS #: _____ Unpaid compensation for services performed from _____ to _____ (date) (date)			
2. Date debt was incurred: see attachment		3. If court judgment, date obtained:	
4. Total Amount of Claim at Time Case Filed: \$ <u>106,684.14</u> (unsecured) <u>33,703.23</u> (secured) <u>140,387.37</u> (Total) If all or part of your claim is secured or entitled to priority, also complete Item 5 or 7 below. <input checked="" type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.			
5. Secured Claim. <input type="checkbox"/> Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Value of Collateral: \$ _____ Amount of arrearage and other charges at time case filed included in secured claim, if any: \$ _____		7. Unsecured Priority Claim. <input checked="" type="checkbox"/> Check this box if you have an unsecured priority claim Amount entitled to priority \$ <u>33,703.23</u> Specify the priority of the claim: <input type="checkbox"/> Wages, salaries, or commissions (up to \$4,925),* earned within 90 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(3). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Up to \$2,225* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(6). <input type="checkbox"/> Alimony, maintenance, or support owed to spouse, former spouse, or child - 11 U.S.C. § 507(a)(7). <input checked="" type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). * Amounts are subject to adjustment on 4/1/07 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.	
6. Unsecured Nonpriority Claim \$ <u>106,684.14</u> <input type="checkbox"/> Check this box if: a) there is no collateral or lien securing your claim, or b) your claim exceeds the value of the property securing it, or if c) none or part of your claim is entitled to priority.		THIS SPACE IS FOR COURT USE ONLY	
8. Credits: The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim.			
9. Supporting Documents: Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary.			
10. Date-Stamped Copy: To receive an acknowledgement of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.		EXHIBIT _____ A.	
Date 07/26/2004	Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any):  Bankruptcy Specialist		

Proof of Claim for Internal Revenue Taxes

Form 10
Attachment

Department of the Treasury/Internal Revenue Service

In the Matter of: JEFFREY ROBERT WRIGHT
3746 INGLEWOOD AVE S
ST LOUIS PARK, MN 55416

Docket Number	04-43298
Type of Bankruptcy Case	Chapter 13
Date of Petition	06/10/2004

The United States has not identified a right of setoff or counterclaim. However, this determination is based on available data and is not intended to waive any right to setoff against this claim debts owed to this debtor by this or any other federal agency. All rights of setoff are preserved and will be asserted to the extent lawful.

Unsecured Priority Claims under section 507(a)(8) of the Bankruptcy Code

Taxpayer ID Number	Kind of Tax	Tax Period	Date Tax Assessed	Tax Due	Interest to Petition Date
XXX-XX-8715	INCOME	12/31/2000	06/21/2004	\$8,013.83	\$1,571.41
XXX-XX-8715	INCOME	12/31/2001	06/14/2004	\$9,720.92	\$1,128.78
XXX-XX-8715	INCOME	12/31/2002	06/07/2004	\$7,274.12	\$393.91
XXX-XX-8715	INCOME	12/31/2003	06/07/2004	\$5,557.58	\$42.68
				<u>\$30,566.45</u>	<u>\$3,136.78</u>

Total Amount of Unsecured Priority Claims: **\$33,703.23**

Unsecured General Claims

Taxpayer ID Number	Kind of Tax	Tax Period	Date Tax Assessed	Tax Due	Interest to Petition Date
XXX-XX-8715	INCOME	12/31/1992	04/11/1994	\$0.00	\$6,139.71
XXX-XX-8715	INCOME	12/31/1993	04/18/1994	\$2,031.00	\$2,396.95
XXX-XX-8715	INCOME	12/31/1994	10/06/1997	\$3,816.00	\$3,835.47
XXX-XX-8715	INCOME	12/31/1995	10/06/1997	\$8,459.00	\$7,013.87
XXX-XX-8715	INCOME	12/31/1996	10/13/1997	\$7,875.00	\$5,319.64
XXX-XX-8715	INCOME	12/31/1997	09/06/1999	\$5,625.00	\$2,992.18
XXX-XX-8715	INCOME	12/31/1998	08/09/1999	\$3,868.00	\$1,615.54
XXX-XX-8715	INCOME	12/31/1999	05/21/2001	\$7,198.00	\$2,216.58
				<u>\$38,872.00</u>	<u>\$31,529.94</u>

Penalty to date of petition on unsecured priority claims (including interest thereon) \$10,413.77
 Penalty to date of petition on unsecured general claims (including interest thereon) \$25,868.43

Total Amount of Unsecured General Claims: **\$106,684.14**

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

In re:) Chapter 13
)
JEFFREY ROBERT WRIGHT,) Bankruptcy No. 04-43298
)
Debtor.)

DECLARATION OF ROYLENE A. CHAMPEAUX

1. This declaration and the attached exhibits are submitted pursuant to 28 U.S.C. § 1746 in connection with the Objections of the United States of America to the Confirmation of the Debtor's Chapter 13 Plan and the United States Motion to Dismiss. I am the Assistant United States Attorney to whom this case is assigned.

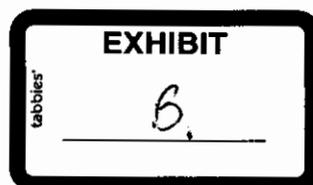
2. Attached are certified copies of the following:

- A. Docket - Bankruptcy No. 94-31105
- B. Claims Register - Bankruptcy No. 94-31105
- C. Docket - Bankruptcy No. 97-35306
- D. Claims Register - Bankruptcy No. 97-35306
- E. Docket - Bankruptcy No. 99-33244
- F. Claims Register - Bankruptcy No. 99-33244
- G. Order of Dismissal - Bankruptcy No. 99-33244

3. Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/2/04 in Minneapolis, Minnesota.


ROYLENE A. CHAMPEAUX



CERTIFIED COPY - Certified a true copy
5 pages on (date) 7/30/04
Lori Vosejka, Acting Clerk, United States
Bankruptcy Court, District of Minnesota
(SEAL) BY *[Signature]* Deputy Clerk

U.S. Bankruptcy Court
District of Minnesota (St. Paul)

Bankruptcy Petition #: 94-31105

Date filed: 3/9/94
Assigned to: JUDGE GREGORY F KISHEL
Chapter 13 voluntary

Date terminated: 4/15/97

asset

* Attorneys *

JEFFREY ROBERT WRIGHT
4700 ANNE POINT
EAGAN, MN 55122
SSN: 212-66-8715
* Debtor *

KENNETH E KEATE
KEATE LAW OFFICE PA
1102 GRAND AVE
ST PAUL, MN 55105
612-224-5079

J J MICKELSON
12 S 6TH ST #310
MINNEAPOLIS, MN 55402
* Trustee *

U S TRUSTEE
331 2ND AV S #540
MINNEAPOLIS, MN 55401
* U S Trustee *

INTERNAL USE ONLY: Events between 1/1/1 and 4/15/97.

