

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF COLORADO**

<p>In re:</p> <p style="text-align: center;">Matt Garton and Associates, LLC, EIN: 73-1684711 Debtor.</p>	<p>Case No.: 19-18917-TBM Chapter: 7</p>
<p>Jeffrey A. Weinman, as Chapter 7 Trustee of the Estate of Matt Garton and Associates, LLC,</p> <p style="text-align: center;"><b>Plaintiff</b></p> <p>v.</p> <p>BBVA USA Inc., an Alabama Corporation</p> <p style="text-align: center;"><b>Defendant.</b></p>	<p>Adv. Case No.:</p>

**COMPLAINT FOR TURNOVER**

Jeffrey A. Weinman, the duly-appointed Chapter 7 Trustee of the Estate of Matt Garton and Associates, LLC, for his Adversary complaint against Defendant, BBVA USA, Inc. for turnover of assets of the estate, pursuant to 11 U.S.C. §542 (a) and FED. R. BANKR. P. 7001(1), states as follows:

**PARTIES, JURISDICTION AND VENUE**

1. Plaintiff, Jeffrey A. Weinman, (the “Trustee”) is the duly appointed Chapter 7 trustee of the bankruptcy estate of Matt Garton and Associates, LLC (the “Estate”).

2. Defendant, BBVA USA, Inc. (“Defendant” or “BBVA”), is an Alabama corporation, which at all times relevant herein, was authorized to and did business in the State of Colorado. BBVA may be served with process through its registered

agent, C.T. Corporation System, 7700 E. Arapahoe Road, Suite 220, Centennial, Colorado 80112-1268.

3. At all times relevant herein, Matt Garton & Associates, LLC (the “Debtor”) maintained a business checking account with BBVA, including account number 2503490199.

4. This Court has jurisdiction over this adversary proceeding pursuant to 11 U.S.C. § 542 and 28 U.S.C. §§ 157 and 1334.

5. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(E) and arising in the above-captioned case under Chapter 7 of the United States Bankruptcy Code (the “Bankruptcy Code”), now pending in the United States Bankruptcy Court for the District of Colorado.

6. Venue is proper in this Court under 28 U.S.C. §§ 1408-1409.

### **GENERAL ALLEGATIONS**

7. On October 16, 2019 (the “Petition Date”), the Debtor filed its Voluntary Petition for relief under Chapter 7 of the U.S. Bankruptcy Code in the United States Bankruptcy Court of the District of Colorado. Dkt. No. 1.

8. Jeffrey A. Weinman was appointed as the Chapter 7 Trustee of the bankruptcy estate of the Debtor (the “Estate”). Dkt. No. 6.

9. Prior to the Debtor’s filing for bankruptcy, it operated as a third-party, online travel booking company.

10. Among the assets listed by the Debtor in its schedules is a business checking account (No. 2503490199) with BBVA that is estimated to have held \$164,535.13 of Debtor’s funds as of the Petition Date (the “BBVA Account”). Dkt. No. 1, at p. 16.

11. At the meeting of creditors pursuant to 11 U.S.C. § 342 on November 22, 2019, Mr. Garton, as representative of the Debtor confirmed that the schedules contained accurate information about Debtor’s BBVA Account.

12. On October 24, 2019, counsel for the Trustee made a written demand on Defendant for turnover of the funds in Debtor’s BBVA Account under §542(a), as such funds are property of the Bankruptcy Estate. *See* Oct. 24, 2019 Letter to BBVA, attached as **Exhibit A**.

13. Not having received any response to the aforementioned correspondence, undersigned counsel again contacted BBVA on November 7, 2019 *via* email to inquire as to the status of the turnover request. *See* Nov. 7, 2019 Email to BBVA, attached as **Exhibit B**.

14. BBVA again failed to respond or acknowledge receipt, and thus, on November 22, 2019, undersigned contacted counsel who represented BBVA in responding to a writ of attachment it was served with in a related pre-petition state court proceeding instituted by Independent Bank.

15. Notwithstanding counsel's good faith efforts to locate a BBVA representative to respond to the Trustee's turnover request, BBVA has failed to respond to or acknowledge same to date.

