BANKRUPTCY

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WHAT WE'LL LEARN

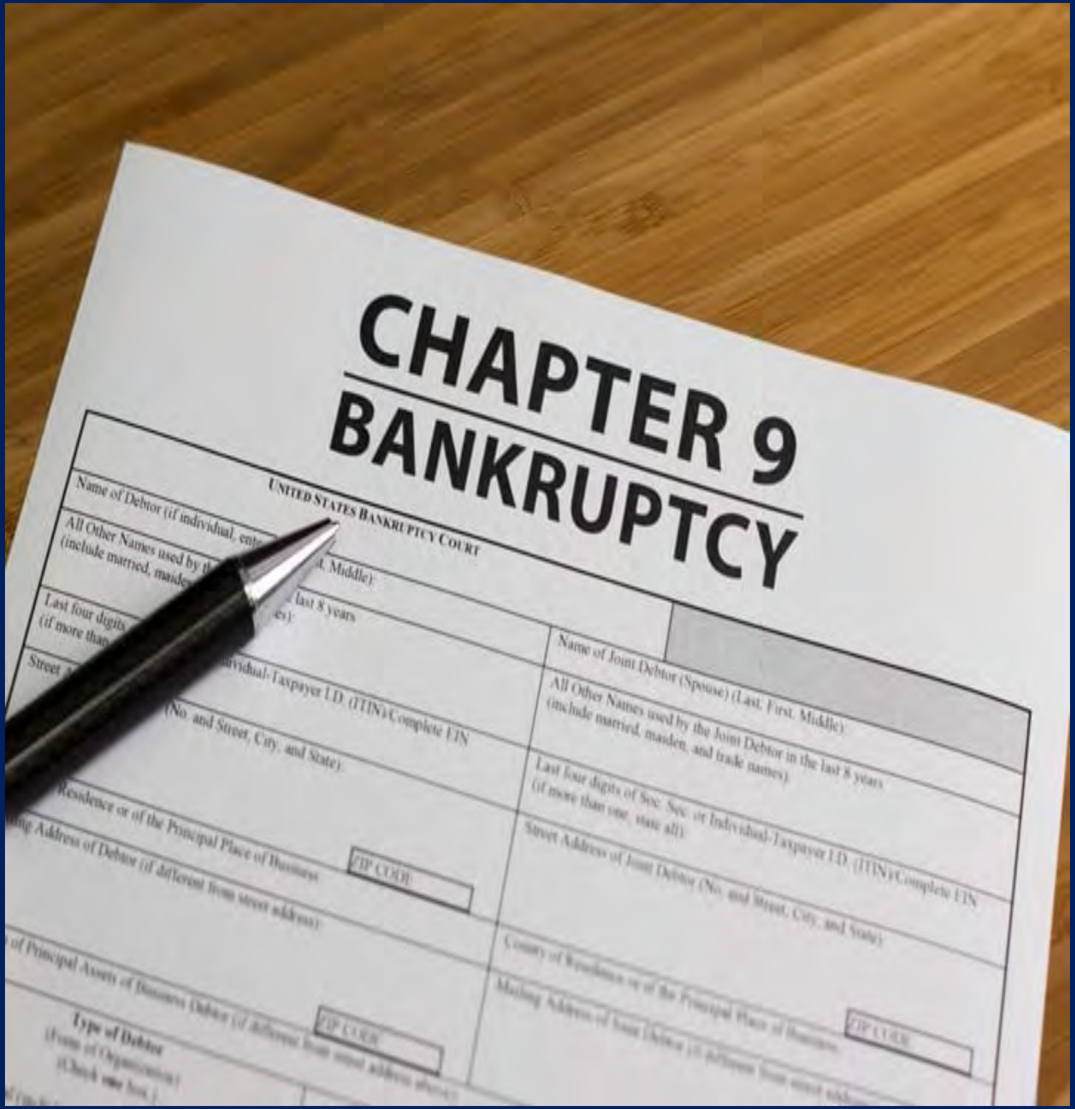
- Goals
- Chapters
- Players
- Automatic stay
- IV-D enforcement
- Filing appearances and claims
- Bankruptcy remedies
- Effect of a discharge injunction

Goals of Modern Bankruptcy

- Debtor's "fresh start"
- Equitable division of property
- Rehabilitation of business debtor

Common Chapters for Filing Bankruptcy

- Ch. 7 – Liquidation
- Ch. 11 – Business reorganization and high-debt individuals
- Ch. 12 – Family Farmers & Fisherman
- Ch. 13 – Individual Reorganization



Chapter 7 - Liquidation

- Estate = non-exempt property when bankr is filed
  (does NOT include future income)

- Trustee collects / sells assets to pay off creditors

- 90-day process from start to finish

Chapter 13 - Reorganization

- Estate = non-exempt property when bankr is filed PLUS future income
- Debtor proposes a plan
  - Creditors and trustee may object
- Confirmed plan is binding on all parties
- Usually 3-5 years, maybe longer (COVID)

The Players

- Judge
- U.S. Trustee
- Ch. 7 trustee
- Ch. 13 trustee
- Debtor
- Creditors
- Attorneys & others

The Judge

- Appointed by U.S. Court of Appeals

- 14-Year term

U.S. Trustee

- Oversees administration of bankruptcy cases and private trustees

- Broad administrative and regulatory authority

- Mission = promote integrity and efficiency of bankruptcy system

- Executive Office in DC, 21 regions with 90 field offices nationwide

Chapter 7 Trustee

- Usually a private attorney
- Appointed by U.S. Trustee to a rotation
- Job = liquidate debtor's nonexempt property and pay off creditors

Chapter 13 Trustee

- Standing trustee
- Appointed by U.S. Trustee to a rotation
- Job = receive debtor's monthly payments and distribute to creditors on a payment plan