CLOSED

- 3/9/94 1 Voluntary Petition missing documents: Schedules A through J
Due on 3/24/94 ;Chapter 13 Plan due on 3/24/94 (Filing
Fee \$ 160.00 Receipt # 33605) (tga) [EOD 03/10/94]
- 3/10/94 -- Added U S Trustee U S TRUSTEE (tga) [EOD 03/10/94]
- 3/10/94 2 Order Upon Partial Case Filing ; Incomplete Filings Due:
3/24/94 Certificate of Mailing. (mpl) [EOD 03/10/94]
- 3/24/94 3 Schedules FILED. (mpl) [EOD 03/24/94]
- 3/24/94 -- Deadline for missing documents satisfied. (mpl)
[EOD 03/24/94]
- 3/24/94 4 Chapter 13 Plan. (mpl) [EOD 03/24/94]

INTERNAL USE ONLY: Events between 1/1/1 and 4/15/97.
94-31105 In re: JEFFREY ROBERT WRIGHT

CLOSED

3/25/94 5 Notice of First Meeting of Creditors under 11 USC 341(a)
Scheduled For 10:30 4/27/94 At Ch. 13 Office Minneapolis
Confirmation Hearing Set For 10:30 5/26/94 At St.Paul (Ch.
13 Room) ;Last Day to File Proofs of Claim: 7/26/94 (tga)
[EOD 03/25/94]

3/28/94 6 Courts Certificate of Mailing Re: [5-1] First Meeting # of
Notices: 51. (tga) [EOD 03/28/94]

4/27/94 -- Meeting of Creditors Held. (kj) [EOD 05/05/94]

5/3/94 -- Application Filed By KENNETH E KEATE (lam) [EOD 05/03/94]

5/3/94 7 Certificate Of Service By KENNETH E KEATE RE: APPLICATION
FOR COMPENSATION. (lam) [EOD 05/03/94]

5/12/94 8 Objection By Creditor INTERNAL REVENUE SERVICE To
Confirmation Of Plan. MEMORANDUM. CERTIFICATE OF SERVICE.
(lam) [EOD 05/12/94]

5/26/94 9 Minute Sheet Re: [8-1] confirmation of plan Objection by
INTERNAL REVENUE SERVICE . M. URBANOS, AND S. CREASEY
APPEARED. OJECTION SUSTAINED, CASE DISMISSED. (hcm)
[EOD 05/26/94]

5/26/94 10 Order Sustaining [8-1] by INTERNAL REVENUE SERVICE
confirmation of plan Objection , AND DISMISSING CASE.(GFK)
COURT'S CERTIFICATE OF MAILING. (hcm) [EOD 05/26/94]

6/6/94 11 Motion By Debtor JEFFREY ROBERT WRIGHT FOR RECONSIDERATION
OF ORDER REFUSING TO CONFIRM PLAN AND DISMISSING CASE,
FOR CLASSIFICATION OF CLAIMS, DETERMINING SECURED STATUS
CLAIMS. AFFIDAVITS. (lam) [EOD 06/07/94]

6/6/94 -- Hearing Re: [11-3] Motion DETERMINING SECURED STATUS CLAIMS
by JEFFREY ROBERT WRIGHT Scheduled For 2:00 7/12/94 at
Courtroom 228B (St. Paul), [11-2] Motion FOR CLASSIFICATION
OF CLAIMS by JEFFREY ROBERT WRIGHT Scheduled For 2:00
7/12/94 at Courtroom 228B (St. Paul), [11-1] Motion FOR
RECONSIDERATION OF ORDER REFUSING TO CONFIRM PLAN AND
DISMISSING CASE by JEFFREY ROBERT WRIGHT Scheduled For 2:00
7/12/94 at Courtroom 228B (St. Paul) (lam) [EOD 06/07/94]

6/6/94 12 Objection By Debtor JEFFREY ROBERT WRIGHT To Claim of
INTERNAL REVENUE SERVICE. AFFIDAVITS. (lam) [EOD 06/07/94]

6/6/94 -- Hearing Re: [12-1] Claims Objection by JEFFREY ROBERT
WRIGHT Scheduled For 2:00 7/12/94 at Courtroom 228B (St.
Paul) (lam) [EOD 06/07/94]

6/27/94 13 WITHDRAWAL BY Creditor INTERNAL REVENUE SERVICE RE: [8-1]
confirmation of plan Objection by INTERNAL REVENUE SERVICE.
CERTIFICATE OF SERVICE. (sas) [EOD 06/27/94]

INTERNAL USE ONLY: Events between 1/1/1 and 4/15/97.
94-31105 In re: JEFFREY ROBERT WRIGHT

CLOSED

7/5/94 14 Notice OF CORRECTED WITHDRAWAL by Creditor INTERNAL REVENUE SERVICE Re: [8-1] confirmation of plan Objection by INTERNAL REVENUE SERVICE. CERTIFICATE OF SERVICE. (lam) [EOD 07/05/94]

7/29/94 -- Hearing Re: [13-1] Document by INTERNAL REVENUE SERVICE rescheduled For 1:30 8/2/94 at Courtroom 228B (St. Paul), [11-1] Motion FOR RECONSIDERATION OF ORDER REFUSING TO CONFIRM PLAN AND DISMISSING CASE by JEFFREY ROBERT WRIGHT rescheduled For 1:30 8/2/94 at Courtroom 228B (St. Paul), [11-2] Motion FOR CLASSIFICATION OF CLAIMS by JEFFREY ROBERT WRIGHT rescheduled For 1:30 8/2/94 at Courtroom 228B (St. Paul), [11-3] Motion DETERMINING SECURED STATUS CLAIMS by JEFFREY ROBERT WRIGHT rescheduled For 1:30 8/2/94 at Courtroom 228B (St. Paul). (ENTRY FOR HEARING ON ABOVE MOTIONS MADE ON 7/29/94 DUE TO ERROR WHEN DOCKETING ORIGINAL NOTICE OF RESCHEDULED HEARING) (aml) [EOD 07/29/94]

8/2/94 15 Minute Sheet Re: [12-1] Claims Objection by JEFFREY ROBERT WRIGHT, [11-3] Motion DETERMINING SECURED STATUS CLAIMS by JEFFREY ROBERT WRIGHT, [11-2] Motion FOR CLASSIFICATION OF CLAIMS by JEFFREY ROBERT WRIGHT, [11-1] Motion FOR RECONSIDERATION OF ORDER REFUSING TO CONFIRM PLAN AND DISMISSING CASE by JEFFREY ROBERT WRIGHT . KENNETH KEATE APPEARED. ORDER TO BE ENTERED. (hcm) [EOD 08/05/94]

8/5/94 16 Order Sustaining [12-1] by JEFFREY ROBERT WRIGHT Claims Objection, Granting [11-3] Motion DETERMINING SECURED STATUS CLAIMS by JEFFREY ROBERT WRIGHT, Granting [11-2] Motion FOR CLASSIFICATION OF CLAIMS by JEFFREY ROBERT WRIGHT, Granting [11-1] Motion FOR RECONSIDERATION OF ORDER REFUSING TO CONFIRM PLAN AND DISMISSING CASE by JEFFREY ROBERT WRIGHT .(GFK) COURT'S CERTIFICATE OF MAILING (hcm) [EOD 08/05/94]