**FIRST CAUSE OF ACTION: TURNOVER AND ACCOUNTING  
OF ESTATE PROPERTY UNDER 11 U.S.C. §542**

16. The Trustee incorporates by reference, the allegations contained in the preceding paragraphs, as though fully set forth herein.

17. At the time of the entry of the order for relief herein, Debtor was possessed of certain assets, including but not limited to the BBVA Account as set forth herein, above. *See* Dkt. No. 1, at p. 16.

18. The funds in the BBVA Account are property of the Debtor's Bankruptcy Estate and are property which the Trustee may use under 11 U.S.C. § 363.

19. The Debtor's schedules indicate that as of the Petition Date, the funds in the BBVA Account at issue were frozen.

20. The Trustee has made repeated demands on BBVA for turnover of the funds pursuant to section 542 of the Bankruptcy Code, but these requests have gone unanswered and unacknowledged.

21. The Trustee therefore seeks immediate turnover of all funds maintained in the Debtor's BBVA Account as of the Petition Date.

22. The Trustee also seeks an accounting from BBVA of all accounts held in the Debtor's name, including, but not limited to, a breakdown of all funds BBVA received, collected and disbursed ninety (90) days prior to the Petition Date through the present.

**PRAYER FOR RELIEF**


WHEREFORE the Jeffrey A. Weinman, the Chapter 7 Trustee of the Debtor's Estate, respectfully prays for:

- a. An order of the Court compelling the Defendant, by a date certain, to turnover to the Trustee of all funds currently held in the Debtor's BBVA Account and an accounting thereof from July 18, 2019 through the present;
- b. Judgment in favor of the Trustee and against the Defendant for any damages or losses suffered by the Estate as a result of Defendant's failure to turnover Estate Assets, including interest on the principal amount at the maximum legal rate, calculated from the Trustee's first demand for turnover on October 24, 2019;
- c. An award of attorney's fees and costs in favor of the Trustee against the Defendant; and
- d. Such other relief as this Court deems just and appropriate under the circumstances.

DATED: December 19, 2019

RESPECTFULLY SUBMITTED,

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.

  
BY: s/ Rachel A. Sternlieb

Patrick D. Vellone, #15284  
Rachel A. Sternlieb, # 51404  
1600 Stout Street, Suite 1100  
Denver, CO 80202  
Phone: (303) 534-4499  
pvellone@allen-vellone.com  
rsternlieb@allen-vellone.com

**ATTORNEYS FOR JEFFREY WEINMAN,  
CHAPTER 7 TRUSTEE**



October 24, 2019

RACHEL A. STERNLIEB  
rsternlieb@allen-vellone.com

***Via E-mail:*** [defaultspecialty.us@BBVA.com](mailto:defaultspecialty.us@BBVA.com)

BBVA Compas Bank  
999 18<sup>th</sup> Street, Suite 2820  
Denver, CO 80202

*Re:* *In re: Matt Garton and Associates, LLC* - Case No. 19-18917-TBM  
U.S. Bankruptcy Court, District of Colorado  
BBVA Account No.: \*0199

To Whom it May Concern:

This firm represents Jeffrey A. Weinman (the “Trustee”), the duly appointed Chapter 7 Trustee of the Bankruptcy Estate of Matt Garton and Associates, LLC in *In re: Matt Garton and Associates, LLC*, Case No. 19-18917-TBM presently pending in the United States Bankruptcy Court for the District of Colorado. Attached as **Exhibit A** is the notice of the Trustee’s Appointment filed in the case.

Matt Garton and Associates, LLC (the “Debtor”) filed a petition for bankruptcy under Chapter 7 of the United States Bankruptcy Code on October 16, 2019 (the “Petition Date”), thus creating the Bankruptcy Estate. In the bankruptcy schedules filed with the bankruptcy petition, the Debtor has identified a checking account maintained at BBVA ending in \*0199. Attached as **Exhibit B** to this letter is Debtor’s Schedule A/B, wherein you will find reference to this BBVA bank account.

