EXHIBIT 68

INITIAL CC ULTATION AGREEMENT AND I QUIRED NOTICES

Client desires to obtain advice and assistance with debt issues and relief from debt and has scheduled an initial consultation with the Law Firm of Rogers, Anderson & Bensey, PLLC. The client understands that in order for the attorney to give meaningful advice, certain detailed financial information must be provided fully and accurately. The client agrees to give accurate, honest full and fair disclosure of financial information concerning income from all sources, monthly living expenses, the type and amount of all debts, and a disclosure of all assets and property owned by the client.

The attorney agrees to interview the client and give advice and counsel to assist the client in making decisions about debt problems, the possibility of filing bankruptcy, selecting the appropriate chapter of bankruptcy, and how a bankruptcy case may help or hurt the debt problems of the client. The initial consultation will consist of a review of the client's current monthly income, a preliminary budget analysis, a preliminary analysis of qualifications for certain chapters of bankruptcy and a recommendation.

DISCLOSURES

The following disclosure notices are required by recent changes to the United States Bankruptcy Code enacted in 2005 under the name Bankruptcy Abuse Prevention and Consumer Protection Act (BACPA). This law was enacted after many years of intense lobbying by the credit industry. It is our opinion that the required disclosures and many provisions of the law are intended to intimidate and scare people, unduly complicate the process, increase the cost, and create more hurdles for people who are already struggling. The disclosures imply that debtors are dishonest people and that credit counseling agencies who get paid by creditors are in a better position to advise you about your financial situation than an attorney. As the disclosures note, you do not need an attorney to file bankruptcy. You are also free to represent yourself in a criminal proceeding or in any other legal proceeding. Bankruptcy laws are complicated, if done incorrectly you face losing assets or being denied your discharge.

We debtors' lawyers have spent many years fighting the passage of the BACPA and yet the credit industry was finally successful in passing this horrible legislation. They paid congress enormous sums of money to eliminate and restrict your rights. Imagine what they would do to you if you didn't have lawyers fighting on your behalf.

We are also required to disclose that we are a "debt relief agency" and that we "help people file for bankruptcy relief under the Bankruptcy Code." We disagree that we are a "debt relief agency." We are attorneys. We specialize in bankruptcy law. We will gladly represent you in filing for bankruptcy relief.



DISCLOSURE PURSUANT TO 11 U.S.C. §527(a)(2)

- All informati hat you are required to provide witi. _ petition and thereafter during a case under the Bankruptcy Code is required to be complete, accurate, and truthful.
- All assets and all liabilities are required to be completely and accurately disclosed in the documents filed to commence the case. Some places in the Bankruptcy Code require that you list the replacement value of each asset. This must be the replacement value of the property at the date of filing the petition, without deducting for costs of sale or marketing, established after a reasonable inquiry. For property acquired for personal, family, or household use, replacement value means the price a retail merchant would charge for property of that kind, considering the age and condition of the property.
- The following information, which appear on Official Form 22, Statement of Current Monthly Income, are required to be stated after reasonable inquiry: current monthly income, the amounts specified in section 707(b)(2), and, in a case under chapter 13 of the Bankruptcy Code, disposable income (determined in accordance with section 707(b)(2)).
- Information that you provide during your case may be audited pursuant to provisions of the Bankruptcy Code. Failure to provide such information may result in dismissal of the case under this title or other sanction, including criminal sanctions.

IMPORTANT INFORMATION ABOUT BANKRUPTCY ASSISTANCE SERVICES FROM AN ATTORNEY OR BANKRUPTCY PETITION PREPARER.

If you decide to seek bankruptcy relief, you can represent yourself, you can hire an attorney to represent you, or you can get help in some localities from a bankruptcy petition preparer who is not an attorney. THE LAW REQUIRES AN ATTORNEY OR BANKRUPTCY PETITION PREPARER TO GIVE YOU A WRITTEN CONTRACT SPECIFYING WHAT THE ATTORNEY OR BANKRUPTCY PETITION PREPARER WILL DO FOR YOU AND HOW MUCH IT WILL COST. Ask to see the contract before you hire anyone.

The following information helps you understand what must be done in a routine bankruptcy case to help you evaluate how much service you need. Although bankruptcy can be complex, many cases are routine.

Before filing a bankruptcy case, either you or your attorney should analyze your eligibility for different forms of debt relief available under the Bankruptcy Code and which form of relief is most likely to be beneficial for you. Be sure you understand the relief you can obtain and its limitations. To file a bankruptcy case, documents called a Petition, Schedules and Statement of Financial Affairs, as well as in some cases a Statement of Intention need to be prepared correctly and filed with the bankruptcy court. You will have to pay a filing fee to the bankruptcy court. Once your case starts, you will have to attend the required first meeting of the creditors where you may be questioned by a court official called a 'trustee' and by creditors.

If you choose to file hapter 7 case, you may be asked by a editor to reaffirm a debt. You may want help deciding whether to do so. A creditor is not permitted to coerce you into reaffirming your debts.

If you choose to file a chapter 13 case in which you repay your creditors what you can afford over 3 to 5 years, you may also want help with preparing your chapter 13 plan and with the confirmation hearing on your plan which will be before a bankruptcy judge.

If you select another type of relief under the Bankruptcy Code other than chapter 7 or chapter 13, you will want to find out what should be done from someone familiar with that type of relief.

Your bankruptcy case may also involve litigation. You are generally permitted to represent yourself in litigation in bankruptcy court, but only attorneys, not bankruptcy petition preparers, can give you legal advice.

NOTICE TO INDIVIDUAL CONSUMER DEBTOR UNDER § 342(b) OF THE BANKRUPTCY CODE

In accordance with § 342(b) of the Bankruptcy Code, this notice: (1) Describes briefly the services available from credit counseling services; (2) Describes briefly the purposes, benefits and costs of the four types of bankruptcy proceedings you may commence; and (3) Informs you about bankruptcy crimes and notifies you that the Attorney General may examine all information you supply in connection with a bankruptcy case. You are cautioned that bankruptcy law is complicated and not easily described. Thus, you may wish to seek the advice of an attorney to learn of your rights and responsibilities should you decide to file a petition. Court employees cannot give you legal advice.

1. Services Available from Credit Counseling Agencies

With limited exceptions, § 109(h) of the Bankruptcy Code requires that all individual debtors who file for bankruptcy relief on or after October 17, 2005, receive a briefing that outlines the available opportunities for credit counseling and provides assistance in performing a budget analysis. The briefing must be given within 180 days before the bankruptcy filing. The briefing may be provided individually or in a group (including briefings conducted by telephone or on the Internet) and must be provided by a nonprofit budget and credit counseling agency approved by the United States trustee or bankruptcy administrator. The clerk of the bankruptcy court has a list that you may consult of the approved budget and credit counseling agencies.

In addition, after filing a bankruptcy case, an individual debtor generally must complete a financial management instructional course before he or she can receive a discharge. The clerk also has a list of approved financial management instructional courses.

2. The Four Chapters of the Bankruptcy Code Available to Individual Consumer Debtors

Chapter 7: Liquidation (\$220 filing fee, \$39 administrative fee, \$15 trustee surcharge: Total Fee \$274)

1 . Chapter 7 is designed for debtors in financial difficulty who do not have the ability to pay their existing debts. Debtors whose debts are primarily consumer debts are subject to a "means test" designed to determine whether the case should be permitted to proceed under chapter 7. If your income is greater than the median income for your state

family size, in some cases, creditors of residence a ve the right to file a motion requesting that me court dismiss your case under § 707(b) of the Code. It is up to the court to decide whether the case should be dismissed.

. Under chapter 7, you may claim certain of your property as exempt under governing law. A trustee may have the right to take possession of and sell the remaining property that is not exempt and use the sale proceeds to pay your creditors.

. The purpose of filing a chapter 7 case is to obtain a discharge of your existing debts. If, however, you are found to have committed certain kinds of improper conduct described in the Bankruptcy Code, the court may deny your discharge and, if it does, the purpose for which you filed the bankruptcy petition will be defeated.

Even if you receive a general discharge, some particular debts are not discharged under the law. Therefore, you may still be responsible for most taxes and student loans; debts incurred to pay nondischargeable taxes; domestic support and property settlement obligations; most fines, penalties, forfeitures, and criminal restitution obligations; certain debts which are not properly listed in your bankruptcy papers; and debts for death or personal injury caused by operating a motor vehicle, vessel, or aircraft while intoxicated from alcohol or drugs. Also, if a creditor can prove that a debt arose from fraud, breach of fiduciary duty, or theft, or from a willful and malicious injury, the bankruptcy court may determine that the debt is not discharged.

Chapter 13: Repayment of All or Part of the Debts of an Individual with Regular Income (\$150 filing fee, \$39 administrative fee: Total fee \$189)

- 1. Chapter 13 is designed for individuals with regular income who would like to pay all or part of their debts in installments over a period of time. You are only eligible for chapter 13 if your debts do not exceed certain dollar amounts set forth in the Bankruptcy Code.
- 2. Under chapter 13, you must file with the court a plan to repay your creditors all or part of the money that you owe them, using your future earnings. The period allowed by the court to repay your debts may be three years or five years, depending upon your income and other factors. The court must approve your plan before it can take effect.
- 3. After completing the payments under your plan, your debts are generally discharged except for domestic support obligations; most student loans; certain taxes; most criminal fines and restitution obligations; certain debts which are not properly listed in your bankruptcy papers; certain debts for acts that caused death or personal injury; and certain long term secured obligations.

Chapter 11: Reorganization (\$1000 filing fee, \$39 administrative fee: Total fee \$1039)

Chapter 11 is designed for the reorganization of a business but is also available to consumer debtors. Its provisions are quite complicated, and any decision by an individual to file a chapter 11 petition should be reviewed with an attorney.

