

Jeremy J. Gugino
Chapter 7 Bankruptcy Trustee
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF IDAHO**

In Re:

ANGELOS, KERRY RANDALL
ANGELOS, JACQUELINE LEE

Debtor(s)

CHAPTER 7

CASE NO. 11-01289-JDP

**NOTICE OF MOTION FOR
TURNOVER FOR ESTATE
PROPERTY**

Notice of Motion for Turnover and Opportunity to Object and for a Hearing

No Objection. The Court may consider this request for an order without further notice or hearing unless a party in interest files an objection within 14 days of the date of this notice. If an objection is not filed within the time permitted, the Court may consider that there is no opposition to the granting of the requested relief and may grant the relief without further notice or hearing.

Objection. Any objection shall set out the legal and/or factual basis for the objection. A copy of the objection shall be served on the movant.

Hearing on Objection. The objecting party shall also contact the court's calendar clerk to schedule a hearing on the objection and file a separate notice of hearing.

COMES NOW the Trustee, **Jeremy J. Gugino**, in the above-entitled matter and moves this Court pursuant to 11 U.S.C. §521(a)(4) to issue an order compelling Debtor to turnover the following property: All of Debtors' personal bank and business bank statements with an explanation of every expenditure and deposit of \$500.00 or more from the period beginning 4/29/2011 and ending 12/31/2011; copies of all pay stubs from the same period and evidence of the monthly mortgage or rent rate they have been paying during that same time period.

In support of this motion, the Trustee alleges as follows:

1. In late October 2011 Trustee received a communication from a potential interested party in this case that Debtors may be attempting to collect, either individually or through an entity or entities rent from real property being used for farming operations in Caldwell, Idaho.
2. Debtors have previously testified under oath that their various entities are worthless. Furthermore, they have not listed any rental income in their schedule I or statement of financial affairs, q. 1 or 2.
3. Trustee has made demand for the above information via letter dated 11/1/2011.
4. Trustee followed this demand by emailing a copy of the letter to Debtors and/or their attorney(s) on 11/29/2011, 12/12/2011, 12/19/2011, and 1/6/2012.
5. Neither Debtors nor their attorney(s) have cooperated.
6. For the above reasons, the Trustee respectfully requests the Court grant Trustee's motion and order that the above noted documents and information be turned over to the Trustee.

Date: January 13, 2012

/s/ Jeremy J. Gugino
Chapter 7 Bankruptcy Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this date as indicated below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the individuals so noted below. I further certify that, on the same date, I have mailed by United States Postal Service the foregoing document to the following non-EM/ECF Registered Participant(s) either listed below or on an attached list.

**Electronic Notification* _____

U.S. TRUSTEE
ECF: ustp.region18.bs.ecf@usdoj.gov

Served by U.S. MAIL _____

ANGELOS, KERRY RANDALL
ANGELOS, JACQUELINE LEE
P.O. BOX 2506
EAGLE, ID 83616

Scott Sims
4675 MacArthur Court, Suite 1200
Newport Beach, CA 92660

/S/ Jeremy J. Gugino
Chapter 7 Bankruptcy Trustee
Date: January 13, 2012