Thus, the Trustee hereby demands turnover of the funds that existed in the Debtor’s above-referenced account, as well as any other accounts maintained by the Debtor<sup>1</sup> at BBVA, as of the Petition Date, under section 542(a) of the Bankruptcy

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<sup>1</sup> The Debtor conducted its business operations under the following five dba entity names: Hotels for Everyone, All Inclusives for Everyone, Affordable Luxury Hotels, Just Right Hotels, and HotelDeck. This request includes accounts of Debtor as well as any of the foregoing trade names.

October 24, 2019

Page 2

Code, as such are deemed property of the Bankruptcy Estate. We also request that BBVA provide the September and October bank statements reflecting the Debtor's account transactions prior to and following the Petition Date.

Should you have any questions or require additional information, please don't hesitate to contact me at (303) 534-4499, or via email at [rsternlieb@allen-vellone.com](mailto:rsternlieb@allen-vellone.com). Thank you for your prompt attention to this matter.

Very truly yours,

Allen Vellone Wolf Helfrich & Factor P.C.

A handwritten signature in black ink that reads "Rachel A. Sternlieb". The signature is written in a cursive, flowing style.

Rachel A. Sternlieb

RAS:

Cc: Patrick D. Vellone, Esq.  
Jeffrey A. Weinman, Esq.

<b>Information to identify the case:</b>	
Debtor Name	<u>Matt Garton And Associates, LLC</u> EIN: 73-1684711
United States Bankruptcy Court District of Colorado	Date case filed for chapter: 7 10/16/19
Case number:	19-18917-TBM

**Official Form 309C (For Corporations or Partnerships)**

**Notice of Chapter 7 Bankruptcy Case -- No Proof of Claim Deadline**

12/17

For the debtor listed above, a case has been filed under chapter 7 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at [www.pacer.gov](http://www.pacer.gov)).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

**Do not file this notice with any proof of claim or other filing in the case.**

<b>1. Debtor's full name</b>	Matt Garton And Associates, LLC	
<b>2. All other names used in the last 8 years</b>	dba All Inclusives for Everyone, dba Hotels for Everyone, dba HotelDeck, dba Just Right Hotels, dba Affordable Luxury Hotels	
<b>3. Address</b>	11833 Ridge Parkway, Apt. 531 Broomfield, CO 80021	
<b>4. Debtor's attorney</b> Name and address	David M. Rich 999 18th St. Ste. 1230 S Denver, CO 80202	Contact phone 720-381-0045 Email dmrich@comcast.net
<b>5. Bankruptcy trustee</b> Name and address	Jeffrey A. Weinman 730 17th St. Ste. 240 Denver, CO 80202	Contact phone ( ) 303-572-1010 Email jweinmantrustee@outlook.com
	The person designated as Bankruptcy Trustee has been selected as Interim Trustee of the bankruptcy estate and the trustee's previously-filed blanket bond is approved. Unless another trustee is elected at the meeting of creditors, the trustee shall serve without further appointment or qualification. The trustee is deemed to have accepted the appointment, unless the trustee notifies the Court and the U.S. Trustee in writing of any rejections within seven days after receipt of notice of selection.	
<b>6. Bankruptcy clerk's office</b> Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at <a href="http://www.pacer.gov">www.pacer.gov</a> .	US Bankruptcy Court US Custom House 721 19th St. Denver, CO 80202-2508	Hours open Monday – Friday 8:00 AM – 4:30 PM  Contact phone 720-904-7300  Date: 10/17/19
<b>7. Meeting of creditors</b> The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.	<b>November 22, 2019 at 09:30 AM</b>  The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Location:  <b>Byron G. Rogers Federal Building, 1961 Stout Street, Suite 16-200, Room A, Denver, CO 80294</b>

<p><b>8. Proof of claim</b></p> <p>Please do not file a proof of claim unless you receive a notice to do so.</p>	<p>No property appears to be available to pay creditors. Therefore, please do not file a proof of claim now.</p> <p>If it later appears that assets are available to pay creditors, the clerk will send you another notice telling you that you may file a proof of claim and stating the deadline.</p>
<p><b>9. Creditors with a foreign address</b></p>	<p>If you are a creditor receiving a notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>



**Fill in this information to identify the case:**

Debtor name Matt Garton And Associates, LLC

United States Bankruptcy Court for the: DISTRICT OF COLORADO

Case number (if known) \_\_\_\_\_

Check if this is an amended filing

# Official Form 206A/B

## Schedule A/B: Assets - Real and Personal Property

12/15

Disclose all property, real and personal, which the debtor owns or in which the debtor has any other legal, equitable, or future interest. Include all property in which the debtor holds rights and powers exercisable for the debtor's own benefit. Also include assets and properties which have no book value, such as fully depreciated assets or assets that were not capitalized. In Schedule A/B, list any executory contracts or unexpired leases. Also list them on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G).