Debtor

- A person or entity that owes money to a creditor

- The person or entity that has filed for bankruptcy relief

- Spouses may be joint debtors

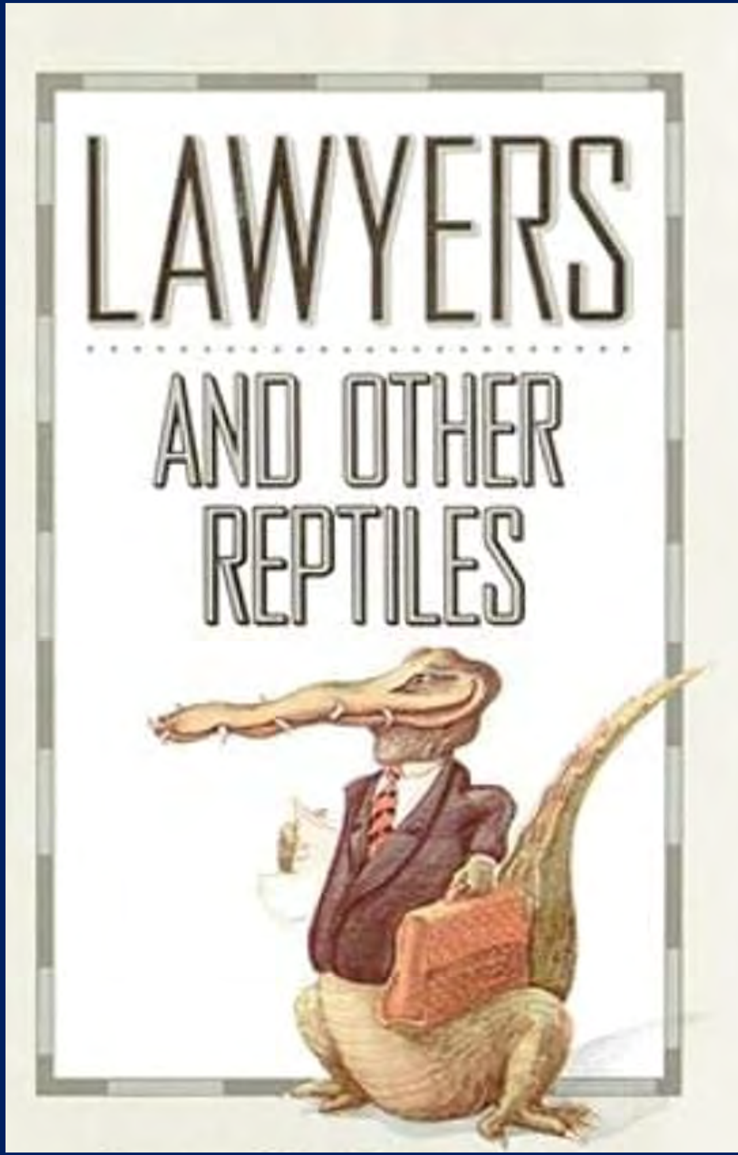
Creditor

- A person or entity to whom the Debtor owes money

- A person or entity that has a claim against the Debtor

Attorneys and Others

- Debtor's attorneys
- Creditor's attorneys
- Trustee staff attorneys and staff
- IV-D attorneys and staff



Fundamentals

- Child support is nondischargeable
  - Even if owed to the state
- Child support = priority claim
- Ch 7 – paid in front of other debts
- Ch 13 – Pre-petition arrearage must be paid in full by end of Ch. 13 plan, unless:
  - Obligee consents or
  - Arrearage is owed to the state

CHAPTER 13 TIMELINES

- Plan must be filed within 14 days of bankr petition
- Debtor must start paying trustee w/in 30 days of bankr petition
- Trustee holds payments until plan is confirmed
- Child support creditors have six months to file claims

THE AUTOMATIC STAY - § 362

STAY!!

AUTOMATIC STAY BEGINS

Stay begins *automatically* when bankruptcy petition is filed

- Most actions are STAYED; transactions are VOID
  - Even if you didn't have notice
- Innocent violations = actions still void, but no sanctions
- Willful violations = contempt, fines, trouble
- Seek relief from stay (even for comfort, if unsure)

AUTOMATIC STAY ENDS

Actions *against the debtor* (e.g., contempt):

- At earlier of discharge, dismissal or case closure

Actions *against estate property* (e.g., foreclosure)

- When property is no longer estate property, e.g.,
  - Trustee abandons estate property
  - Bankr case closes

AUTOMATIC STAY ENDS

Ch. 7 – apprx. 90 days

Ch. 13 – could be 5 years, even 7 years (COVID)

AUTOMATIC STAY VS.
BINDING EFFECT OF A CONFIRMED PLAN

AUTOMATIC STAY VS.
BINDING EFFECT OF A CONFIRMED PLAN

BAPCPA exemptions to automatic stay:

- Income withholding
- License suspension
- Credit reporting
- Tax refund offset
- Medical support enforcement

AUTOMATIC STAY VS.
BINDING EFFECT OF A CONFIRMED PLAN

Violating confirmed plan =

- Contempt
- Fines
- Other sanctions

DON'T RELY ON EXEMPTIONS TO AUTOMATIC STAY (CH. 13)

- If necessary, object to the plan

ACTIONS ALLOWED / PROHIBITED

ALWAYS OK

- Establish Paternity
- Establish Support
- Modify Support
- Initiate or Continue with Criminal Proceedings

NEVER OK
(Without bankruptcy court permission)

- Contempt actions
- Initiate liens on estate property
- Foreclose on estate property
- Suspend / revoking passport
- Demand letters for pre-petition debt

SOMETIMES OK

- Income withholding
- License suspension
- Credit reporting

- Tax refund interception
- Enforcing medical support order

SOMETIMES OK --- DEPENDS ON:

- Ch. 7 – Always OK
- Ch. 13 –
  - Ok up to plan confirmation
  - Probably NOT OK after confirmation
  - When in doubt - seek bankr court permission

OTHER ENFORCEMENT REMEDIES

OTHER ENFORCEMENT REMEDIES

<u>Charging Interest</u> –

- Interest OK if already in child support order
- Not OK to obtain post-petition interest order in Ch 13 cases

<u>Discovery</u> –

- OK for establishing paternity or support, or for modifying support
- Not OK for seeking info for contempt

OTHER ENFORCEMENT REMEDIES

FIDM –

- Not OK

Passport Suspension –

- Not OK to suspend while in bankruptcy
- If already suspended, no requirement to give it back
- But do not negotiate lump sum for release to liquidate pre-petition arrearage

OTHER ENFORCEMENT REMEDIES

Probation Revocation / Payment of restitution –

- OK if purpose is to rehabilitate NCP
- Not OK if purpose is to collect the debt

QDRO –

- OK if pension plan is subject to ERISA's anti-assignment rule
- Not OK if pension plan is not subject to ERISA's anti assignment rule

OTHER ENFORCEMENT REMEDIES

Renewal of Judgments –

- OK if merely to preserve status quo
- Not OK if intended to create, perfect or enforce a lien against estate property

UIFSA Registration of Foreign Support Order –

- Ok if registration is to modify
- OK if mere registration without enforcement
- Not OK to enforce following registration

OTHER ENFORCEMENT REMEDIES

<u>Worker's Compensation</u> –

- Not OK – same as lien on estate property

MANAGING AUTOMATED ENFORCEMENT

MANAGING AUTOMATED ENFORCEMENT

Early - Systematically suppress automated enforcement when notified of bankruptcy

