

THE HONORABLE PAUL B. SNYDER

LOCATION: TACOMA
CHAPTER: 7

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RONALD W. AKERS
MARIE AKERS,

Debtors.

MICHAEL D. HITT, Trustee on Behalf of the
Bankruptcy Estate of AKERS,

Plaintiff,

vs.

J. HASS GROUP, LLC dba
J. HASS GROUP, an Arizona company,

Defendant.

Case No. 09-47987

ADVERSARY NO.

COMPLAINT TO RECOVER
FRAUDULENT CONVEYANCES

Plaintiff, Michael D. Hitt, as trustee of the debtors' estate, by and through his attorney of record, for his cause of action against the defendant, states, claims and alleges as follows:

COMPLAINT TO RECOVER
FRAUDULENT CONVEYANCES - 1

MICHAEL D. HITT, Trustee
P.O. Box 65530
University Place, WA 98464-5530
Phone (253) 212-1130
Fax (253)212-1051

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I. PARTIES

1.1. Plaintiff. Michael D. Hitt is the duly qualified and acting trustee of the debtors' bankruptcy estate, appointed pursuant to Court order.

1.2. Defendant. J. HASS GROUP, LLC is an Arizona registered and licensed company doing business in all regions of the United States via the internet or worldwide web.

II. JURISDICTION AND VENUE

2.1 Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1334(b). Venue is established pursuant to 28 U.S.C. § 1409(a).

2.2 This action is a core proceeding pursuant to 28 U.S.C. §§157(b)(1) and (b)(2)(H).

III. FACTS

3.1 On October 24, 2009, debtors filed a petition for bankruptcy relief.

3.2 In or about late 2008, the debtors executed an agreement with the defendant creating a financial obligation to the same in exchange for purported assistance in negotiating and settling their outstanding debts with their creditors.

3.3 Between November, 2008 and October, 2009, debtors paid and transferred to defendant through a series of ACH bank transactions and deductions from their bank account the sum of \$5445.96.