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. At the top of any pages added, write the debtor's name and case number (if known). Also identify the form and line number to which the additional information applies. If an additional sheet is attached, include the amounts from the attachment in the total for the pertinent part.

For Part 1 through Part 11, list each asset under the appropriate category or attach separate supporting schedules, such as a fixed asset schedule or depreciation schedule, that gives the details for each asset in a particular category. List each asset only once. In valuing the debtor's interest, do not deduct the value of secured claims. See the instructions to understand the terms used in this form.

**Part 1: Cash and cash equivalents**

1. Does the debtor have any cash or cash equivalents?

- No. Go to Part 2.
- Yes Fill in the information below.

All cash or cash equivalents owned or controlled by the debtor

Current value of debtor's interest

2. **Cash on hand** \$12.55

3. **Checking, savings, money market, or financial brokerage accounts** *(Identify all)*

	Name of institution (bank or brokerage firm)	Type of account	Last 4 digits of account number	
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3.1. <u>BBVA Compass Bank (Funds Frozen)</u>	<u>Checking</u>	<u>0199</u>		<u>\$184,535.13</u>
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3.2. <u>Independent Bank</u>	<u>Checking</u>	<u>8119</u>		<u>\$0.00</u>
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3.3. <u>Wells Fargo (Funds Frozen and Closed)</u>	<u>Checking</u>	<u>3672</u>		<u>\$18,667.18</u>
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4. **Other cash equivalents** *(Identify all)*

5. **Total of Part 1.**

Add lines 2 through 4 (including amounts on any additional sheets). Copy the total to line 80.

<u>\$203,214.86</u>
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**Part 2: Deposits and Prepayments**

6. Does the debtor have any deposits or prepayments?

- No. Go to Part 3.
- Yes Fill in the information below.

Debtor **Matt Garton And Associates, LLC**  
Name

Case number (If known) \_\_\_\_\_

**Part 3: Accounts receivable**

10. Does the debtor have any accounts receivable?

- No. Go to Part 4.
- Yes Fill in the information below.

11. **Accounts receivable**

11a. 90 days old or less: 956.93 - 0.00 = ... \$956.93  
face amount doubtful or uncollectible accounts

11a. 90 days old or less: 3,279.19 - 0.00 = ... \$3,279.19  
face amount doubtful or uncollectible accounts

11a. 90 days old or less: 0.00 - 0.00 = ... Unknown  
face amount doubtful or uncollectible accounts

11a. 90 days old or less: 0.00 - 0.00 = ... Unknown  
face amount doubtful or uncollectible accounts

11a. 90 days old or less: 0.00 - 0.00 = ... Unknown  
face amount doubtful or uncollectible accounts

12. **Total of Part 3.**

Current value on lines 11a + 11b = line 12. Copy the total to line 82.

<u>\$4,236.12</u>
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**Part 4: Investments**

13. Does the debtor own any investments?

- No. Go to Part 5.
- Yes Fill in the information below.

**Part 5: Inventory, excluding agriculture assets**

18. Does the debtor own any inventory (excluding agriculture assets)?

- No. Go to Part 6.
- Yes Fill in the information below.

**Part 6: Farming and fishing-related assets (other than titled motor vehicles and land)**

27. Does the debtor own or lease any farming and fishing-related assets (other than titled motor vehicles and land)?

- No. Go to Part 7.
- Yes Fill in the information below.

**Part 7: Office furniture, fixtures, and equipment; and collectibles**

38. Does the debtor own or lease any office furniture, fixtures, equipment, or collectibles?

- No. Go to Part 8.
- Yes Fill in the information below.