- Suppress all actions, even those that are not stayed
- Legal safety

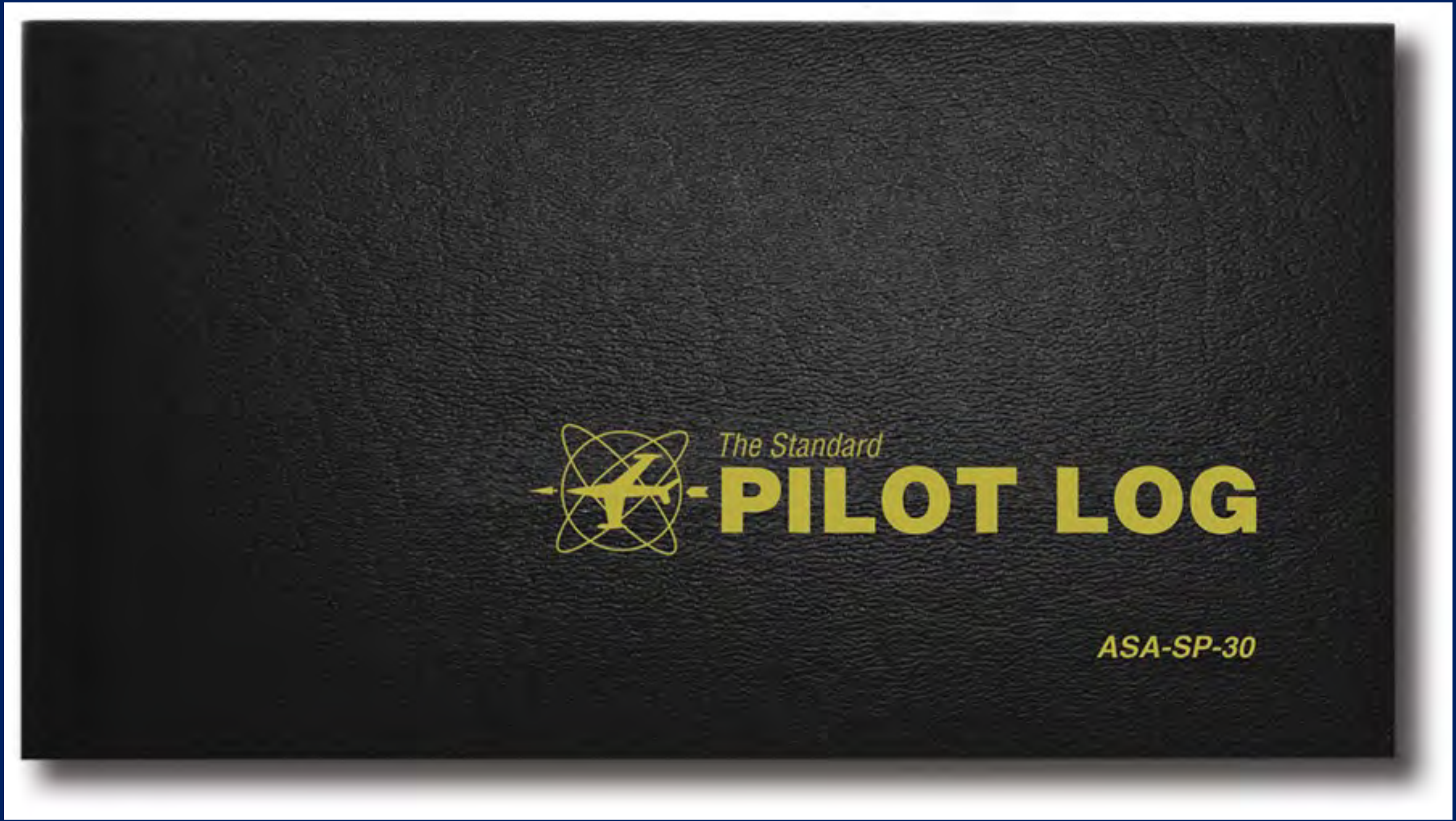
Late - Suppress when actions are prohibited by confirmed plan

- Examples: I/W for pre-petition arrears, tax offset
- Greater collections

MANAGING AUTOMATED ENFORCEMENT
Set Reminders / Alarms / Calendars

MANAGING AUTOMATED ENFORCEMENT

Keep a log



CONVERSION FROM ONE CHAPTER TO ANOTHER

- Cases can get converted from one chapter to another

- From 13 to 7 eliminates limitations of confirmed plan

- From 7 to 13 – imposes plan limitations upon confirmation

- No need to file new appearance
- No need to file new claim(s)

APPEARING IN BANKRUPTCY CAUSE

APPEARING IN BANKRUPTCY CAUSE - PROS

- Get notified of all actions, motions, etc.
  - Includes DSO notice when requesting discharge
- Allows you to file motions, objections, etc.
- Others know how to contact you
  - Facilitates communication with attys, trustee, etc.
  - Allows you to better manage your child support case
  - May help alleviate issues or actions against you

APPEARING IN BANKRUPTCY CAUSE - CONS

- Waive sovereign immunity
- Inbox bombarded with emails, notices from the court
- Requires organization and diligence to stay on top of a large case load
- Significant data input into child support systems
  - But modern child support systems may send you alerts to keep you on track

WHEN TO FILE AN APPEARNCE - Form B 2810

File early - when notified of bankr action (Ch 13 only)

- keeps you informed
- saves you $$ for downloading plan and other docs
- let's everyone know IV-D is involved
- keeps you apprised of deadlines to file objections, etc

Ok to file late –

- keep tabs on the case
- get notified of applications for Ch 13 discharge

HOW TO FILE AN APPEARNCE - Form B 2810

Required information –

- Name of Debtor(s), cause number and court
- Arrears amount – as of bankruptcy filing date
  - Specify amount owed to CP / State, if both

Best practice

- Include name(s) of obligee(s)
- Include child support case number(s)

EXAMPLE

(certificate of service not shown)

If some / all arrearage is assigned, specify amounts

United States Bankruptcy Court

Southern District Of Indiana

In re Daddy Deadbeat, Debtor(s) Case No. 23-05100-JMC-13

APPEARANCE OF CHILD SUPPORT CREDITOR*
OR REPRESENTATIVE

I certify under penalty of perjury that I am a child support creditor* of the above-named debtor, or the authorized representative of such child support creditor, with respect to the child support obligation which is set out below.

Name:
Organization:
Address:

Telephone Number:

05/22/2023 — Date

X Joe Schmo, Deputy Prosecutor — Child Support Creditor* or Authorized Representative

Summary of Child Support Obligation

Amount in arrears:
$ 4,000.00 (obligee Mommy Dearest)

Amount currently due per week or per month:
on a continuing basis:
$ $100.00 per week
(per week) (per month)

If Child Support has been assigned:

Amount of Support which is owed under assignments:
$ ______________

Amount owed primary child support creditor (balance not assigned):
$ ______________

... itemized statement of account. Do not disclose the name of a minor child. See 11 U.S.C. § 112. If a social security number or a taxpayer identification number is included, set out only the last four digits of the number. Judicial Conference Privacy Policy (09/01).

* Child support creditor includes both creditor to whom the debtor has a primary obligation to pay child support as well as any entity to whom such support has been assigned, if pursuant to Section 402(a)(26) of the Social Security Act or if such debt has been assigned to the Federal Government or to any State or political subdivision of a State.