8/8/94 -- Update Deadline ;Proofs of Claim Due on 9/6/94 (sas) [EOD 08/08/94]

8/8/94 17 Order Confirming [4-1] Chapter 13 Plan. Certificate of Mailing.(GFK 8/8/94) (sas) [EOD 08/08/94] [Edit date 08/08/94]

8/9/94 18 Courts Certificate of Mailing Re: [17-1] chapter 13 plan Order # of Notices: 59. (tga) [EOD 08/09/94]

8/12/94 19 Certificate Of Service By Debtor JEFFREY ROBERT WRIGHT RE: [11-3] Motion DETERMINING SECURED STATUS CLAIMS by JEFFREY ROBERT WRIGHT, [11-2] Motion FOR CLASSIFICATION OF CLAIMS by JEFFREY ROBERT WRIGHT, [11-1] Motion FOR RECONSIDERATION OF ORDER REFUSING TO CONFIRM PLAN AND DISMISSING CASE by JEFFREY ROBERT WRIGHT. (lam) [EOD 08/12/94]

10/24/94 20 Order Granting Attorney's Fees in the amount of \$ 522.18. Certificate of mailing. (sas) [EOD 10/24/94]

INTERNAL USE ONLY: Events between 1/1/1 and 4/15/97.
94-31105 In re: JEFFREY ROBERT WRIGHT

CLOSED

11/29/94 21 Motion By Trustee J J MICKELSON To Dismiss Case .
AFFIDAVIT AND CERTIFICATE OF SERVICE. (tga) [EOD 11/29/94]

11/29/94 -- Hearing Re: [21-1] Motion To Dismiss Case by J J MICKELSON
Scheduled For 10:00 12/22/94 at St.Paul (Ch. 13 Room) (tga)
[EOD 11/29/94]

12/22/94 22 Minute Sheet Re: [21-1] Motion To Dismiss Case by J J
MICKELSON. MOTION STRICKEN. (sas) [EOD 12/29/94]

5/2/95 23 Court Costs Paid \$.25, Receipt # 47108 . (saj)
[EOD 05/02/95]

6/16/95 -- Terminated Deadline (kmn) [EOD 06/16/95]

2/29/96 24 Notice of Appearance And Request For Service Of Notice By
LINDA JEANNE JUNGERS for Interested Party HEALTH ONE
SERVICES CO. (kj) [EOD 02/29/96]

11/5/96 25 Motion By Trustee J J MICKELSON To Dismiss Case.
AFFIDAVIT. CERTIFICATE OF SERVICE. (blm) [EOD 11/05/96]

11/5/96 -- Hearing Re: [25-1] Motion To Dismiss Case by J J MICKELSON
SCHEDULED For 10:00 11/26/96 at Courtroom 228B (St. Paul)
(blm) [EOD 11/05/96]

11/25/96 26 Response By Debtor JEFFREY ROBERT WRIGHT To [25-1] Motion
To Dismiss Case by J J MICKELSON. AFFIDAVIT. CERTIFICATE OF
SERVICE. (sas) [EOD 11/25/96]

11/26/96 27 Minute Sheet Re: [25-1] Motion To Dismiss Case by J J
MICKELSON . S. CREASEY AND K. KEATE APPEARED. ORDER TO
BE ENTERED FOR CURE. (hcm) [EOD 11/27/96]

11/27/96 28 Order Denying [25-1] Motion To Dismiss Case by J J
MICKELSON AND SETTING CURE (GFK) COURT'S CERTIFICATE OF
MAILING.. (hcm) [EOD 11/27/96]

12/10/96 29 Affidavit of Default by: Trustee J J MICKELSON In RE:
[28-1] Order, [25-1] Motion To Dismiss Case by J J
MICKELSON (sas) [EOD 12/10/96]

12/11/96 30 Order Dismissing Case. (GFK: 12/11/96) (sas) [EOD 12/11/96]

12/11/96 31 Courts Certificate of Mailing Re: [30-1] To Dismiss Order
of Notices: 61. (kh) [EOD 12/11/96]

2/14/97 32 Trustee's Final Report in Chapter 13 Case - Dismissed. (sas)
[EOD 02/18/97]

4/15/97 33 Order Closing Case and Discharging Trustee. (sas)
[EOD 04/15/97]

INTERNAL USE ONLY: Events between 1/1/1 and 4/15/97.
94-31105 In re: JEFFREY ROBERT WRIGHT

CLOSED

4/15/97 -- Case Closed. (sas) [EOD 04/15/97]

CERTIFIED COPY - Certified a true copy
3 pages on (date) 7/30/04
 Lori Vosejka, Acting Clerk, United States
 Bankruptcy Court, District of Minnesota
 (SEAL) BY J. Hanerty Deputy Clerk

District of Minnesota
 CLAIMS REGISTER

04/11/97 Last Date to File Claims: 09/06/94 94-31105 gfk Page 1
 Last Date to File Claims for Governmental Unit: **/**/**
 JEFFREY ROBERT WRIGHT

Name and Address of Claimant	Amount of Claims Filed and Allowed	Remarks
No: 1 ASPEN MEDICAL GROUP 1021 BANDANA BLVD E SUITE 200 ST PAUL MN 55108-5127	Filed: 04/07/94 Filed Amt: 10.00 uns (n/a)	(n/a)
No: 2 JOBS & TRAINING 390 N ROBERT ST ST PAUL MN 55101	Filed: 04/07/94 Filed Amt: 1,123.00 uns (n/a)	(n/a)
No: 3 DEPT OF TREASURY INTERNAL REVENUE SERVICE PO BOX 64450 STOP 5700 ST PAUL MN 55164	Filed: 04/07/94 Filed Amt: 21,909.22 prt (n/a)	(n/a)
No: 4 VALLEY SALES INC 7500 W 145TH STREET APPLE VALLEY MN 55124	Filed: 04/28/94 Filed Amt: 4,800.60 uns (n/a)	(n/a)
No: 5 HEALTH ONE SERVICES CO RELIANCE RECOVERIES 430 OAK GROVE ST SUITE 200 MPLS MN 55403	Filed: 05/02/94 Filed Amt: 641.43 uns (n/a)	(n/a)
No: 6 HAZELDEN PO BOX 11 CENTER CITY MN 55012	Filed: 05/05/94 Filed Amt: 2,193.64 uns (n/a)	(n/a)
No: 7 INTERNAL REVENUE SERVICE SPECIAL PROCEDURES STOP 5700 EG PO BOX 64450 ST PAUL MN 55164	Filed: 05/09/94 Filed Amt: 4,479.01 sec (n/a) 19,461.21 prt (n/a) 23,940.22 Total (n/a)	(n/a)