Debtor Matt Garton And Associates, LLC Case number (If known) \_\_\_\_\_  
 Name

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
39. Office furniture Office Furniture, Fixtures, and Equipment. See Attached.	\$4,124.94	Est Market Value	\$4,124.94

40. Office fixtures

41. Office equipment, including all computer equipment and communication systems equipment and software

42. Collectibles Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; china and crystal; stamp, coin, or baseball card collections; other collections, memorabilia, or collectibles

43. Total of Part 7. Add lines 39 through 42. Copy the total to line 86. \$4,124.94

44. Is a depreciation schedule available for any of the property listed in Part 7?  
 No  
 Yes

45. Has any of the property listed in Part 7 been appraised by a professional within the last year?  
 No  
 Yes

**Part 8: Machinery, equipment, and vehicles**

46. Does the debtor own or lease any machinery, equipment, or vehicles?

- No. Go to Part 9.
- Yes Fill in the information below.

**Part 9: Real property**

54. Does the debtor own or lease any real property?

- No. Go to Part 10.
- Yes Fill in the information below.

**Part 10: Intangibles and intellectual property**

59. Does the debtor have any interests in intangibles or intellectual property?

- No. Go to Part 11.
- Yes Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
60. Patents, copyrights, trademarks, and trade secrets			
61. Internet domain names and websites See Attached (Valuation method used for current value: GoDaddy Appraisal)	\$0.00	Appraisal	\$30,278.00

62. Licenses, franchises, and royalties

Debtor Matt Garton And Associates, LLC Case number (If known) \_\_\_\_\_  
 Name

63. **Customer lists, mailing lists, or other compilations**

64. **Other intangibles, or intellectual property**

<b>HotelDeck System Software</b>	<b>\$0.00</b>	<b>Cost Plus Val.</b>	<b>\$350,000.00</b>
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65. **Goodwill**

66. **Total of Part 10.** **\$380,278.00**  
 Add lines 60 through 65. Copy the total to line 89.

67. **Do your lists or records include personally identifiable information of customers** (as defined in 11 U.S.C. §§ 101(41A) and 107?)  
 No  
 Yes

68. **Is there an amortization or other similar schedule available for any of the property listed in Part 10?**  
 No  
 Yes

69. **Has any of the property listed in Part 10 been appraised by a professional within the last year?**  
 No  
 Yes

**Part 11: All other assets**

70. **Does the debtor own any other assets that have not yet been reported on this form?**  
 Include all interests in executory contracts and unexpired leases not previously reported on this form.

No. Go to Part 12.  
 Yes Fill in the information below.

**Current value of debtor's interest**

71. **Notes receivable**  
 Description (include name of obligor)

72. **Tax refunds and unused net operating losses (NOLs)**  
 Description (for example, federal, state, local)

73. **Interests in insurance policies or annuities**

74. **Causes of action against third parties (whether or not a lawsuit has been filed)**

75. **Other contingent and unliquidated claims or causes of action of every nature, including counterclaims of the debtor and rights to set off claims**

**Tourico Holidays - Wholesaler to Hotels for Everyone; Tourico did not honor pricing agreement; told by Tourico to remove majority of inventory; inventory was withdrawn without adequate notice; Tourico would not provide viable workout.**

**Unknown**

Nature of claim	<b>Breach of Pricing Agreement</b>
Amount requested	<b>\$0.00</b>

**Tourico-Hotel Beds - technology interface that was not ready**

**Unknown**

Nature of claim	<b>Technology interface</b>
Amount requested	<b>\$0.00</b>

Debtor Matt Garton And Associates, LLC  
Name

Case number (If known) \_\_\_\_\_

**World 2 Meet; secondary supplier**

**Unknown**

Nature of claim abnormal number of customer service issues and chargebacks  
Amount requested \$0.00

76. **Trusts, equitable or future interests in property**

77. **Other property of any kind not already listed** *Examples: Season tickets, country club membership*  
**State of Colorado - Payment collected by Google LLC in August 2013; escheated funds to State of Colorado**

**\$501.43**

78. **Total of Part 11.**

Add lines 71 through 77. Copy the total to line 90.