IF NO APPEARNCE

- Suppress manual and automated enforcement as needed
- Advise custodial parent of remedies, advisement to seek counsel (see Illinois example)
- Monitor bankruptcy case
- Reinstate enforcement when bankruptcy case closes

FILING A PROOF OF CLAIM

FILING A PROOF OF CLAIM – PROS (1 of 3)

- Clarifies records of all debts owed
- Trustee includes child support in determining plan feasibility
- Buttresses later-filed motions, e.g., MTD, relief from stay, obj to discharge and/or confirmation
- Allows ability to file amended claim

FILING A PROOF OF CLAIM – PROS (2 of 3)

- Trustee manages payment compliance
- Trustee Ensures full payment over the life of the plan
- Trustee files MTD, objections to confirmation and discharge
- Trustee prefers claims to stay informed
- Debtor may prefer to stretch out payments

FILING A PROOF OF CLAIM – PROS (3 of 3)

- Technically, payments required “through the plan.” § 1322
- Trustees may allow “direct” payments outside the plan
  - Debtors often prefer this to avoid trustee fees
  - You must monitor compliance
  - But at least plan reflects the arrearage

FILING A PROOF OF CLAIM – CONS (1 of 2)

- “If it ain’t broke, don’t fix it.”
- May prolong liquidation of pre-petition debt
- Requires suppressing I/W and careful case monitoring

FILING A PROOF OF CLAIM – CONS (2 of 2)

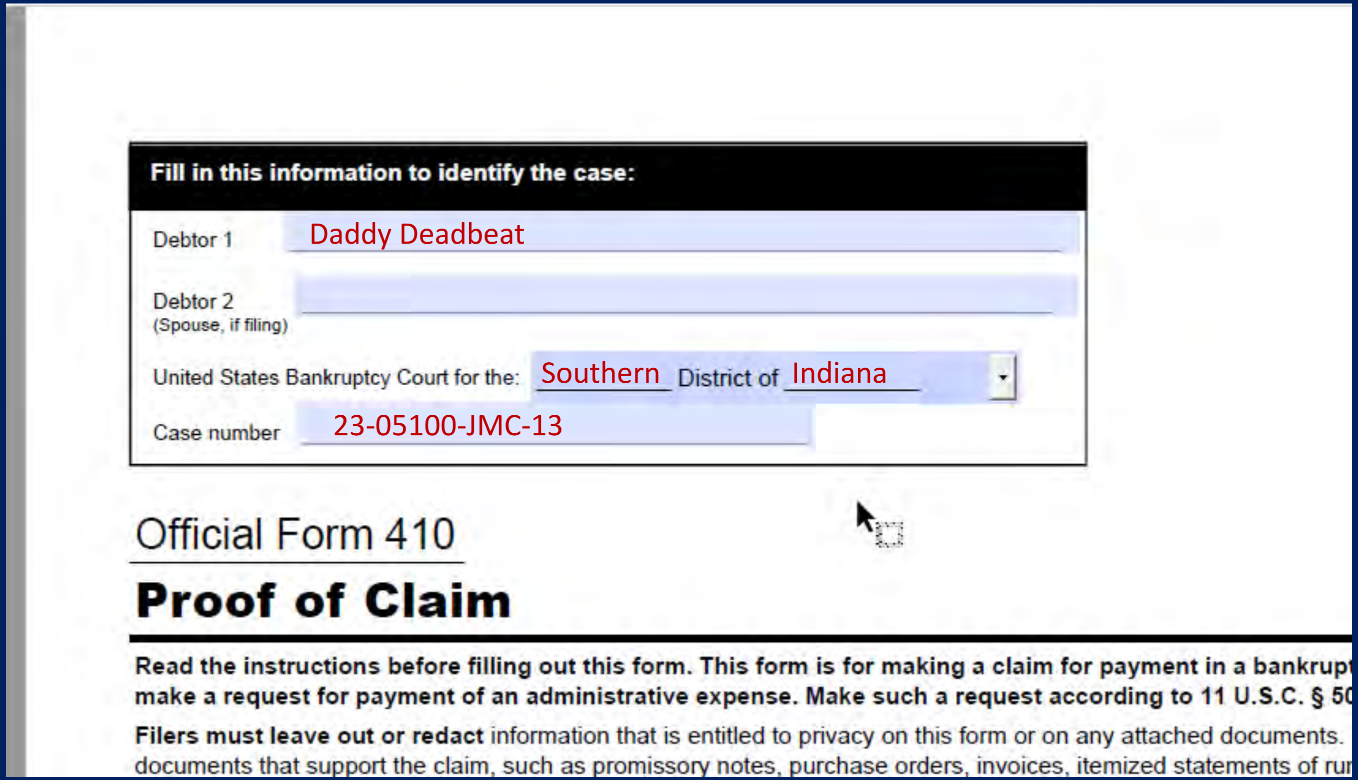
- May prevent bankruptcy itself – which may impede collections
- More paperwork to complete and file
- May anger debtor's attorney – imposes trustee fees

HOW TO COMPLETE A POC – Form B 410 (1 of 9)

Enter Debtor (and co-debtor, if any)

Enter court
(use dropdown list)

Enter full court cause number


Fill in this information to identify the case:

Debtor 1 Daddy Deadbeat

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: Southern District of Indiana

Case number 23-05100-JMC-13

Official Form 410

Proof of Claim

Read the instructions before filling out this form. This form is for making a claim for payment in a bankrup
make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 50