Chapter 12: Family Farmer or Fisherman (\$200 filing fee, \$39 administrative fee: Total fee \$239)

Chapta 2 is designed to permit family farm. and fishermen to repay their debts over a period of time from future earnings and is similar to chapter 13. The eligibility requirements are restrictive, limiting its use to those whose income arises primarily from a family-owned farm or commercial fishing operation.

3. Bankruptcy Crimes and Availability of Bankruptcy Papers to Law Enforcement Officials

A person who knowingly and fraudulently conceals assets or makes a false oath or statement under penalty of perjury, either orally or in writing, in connection with a bankruptcy case is subject to a fine, imprisonment, or both. All information supplied by a debtor in connection with a bankruptcy case is subject to examination by the Attorney General acting through the Office of the United States Trustee, the Office of the United States Attorney, and other components and employees of the Department of Justice.

WARNING: Section 521(a)(1) of the Bankruptcy Code requires that you promptly file detailed information regarding your creditors, assets, liabilities, income, expenses and general financial condition. Your bankruptcy case may be dismissed if this information is not filed with the court within the time deadlines set by the Bankruptcy Code, the Bankruptcy Rules, and the local rules of the court.

Attorney hereby acknowledges delivery to clients this INITIAL CONSULTATION AGREEMENT AND REQUIRED NOTICES document, which consists of 5 Pages.

BARBARA M. ROGERS, ATTORNEY

CLIENT

Clients hereby acknowledge receipt of AGREEMENT AND REQUIRED NOTICES	this INITIAL CONSULTATION document, which consists of 5 pages.
2	· <u>-</u>
DATE: 3-27-06	
CLIENT CLIENT	
DATE:	· •

ROGERS, ANDERSON & BENSEY, PTIC
2200 North Loop West, Suite 31
Houston, TX 77018
713-957-0100
713-957-0105 (fax)

BANKRUPTCY - PERSONAL

BEFORE YOUR BANKRUPTCY CAN BE FILED ALL INFORMATION REQUESTED MUST BE COMPLETED, YOU MUST INCLUDE A COMPLETE LIST OF ALL CREDITORS, WITH COMPLETE ADDRESSES AND THE AMOUNT OWED

	•
FULL NAME JIMMY W. SISSOM	SS# 455 51 7710
SPOUSE'S FULL NAME DIVORCE PROCESINGS	SS#
NAMES USED DURING PAST SIX YEARS:	· .
5 _{am} e	
	•
MAILING ADDRESS: OWN _ / RENT	•
4315 WATTRULY CF	
MISSOUR: CITY DE mysig	
COUNTY: Harry	
PHONE NUMBERS: HOME: WORK: CELL:	9053770 PAGER:
SPOUSE'S WORK:CELL:	PAGER:
TYPE OF BUSINESS	ID# NoNe
ASSETS:	
REAL PROPERTY (Please list mortgage information under the Secu	red Creditor section at the end of this Schedule)
ADDRESS/DESCRIPTION	<u>VALUE</u>
48	Nighter of Alberton (A. P. Constant and A. Con
Questionnaire Revised 11/02	EXHIBIT
7 M 1 1/02	

PERSONAL PROPERTY

		بسر				
1.	CASH ON HAND:	5000 -				
2.	CHECKING, SAVINGS, O	THER FINANCIA	T YCCOM	NTS:		
		ME OF BANK	, de		AMOUNT	
	CD	KOYAL DAR'S I	Janu		45,00	0-
3.	Do you have any security de If the answer is Yes, please t deposit.				No posit and the	amount of the
	PARTY HOLDING DEPOS	II ADDI	RESS		<u>AM</u>	OUNT
4.	HOUSEHOLD GOODS: The Bankruptcy Code requires such as furniture and applian think a fair value is. In other it is easier to go room by room	nces, and their curr er words, what do	rent value.	Please try to indicate	beside each i	tem what you
Kitch	еп:	11-1-11-11-11-11-11-11-11-11-11-11-11-1		Dining Room:		
Iten	1	Value		Item		Value
7	ABLE & CHAINS (4)	100-		TABLE & CH	tains (c)	500 -
	The state of the s		_			
·			<u> </u>		N	<u> </u>
			 	<u> </u>		
Livin	g Room:			Bedroom No.1:		<u> </u>
Item	1	Value		Item	· -	Value
2	CHOINS	150		BED		100 -
	OFA	200 -	ļ	NIGHTSTANG	1	55
Co	LEVE TABLE	100-				
7	ELEVISION	1,00 -				
<u> </u>				•		

Item	Value	Item	Value
KIDS BED	100-		/60
		KIPS BUTD	5-
CHEST OF PLANETES	55 -	CHEST OF DRAWERS	
		NKIASTANO	5-
		- 17 ·	50 -
i Neise dalyt galages and a large growth and a			
<u>itility Room:</u>		Garage:	1.
<u>Item</u>	Value Value	Item	Value
INASHOR PRYLIL	200-	NIA	
		-	

ttach additional sheets if names	saru.		<u> </u>
Please give an estimated stamps, coin collections, Books; CD's, Tapes, etc.; Please give an estimated Eyan - Soo	value of the books, picture, records, tapes, compact di 200 – value of the clothing owner Dycan 500 –	es and other art objects that you own, incluses and other collectibles of every type: Pictures: Other Collectibles: od by every member of your family who is Sugard Soo items that you valued over \$200.00:	00 V/A
Stamps, coin collections, Books; CD's, Tapes, etc.: Please give an estimated Ryan - 500 If this amount is over \$2 Please list all jewelry ov What do you believe this	value of the books, picture, records, tapes, compact di 200- value of the clothing owned by you and your dependence of the worth?	scs and other collectibles of every type: Pictures: Other Collectibles: od by every member of your family who is Soc. litems that you valued over \$200.00:	00 V/A

company, its address and the fac Company Farmuls	Address	•
Please list all annuities. Itemize	and name each issuer:	
sharing plan: NoNE	or your dependents have in any IRA,	
Please list all stock that you own Name of Stock	n and indicate its value: No. of Shares	Value
Please list all ownership interest Name of Entity NIR	s that you have in any partnership, jo Ownership Interest	<u>Value</u>
Please list all government or con	porate bonds that you own, either di	
injury claims or any other type	OU, including alimony, maintenance of debt that you are aware of that is count money and the amount that the	owed to you. Include the name an
Party Owing Debt	Address	Amount Owed
	nance, support, and property settleme	ents to which the debtor is or may
Please list any alimony, mainter entitled. Give particulars:		
	Address	Estimated Value
entitled. Give particulars: Property to be inherited	and the second s	Estimated Value

Please list all contingent and unliquidated claims of every nature debtor, and rights to setoff claims. Give estimated value of each	la.	
7/79		
Please list all patents, copyrights, and other intellectual property	<u>Value</u>	
N/A		
Please list all licenses, franchises, and other general intangibles. Property	Give particulars. Value	
Please list all automobiles, trucks, trailers, and other vehicles an Property	d accessories: Value	_
Please list all boats, motors and accessories: Property N/A	Value	
Please list all aircraft and accessories: Property N/A	Value	
Please list all office equipment, furnishings, and supplies: Property N/A	<u>Value</u>	
Please list all machinery, fixtures, equipment, and supplies used Property	in business. Value	<u> </u>
Please list all inventory: Property	Value	

28,	Please list all pets		· · · · · · · · · · · · · · · · · · ·
29.	Please list all orops - growing	ng or harvested. Give particulars:	
30 <u>.</u>	Please list all farming equip		
31. •	Please list all farm supplies	, chemicals, and feed:	,
32,		erty of any kind not already listed.	
TAX (CLAIMS:		- -
Count Name	y Tax Authority:	Address	Amount Owed
Texas Name	State Comptroller:	Address	Amount Owed
Intern Name	nal Revenue Service:	Address	Amount Owed
School Name	l District:	Address	Amount Owed
		•	who you owe and how much:
addre	ou party to any lease agreemess of the other parties to the last to the last Leased	ents?YesNo If yes, please ease: Name and Address of Lessor	e list the particulars including the name and
	· · · · · · · · · · · · · · · · · · ·		

PERSONAL INFORMA	TIOIs:			
Marital Status:	DITORLE	PROCESSING		•
List all dependents, their a Dependent Name	ges and relati	onship: <u>Relationship</u>	Age	
RYAN SIGGORA DYLON SIGGOM	·	5013 5014		<u>, , , , , , , , , , , , , , , , , , , </u>
pydax ylaybri				
What is your occupation?	KILIOL	BALI, STOROLE NO WORK RIGHT NOW		<u>.</u>
How long?				
What is your spouse's occ Who is your spouse's emp How long?	loyer?	N/a		, Market
weekly, please figure on a	monthly bas	ie? (This is the amount you ma is.) <u>HONE AT IU</u> LY income? <u>N/O</u>	<u>15 71ME</u>	•
		ions for you and your spouse:	•	•
Taxes (including Social Security & Medicare)		<u>Debtor</u>	<u> Spouse</u>	
Insurance	÷			
Union Dues			· · · · · · · · · · · · · · · · · · ·	
Other (Describe)				
Please list all income from	n any other so	ource, give the amount received Address		its address.