**\$501.43**

79. **Has any of the property listed in Part 11 been appraised by a professional within the last year?**

- No
- Yes

Debtor **Matt Garton And Associates, LLC**  
Name

Case number (If known) \_\_\_\_\_

**Part 12: Summary**

In Part 12 copy all of the totals from the earlier parts of the form

Type of property	Current value of personal property	Current value of real property
80. <b>Cash, cash equivalents, and financial assets.</b> <i>Copy line 5, Part 1</i>	<u>\$203,214.86</u>	
81. <b>Deposits and prepayments.</b> <i>Copy line 9, Part 2.</i>	<u>\$0.00</u>	
82. <b>Accounts receivable.</b> <i>Copy line 12, Part 3.</i>	<u>\$4,236.12</u>	
83. <b>Investments.</b> <i>Copy line 17, Part 4.</i>	<u>\$0.00</u>	
84. <b>Inventory.</b> <i>Copy line 23, Part 5.</i>	<u>\$0.00</u>	
85. <b>Farming and fishing-related assets.</b> <i>Copy line 33, Part 6.</i>	<u>\$0.00</u>	
86. <b>Office furniture, fixtures, and equipment; and collectibles.</b> <i>Copy line 43, Part 7.</i>	<u>\$4,124.94</u>	
87. <b>Machinery, equipment, and vehicles.</b> <i>Copy line 51, Part 8.</i>	<u>\$0.00</u>	
88. <b>Real property.</b> <i>Copy line 56, Part 9.....&gt;</i>		<u>\$0.00</u>
89. <b>Intangibles and intellectual property.</b> <i>Copy line 66, Part 10.</i>	<u>\$380,278.00</u>	
90. <b>All other assets.</b> <i>Copy line 78, Part 11.</i>	+ <u>\$501.43</u>	
91. <b>Total.</b> Add lines 80 through 90 for each column	<u>\$592,355.35</u>	+ 91b. <u>\$0.00</u>
92. <b>Total of all property on Schedule A/B.</b> Add lines 91a+91b=92		<u>\$592,355.35</u>

## Rachel Sternlieb

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**From:** Rachel Sternlieb  
**Sent:** Thursday, November 7, 2019 10:16 AM  
**To:** 'defaultspecialty.us@BBVA.com'  
**Cc:** Pat Vellone; 'Jeffrey Weinman'  
**Subject:** RE: In re: Matt Garton and Associates, LLC (Case No. 19-18917-TBM, U.S. Bankr. Court, Dist. Colo.)  
**Attachments:** 20191024 RAS Ltr to BBVA re Debtor's Account (w.exhs).pdf  
**Importance:** High

To whom it may concern:

I have not received any response concerning the attached letter that was sent on October 24, 2019. Please be advised that if we do not receive a response by 5 p.m. MST on Monday, November 11, 2019, we will be filing an adversary complaint against BBVA Compass for turnover under 11 U.S.C. § 542 and seek all damages available under applicable bankruptcy law, including for punitive damages as a result of willful violations of the automatic stay under failure to turnover property of the Bankruptcy Estate, in violation of the automatic stay provisions of 11 U.S.C. § 362(h) of the Bankruptcy Code.

Thank you for your prompt attention to this matter.

Very truly,

**Rachel A. Sternlieb**

Attorney at Law  
Allen Vellone Wolf Helfrich & Factor P.C.

(303) 534-4499 | Main  
(720) 245-2403 | Direct



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**From:** Rachel Sternlieb  
**Sent:** Thursday, October 24, 2019 3:49 PM  
**To:** 'defaultspecialty.us@BBVA.com' <defaultspecialty.us@BBVA.com>  
**Cc:** Pat Vellone <PVellone@allen-vellone.com>; 'Jeffrey Weinman' <jweinmantrustee@outlook.com>  
**Subject:** FW: In re: Matt Garton and Associates, LLC (Case No. 19-18917-TBM, U.S. Bankr. Court, Dist. Colo.)  
**Importance:** High

To whom it may concern:

Enclosed please find correspondence concerning the above-referenced bankruptcy matter.  
Thank you.

Very truly,

**Rachel A. Sternlieb**

Attorney at Law  
Allen Vellone Wolf Helfrich & Factor P.C.  
1600 Stout Street, Suite 1100  
Denver, CO 80202

[rsternlieb@allen-vellone.com](mailto:rsternlieb@allen-vellone.com)  
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