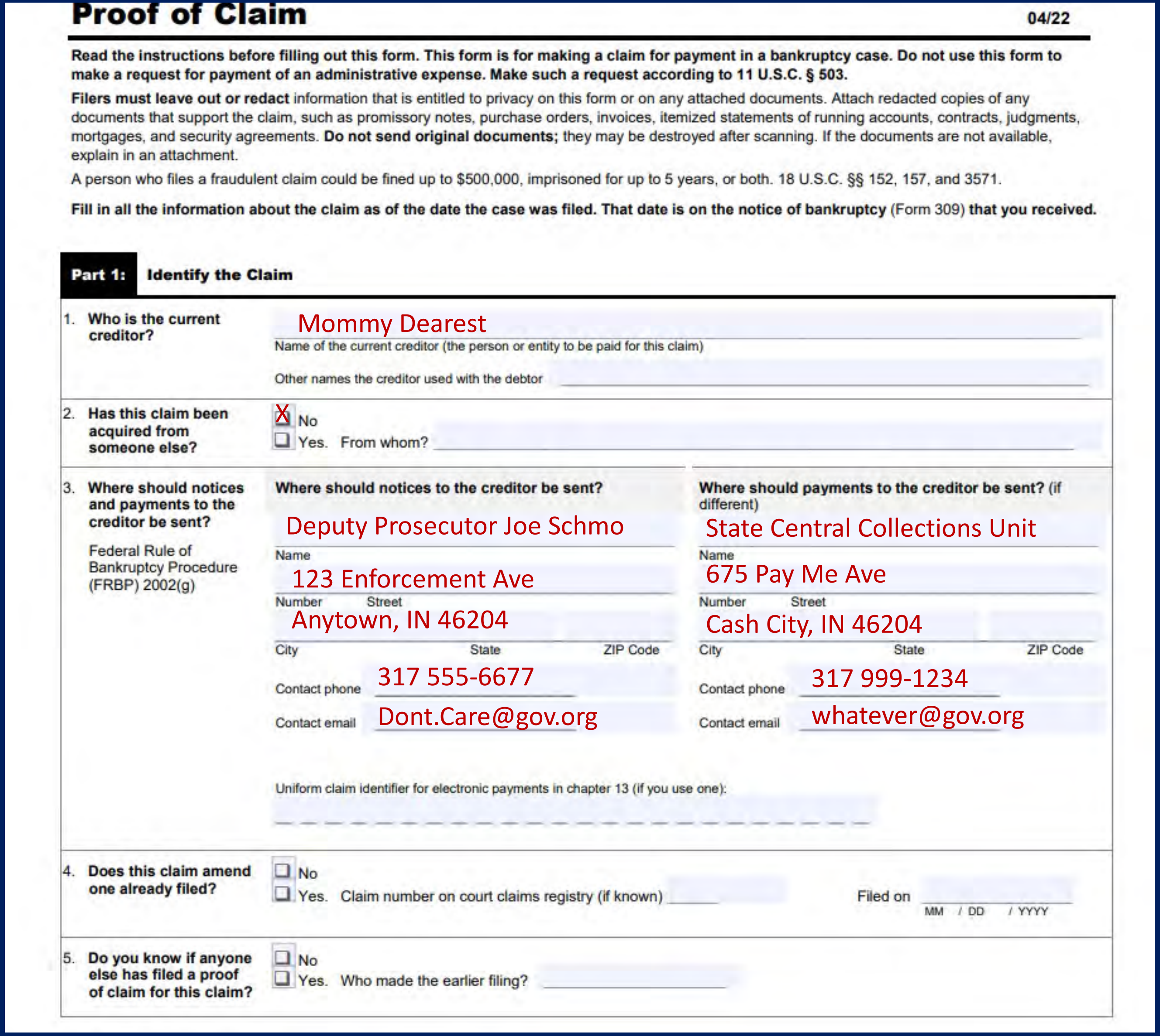
Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents.
documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of ru

HOW TO FILE A POC – Form B 410 (2 of 9)

<u>Line 1</u> – Creditor = Obligee (or support enforcement agency)

<u>Line 2</u> – Claim acquired from someone else - NO

<u>Line 3</u> – Send notice to enforcement agency; Send payments to SDU



Proof of Claim 04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) **that you received.**

Part 1: Identify the Claim

1. **Who is the current creditor?**
   Mommy Dearest
   Name of the current creditor (the person or entity to be paid for this claim)
   Other names the creditor used with the debtor

2. **Has this claim been acquired from someone else?**
   X No
   ☐ Yes. From whom?

3. **Where should notices and payments to the creditor be sent?**
   Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	**Where should payments to the creditor be sent?** (if different)
Name: Deputy Prosecutor Joe Schmo	Name: State Central Collections Unit
Number Street: 123 Enforcement Ave	Number Street: 675 Pay Me Ave
City State ZIP Code: Anytown, IN 46204	City State ZIP Code: Cash City, IN 46204
Contact phone: 317 555-6677	Contact phone: 317 999-1234
Contact email: Dont.Care@gov.org	Contact email: whatever@gov.org

   Uniform claim identifier for electronic payments in chapter 13 (if you use one):

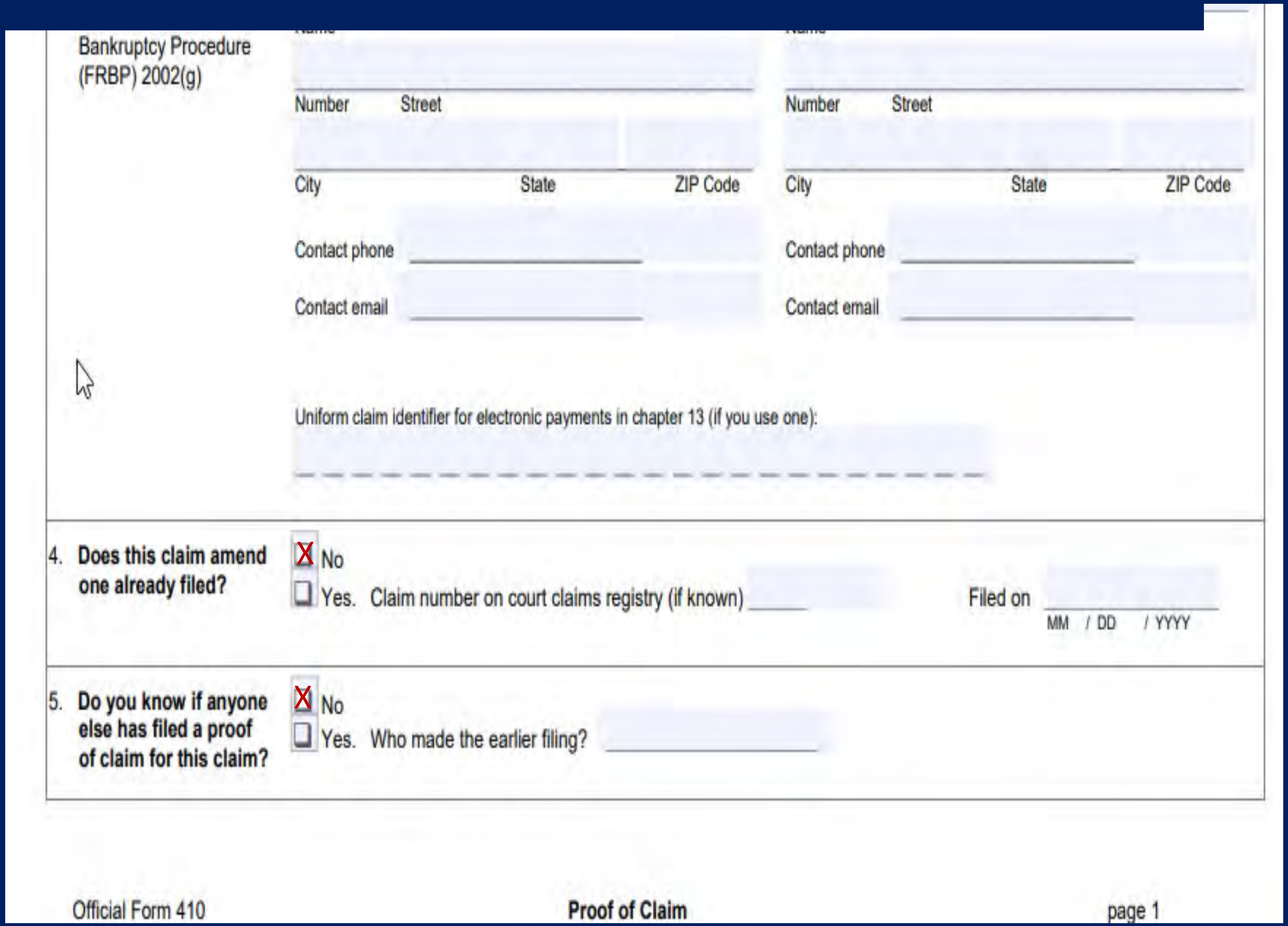
4. **Does this claim amend one already filed?**
   ☐ No
   ☐ Yes. Claim number on court claims registry (if known) ______ Filed on MM / DD / YYYY

5. **Do you know if anyone else has filed a proof of claim for this claim?**
   ☐ No
   ☐ Yes. Who made the earlier filing?