MONTHLY EXPENSES:

_			_	<i>*</i> 0	
Rent or Mortgage Payment			\$	1800 -	
Electricity			\$	200 -	
Gas (Natural)			\$	500	
Water & Sewage	•		\$		
Telephone			\$	100 -	
TV Ĉable		•	\$	•	
Security System			\$		
Home Maintenance			\$		
Food			\$	1000 -	
Clothing			\$		
Laundry and Dry Cleaning		•	S	250	······································
Medical & Dental			\$	400-	,
Automobile Gas and Maintenance			\$		
Recreation	•		\$		······································
Charitable		•	\$	·	•
Insurance (not deducted from pay)			<u>"</u>	. ·	
Homeowners	•		\$	100-	
Life			\$	as -	
Health			\$		
AUTO.			\$		
Taxes (not deducted from pay)			\$		
Installment Payments:			v		
. AUTO			\$		•
Other			\$		
Other			\$		
Alimony		•	\$		
Child Support			\$ \$		
	•			· · · · · · · · · · · · · · · · · · ·	
Dependent Support for Others Other Expenses;			\$		· · · · · · · · · · · · · · · · · · ·
			m		
Personal Grooming	•		\$		
Veterinary	•		§		
Cellular Phone		•	\$		
Educational Expenses			<u>\$</u>		
			<u>\$</u>		
		•	\$,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	•		\$		· ·

W/ KSHEET: STATEMENT OF FINANCIA' AFFAIRS (PLEASE PUT N/A IF DOES NOT AP. .)

1.	Income from employment or operation of business.	Enter each income source for the past two years.	Specify
	the amount of income and the fiscal year.		

Sources (name and address)	Amount	Fiscal Period
None		

2. Income other than from employment or operation of business. Enter sources of any other income during the past two years. Specify the amount of income and the fiscal year.

Sources (name and address)	•	Amount	Fiscal Period
	 :	<u> </u>	

3a. List payments made to any creditor totaling more than \$600.00 during the last 90 days.

Creditors (name and address)	Dates of Payments	Amount Paid	Amount Still Owing
WONE	·	214 cm. — 2 Am I Januari I Market III	
		ı	
		.	

3b. List payments made to insider creditors during the last year.

Creditors (name and address)	Dates of Payments	Amount Paid	Amount Still Owing
NONE			·

Were you sued or did · sue anybody last year (12 months)? If yes, liet the follow	wing for each:
CAPTION OF SUIT: KEIN. CASE NO.: 06 - CV. NATURE OF PROCEEDING:	#1-00 3GB	
CASE NO.:	31-00270	
NATURE OF PROCEEDING:	FAYE DETRING	
COURT AND LOCATION: JUDGE 1 TATUS/DISPOSITION: APEIL 3, 2	AND PART PART	
List any property garnished, attached or seized du	ring the last year by a creditor.	
Creditor (name and address)	Date of seizure	Description and value of property
North		
	1	
List any repossessions, foreclosures and voluntar	y returns during the last year.	
Creditor (name and address)	Date of repossession	Description and value of property
	Терововатоп	Of property
Nove	<u> </u>	
TANK		
·		•
Describe any assignment of property for the bene following for each: NAME OF ASSIGNEE: ADDRESS OF ASSIGNEE: DATE OF ASSIGNMENT: TERMS OF ASSIGNMENT OR SETTLEMENT		
List all property which has been in the hands of a past year. List the following for each:	a custodian, receiver or court-app	pointed official during the —
NAME OF CUSTODIAN: NAME	su 2+	
ADDRESS OF CUSTODIAN:	-	,
COURT AND LOCATION:		
CASE TITLE AND NUMBER:	`	,
DATE OF ORDER:		
DESCRIPTION OF PROPERTY:	, · · · · · · · · · · · · · · · · · · ·	
VALUE OF PROPERTY:		

Recipient (name and address)	- · · · · · · · · · · · · · · · · · · ·	Relationship (if any)	Date of gift	Description value of g
N/A			. ,	
			;	. •
List all losses from fire, theft, other casua	lty or gan	nbling during the 1	oast year.	
Description and value of property	Circu	mstance of loss	Covered by insurance	Date of - loss
· N/A				
				·
List all payments made or property transfe attorneys, for consultation concerning deb petition in bankruptcy during the past year	ot consoli	or on behalf of the dation, relief unde	debtor to any per r the bankruptcy	rsons, including law or preparat
attorneys, for consultation concerning deb	ot consoli r.	or on behalf of the dation, relief unde Date of payment, Payor	the bankruptcy Amount paid	rsons, including law or preparator or value of pro
attorneys, for consultation concerning deb petition in bankruptcy during the past year	ot consoli r.	dation, relief unde	the bankruptcy Amount paid	law or preparat
attorneys, for consultation concerning deb petition in bankruptcy during the past year Payee (name and address)	ot consoli r.	dation, relief unde	the bankruptcy Amount paid	law or preparat
attorneys, for consultation concerning deb petition in bankruptcy during the past year Payee (name and address)	ot consoli	Date of payment, Payor red in the ordinary	Amount paid tra	law or prepara or value of pro
attorneys, for consultation concerning deb petition in bankruptcy during the past year Payee (name and address) N/A List all other property, other than property affairs of the debtor, transferred either abs	ot consoli	Date of payment, Payor red in the ordinary	Amount paid transcript course of the bug the past year to	law or prepara or value of pro

(name and address)	4-7 Parks	Account type Amount of fin		Amo	unt & date of sale or closing
N/D					
List each safe deposit or other box or	depository i	n which you ha	ve had valua	bles wit	hin the past year,
Institution (name and address)	.,	has access and address)	Descripti conter		Date of transf
N/A					
		· •			_
List all property OWNED by another	person that	the debtor (you	or you and y	our spo	use) holds or con
·		Description of prope			Location of property
Owner (name and address)	AND ASSESSMENT OF PERSONS ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSMENT ASSESSM			·····	
1					·
(name and address)	1i-4 -11				
(name and address)	eers, list all	premises occup			ng that period.

The following questions are to be completed by every debtor that is a corporation or partnership and by any individual debtor who is or has been, within the two years immediately preceding the commencement of this case, any of the following: an officer, director, managing executive, or owner of more than 5 percent of the voting securities of a corporation; a partner, other than a limited partner, or a partnership; a sole proprietor or otherwise self-employed.

(An individual or joint debtor should complete this portion of the statement ONLY if the debtor is or has been in business, as defined above, within the two years immediately preceding the commencement of this case.)

- 17. Environmental Information
- 18. Nature, location and name of business.
- a. If the debtor is an individual, list the names and addresses of all business in which the debtor was an officer, director, partner, or managing executive of a corporation, partnership, sole partnership, or was a self-employed professional within the two years immediately preceding the commencement of this case, or in which the debtor owned 5 percent or more of the voting or equity securities within the two years immediately preceding the commencement of this case.

If the debtor is a partnership, list the name and addresses of all businesses in which the debtor was a partner or owned 5 percent or more of the voting securities within the two years immediately preceding the commencement of this case.

If the debtor is a corporation, list the name and addresses of all businesses in which the debtor was a partner or owned 5 percent of the voting securities within the two years immediately preceding the commencement of this case.

Business Name and Address	Nature of business	Beg/End dates Of operation
		,

- 19. Books, records and financial statements
- a. List all bookkeepers and accountants who within the two years immediately preceding the filing of this bankruptcy case kept or supervised the keeping of books of account and records of the debtor.

Auditors (Name and Address)	Dates Services Rendered
BERNIECE BILBKI	20 04, 2003

b. List all firms or individuals who within the two years immediately preceding the filing of this bankruptcy case have audited the books account and records, or prepared a financial statement of the debtor.

Name	Address
BILSKI BOOKEORPING	
171072. 13002206 17104	tani,

c. List all firms or individuals who at the time of the commencement or this case were in possession of the books of account and records of the debtor. If any of the books of account and records are not available, explain.

Name and Address	. Date Issued
BOLSKI BOOKKERING	· · · · · · · · · · · · · · · · · · ·

- d. List all financial institutions, creditors and other parties, including mercantile and trade agencies, to whom a financial statement was issued within the two years immediately preceding the commencement of this case by the debtor.
- 20. Inventories.
- a. List the dates of the last two inventories taken of your property, the name of the person who supervised the taking of each inventory, and the dollar amount and basis of each inventory.

Date of Inventory	Inventory Supervisor	Dollar Amount of Inventory
MONE		

- b. List the name and address of the person having possession of the records of each of the two inventories listed above.
- 21. Current partners, officers, directors and shareholders
- a. If the debtor is a partmership, list the nature and percentage of partnership interest of each member of the partnership.

Members (Name and Address)	Nature of Interest	Percentage of Interest
NOAS		

ъ,	If the debtor is a corp	ion, list all officers and directors of the r ly owns, controls, or holds 5 percent or me-	noration, and each stockholder
	who directly or indirect	th owns' commons' or more a beloom at mor	o o'x rito toming and mines of the
	corporation.		

Name and Address	Title	Nature and Percent of Stock Ownership
	·	
		,

- 22. Former partners, officers, directors and shareholders
- a. If the debtor is a partnership, list each member who withdrew from the partnership within one year immediately preceding the commencement of this case.

Name	. Address	Date of Withdrawal
		-

b. If the debtor is a corporation, list all officers and directors whose relationship with the corporation terminated within one year immediately preceding the commencement of this case.

Name and Address	Title	Date of Termination

23. Withdrawals from a partnership or distributions by a corporation to an insider. Attach a separate sheet, if necessary.

Recipient Name and Address/ Relation to Debtor	Date and Purpose of Withdrawal	Amount of Money or Description and value of property
	·	. –

ITEM\$ NEEDED TO COMPLETE BANKRUPTCY SCHEDULES:

- 1. Bankruptcy Information Schedule completed to the best of your ability.
- 2. Last two 1040 Income Tax Returns.
- 3. Most recent paycheck stubs.
- 4. Completed Statement of Financial Affairs.
- 5. COMPLETED LIST OF ALL SECURED AND UNSECURED CREDITORS, WITH ACCOUNT NUMBERS, ADDRESSES OF CREDITORS AND AMOUNTS OWED, on the attached forms.

