

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

BKY No. 02-50651
ADV No.

Jerry Raymond Reno, Sr.,

Debtor.

Randall L. Seaver, Trustee

Plaintiff

COMPLAINT

vs.

Raymond Reno and Harriet Reno,

Defendants

Randall L. Seaver, Trustee (“Trustee”) of the Bankruptcy Estate of Jerry Raymond Reno, Sr., (“Debtor”) as and for his Complaint against Raymond Reno and Harriet Reno (“Defendants”), states and alleges as follows:

1. Trustee is the duly appointed Chapter 7 Trustee of the bankruptcy estate of the Debtor.
2. This bankruptcy case was commenced on August 9, 2002 by the filing of a voluntary Chapter 7 petition.
3. This adversary proceeding is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
4. This court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 157 and § 1334. This case arises under 11 U.S.C. §§ 547 and 550 and Minn. Stat. §§ 513.44, 513.45 and 513.47.

5. That in the year prior to the commencement of this bankruptcy case, the Defendants received transfers of the Debtor's funds in an amount of not less than \$4,500.00 ("Transfers").
6. That, in the year prior to filing, there may have been other transfers from the Debtor or of the Debtor's property to the Defendants that have not been disclosed to the Trustee ("Undisclosed Transfers").
7. The Transfers were made when the Debtor was insolvent or caused the Debtor to become insolvent.
8. That said Transfers are avoidable by the Trustee under 11 U.S.C. § 547 and Minn. Stat. §§ 513.44 and 513.45 and the property transferred or the value thereof recoverable under 11 U.S.C. § 550 and Minn. Stat. § 513.47.
9. That the Undisclosed Transfers, if any, are avoidable by the Trustee under 11 U.S.C. § 544, 547 and/or 548 and recoverable under 11 U.S.C. § 550, 551 and Minn. Stat. § 513.47
10. At all relevant times there was at least one creditor of the Debtor.

WHEREFORE, Plaintiff respectfully requests that this court make its Order:

- (1) Avoiding any and all transfers from the Debtor to the Defendants in the year prior to filing under the authority of 11 U.S.C. § 547 and Minn. Stat. §§ 513.44, 513.45 and awarding Plaintiff the value thereof under 11 U.S.C. § 550 and Minn. Stat. § 513.47.
- (2) Entering judgment against the Defendants Raymond Reno and Harriet Reno in the amount of \$4,500.00; and
- (3) Avoiding the Undisclosed Transfers under the authority of 11 U.S.C. § 544, 547 and/or 548 and ordering recovery of those transfers under 11 U.S.C. § 550 or 551.
- (4) Awarding the Plaintiff his costs and disbursements in this action and

(5) Granting such other and further relief as is just and equitable.

FULLER, SEAVER & RAMETTE, P.A.

Dated: July _14_, 2004

By: ___/e/ Roger B. Seaver _____
Roger B. Seaver #251227
Randall L. Seaver #152882
12400 Portland Ave. S., Suite 132
Burnsville, MN 55337
(952) 890-0888

Attorneys for Plaintiff