HOW TO FILE A POC – Form B 410 (3 of 9)

Line 4 – Amended claim?
[ ] yes [ ] No

Line 5 – check to see if obligee (or another agency) has filed a separate claim



Bankruptcy Procedure (FRBP) 2002(g)

Number Street

City State ZIP Code

Contact phone

Contact email

Number Street

City State ZIP Code

Contact phone

Contact email

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?
X No
❑ Yes. Claim number on court claims registry (if known) _____ Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
X No
❑ Yes. Who made the earlier filing?

Official Form 410 Proof of Claim page 1

HOW TO FILE A POC – Form B 410 (4 of 9)

<u>Line 6</u> – use child support case number, not obligor's SSN

- Important where obligor has multiple child support cases
- File multiple claims
- Use unique account number for each case

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?**
   - ☐ No
   - ☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 4567

7. **How much is the claim?** $ ____________ . **Does this amount include interest or other charges?**
   - ☐ No
   - ☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?** Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

   Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

   Limit disclosing information that is entitled to privacy, such as health care information.

9. **Is all or part of the claim secured?**
   - ☐ No
   - ☐ Yes. The claim is secured by a lien on property.

     Nature of property:

HOW TO FILE A POC – Form B 410 (5 of 9)

Line 7 – Claim amount

- If balance includes interest, attach calculation
- Arrearage as of date bankruptcy was filed (pre-petition debt)
- Claim amount must match amount placed on Line 12

Part 2: **Give Information About the Claim as of the Date the Case Was Filed**

6. **Do you have any number you use to identify the debtor?**
   - ☐ No
   - ☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 4567

7. **How much is the claim?** $ 4,000.00 . **Does this amount include interest or other charges?**
   - ☒ No
   - ☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?** Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

   Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

   Limit disclosing information that is entitled to privacy, such as health care information.

9. **Is all or part of the claim secured?**
   - ☐ No
   - ☐ Yes. The claim is secured by a lien on property.

     Nature of property:

HOW TO FILE A POC – Form B 410 (6 of 9)

<u>Line 8</u> – Basis for Claim – “child support arrearage”

- State whether arrearage is owed to CP, State, or both

- Specify how much is owed to each

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?**
   ☐ No
   ☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 4567

7. **How much is the claim?** $ 4,000.00
   Does this amount include interest or other charges?
   ☒ No
   ☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?**
   Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
   Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
   Limit disclosing information that is entitled to privacy, such as health care information.
   child support – All owed to obligee, none owed to state

9. **Is all or part of the claim secured?**
   ☐ No
   ☐ Yes. The claim is secured by a lien on property.
   Nature of property:

HOW TO FILE A POC – Form B 410 (7 of 9)

Line 9 – Is claim secured?

- Ordinarily mark "No."
- You may have secured interest in property, *e.g.*, vehicle

8. **What is the basis of the claim?**

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

child support – All owed to obligee, none owed to state

9. **Is all or part of the claim secured?**

X No

☐ Yes. The claim is secured by a lien on property.

Nature of property:

☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim.*

☐ Motor vehicle

☐ Other. Describe: ____________________

Basis for perfection: ____________________

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: $__________

Amount of the claim that is secured: $__________

Amount of the claim that is unsecured: $__________ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: $__________

Annual Interest Rate (when case was filed)______%

☐ Fixed

☐ Variable

10. **Is this claim based on a lease?**

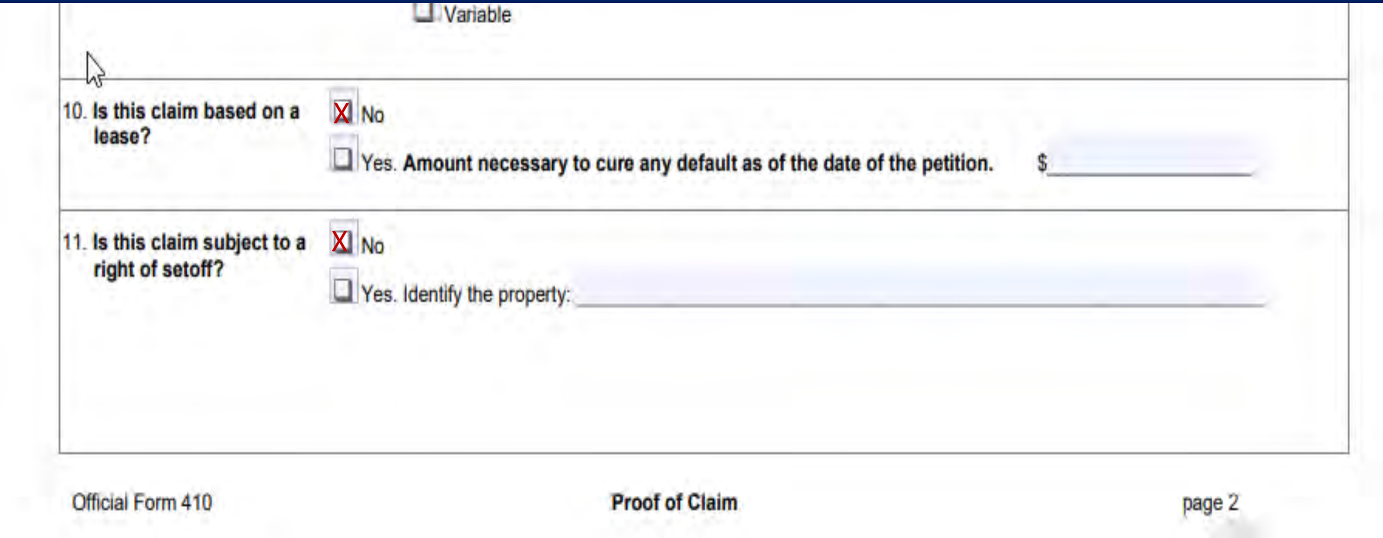
☐ No

☐ Yes. **Amount necessary to cure any default as of the date of the petition.** $__________

HOW TO FILE A POC – Form B 410 (8 of 9)

<u>Line 10</u> – Is claim based on a lease? "No"

<u>Line 11</u> – Is claim subject to a setoff? "No"


Variable

10. Is this claim based on a lease?
X No
☐ Yes. Amount necessary to cure any default as of the date of the petition. $______

11. Is this claim subject to a right of setoff?
X No
☐ Yes. Identify the property: ______

Official Form 410 | Proof of Claim | page 2

HOW TO FILE A POC – Form B 410 (9 of 9)

Line 12 – Priority claim? – “Yes”

- DSO under 11 § USC 507(a)(1)(A) or (a)(1)(B)

Signature Line – Check “I am the creditor’s attorney or authorized agent.”