I hereby certify that all of the information contained in this form and the attachments thereto are true and correct to the best of my knowledge and ability.

_ Mong J. Str.	
Debtor /	Debtor
Date: 3/28/06	Date:

SECURED CREDITORS

REAL PROPERTY:

	ADDRESS/DESCRIPTION	VALUE	AWOUNT	MORTGAGE CO./ LIENHOLDER	ADDRESS
номе	AFFU 4315 WARRACY G	200,005	150,000	ABN AME	
	MELOURI CITY PX 17459				
OTHER REAL PROPERTY					
			·		
	•				

PERSONAL PROPERTY: (ITEMS YOU STALL OWE MONEY ON)

	DESCRIPTION	VALUE	AMOUNT	LIENHOLDER	ADDRESS
CARS					
OTHER				-	
SECURED	-				
PROPERTY		,		,	•
(COMPUTERS,					٠
BOATS, MAJOR			,	,	
APPLIANCES.					

č					
Ä	DESCRIPTION	VALUE	AMOUNT	LIENHOLDER	ADDRESS
T¥=5}					
	-				

CREDIT CARD AND OTHER UNSECURED CREDITORS

		ממחםכני	ACCT NO	AMOUNT OWED
	CREDII OR NAME	CREDITOR ADDRESS		
~	ADVANTA	P.O. Box 30715 SALTLAKE CITY WAN 845	5475 8416 5284 core	5459.09
	Put 156	7.0. Box 15298 KILMINGTON THE 19850	424 3119 1831 3038	5000 -
7	1 60)	80.6x 30285 34C, UT 84.5	4802 1322 3479 0502	5700-
	(151 BUSINETS	i	558B 5880 0101 1777	1/1000
c.	DISLOVER	P.O. Ook 15192 KlimINGTON THE 19850	6011 2988 27428920	10,000-
	HELE 1115 H	l	4266 0530 0024 0217	5,000
4	MASTERAND HSBC	P. O. Box Exote Sounds Co 43512	5491 0936 1320 6683	£,000.
	HSBC		549, 0996 1325 9026	5000 -
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CREDIT CARD AND OTHER UNSECURED CREDITORS

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ROGERS, ANDERSON & BENSEY, PLLC

Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
Telephone: (713) 957-0100
Facsimile (713) 957-0105

CONFIDENTIAL AND PRIVILEGED

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH I'T IS ADDRESSED. IT MAY CONTAIN INFORMATION THAT IS PRIVILEGED. CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S., POSTAL SERVICE, THANK YOU.

то:	Jimmy Sissom		<u>.</u> .
FAX;	713-665-7070	, metro	
	,		



ROGERS, ANDERSON & BENSEY, PLLC

Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
Telephone: (713) 957-0100
Facsimile (713) 957-0105

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TO:	Jimmy Sissom			
FAX:	713-665-7070			
FROM:	Barbara M. Rogers			
PAGES:	3			
COMMENTS:			···	

Items still needed: All real property in which you own an interest, including homestead: 1. List of ALL BANK ACCOUNTS that you own an interest in, complete with account 2. numbers, etc. Explanation of CD at Royal Oaks Bank - I will assume they have a collateral interest in 3. that CD and either have offset it or plan to. Need to know the particulars. Why did you list Susan's clothing if the two of you are separated and not living together? 4. There is nothing more important in a bankruptcy case other than FULL DISCLOSURE. If the Court believes you have in any way failed to be frank or thorough in answering the questions you may lose your discharge. You listed no jewelry. Do you not own a watch or a set of cufflinks???? 5.

What stock do you own? (In small companies as well as large, if any)

operation, what each did and what percentage you owned)

What businesses have you owned an interest in the last 5 years? (I need dates of

What lawsuits are you involved in personally? Make sure and include the divorce. (I

б.

8.

need style of case, case or cause number, court where the case is or was, and status, ie., pending, judgment, etc.)

- 9. I need you to explain to me how you are paying your expenses. If you list a house payment of \$2800 per month but say you have no income from any source then the Court will not believe you. (I know because I have had that scenerio before) Income from relatives or draw down of a savings account, cashing in of IRAs, etc. is all sources of income that we should disclose.
- 10. Do you own/lease an automobile? Are there any automobiles in your name? If the divorce is not final then anything your wife has that was purchased during the marriage is technically still yours too.
- 11. Who is your mortgage company, what is the account number and the address?

Thanks.

Items still needed:

All real property in which you own an interest, including homostoad! l.

A THINKINGHE BEIDEL

A315 WATERLILY Cr MISSOURI CITY The 77459

List of ALL BANK ACCOUNTS that you own an interest in, complete with account 2. mimbers, etc.

NONE

- Explanation of CD at Royal Oaks Bank I will assume they have a collateral interest in 3. that CD and either have offset it or plan to. Need to know the particulars. CO WAS USED FOR COLLATERAL OF LOANS & BANK USED IT TO \$45,000 CO PLUS INTEREST
- Why did you list Susan's clothing if the two of you are separated and not living together? 4. There is nothing more important in a bankruptcy case other than FULL DISCLOSURE. If the Court believes you have in any way failed to be frank or thorough in answering the questions you may lose your discharge.

YOUHAR A QUESTION GISTING WAS G CLOTHING AND SINCE WE HAVE NOT FINISHED THE DIVORCE I LISTED THE CLOTHING.

You listed no jewelry. Do you not own a watch or a set of cufflinks???? 5.

I DO NOT NOR HAVE NOWN JEWELRY OTHER THAN MY WATCHES WHICH WERE SOLD 3 YUMAS AGO

What stock do you own? (In small companies as well as large, if any) Ó.

NONE



What businesses have you owned an interest in the last 5 years? (I need dates of

Operation, what each did and what percentage you owned)

Roberts ENT, Dancari Mannet ment facus ha

SISSOM ENT DEA SES FINANCIAL FES VENTURES INC ,

What lawsuits are you involved in personally? Make sure and include the divorce. (I

need style of case, case or cause number, court where the case is or was, and status, ic... pending, judgment, etc.)

9. I need you to explain to me how you are paying your expenses. If you list a house payment of \$2800 per month but say you have no income from any source then the Court will not believe you. (I know because I have had that scenerio before) Income from relatives or draw down of a savings account, cashing in of IRAs, etc. is all sources of income that we should disclose.

MY FAMILY & FRIENDS LOAN ME MONEY UNTIL I CAN GET BAGG TO WORK

Do you own/lease an automobile? Are there any automobiles in your name? If the 10. divorce is not final then anything your wife has that was purchased during the marriage is technically still yours too.

> VEHILLES DEINGT Nο

Who is your mortgage company, what is the account number and the address? 11.

ABN AMED MIRTHAGS OLITAILELY

I DO NOT WANT TO INCLUDE IT

IN THE BANKRUPTCY

Thanks.

OTHER DUITS WITH POST

KRISTINE GARES - CHARLE DEPOSONAL WAN STONEED #169560-

BUSINGES COANS:

OSCAR DAVALOS

505100066393

\$4683-

ANTONIS ALVAREZ

RICKY DAIDNEY

3500

(בטוטו)

SOUTHERN DISTRICT TEXAS DISTRICT OF TEXAS HOUSTON DIVISION

IN RE: Jimmy Sissom

CASE NO

CHAPTER 7

SCHEDULE A - REAL PROPERTY

Description Location Property	of Strategistation		Nature. Linterest	FDebtor's in Ricoparty	Husband, Wife, Hoint Hoor	Gurrent Value of Debtor's Interest in Peoperty, Without Deducting Any Secured Claim or Exemption	Amount Of Secured Claim
4315 Waterlily Court, Missouri	TClly, TX 77459		Homestead		-C	\$200,000.00	\$167,72 4.87
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april	20,2006	0					
5P#	20,2006 243,00 25,000	ŗ.					
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	•	-					
	•						

EXHIBIT68-E

Total: \$200,000.00. (Report also on Summary of Schedules)

Regarding sale of home on 4315 whiterlify Ct. .

Buyers - Joe : Sondra Perez

Amount paid - 253,000.00.

Closins date - April 26,2006

Amount back to Jimmy Sissum - 00-00

Amount back to _ \$ 75,426.78.00 Susan Sissum

Amount book to
Pezez' for lease
back on home 42 Days

w-2	central line	 	ankone.			
	2943	DATE # 23 0C	Low PEREZ & SONTHUR PEREZ 1\$ 1746.73	ONE THOUSAND SEVEN HUNDLED FORTISM PARTISM BET	Thick I will be a second	637862462943
		SUSAN P. SISSOM A315 WATERLLY CT. MISGOURI GTY, TX 77459	SANTOTIES JOHN FIRES &	ONE THOUSAND SEVER	CHASE OF NA. Principal Chase Bank, N.A. Option These Table N.A. (Chase These Table N.A. (Same Table Table N.A. (Same Table Table Table N.A.	LI I LOOUE LATE

JIMMY SISSOM

4315 WATERLILY CT MISSOURI CITY, TX. 77459 281-261-8166

May 2, 2006

EXPENSES

SALE PRICE	\$243,000.00
PAYOFF	<\$165,795.22>
LEASE BACK	<\$1746.73>
TAXES	<\$7200.00>
HOUSING PAYOFF SHORTAGE	<\$1122.00>
APRIL LIVING EXPENSES	<\$7500.00>
MAY LIVING EXPENSES	<\$7500.00>
HOUSING REPAIRS-CEILING, PAINT A/C WORK, TILE REPAIR	<\$5000.00>
HOMEOWNERS	<\$585.00>
HONOR ROLL APRIL & MAY	<\$1600.00> -
METHODIST	<\$370.00>
SUSAN VEHICLE	<\$20,000.00> - 2002 Saburba
EYE SURGERY	<\$4900.00>
RYAN TONSILS	<\$2800.00>
JIMMY VEHICLE	<\$15,000.00> + 1997 BMW

68-F

HEALTH INSURANCE

<\$858.00>

HOUSE PAYMENT APRIL

<\$2155.00>

Attorneys at Law

2200 North Loop West, Suite 310 Houston, Texas 77018 telephone: 713-957-0100

facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

brogers@lifename.net dwanderson@lifename.net bensey@lifename.net

Of counsel Lisa Nichols

April 10, 2006

Mr. Jimmy Sissom

Re: Retainment of Barbara M. Rogers to represent Jimmy Sissom in Chapter 7
Bankruptcy

Dear Mr. Sissom:

This letter is to serve as our agreement in regard to your retaining Barbara M. Rogers to advise, prepare documents and file on your behalf a Voluntary Chapter 7 petition pursuant to the provisions of Title 11 of the United States Code more commonly known as the Bankruptcy Code. Our agreement is fully contained in this letter. Any other agreement must be in writing and executed by all parties in order to have any binding effect.