District of Minnesota
CLAIMS REGISTER

04/11/97 Last Date to File Claims: 09/06/94 94-31105 gfk Page 2
 Last Date to File Claims for Governmental Unit: **/**/**
 JEFFREY ROBERT WRIGHT

Name and Address of Claimant	Amount of Claims Filed and Allowed	Remarks
<hr/>		
No: 8 Filed: 05/11/94	Filed Amt: 6,524.78 uns	(n/a)
FAIRVIEW COMMUNITY HOSP PO BOX 147 MINNEAPOLIS MN 55440-		(n/a) (n/a) (n/a)
<hr/>		
No: 9 Filed: 05/23/94	Filed Amt: 3,355.15 uns	(n/a)
NEW ENGLAND COLLEGE 7 MAIN ST HENNIKER NH 03242		(n/a) (n/a) (n/a)
<hr/>		
No: 10 Filed: 07/21/94	Filed Amt: 1,801.00 prt	(n/a)
STATE OF MN DEPT OF REVENUE 551 BANKRUPTCY SECTION PO BOX 64447 ST PAUL MN 55164		(n/a) (n/a) (n/a) (n/a)
<hr/>		
No: 11 Filed: 08/30/94	Filed Amt: 10,126.68 pri	(n/a)
KAREN WRIGHT HENNEPIN COUNTY COLL SERVICES 300 S 6TH ST MPLS MN 55487		(n/a) (n/a) (n/a)
<hr/>		
No: 12 Filed: 10/19/94	Filed Amt: 15,564.07 prt	(n/a)
DEPT OF TREASURY INTERNAL REVENUE SERVICE PO BOX 64450 STOP 5700 ST PAUL MN 55164		(n/a) (n/a) (n/a) (n/a)
<hr/>		
No: 13 Filed: 08/18/95	Filed Amt: 2,808.87 uns	(n/a)
INTERNAL REVENUE SERVICE SPECIAL PROCEDURES STOP 5700 EG PO BOX 64450 ST PAUL MN 55164	2,150.00 sec 10,271.11 prt 15,229.98 Total	(n/a) (n/a) (n/a) (n/a)
<hr/>		

District of Minnesota
CLAIMS REGISTER

04/11/97 Last Date to File Claims: 09/06/94 94-31105 gfk Page 3
Last Date to File Claims for Governmental Unit: **/**/**
JEFFREY ROBERT WRIGHT

Name and Address of Claimant	Amount of Claims Filed and Allowed	Remarks
No: 14 Filed: 12/09/96	Filed Amt: 2,500.00 aex	(n/a)
KEATE LAW OFFICE PA 1102 GRAND AVE ST PAUL MN 55105		(n/a)
		(n/a)
		(n/a)
		ACCT 94009

Return to Search Results Page

U.S. Bankruptcy Court
District of Minnesota (St. Paul)

Bankruptcy Petition #: 97-35306

Date filed: 8/8/97

Date terminated: 6/26/01

Assigned to: Chief Judge GREGORY F KISHEL

Chapter 13 voluntary asset

CERTIFIED COPY - Certified a true copy
5 pages on (date) Jul 30 2004
Lori Vosejka, Acting Clerk, United States
Bankruptcy Court, District of Minnesota
(SEAL) BY Bruce Kishel Deputy Clerk

===== * Attorneys *

JEFFREY ROBERT WRIGHT
4700 ANNE POINT
EAGAN, MN 55122
SSN: XXX-XX-8715
* Debtor *

KENNETH E KEATE
KEATE LAW OFFICE PA
1102 GRAND AVE
ST PAUL, MN 55105
612-224-5079

JASMINE Z KELLER
12 S 6TH ST STE 310
MINNEAPOLIS, MN 55402
(null) - * Trustee *

J J MICKELSON
12 S 6TH ST #310
MINNEAPOLIS, MN 55402
(null) - * Trustee *
[term 09/30/98]

U S TRUSTEE
331 2ND AV S #540
MINNEAPOLIS, MN 55401
(null) - * U S Trustee *

Proceedings include all events.

CLOSED ARCHIV

8/8/97 1 Voluntary Petition missing documents: Schedules A through J
Due on 8/25/97 ;Chapter 13 Plan due on 8/25/97 ;Proof of
Claim (gov) Deadline: 2/4/98 (Filing Fee \$ 160.00 Receipt
78313) (sas) [EOD 08/11/97]

8/11/97 2 Order Upon Partial Case Filing ; Incomplete Filings Due:
8/25/97 Certificate of Mailing. (sas) [EOD 08/11/97]

8/20/97 3 Schedules (j1) [EOD 08/21/97]

8/20/97 4 Chapter 13 Plan. (lam) [EOD 08/25/97]

Docket as of July 30, 2004 2:50 pm

Page 1

Proceedings include all events. CLOSED ARCHIV
97-35306 In re: JEFFREY ROBERT WRIGHT DISMSD 040398

8/25/97 5 Notice of First Meeting of Creditors under 11 USC 341(a) Scheduled For 11:15 9/19/97 At Ch. 13 Office Minneapolis Confirmation Hearing Set For 11:00 10/23/97 At St.Paul (Ch. 13 Room) ;Last Day to File Proofs of Claim: 12/18/97 (lam) [EOD 08/25/97]

8/28/97 6 Courts Certificate of Mailing Re: [4-1] Chapter 13 Plan # of Notices: 51. (slg) [EOD 08/28/97]

8/28/97 7 Courts Certificate of Mailing Re: [5-1] First Meeting # of Notices: 51. (slg) [EOD 08/28/97]

9/10/97 8 AMENDED Notice of First Meeting of Creditors under 11 USC 341(a) Scheduled For 11:15 10/7/97 At Ch. 13 Office Minneapolis Confirmation Hearing Set For 11:00 10/23/97 At St.Paul (Ch. 13 Room) ;Last Day to File Proofs of Claim: 1/5/98 (lje) [EOD 09/10/97]

9/15/97 9 Courts Certificate of Mailing Re: [8-1] First Meeting # of Notices: 51. (slg) [EOD 09/15/97]

10/2/97 10 Motion By Trustee J J MICKELSON To Dismiss Case . AFFIDAVIT. CERTIFICATE OF SERVICE. (slg) [EOD 10/02/97]

10/2/97 -- Hearing Re: [10-1] Motion To Dismiss Case by J J MICKELSON Scheduled For 10:00 10/23/97 at Courtroom 228B (St. Paul) (slg) [EOD 10/02/97]

10/7/97 -- Meeting of Creditors Held. (krb) [EOD 10/16/97]

10/15/97 11 Objection By Creditor IRS To Confirmation Of Plan. AFFIDAVIT. MEMORANDUM. CERTIFICATE OF SERVICE. (sas) [EOD 10/15/97]

10/22/97 12 Response By Debtor JEFFREY ROBERT WRIGHT To [11-1] confirmation of plan Objection by IRS. AFFIDAVIT. CERTIFICATE OF SERVICE. (sas) [EOD 10/22/97]