12. **Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No

X Yes. *Check one:*

Amount entitled to priority

X Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). $ 4,000.00

☐ Up to $3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). $____

☐ Wages, salaries, or commissions (up to $15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). $____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). $____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). $____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)(__) that applies. $____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

X I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

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

Executed on date 05/22/2023
MM / DD / YYYY

Joe Schmo, Deputy Prosecutor
Signature

Print the name of the person who is completing and signing this claim:

BANKRUPTCY REMEDIES (1 of 4)

Motion for Relief from Stay –

- Can be filed anytime in Ch. 7 or 13
- If granted in full, allows you to “ignore” bankruptcy
- Pros – enforce as usual (court or admin) in more familiar territory
- Cons – partial relief from stay = requires greater attention to allowed/prohibited actions

BANKRUPTCY REMEDIES (2 of 4)

Objection to Confirmation –

- Ch 13 – failure to pay post-petition csup
- Pros – Incentivizes payments, good leverage tool
- Cons – usually requires multiple bankruptcy hearings

BANKRUPTCY REMEDIES (3 of 4)

Motion to Dismiss –

- Usually filed by trustee
- May be filed anytime in Ch. 13 but usually after confirmation
- Usually filed by IV-D when debtor fails to pay post-petition support

BANKRUPTCY REMEDIES (4 of 4)

Objection to Discharge –

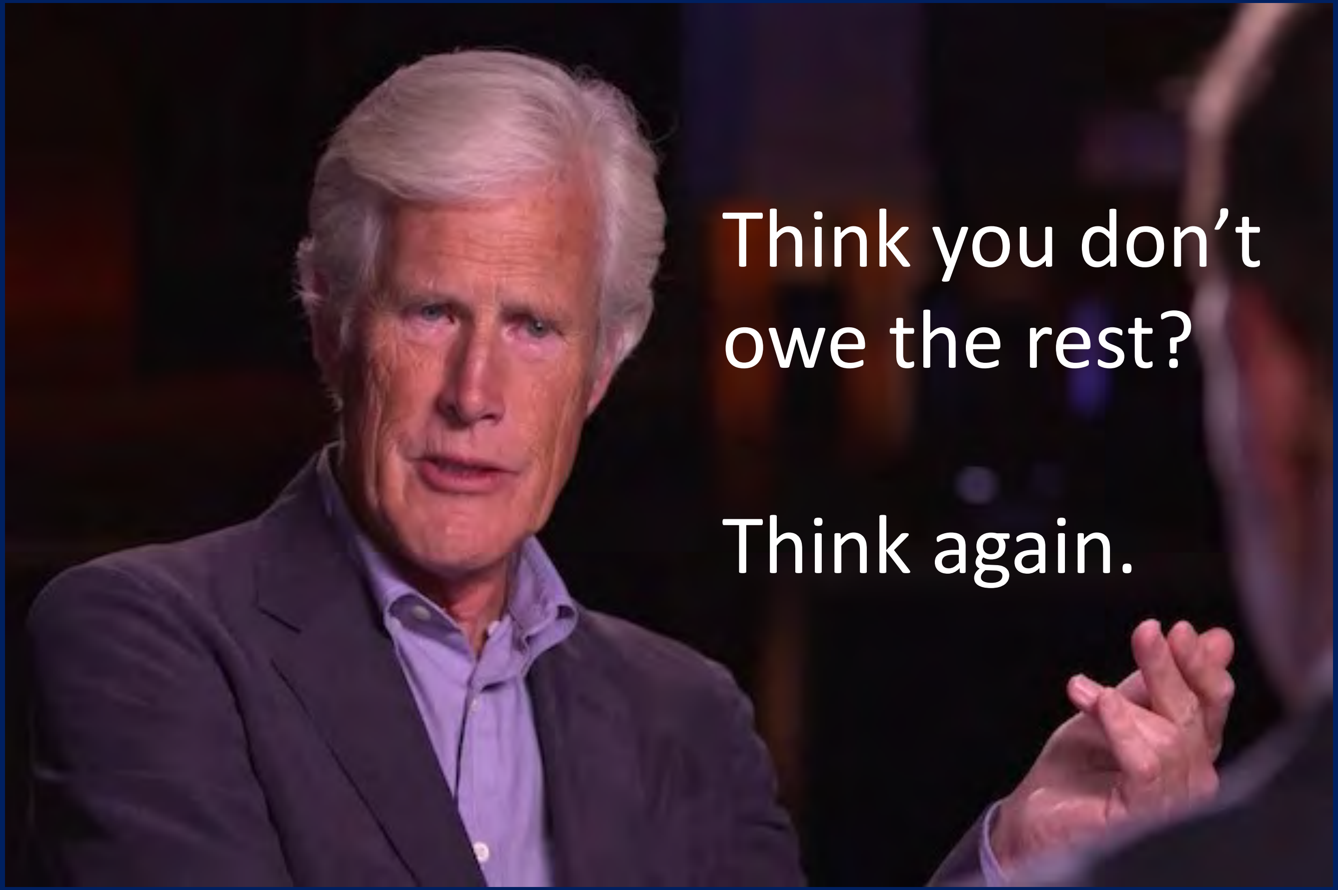
- Ch 13 – Debtor must certify payment of pre-petition arrearage and all post-petition support

- Useful if you've joined the IV-D case after confirmation
  - Notice to all parties (good reason to file appearance)