Barbara M. Rogers has agreed to represent you in your Voluntary Chapter 7 case. This representation will be limited to:

- (1) General advice regarding exemption laws, both federal and state and how they apply to your specific situation;
- (2) General advice regarding possible causes of action that might arise ancillary to the bankruptcy case;
- (3) General advice regarding the preparation of schedules and statement of affairs, plan of arrangement and other documents to be filed with the Court;
- Preparation of the voluntary petition, schedules, statement of affairs and other documents necessary for the filing of your Voluntary Chapter 7 case;

^{*} Board Certified in Business Bankruptcy by the Texas Board of Legal Specializations



- (5) Response to general inquiries of creditors and other parties in interest in your bankruptcy case; and
- (6) Attending the creditors' meeting with you and cooperating with requests by the Trustee for additional information insofar as such information is available and furnished by you.

You, in turn, have agreed to pay to Barbara M. Rogers as a flat rate fee for the above-referenced services the amount of \$1,550.00. This amount includes all out of pocket costs associated with the filing of your case, including the filing fee.

This agreement does not include representation of your interest in any matter other than the Voluntary Chapter 7 case. The retainer paid hereunder does not include the cost of services necessary to represent you in any ancillary case that might arise. Matters not included in this agreement include objections to dischargeability of particular debtors, objections to property claimed by you as exempt, actions to clear title to exempt property, discovery proceedings, debt reaffirmation matters, or any litigation that be filed against you by the Trustee or one of your creditors.

The filing of a Chapter 7 bankruptcy will be reported to all of the major credit reporting agencies and will become a part of your credit report for ten years from the date of the filing. After the ten years, it will be up to you to notify the credit reporting agencies seeking removal of any debt that is still being reported that was discharged in the bankruptcy case. During the next ten years you will need to retain a copy of your schedules and your discharge order and present those to any creditor from whom you are trying to obtain credit in order to show that all of the "bad" debt on your credit report has been discharged. This includes judgments that have been reported on your credit report.

Approximately six weeks after the filing of your bankruptcy case, the Bankruptcy Court will schedule a meeting with the Trustee assigned to administer your case. Your creditors are also invited to attend this meeting which will be held at the offices of the United States Trustee at 515 Rusk, Suite 3401, Houston, Texas. You must attend this meeting.

Please be advised that I am not an expert in tax law and am not qualified to give advice in this field except in respect to the dischargeability of certain tax liabilities. You have indicated in your bankruptcy information schedule that you do not owe federal income taxes or any other taxes. Therefore, taxes will not be considered in your case.

April 10, 2006 Page Three

By execution of this letter agreement you are representing to me that all information that you have furnished to me for inclusion in the schedules and statement of affairs is true and correct. If you fail to list a creditor then that debt will not be discharged. Also, if you fail to disclose all of your assets you could be charged with a Bankruptcy Crime. Last but not least, if you make careless errors on your schedules that are misleading, you could be denied a discharge on all of your debts.

A duplicate original of this letter agreement is enclosed herein for your signature. By signature of this letter agreement, you are representing that you have read the entire agreement, and that you have no questions regarding the meaning of same.

After you have executed the agreement, please return one copy to me for my records. It is a pleasure to be of service to you.

Sincerely,

Barbara M. Rogers

AGREED TO:

Mr. Jimmy Sissom

Attorneys at Law

2200 North Loop West, Suite 310 Houston, Texas 77018

telephone: 713-957-0100 facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

brogers@lifename.net dwanderson@lifename.net bensey@lifename.net

Of counsel Lisa Nichols

May 4, 2006

Mr. Jimmy Sissom 4314 Waterlily Court Missouri City, TX 77459

Re: Case No. 06-31917; In re Jimmy Sissom; In the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

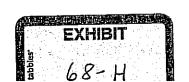
Dear Mr. Sissom:

I have received the notice of creditors' meeting for your case and am enclosing a copy for your review. You should also have received this notice directly from the Court. Your meeting is scheduled for May 24, 2006 at 10:00 a.m. The meeting will be held on the THIRD FLOOR OF THE U.S. COURTHOUSE, SUITE 3401, AT 515 RUSK AVENUE IN DOWNTOWN HOUSTON.

You should bring with you:

- 1. Your copy of all of your schedules and other pleadings filed in your case;
- 2. Your Texas Drivers' License (for identification purposes at the security checkpoint at the Courthouse);
- 3. Your Social Security Card and
- 4. Approximately \$10 for parking.

If you do not bring your Drivers' License or your Social Security Card you cannot finish the creditors' meeting and you will be required to come back at a later date. The best place to park is in the Theater District Underground parking. I usually enter from Capital and turn right after going through the ticket machine. Parking in that area puts you very close to the federal building when you go up the stairs.



Creditors Meeting Notice Page 2

If this date and time are totally unworkable, then we can obtain a reset, but the cost of resetting same will be approximately \$75.00 to cover the notice of the reset and the time and expense involved in obtaining the reset.

If you have any questions please call.

Sincerely,

Barbara M. Rogers

BMR:me

Enclosure

Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
telephone: 713-957-0100
facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

b.m.rogers@att.net dwanderson@swbell.net bensey@swbell.net

Of counsel Lisa Nichols

May 24, 2006

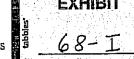
Mr. Jimmy Sissom 4315 Waterlily Court Missouri City, TX 77459

Re: Case No. 06-31917; In re Jimmy Sissom; In the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Dear Jimmy:

The purpose of this letter is to outline for you the items that you need to get together for the Trustee. Please forward these items to me before next Wednesday, May 31, 2006, so I will have an opportunity to review them before sending them to the Trustee:

- 1. All closing documents related to the borrowing of \$250,000 (net \$225,000) from Crown Financial in January 2006;
- 2. An itemization of what you did with that \$225,000, including copies of cancelled checks, receipts, invoices, etc. to back up those expenditures, and, if you do not have that, an explanation of what was paid, whose liability it was, etc.
- 3. Contact information for John Spence and Chris Parker, the name of the current CPA for F & S Ventures, Inc. and his/her contact information.
- 4. 2004 and 2005 Tax Returns for F & S Ventures, Inc.
- 5. Profit/Loss Statement and Balance Sheet for year end 2005 for F&S Ventures, Inc.



May 24, 2006 Page Two

6. A damage model for your claim against the Frys, including copies of any documents related to that claim. (For instance you need to list why you think the Frys owe you \$300,000.00 and provide the Trustee with an itemized explanation of how you arrived at that number.

If you have any questions please call.

Sincerely,

Barbara M. Rogers

BMR:me

Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
telephone: 713-957-0100
facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

b.m.rogers@att.net dwanderson@swbell.net bensey@swbell.net

Of counsel Lisa Nichols

June 22, 2006

Mr. Jimmy Sissom
431 Waterlily Court
Missouri City, TX 77459

Re: Case No. 06-31917; In re Jimmy Sissom; In the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Dear Jimmy:

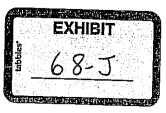
Your reset 341 meeting was yesterday morning at 9:30 a.m. I was there, the Trustee was there and Bank counsel and Bank representative were there, but you were not there. The Trustee reset the meeting to July 5, 2006 at 9:30 a.m. to give me an opportunity to find you if possible and get you there.

If you do not show up on July 5, 2006, then the Trustee will ask the Court for an order instructing the U.S. Marshalls to find you and bring you in to a creditors' meeting. That is not what you want to happen. I have tried to reach on the cell phone number that you left on my voicemail a couple of weeks ago (832-496-5921), but I never get an answer and the messages are full.

I will expect to see you on July 5, 2006 at 9:30 a.m. on the 3rd floor of the U.S. Courthouse, 515 Rusk, Houston, TX. If you have any questions call me.

Sincerely,

Barbara M. Rogers



Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
telephone: 713-957-0100
facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

b.m.rogers@att.net dwanderson@swbell.net bensey@swbell.net

Of counsel Lisa Nichols

July 10, 2006

Mr. Jimmy Sissom 1911 Trixie Houston, TX 77042

Re:

Case No. 06-31917; In re Jimmy Sissom; In the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Dear Jimmy:

The purpose of this letter is to remind you that at the creditors' meeting last week you agreed to provide the Trustee with a complete explanation/itemization of all amounts that you paid out of the funds you received from Crown Financial Services. These funds were within a few months prior to the filing of the bankruptcy but were exhausted prior to the filing of the bankruptcy. The Trustee needs to know who got what portion, when and how. For instance, if you paid someone \$30,000, did they receive that money in cash; check or cashiers' check?? If they were paid in cash, how did you get the cash? In addition you will need to provide the Trustee with copies of cashiers' checks or any other documentation evidencing these payments unless you have already provided him with this information in the bank statements that were previously provided.