10/23/97 13 Minute Sheet Re: [4-1] Chapter 13 Plan, [10-1] Motion To Dismiss Case by J J MICKELSON, [11-1] confirmation of plan Objection by IRS . APPEARANCES NOTED ON THE RECORD. OBJECTION WITHDRAWN. PLAN CONFIRMED. MOTION TO DISMISS WITHDRAWN. (sas) [EOD 10/23/97]

10/23/97 14 Order Confirming [4-1] Chapter 13 Plan. Certificate of Mailing. (sas) [EOD 10/23/97]

10/24/97 15 Notice of Appearance And Request For Service Of Notice By LINDA JEANNE JUNGERS for Interested Party HEALTH ONE SERVICES CO. (slg) [EOD 10/24/97]

10/30/97 16 Letter of Withdrawal by Creditor IRS. In Re: [11-1] confirmation of plan Objection by IRS. CERTIFICATE OF SERVICE. (sas) [EOD 10/30/97]

Docket as of July 30, 2004 2:50 pm

Page 2

Proceedings include all events. CLOSED ARCHIV
 97-35306 In re: JEFFREY ROBERT WRIGHT DISMSD 040398

2/5/98 17 Motion By Trustee J J MICKELSON To Dismiss Case .
 AFFIDAVIT. CERTIFICATE OF SERVICE. (slg) [EOD 02/06/98]

2/5/98 -- Hearing Re: [17-1] Motion To Dismiss Case by J J MICKELSON
 Scheduled For 10:00 2/26/98 at Courtroom 228B (St. Paul)
 (slg) [EOD 02/06/98]

2/25/98 18 Response By Debtor JEFFREY ROBERT WRIGHT To [17-1] Motion
 To Dismiss Case by J J MICKELSON. AFFIDAVIT. MEMORANDUM.
 CERTIFICATE OF SERVICE. (sas) [EOD 02/25/98]

2/26/98 19 Minute Sheet Re: [17-1] Motion To Dismiss Case by J J
 MICKELSON . S. CREASEY AND K. KEATE APPEARED. CURE
 APPROVED. (hcm) [EOD 02/27/98]

2/27/98 20 Order Denying [17-1] Motion To Dismiss Case by J J
 MICKELSON .AND APPROVING CURE (GFK) COURT'S CERTIFICATE
 OFMAILING. (hcm) [EOD 02/27/98]

3/11/98 21 Order For employer KEY CADILLAC To Pay Trustee \$ 525.41
 PER MONTH FROM 3/98-3/99, \$1,502.17 FROM 4/99-12/99,
 \$525.41 FROM 1/00-3/00, \$1502.17 FROM 4/00-12/00, \$525.41
 FROM 1/01-3/01, \$1,502.17 FROM 4/01-12/01, \$525.41 FROM
 1/02-3/02, \$1,502.17 FROM 4/02-8/02. Certificate of
 Mailing. (slg) [EOD 03/11/98]

4/3/98 22 Affidavit of Default by: Trustee J J MICKELSON In RE:
 [20-1] Order, [17-1] Motion To Dismiss Case by J J
 MICKELSON (sas) [EOD 04/03/98]

4/3/98 23 Order Dismissing Case. (GFK: 4/3/98) (sas) [EOD 04/03/98]

4/8/98 24 Courts Certificate of Mailing Re: [23-1] To Dismiss Order .
 (lje) [EOD 04/09/98]

10/17/98 -- Due to Retirement of J.J. Mickelson, Jasmine Z. Keller
 Apptd as Ch 13 Standing Trustee for the Dist. of MN,
 Effective 10/1/98. See Misc. Proc. 98-408, [2-1] for
 Designation and Ratification and Approval of same. (drd)
 [EOD 10/17/98]

7/13/99 25 Order to Stop Wage Deduction. Certificate of mailing. (slg)
 [EOD 07/13/99]

10/18/00 26 MOTION Objection by Trustee JASMINE Z KELLER to Claim # 6 of
 KENNETH E KEATE AND KEATE LAW OFFICE AND TO SET TIME FOR
 FILING OF FEE APPLICATION. AFFIDAVIT. CERTIFICATE OF
 SERVICE. PROPOSED ORDER. (sas) [EOD 10/18/00]
 [Edit date 10/18/00]

10/18/00 -- Hearing Re: [26-1] Claims Objection by JASMINE Z KELLER
 Scheduled For 3:00 11/20/00 at Courtroom 228B (St. Paul) .

(sas) [EOD 10/18/00]

Docket as of July 30, 2004 2:50 pm

Page 3

Proceedings include all events.
97-35306

In re: JEFFREY ROBERT WRIGHT

CLOSED ARCHIV
DISMSD 040398

11/14/00 27 Response by Trustee JASMINE Z KELLER to [26-1] Claims
Objection by JASMINE Z KELLER . AFFIDAVIT. CERTIFICATE
OF SERVICE. (slg) [EOD 11/15/00]

11/20/00 28 Minute Sheet Re: [26-1] Claims Objection by JASMINE Z
KELLER . APPEARANCES: ERICK SHERBURNE FOR TRUSTEE AND
KENNETH KEATE. FILED CLAIM DISALLOWED. DEADLINE FOR FEE
APPLICATION TO BE SET. ORDER TO BE ENTERED BY THE COURT.
(tja) [EOD 12/07/00]

12/11/00 29 Order Sustaining [26-1] by JASMINE Z KELLER Claims
Objection AND SETTING DEADLINE FOR FILING FEE APPLICATIONS.
(tja) [EOD 12/11/00]

3/14/01 30 Application For Postconfirmation Compensation Filed by
KENNETH E KEATE Attorney for Debtor. For Compensation (Fees: \$ 505.01,) (sas) [EOD 03/14/01]

3/14/01 31 Clerk's Note to File. (sas) [EOD 03/14/01]

3/16/01 32 Order Granting Attorney's Fees Re: [30-1] Application For
Compensation (Fees: \$ 505.01,) in the Amount of \$ 505.01
(GFK: 3/16/01). CERTIFICATE OF MAILING (sas) [EOD 03/16/01]

6/14/01 33 Trustee's Final Report in Chapter 13 Case - Dismissed. (jjl)
[EOD 06/14/01]

6/26/01 34 Order Closing Case and Discharging Trustee. (jjl)
[EOD 06/26/01]

6/26/01 -- Case Closed. (jjl) [EOD 06/26/01]

Docket as of July 30, 2004 2:50 pm

Page 4

Claims Data for Case 97-35306

An 'underlined blue or purple' entry in the 'Creditor' column indicates that there is an image for the entry. The image can be accessed using either the Paperport viewer for MAX documents or the Adobe Acrobat Reader for PDF documents. These viewers may be downloaded free of charge by clicking on the Image Viewer Download hyperlink. Install help is available by clicking on the Viewer Install Help hyperlink. The buttons in the 'Link' column display text associated with the entry.