**Examples of all motions/objections are provided in attached materials

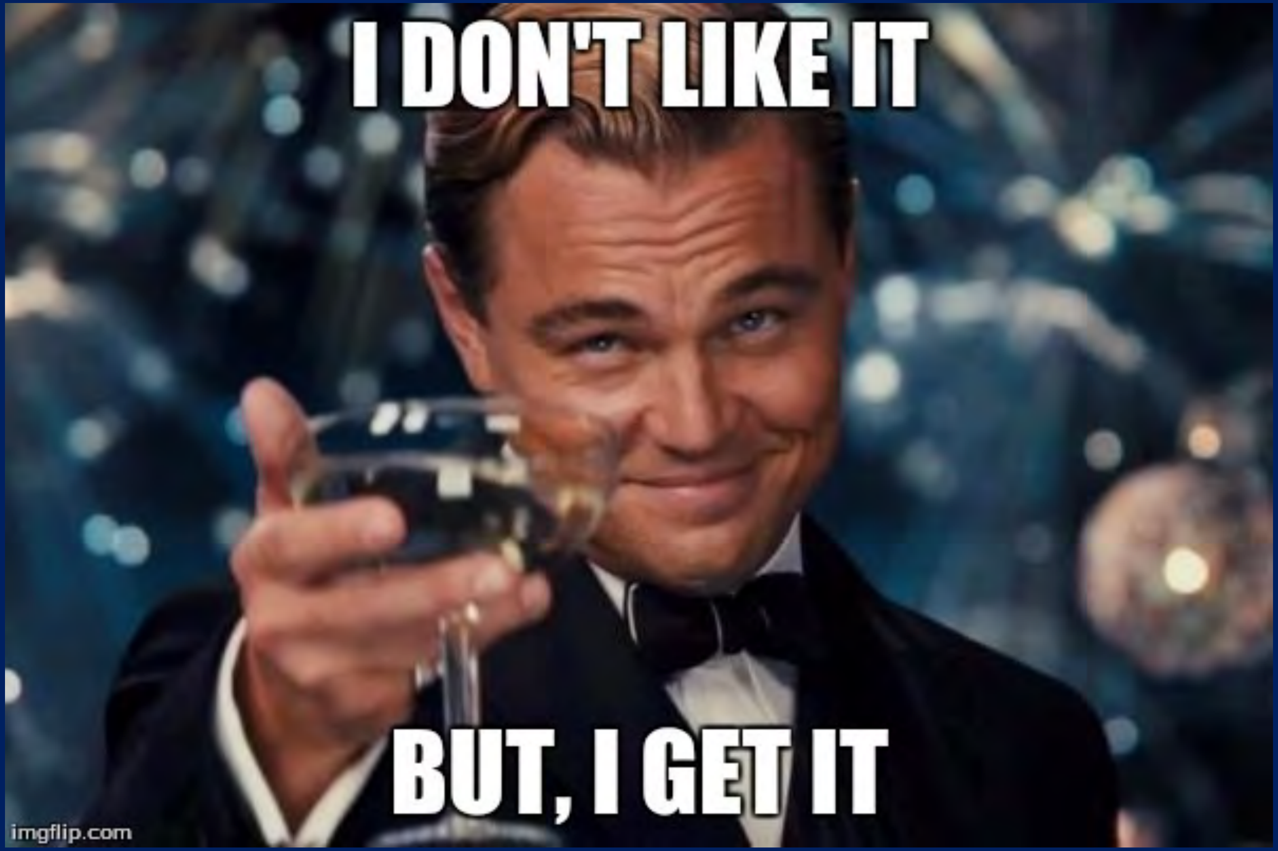
EFFECT OF A DISCHARGE INJUNCTION

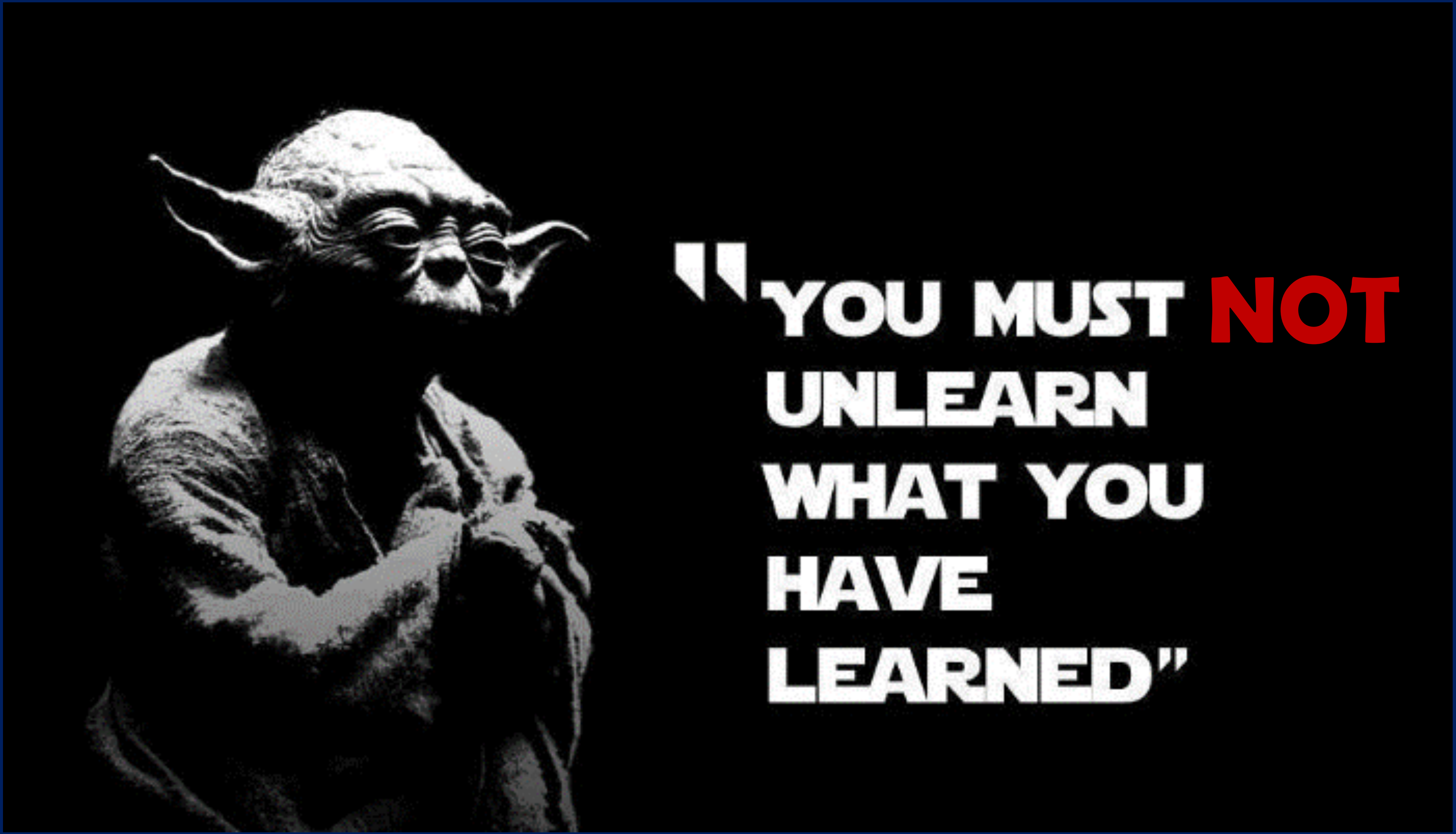
- Child support not dischargeable
- Exception where bankr court fully adjudicates arrearage



WHAT WE'VE LEARNED

- Goals
- Chapters
- Players
- Automatic stay
- IV-D enforcement
- Filing appearances and claims
- Bankruptcy remedies
- Effect of a discharge injunction




"YOU MUST NOT
UNLEARN
WHAT YOU
HAVE
LEARNED"

REMEMBER – IT'S ALL ABOUT THE KIDS


AND THAT'S ALL I HAVE
TO SAY ABOUT THAT.

For questions or comments, please contact my agent:

Pippin von Beast

STINKINBEAST, LLP

WORKING HARD FOR YOUR JUSTICES

NO COOKIES FOR ME UNLESS YOU WIN