Your creditors' meeting has been reset to August 2, 2006 at 9:30 a.m. You need to have the information requested to the Trustee prior to that time. In fact, he requested that you make an appointment with him prior to that date and sit down and go over all of the transfers with him so that he understands them.

^{*} Board Certified in Business Bankruptcy by the Texas Board of Legal Specializations

July 10, 2006 Page Two

The reason that this is important is two fold. First, the Trustee has to make sure that you do not have \$50,000 buried in the back yard in a can. Second, many of the payments you made were either preferences (if they paid your debts) or fraudulent conveyances (if they paid the debts of Dealers' Management.

Sincerely,

Barbara M. Rogers

BMR:me

Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
telephone: 713-957-0100
facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

Of counsel Lisa Nichols b.m.rogers@att.net dwanderson@swbell.net bensey@swbell.net

July 24, 2006

Mr. Jimmy Sissom 1911 Trixie Houston, TX 77042



Re:

Case No. 06-31917; In re Jimmy Sissom; In the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Dear Jimmy:

Enclosed is a copy of a lawsuit filed against you by Chase Bank USA, N.A. This suit is for the repayment of debt that you and/or your wife incurred within 90 days of the filing of your Chapter 7. The Bankruptcy Law states that if you incur debt during this time period then it is not dischargeable in a bankruptcy. You may recall at the last creditors' meeting that I had reaffirmation agreements for you to sign with Chase but you declined to sign them because you did not believe the amounts were correct. Based on the attachments to the lawsuit that are enclosed herein, I believe the amounts were correct.

The easiest way to deal with this suit is to simply agree that the debt is nondischargeable and to sign documents to reaffirm the debt and agree to repay the debt. However, if you wish to contest the suit, then you need to call me to discuss your defenses.

Your creditors' meeting has been reset to August 2, 2006 at 9:30 a.m. You need to have the information requested to the Trustee prior to that time. I have obtained all of the information that you furnished him previously. You are correct. You did provide him with an itemized list. What he is now looking for is backup for the items on the list. In other words, he wants you to go down the list and give him copies of checks, receipts, invoices, etc. that evidence each expenditure. I have all of the receipts that you originally turned over to the Trustee. Let me

July 24, 2006 Page Two

know if you need them or if you need another copy of the itemization that you originally supplied to the Trustee of the use you made of the funds from Crown Financial.

Last, but not least, enclosed is a notice of 2004 examination that I received from Royal Oaks Bank. The last two pages of this document contain a list of documents that you must produce at the time of the examination. Please get these documents together. If any of them have already been produced to the trustee, then I have already given the Bank's attorney a copy.

Call me if you have any questions.

Sincerely,

Barbara M. Rogers

BMR:mė

Enclosures

Attorneys at Law
2200 North Loop West, Suite 310
Houston, Texas 77018
telephone: 713-957-0100
facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

b.m.rogers@att.net dwanderson@swbell.net bensey@swbell.net

Of counsel Lisa Nichols

August 17, 2006

VIA REGULAR MAIL AND CM RRR # 7006 0810 0001 6550 8740

Mr. Jimmy Sissom 1911 Trixie Houston, TX 77042 EXHIBIT 68-M

Ŗе:

Case No. 06-31917; In re Jimmy Sissom; In the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

Dear Mr. Sissom:

Enclosed is a copy of the motion to withdraw as your attorney that I have filed with the Court this morning. It is clear from the most recent series of communications or lack of communications that it is not possible for me to continue to represent you in this Chapter 7 case. I am having your file copied today and will have it available at my office. You may either pick it up here or direct me to send it to you or your new attorney. In order for me to send it to someone, including yourself, I need to have a specific address complete with zip code.

You are hereby advised that the following deadlines are pending in your case that need immediate attention:

- a. The Trustee has resct your creditors' meeting from August 16, 2006 at 9:30 a.m. to August 30, 2006 at 9:30 a.m.
- I have previously sent to you a copy of a lawsuit filed against you by Chase Bank,
 N.A. with regard to the credit card charges made shortly before and after the filing

^{*} Board Certified in Business Bankruptcy by the Texas Board of Legal Specializations

August 19, 2006 Page Two

of the bankruptcy. This adversary proceeding is currently pending before the Court. Your answer is due to the Court and to Mr. Neville, attorney for Chase Bank, N.A. on or before August 24, 2006.

c. The Court has set a scheduling conference on the a lawsuit filed against you by Chase Bank USA, N.A. for August 24, 2006 at 9:00 a.m.

My retainer agreement with you did not include representation of you in anything other than the Chapter 7 case. When you were noticed for a 2004 examination by MetroBank, N.A., you paid to me \$1,000.00 as a retainer for services I would expend with regard to that 2004 examination. I enclose for your benefit a copy of my itemized bills for services rendered in this regard showing a balance due and owing.

I urge you to immediately obtain new bankruptcy counsel. Based on what I know about your case I would suggest that you might be well served to get experienced counsel with significant bookkeeping or accounting experience as well. Your biggest hurdle at this time is going to be to explain to the Trustee what happened to the funds you received from Crown Financial and to explain to MetroBank, N.A. what happened to the automobiles that are the subject of the 120 contracts that were assigned to them. You have provided me with some of this information, and I, in turn, have provided that information to the Trustee and to MetroBank, N.A.'s counsel. However, there are still very big gaps in this information.

Sincerely.

Barbara M. Rogers

BMR:me

Enclosures

Attorneys at Law . 2200 North Loop West, Suite 310 Houston, Texas 77018 telephone: 713-957-0100 facsimile: 713-957-0105

Barbara M. Rogers* David W. Anderson David E. Bensey

b.m.rogers@att.net dwanderson@swbell.net bensey@swbell.net

Of counsel Lisa Nichols

August 22, 2006

VIA REGULAR MAIL AND CM RRR # 7006 0810 0001 6550 8757

Mr. Jimmy Sissom 1911 Trixie Houston, TX 77042

> Re: Case No. 06-31917; In re Jimmy Sissom

Dear Mr. Sissom:

Enclosed is a copy of an emergency motion filed by the Ronald J. Sommers, Trustee in your Chapter 7 case and by Royal Oaks Bank compelling your attendance at the creditors' meeting now set for August 30, 2006 at 9:30 a.m. and at a 2004 examination to be held at the offices of Storey & Denum, 11757 Katy Freeway, Suite 1010 on September 7, 2006 at 9:30 a.m. While I have heard from Bob Pickelner and know that he is trying to assist you in finding new bankruptcy counsel, I have not been contacted by your new attorney.

Also enclosed is a motion requesting the judge to set the motion to compel for hearing on an expedited basis. It is very important that you read both of these motions. They will explain to you what you need to do, where you need to go to comply with the requests made by the Trustee and Royal Oaks Bank and what you need to bring with you to the 2004 examination on September 7, 2006.

I still have your file in my office and am happy for you to pick it up or I will deliver it to your new attorney if you wish.

Barbara M. Rogers

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
JIMMY SISSOM	8	CASE NO. 06-31917-H4-7
	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	CHAPTER 7
DEBTOR(S)	. §	

EMERGENCY MOTION TO COMPEL ATTENDANCE AT MEETING OF CREDITORS AND BANKRUPTCY RULE 2004 EXAMINATION AND REQUIRE PRODUCTION OF DOCUMENTS

Pursuant to Local Rule 9013:

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 20 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Ronald J. Sommers, Chapter 7 Trustee ("Trustee"), and Royal Oaks Bank, a party in interest, (collectively, "Movants") in the above entitled and numbered case and hereby file this Emergency Motion to Compel Attendance at Meeting of Creditors and Bankruptcy Rule 2004 Examination and Require Production of Documents ("Motion") and in support thereof would respectfully show the Court as follows:

Facts

- 1. On May 3, 2006, the Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code ("Bankruptcy"). Ronald J. Sommers was subsequently appointed Chapter 7 Trustee.
- 2. The first meeting of creditors was scheduled for May 24, 2006 at 10:30 a.m. The meeting was not concluded and was reset several times thereafter.
- 3. The Debtor failed to appear at the meeting of creditors scheduled for June 21, 2006 at 9:30 a.m.
- 4. The Debtor failed to appear at the meeting of creditors scheduled for August 16, 2006 at 9:30 a.m.
- The Debtor failed to appear at the 2004 Examination scheduled for August 10, 2006
 and by Royal Oaks Bank.
- 6. The meeting of creditors has been reset to August 30, 2006 at 9:30 a.m. The meeting of creditors will be held at 515 Rusk Avenue, 3rd Floor, Houston, TX.
- 7. The Bankruptcy Rule 2004 Examination has been scheduled for September 7, 2006 at 9:30 a.m. The Bankruptcy Rule 2004 Examination will be held at the offices of Storey & Denum, P.C., 11757 Katy Freeway, Suite 1010, Houston, Texas 77079.
- 8. The Debtor received two (2) cashier's checks from the sale of his stock in a business enterprise totaling \$225,100.00. One of the cashier's checks payable to the Debtor in the amount of \$189,740.00 was negotiated on or about February 14, 2006, and the other cashier's check payable to the Debtor's business, Dealer's Management Group, Inc. in the amount of \$35,360.00 was negotiated on or about March 3, 2006. The Debtor has failed to provide adequate documentation

accounting for the expenditures or whereabouts of the proceeds of the two cashier's checks.