Return to Previous Page

Claim Date	Amount	Claim Number	Descriptive Text	Creditor	
09/23/97	36938.81	1		INTERNAL REVENUE SERVICE SPECIAL PROCEDURES ROOM 320 STOP 5700 316 NORTH ROBERT STREET ST PAUL MN 55101	No Claim image
10/02/97	12545.56	2	SEE CLAIM RE: AMOUNTS	KAREN M WRIGHT C/O HENNEPIN COUNTY CSD A12GC 300 S 6TH ST MPLS MN 55487	No Claim image
10/24/97	620.48	3		HEALTH ONE SERVICES CO DBA RELIANCE RECOVERIES C O STEWART ZLIMEN & JUNGERS 430 OAK GROVE ST 1200 MINNEAPOLIS MN 55403	No Claim image
01/02/98	12545.00	4		HENNEPIN CO CSD GN 314 A12 GC 300 S 6TH ST MPLS MN 55487	No Claim image
01/28/98	9677.56	5		DEPT OF REVENUE STATE OF MINNESOTA COLLECTION DIVISION BKY SECTION PO BOX 64447 ST PAUL MN 5564-0447	No Claim image
				KEATE LAW OFFICE 1102 GRAND AVE	No Claim

CERTIFIED COPY - Certified a true copy
 2 pages on (date) III 30 2004
 Lori Vosejka, Acting Clerk, United States
 Bankruptcy Court, District of Minnesota
 (SEAL) BY: *[Signature]*, Deputy Clerk

04/23/98	3000.00	6		ST PAUL MN 55105	image
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U S Bankruptcy Court - District of Minnesota
Last revised: October 24, 2000

Proceedings include all events. CLOSED
 99-33244 In re: JEFFREY ROBERT WRIGHT DISMSD 031000

7/12/99 6 Order Granting [5-1] Motion To EXTEND Time To FILE
 SCHEDULES by JEFFREY ROBERT WRIGHT ;Chapter 13 Plan due
 on 7/23/99 ;Missing Documents due: 7/23/99; CERTIFICATE OF
 MAILING . (md) [EOD 07/12/99]

7/23/99 7 Schedules (jt) [EOD 07/23/99]

7/23/99 8 Chapter 13 Plan. (jt) [EOD 07/23/99]

7/27/99 9 Notice of Meeting of Creditors under 11 USC 341(a)
 Scheduled For 10:15 8/24/99 At Ch. 13 Office Minneapolis
 Confirmation Hearing Set For 10:30 9/9/99 At St.Paul (Ch.
 13 Room) ;Last Day to File Proofs of Claim: 11/22/99 (jt)
 [EOD 07/27/99]

7/28/99 10 Court's Certificate of Mailing Re: [8-1] Chapter 13 Plan .
 (blm) [EOD 07/29/99]

7/29/99 11 Courts BNC Certificate of Service Re: [9-1] Meeting . #
 of Notices: 53 were sent out. (auto) [EOD 07/30/99]

8/4/99 13 Notice of Returned Mail Re: Creditor. (lk) [EOD 08/06/99]

8/5/99 12 Notice of Returned Mail Re: Creditor. (md) [EOD 08/05/99]

8/9/99 14 Notice of Returned Mail Re: Creditor. (bbo) [EOD 08/09/99]

8/10/99 15 Notice of Returned Mail Re: Creditor. (md) [EOD 08/10/99]

8/12/99 16 Notice of Returned Mail Re: Creditor. (jpl) [EOD 08/12/99]

8/24/99 -- Meeting of Creditors Held. (vrs) [EOD 08/25/99]

9/9/99 17 Minute Sheet Re: [8-1] Chapter 13 Plan . HEARING CONTINUED.
 (jt) [EOD 09/09/99]

9/9/99 -- CONTINUED Hearing Re: [8-1] Chapter 13 Plan ; Confirmation
 Hearing Set For 10:30 10/14/99 at St.Paul (Ch. 13 Room) (jt)
 [EOD 09/09/99]

10/14/99 18 Minute Sheet Re: [8-1] Chapter 13 Plan . HEARING CONTINUED
 (mph) [EOD 10/14/99]

10/14/99 -- Hearing Re: [8-1] Chapter 13 Plan ; Confirmation Hearing
 Set For 10:30 11/9/99 at Courtroom 228A (St. Paul) (mph)
 [EOD 10/14/99]

10/26/99 19 Motion by Trustee JASMINE Z KELLER To Dismiss or Convert
 Case . Affidavit. Certificate of Service. (mph)
 [EOD 10/26/99]

10/26/99 -- Hearing Re: [19-1] Motion To Dismiss or Convert Case by
 JASMINE Z KELLER SCHEDULED For 10:00 11/9/99 at Courtroom
 228A (St. Paul) (mph) [EOD 10/26/99]

Proceedings include all events. CLOSED
99-33244 In re: JEFFREY ROBERT WRIGHT DISMSD 031000

11/9/99 20 Minute Sheet Re: [8-1] Chapter 13 Plan, [19-1] Motion To Dismiss or Convert Case by JASMINE Z KELLER . HEARING CONTINUED. (sas) [EOD 11/12/99]

11/9/99 -- Hearing Re: [8-1] Chapter 13 Plan ; Confirmation Hearing Set For 10:30 12/9/99 at Courtroom 228A (St. Paul), [19-1] Motion To Dismiss or Convert Case by JASMINE Z KELLER Continued For 10:00 12/9/99 at Courtroom 228A (St. Paul) (sas) [EOD 11/12/99]

11/22/99 21 Notice OF CONTINUED HEARING by Trustee JASMINE Z KELLER Re: [19-1] Motion To Dismiss or Convert Case by JASMINE Z KELLER. CERTIFICATE OF SERVICE. (sas) [EOD 11/23/99]

12/8/99 22 Response By Debtor JEFFREY ROBERT WRIGHT To [19-1] Motion To Dismiss or Convert Case by JASMINE Z KELLER. AFFIDAVIT. CERTIFICATE OF SERVICE. PROPOSED ORDER. (sas) [EOD 12/08/99]

12/8/99 23 Modified Chapter 13 Plan filed by Debtor JEFFREY ROBERT WRIGHT. NOTICE. AFFIDAVIT. CERTIFICATE OF SERVICE. (sas) [EOD 12/08/99]

12/9/99 24 ELECTRONIC Minute Sheet Re: [23-1] Modified Plan by JEFFREY ROBERT WRIGHT, [19-1] Motion To Dismiss or Convert Case by JASMINE Z KELLER . HEARING CONTINUED. (sas) [EOD 12/09/99]

12/9/99 -- Hearing Re: [23-1] Modified Plan by JEFFREY ROBERT WRIGHT ; Confirmation Hearing Set For 10:30 1/13/00 at Courtroom 228A (St. Paul), [19-1] Motion To Dismiss or Convert Case by JASMINE Z KELLER Continued For 10:00 1/13/00 at Courtroom 228A (St. Paul) (sas) [EOD 12/09/99]

12/13/99 25 Stipulation By and Between Debtor JEFFREY ROBERT WRIGHT, Creditor HENNEPIN COUNTY SUPPORT AND COLLECTIONS For RELIEF FROM STAY FOR THE LIMITED PURPOSE OF PERMITTING HENNEPIN COUNTY SUPPORT AND COLLECTIONS SERVICES THE COLLECTION OF ONGOING CHILD SUPPORT AND POST-PETITION ARREARAGES. PROPOSED ORDER. (sas) [EOD 12/13/99]

12/14/99 26 ELECTRONIC Order Granting [25-1] stipulation by HENNEPIN COUNTY SUPPORT AND COLLECTIONS, JEFFREY ROBERT WRIGHT . (DDO 12/13/99) CERTIFICATE OF MAILING. (dlr) [EOD 12/14/99]

12/20/99 27 Notice of Appearance And Request For Service Of Notice By ROYLENE ANN CHAMPEAUX for Interested Party IRS. CERTIFICATE OF SERVICE. (sas) [EOD 12/21/99]

12/20/99 28 Motion by Interested Party IRS Objection to Document [23-1] Modified Plan, To Dismiss Case AFFIDAVIT. MEMORANDUM. CERTIFICATE OF SERVICE. PROPOSED ORDER. (sas) [EOD 12/21/99]

Proceedings include all events. CLOSED
 99-33244 In re: JEFFREY ROBERT WRIGHT DISMSD 031000

12/27/99 29 Order For employer KEY CADILLAC To Pay Trustee \$ 860.00
 PER MONTH FROM 12/99-6/00, \$1000.00 PER MONTH FROM
 7/00-6/02, 1975.00 PER MONTH FROM 7/02-7/04. Certificate of
 Mailing. (mph) [EOD 12/27/99]

1/12/00 30 Response By Debtor JEFFREY ROBERT WRIGHT To [28-1] Motion
 Objection to Document [23-1] Modified Plan by IRS, [28-2]
 Motion To Dismiss Case by IRS. CERTIFICATE OF SERVICE. (sas)
 [EOD 01/12/00]

1/13/00 31 ELECTRONIC Minute Sheet Re: [19-1] Motion To Dismiss or
 Convert Case by JASMINE Z KELLER, [23-1] Modified Plan by
 JEFFREY ROBERT WRIGHT, [28-1] Motion Objection to Document
 [23-1] Modified Plan by IRS, [28-2] Motion To Dismiss Case
 by IRS, [30-1] Response by JEFFREY ROBERT WRIGHT.
 APPEARANCES NOTED ON THE RECORD. MATTER TAKEN UNDER
 ADVISEMENT. (sas) [EOD 01/13/00] [Edit date 01/13/00]

1/19/00 32 ELECTRONIC Order Denying [23-1] Modified Plan by JEFFREY
 ROBERT WRIGHT. (DDO: 1/19/00) Certificate of Mailing. (sas)
 [EOD 01/19/00]

2/10/00 33 ELECTRONIC Minute Sheet Re: [19-1] Motion To Dismiss or
 Convert Case by JASMINE Z KELLER, [28-2] Motion To Dismiss
 Case by IRS . HEARING CONTINUED. (sas) [EOD 02/10/00]

2/10/00 -- Hearing Re: [19-1] Motion To Dismiss or Convert Case by
 JASMINE Z KELLER Continued For 10:30 3/9/00 at Courtroom
 228A (St. Paul), [28-2] Motion To Dismiss Case by IRS
 Continued For 10:30 3/9/00 at Courtroom 228A (St. Paul) (sas)
 [EOD 02/10/00]

3/9/00 34 ELECTRONIC Minute Sheet Re: [23-1] Modified Plan by JEFFREY
 ROBERT WRIGHT, [19-1] Motion To Dismiss or Convert Case by
 JASMINE Z KELLER, [28-2] Motion To Dismiss Case by IRS .
 APPEARANCES NOTED ON THE RECORD. CASE DISMISSED. (sas)
 [EOD 03/09/00]

3/10/00 35 ELECTRONIC Order Dismissing Case. (DDO: 3/10/00)
 CERTIFICATE OF MAILING. (sas) [EOD 03/10/00]

3/10/00 36 Notice of Dismissal (sas) [EOD 03/10/00]

3/15/00 37 Court's Certificate of Mailing Re: [36-1] To Dismiss Notice
 of . (mph) [EOD 03/16/00]

3/17/00 38 Order to Stop Wage Deduction. Certificate of mailing. (mph)
 [EOD 03/17/00]

4/18/00 39 Trustee's Final Report in Chapter 13 Case - Dismissed. (mph)
 [EOD 04/18/00]

7/19/00 40 Order Closing Case and Discharging Trustee. (sl)
 [EOD 07/19/00]

Proceedings include all events.
99-33244 In re: JEFFREY ROBERT WRIGHT

CLOSED
DISMSD 031000

7/19/00 -- Case Closed. (sl) [EOD 07/19/00]

CERTIFIED COPY - Certified a true copy
 2 pages on (date) 7/30/04
 Lori Vosejka, Acting Clerk, United States
 Bankruptcy Court, District of Minnesota
 (SEAL) BY [Signature]

Claims Data for Case 99-33244

An 'underlined blue or purple' entry in the 'Creditor' column indicates that there is an image for the entry. The image can be accessed using either the Paperport viewer for MAX documents or the Adobe Acrobat Reader for PDF documents. These viewers may be downloaded free of charge by clicking on the [Image Viewer Download](#) hyperlink. Install help is available by clicking on the [Viewer Install Help](#) hyperlink. The buttons in the 'Link' column display text associated with the entry.

[Return to Previous Page](#)

Claim Date	Amount	Claim Number	Descriptive Text	Creditor	
08/06/99	20.00	1		<u>ASPEN MEDICAL GROUP</u> 1021 BANDANA BLVD E SUITE 200 ST PAUL MN 55108-5127	Claim image exists
08/20/99	4037.28	2		<u>FAIRVIEW COMMUNITY HOSPITAL</u> P O BOX 147 MINNEAPOLIS MN 55440	Claim image exists
09/01/99	624.00	3		<u>HAZELDEN</u> P O BOX 11 CENTER CITY MN 55012	Claim image exists
09/02/99	50908.22	4		<u>INTERNAL REVENUE SERVICE</u> 316 NORTH ROBERT STREET ROOM 320 STOP 5700 ST PAUL MN 55101-1474	Claim image exists
11/04/99	11245.19	5		<u>HENNEPIN COUNTY COLLECTIONS SRVS</u> 110 S 4TH ST R MPLS MN 455401 2280	Claim image exists
11/26/99	13121.81	6		<u>STATE OF MINNESOTA DEPART OF REVENUE</u> PO BOX 64447	Claim image exists

ST PAUL MN 55164 0447

U S Bankruptcy Court - District of Minnesota

Last revised: October 24, 2000

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

In re:) Chapter 13
)
JEFFREY R. WRIGHT,) Bankruptcy No. 99-33244
)
Debtor.)