Requested Relief

- 9. The Debtor is required, under 11 U.S.C. § 343, to "appear and submit to examination under oath at the meeting of creditors." Because the Debtor has proven that he will not voluntarily comply with his required duties, Movants request that the Court enter an order compelling his compliance.
- 10. Movants ask this Court to order the Debtor to appear and submit to examination under oath at the meeting of creditors to be held at 515 Rusk Avenue, 3rd Floor, Houston, TX on August 30, 2006 at 9:30 a.m. or to attend a meeting of creditors as scheduled by the Court. Movants also ask this Court to order the Debtor to produce the documents listed in the attached Exhibit "A" to the Trustee at or before this meeting of creditors.
- 11. Movants ask this Court to order the Debtor to appear and testify at the Bankruptcy Rule 2004 Examination to be held at the offices of Storey & Denum, P.C., 11757 Katy Freeway, Suite 1010, Houston, Texas 77079 on September 7, 2006 at 9:30 a.m.
- 12. Movants ask this Court to order the Debtor to pay the sum of two-hundred dollars (\$200.00) to the Trustee as reasonable attorney's fees incurred in bringing the Motion.

WHEREFORE Movants respectfully pray that the Court grant the Emergency Motion to Compel Attendance at Meeting of Creditors and Require Production of Documents and for such other and further relief to which Movants may be entitled.

Respectfully submitted,

By: /s/ Jennifer L. Haluptzok

Jennifer L. Haluptzok State Bar No. 24053058 2800 Post Oak Blvd., 61st Floor Houston, Texas 77056

Telephone: 713-960-0303 Facsimile: 713-892-4800

ATTORNEYS FOR RONALD J. SOMMERS, TRUSTEE

OF COUNSEL:

NATHAN SOMMERS JACOBS A Professional Corporation 2800 Post Oak Blvd., 61st Floor Houston, Texas 77056

Telephone: 713-960-0303 Facsimile: 713-892-4800

STOREY & DENUM, P.C.

By: /s/ Craig R. Denum with permission by

Jennifer L. Haluptzok

Craig R. Denum
State Bar No. 05768375
11757 Katy Freeway, Suite 1010
Houston, Texas 77079
(281) 556-6684 – Telephone
(281) 556-8482 – Facsimile

ATTORNEY FOR ROYAL OAKS BANK

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Emergency Motion to Compel Attendance at Meeting of Creditors and Bankruptcy Rule 2004 Examination and Require Production of Documents has been served on the parties listed on the attached service list by U.S. mail, first class, postage prepaid, on the 21st day of August, 2006.

<u>/s/ Jennifer L. Haluptzok</u> Jennifer L. Haluptzok

EXHIBIT A

DOCUMENTS TO BE PRODUCED BY JIMMY SISSOM

DEFINITIONS

The term "documents" shall mean writings of every kind, both originals and all A. non-identical copies thereof, in your possession, custody or control, irrespective of whether the writing is one intended for or transmitted internally by you, or intended for or transmitted to any other person or entity, including without limitation, any government agency or personnel. The term shall include handwritten, typewritten, printed, photocopied, photographic, or recorded matter. It shall include communications in words, symbols, pictures, sound recordings, films, tapes and information stored in, or accessible through computer or other information storage or retrievable systems, together with the codes and/or programming instructions and other materials necessary to understand and use such systems. For purposes of illustration and not limitation, the term shall include: correspondence, transcripts or testimony, notes, reports, files. records, contracts, agreements, telegrams, teletypes communications sent or received, diaries, calendars, logs, notes or memoranda of telephonic or face-to-face conversations, drafts, work papers, agendas, bulletins, notices, circulars, announcements, instructions, schedules, minutes, summaries, notes, and other records or recordings in any conferences or meetings, statements, interviews, bills, vouchers, receipts, and other records of payments, ledgers, journals, balance sheets, profit and loss statements, and other sources of

financial data, analyses, affidavits, published books, articles, speeches and newspaper clippings, press releases, charts, drawings, manuals, brochures, memoranda, evaluations, conclusion, studies, records of administrative and financial actions taken or recommended, and all other writings, the contents of which relate to, discuss, consider, or otherwise refer to the subject matter of the particular documents requested.

- B. The term "you" shall mean Jimmy Sissom.
- C. The term "Royal" shall mean Royal Oaks Bank, a creditor in this bankruptcy proceeding.
- D. The term "Bankruptcy Proceeding" or "Bankruptcy" shall mean Case No. 06-31917-H4-7; In re: Jimmy Sissom; In the United Stated Bankruptcy Court for the Southern District of Texas Houston Division.
- E. The term "the Loans" shall mean any borrowing by you from Royal Oaks Bank.

- Copies of all written receipts given by you after receipt of payments related to Dealer's Management Group, Inc.'s retail installment contracts from January 1, 2006 to present.
- 2. Copies of all documents reflecting the disposition of payments received by you, in any capacity, related to Dealer's Management Group, Inc.'s retail installment contracts from January 1, 2006 to present.
- 3. Copies of all bank statements, dated January 1, 2006 to present, including the front and back of any imaged checks related to any bank account on which you are a signatory, including, but not limited to Dealer's Management Group, Inc., Sissom Enterprises dba S & S Financial, Roberts Enterprises, F & S Ventures, Inc. and Carz-N-More.
- Copies of all bank statements, dated January 1, 2006 to present, including the front and back of any imaged checks related to any bank account on which your wife is a signatory.
- Copies of all bank statements, dated January 1, 2006 to present, including the front and back of any imaged checks related to any bank account on which you are a signatory on behalf of Dealer's Management Group, Inc.
- Copies of all transactions related to the purchase or disposition of any "cashiers check", "tellers check", or "transfers check" by you or your wife from January 1, 2006 to present.
- Copies of all document related to any transactions on behalf of Dealer's Management Group, Inc. from January 1, 2006 to present.
- 8. Copies of any and all documents related to any business transactions with an entity known as Carz-N-More.
- 9. Since January 1, 2006, copies of all documents related to any titled vehicle (such as cars, boats, motorcycles, trailers, trucks, airplanes, etc.) including all certificates of registration, Ioan documents, bills of sale, all transfers of title from Dealer's Management Group, Inc. and all documents indicating all payments to you.
- Since January 1, 2006, all documents indicating ownership (in whole or part, direct or indirect) by you of any real property, whether or not you claim same as exempt or not.
- 11. All documents, since January 1, 2006, that indicate a transfer by you to any person or entity of an interest in real property. Include all deeds, deeds of trust contracts for deed, copies of checks, wire transfers, receipts or other indications

- of the consideration exchanged for same. Include all earnest money contracts and all HUD-1 Closing Statements related to same.
- 12. All stock accounts, investment accounts, bonds, certificates of deposit or other documents indicating any money or other thing of value owned (in whole or in part) by you indicating sums owed to you.
- 13. All promissory notes, IOU's or other indications of indebtedness owed to you.
- 14. Any and all canceled checks, check books, check registers, bank statements, statements of account passbooks, certificates of deposit and/or any other document reflecting, evidencing or indicating an account money market certificate of deposit and/or lock box with a financial institution which is in the name of you or your wife or in which your wife or you claims or asserts an interest presently or within the last two (2) years.
- 15. Any and all accounts receivable, invoices, statements of account transaction summaries, accountings, correspondence and/or any other document(s) reflecting or evidencing any money or thing of value owed to you or Dealer's Management Group, Inc. during last year.
- 16. Any and all document(s) evidencing any right title or interest equitable or legal, in and to any property, personal or real, in favor of you or your wife, including, but not limited to, deeds, deeds of trust, trust agreements, certificates of title, stock or share certificates, bills of sale, pledge agreements, bailment agreements and consignment agreements.
- 17. Any and all document(s) evidencing, relating to or pertaining to the business or financial affairs of you or Dealer's Management Group, Inc. for the period of one (1) year immediately preceding the date hereof, including, but not limited to: federal income tax returns; state tax reports, disclosures or returns; county or local tax renditions, reports or returns; company books and records; financial statements; CPA generated reports; insurance policies; applications for insurance; insurance binders; claims against insurance policies or binders; contracts and correspondence.
- 18. An accounting of all sums received, transferred, and/or converted within the 90 day period before you filed for Bankruptcy, including the name of the transferee and transferor, the date transferred, the amount transferred, and the purpose of the transfer, and/or the item purchased.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	CASE NO. 06-31917-H4-7
JIMMY SISSOM	8	
DEBTOR(S)	9 8	CHAPTER 7

MOTION FOR EXPEDITED HEARING ON
EMERGENCY MOTION TO COMPEL ATTENDANCE AT MEETING OF
CREDITORS AND BANKRUPTCY RULE 2004 EXAMINATION AND REQUIRE
PRODUCTION OF DOCUMENTS

Pursuant to Local Rule 9013:

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 20 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW Ronald J. Sommers, Chapter 7 Trustee ("Trustee"), and Royal Oaks Bank, a party in interest, (collectively, "Movants") in the above entitled and numbered case and hereby file this Motion for Expedited Hearing on Emergency Motion to Compel Attendance at Meeting of Creditors and Bankruptcy Rule 2004 Examination and Require Production of Documents and in support thereof would respectfully show the Court as follows:

- 1. Jimmy Sissom ("Debtor") failed to attend the Bankruptcy Rule 2004 Examination scheduled for August 10, 2002 and the meetings of creditors scheduled for June 21, 2006 and August 16, 2006. Movants seek an order from this Court compelling the Debtor to attend the reset meeting of creditors currently scheduled for August 30, 2006 at 9:30 a.m. or to attend a meeting of creditors as scheduled by the Court and requiring the Debtor to produce the documents listed in Exhibit "A" attached to the Emergency Motion to Compel Attendance at Meeting of Creditors and Require Production of Documents ("Motion"). Movants seek an order from this Court ordering the Debtor to appear and testify at the Bankruptcy Rule 2004 Examination to be held on September 7, 2006 at 9:30 a.m.
- 2. Expedited consideration of the Motion is requested because the meeting of creditors has been reset to August 30, 2006 at 9:30 a.m. Moreover, the Debtor filed his voluntary petition under Chapter 7 of the Bankruptcy Code on May 3, 2006. The Debtor's timely and complete disclosure regarding the whereabouts of various sums received by the Debtor within the 90 days preceding the Bankruptcy is crucial at this juncture. The Affidavit of the Trustee in support of expedited consideration of the Motion is attached hereto as Exhibit "A."
- 3. Movants request that the Court set the Motion for a hearing at the earliest date available on the Court's docket on or before August 29, 2006 and set a deadline of two days prior to the hearing to object to the Motion.