ORDER

At St. Paul, Minnesota, this 10 day of March, 2000.

This matter came before the Court for hearing on the Motion of the United States of America to dismiss the case. Roylene A. Champeaux, Assistant United States Attorney, appeared on behalf of the United States. Other appearances were as noted on the record.

It appears to the satisfaction of the Court that the case should be dismissed for cause in that the failure of the debtor to propose a plan is prejudicial to the creditors.

IT IS THEREFORE ORDERED:

1. The case is dismissed.

/e/ Dennis D. O'Brien

DENNIS D. O'BRIEN
Chief, United States Bankruptcy Judge

35E

CERTIFIED COPY - Certified a true copy
1 pages on (date) 7-30-04
Lori Vosejka, Acting Clerk, United States
Bankruptcy Court, District of Minnesota
(SEAL) BY J. DeWane, Deputy Clerk

NOTICE OF ELECTRONIC ENTRY AND
FILING ORDER OR JUDGMENT
Filed and Docket Entry made on 03/10/00
Patrick G. De Wane, By SAS

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

In re:) Chapter 13
)
JEFFREY ROBERT WRIGHT,) Bankruptcy No. 04-43298
)
Debtor.)

MEMORANDUM IN SUPPORT OF OBJECTIONS OF THE
UNITED STATES OF AMERICA TO THE CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN AND MOTION TO DISMISS

THE UNITED STATES OF AMERICA, Internal Revenue Service ("IRS"), by and through its attorneys, Thomas B. Heffelfinger, United States Attorney for the District of Minnesota and Roylene A. Champeaux, Assistant United States Attorney, submits the following Memorandum in Support of its Objections to Confirmation of Debtor's Chapter 13 Plan and Motion to Dismiss.

1. The United States, IRS, has an unsecured priority claim of \$33,703.23 and an unsecured general claim of \$106,684.14 against this debtor. The total claim is in the amount of \$140,387.37 as set forth in the filed Proof of Claim of the IRS.

2. Since no objections to the tax claims of the IRS have been filed, the claims are deemed allowed, pursuant to 11 U.S.C. § 502(a).

3. This bankruptcy case should be dismissed because the debtor acted in bad faith in filing a fourth Chapter 13 bankruptcy case after manipulating his federal income tax withholding so as to avoid paying taxes. This conduct continued during the

approximately five years the debtor remained in various bankruptcy cases and lasted until approximately July 1, 2004.

4. During the years the debtor remained in Chapter 13, the debtor essentially funded his Chapter 13 Plan payments with funds that should have been used to pay federal income taxes. However, even with this source of funding, the debtor was unable to complete any of his three prior Chapter 13 Plans.

5. In determining whether a debtor has acted in good faith, the Court must consider the totality of circumstances including (1) the debtor's accuracy in stating his debts and expenses; (2) the debtor's honesty in the Bankruptcy process including whether he has made any fraudulent misrepresentations in the matter of his Bankruptcy; (3) whether the Bankruptcy Code is being unfairly manipulated; (4) the type of debt sought to be discharged; (5) whether the debt would be nondischargeable under Chapter 7; and (6) the debtor's motivation and sincerity in seeking Chapter 13 relief. In re Mattson, 241 B.R. 629, 635-637 (Bankr. D. Minn. 1999). Handeen v. LeMaire (In re LeMaire), 898 F.2d 1346, 1349 (8th Cir. 1990).

6. Here the debtor has unfairly manipulated Chapter 13 of the Bankruptcy Code by filing the three prior Chapter 13 cases while scheming to avoid paying federal income taxes.

7. The United States submits that the Plan does not comply with 11 U.S.C. § 1325(a)(6) in that the Plan is not feasible. The

debtor, despite having robbed Peter to pay Paul, (manipulating tax withholding to provide extra monies to fund his Chapter 13 plans) still failed to complete any of the three prior Chapter 13 cases. The United States submits that the debtor is unable to establish his ability to make payments under the current proposed Plan. Thusly, the Plan should be denied confirmation and the bankruptcy case dismissed.

WHEREFORE, for the foregoing reasons, the United States prays that the Chapter 13 Plan filed by this debtor be denied confirmation and that the case be dismissed as having been filed in bad faith.

Date: August 2, 2004

THOMAS B. HEFFELFINGER
United States Attorney

/e/ Roylene A Champeaux
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Attorneys for the United States
of America, IRS

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

JEFFREY ROBERT WRIGHT,

Debtor.

Chapter 13
Case Number: 04-43298

UNSWORN DECLARATION
FOR PROOF OF SERVICE

I, John Kokkinen, employed by the Office of the United States Attorney, with office address 600 U.S. Courthouse, 300 South Fourth Street, Minneapolis, Minnesota 55415, declares that on August 2, 2004, I served the Objections of the United States of America to Confirmation of Debtor's Chapter 13 Plan and Motion To Dismiss, Memorandum in Support of Objections and Motion to Dismiss and proposed Order on the entities named below by mailing to each of them a copy thereof by enclosing same in an envelope with first class mail postage and depositing same in the post office at Minneapolis, Minnesota, addressed to each of them as follows:

William I. Kampf, Esq.
Henson & Efron P.A.
220 South Sixth Street, STE 1800
Minneapolis, MN 55402

Reliance Recoveries
c/o Stewart Zlimen & Jungers
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Minneapolis, MN 55403

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1015 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

John Brink, Esq.
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Chapter 13 Trustee
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Minneapolis, MN 55428

Minnesota Department of Revenue
Collection Enforcement Unit
551 Bankruptcy Section
P.O. Box 64447
St. Paul, MN 55164

UNSWORN DECLARATION
FOR PROOF OF SERVICE-Continued

In re: **Jeffrey Robert Wright**
BKY No. 04-43298

Craig Anderson
Assistant Attorney General
Office of MN Attorney General
Tax Litigation Division
1100 NCL Tower
445 Minnesota Street
St. Paul, MN 55101-2128

And I declare, under penalty of perjury, that the foregoing is true and correct.

Executed: August 2, 2004

Signed: /e/ John Kokkinen
JOHN KOKKINEN

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

In re:)
)
JEFFREY ROBERT WRIGHT,) Case No. 04-43298
)
) Chapter 13
Debtor.)

ORDER

At Minneapolis, Minnesota, this _____ day of _____,
2004.

This matter came before the Court for hearing on Confirmation of the debtor's Plan. The United States of America, on behalf of the Internal Revenue Service, filed objections to confirmation and requested an Order denying confirmation and for an Order dismissing this case. Roylene A. Champeaux, Assistant United States Attorney, appeared on behalf of the United States. Other appearances were noted on the record.

It appears to the satisfaction of the Court that the debtor's Plan is not confirmable.

IT IS THEREFORE ORDERED:

1. Confirmation is denied.
2. The case is dismissed as having been filed in bad faith.

NANCY C. DREHER
United States Bankruptcy Judge