WHEREFORE Movants respectfully pray that the Court grant their Motion for Expedited Hearing on Emergency Motion to Compel Attendance at Meeting of Creditors and Bankruptcy Rule 2004 Examination and Require Production of Documents and for such other and further relief to which Movants may be entitled.

Respectfully submitted,

By: /s/ Jennifer L. Haluptzok

Jennifer L. Haluptzok State Bar No. 24053058 2800 Post Oak Blvd., 61st Floor Houston, Texas 77056

Telephone: 713-960-0303 Facsimile: 713-892-4800

ATTORNEYS FOR RONALD J. SOMMERS, TRUSTEE

OF COUNSEL: NATHAN SOMMERS JACOBS A Professional Corporation 2800 Post Oak Blvd., 61st Floor Houston, Texas 77056

Telephone: 713-960-0303 Facsimile: 713-892-4800

STOREY & DENUM, P.C.

By: /s/ Craig R. Denum with permission by

Jennifer L. Haluptzok

Craig R. Denum
State Bar No. 05768375
11757 Katy Freeway, Suite 1010
Houston, Texas 77079
(281) 556-6684 – Telephone
(281) 556-8482 – Facsimile

ATTORNEY FOR ROYAL OAKS BANK

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	•
	§	CASE NO. 06-31917-H4-7
JIMMY SISSOM	§	
	. §	CHAPTER 7
DEBTOR(5)	·	

THE STATE OF TEXAS 6969 COUNTY OF HARRIS Ş

BEFOREME, the undersigned authority, on this day personally appeared Ronald J. Sommers who, being known to me and duly sworn, upon oath deposed and stated as follows:

- 1. My name is Ronald J. Sommers. My business address is 2800 Post Oak Blyd., 61st Floor, Houston, Texas 77056. I am over the age of eighteen (18) years, am fully competent to testify, have never been convicted of a crime, and am in no way disqualified from making this affidavit.
- 2. The above Chapter 7 case was filed on May 3, 2006.
- 3. The reset creditors meeting is currently scheduled for August 30, 2006 at 9:30 a.m.
- 4. All of the facts stated in Paragraphs 1 through 3 above, are true and correct and warrant expedited consideration of the Emergency Motion To Compel Attendance At Meeting Of Creditors And Require Production of Documents.

Further Affiant sayeth not,

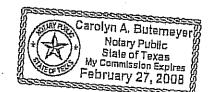
Ronald J. Sommers

SWORN TO AND SUBSCRIBED BEFORE ME this 17th day of August, 2006, to certify which witness my hand and seal of office, A. But

Notary Public in and for

The State of TEXAS

EXHIBIT



May 03, 2006 Wednesday

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Jimmy sissom

4315 WATERLILY CT -MISSOURI CITY, TX. 77459 713-805-3770

islssom@houston.rr.com

Fax Transmittal Form

To: Barbara Rogers

Name: CC:

Phone:

Fax: 713-957-0105

From:

Date Sent: 2/28/06

Number of Pages:

Message:

Barbera,

How are you. My tax return for last year (2005) will be 0 - I will get my accountant to get something over to you this week.

Also I am in divorce proceedings so I was not sure how to answer all of the papers. As well as my house is up for sale and I have a contract and it should be closed in the next 45 days unless something goes awry. I have also applied for the certificate you had said I need.

THANKS, Jimmy Sissom wrong Date

Jimmy sissom

4315 WATERLILY CT MISSOURI CITY, TX. 77459 713-805-3770

Jslssom@houston.rr.com

Fax Transmittal Form

To: Barbara Rogers

Name: CC:

Phone:

Fax: 713-957-0105

From:

Date Sent: 2/28/06

Number of Pages:

Message:

Barbara,

How are you. My tax return for last year (2005) will be 0 -1 will get my accountant to get something over to you this week.

Also I am in divorce proceedings so I was not sure how to answer all of the papers. As well as my house is up for sale and

Barbara M. Rogers

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent:

Tuesday, May 02, 2006 9:43 AM

To: Subject: 'jsissom@houston.rr.com' Additional information

Jimmy,

Last week you advised me that you and your wife had sold your home and had received a sum of money equal to over \$75,000.00, and that you were holding off on investing that money in a new Texas homestead.

The law is very clear in this area. That money is exempt for 6 months under Texas law and then it loses its exemption and becomes available to satisfy your debts. All of this is true even if the money was put in your wife's bank account. Texas is a community property state and while the two of you are married all assets in either of your names are presumed to be community property.

Also, last week I received a phone call from a process server who advised me that he had tried to serve you with a lawsuit and you gave him my name and number. As a matter of policy I do not accept service on lawsuits. That is not part of being your bankruptcy attorney.

Based on the above I still need:

- 1. A copy of the closing statement on the sale of your home (if you did not close in a Title Company then I need an itemization of disbursements made by whoever closed the sale).
- 2. A complete itemization of what happened to the funds that you received, including the bank account number, style and amount currently on deposit of the remaining proceeds, if any.
- 3. A copy of the any lawsuits you have received or been served with since we originally met in my office.
- 4. A complete list of all debts that you owe (we can add them, but there will be a \$100 fee each time we add new creditors--its just better to have it correct up front).

Bankruptcy is a complicated area of law that seems to change all the rules. If you paid any creditors during 90 days before we file then the bankruptcy trustee assigned to your case will demand that those creditors give back the money they received. Any creditor who returns funds to the Trustee will receive a claim in your case equal to the amount returned. The Trustee will then pay himself his expenses and then disburse the balance to ALL of your creditors on a pro rata basis. I tell you this because you indicated to me last week that you had paid some "friend" that you owed money to out of the house proceeds. The only way to protect them from having to give that money back is to wait 90 days to file, and if anyone received money from you who is a relative or a business partner then you have to wait a full year.

This email is not meant to confuse you, but I am sure you will have questions. Please call if you do. Otherwise get this information to me and I will make a final review and let you know if I need additional information. Thanks.

Barbara M. Rogers
Rogers, Anderson & Bensey, PLLC
2200 North Loop West, Ste 310
Houston, TX 77018
(713) 957-0100, Ext. 100
(713) 957-0105 (fax) 713-816-4133 (cell)

A KARAMBARA MENERALA MANAGARA

Rogers, Anderson & Bensey, PLLC 2200 North Loop West, Ste 310 Houston, TX 77018 (713) 957-0100, Ext. 100 (713) 957-0105 (fax) 713-816-4133 (cell)

Barbara M. Rogers

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent:

Monday, May 22, 2006 8:00 AM

To:

'isissom@houston.rr.com'

Subject:

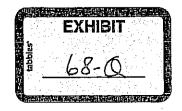
Creditors' Meeting

Sorry for the mix-up in addresses. Your petition had the 4314 address on it and I guess we did not catch that problem when we went over everything. Your mailing address was listed as 4315 so it should be OK.

The new law does not allow you to have an extention if you file for bankruptcy. Your case will be dismissed if you do not produce the 2005 tax return. Early on in the case you advised me that you had had no income and that your accountant would get something to me with regard to 2005. Unfortunately we will have to have that.

Also, Texas is a community property state. Your wife's bank account IS YOURS TOO. The Trustee wants copies of those bank statements. He will probably ask for the company bank statements as well so you might as well bring those too. If you have questions call me.

Barbara M. Rogers
Rogers, Anderson & Bensey, PLLC
2200 North Loop West, Ste 310
Houston, TX 77018
(713) 957-0100, Ext. 100
(713) 957-0105 (fax) 713-816-4133 (cell)



Barbara M. Rogers

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent: To: Monday, May 22, 2006 11:09 AM

o: 'jimmy sissom'

Subject:

RE: Creditors' Meeting

Marvelous.

----Original Message----

From: jimmy sissom [mailto:jsissom@houston.rr.com]

Sent: Monday, May 22, 2006 11:06 AM

To: b.m.rogers@att.net

Subject: RE: Creditors' Meeting

I do not have full control over my cpa and have made contact with him and he decided to file an extension not me. He has had all tax return info since february and I have spoke with him and told him I need my return filed asap. I will let you know shortly what he says. I have all other records.

Thanks,

Jimmy

----Original Message----

From: Barbara M. Rogers [mailto:b.m.rogers@att.net]

Sent: Monday, May 22, 2006 8:00 AM

To: jsissom@houston.rr.com Subject: Creditors' Meeting

Sorry for the mix-up in addresses. Your petition had the 4314 address on it and I guess we did not catch that problem when we went over everything. Your mailing address was listed as 4315 so it should be OK.

The new law does not allow you to have an extention if you file for bankruptcy. Your case will be dismissed if you do not produce the 2005 tax return. Early on in the case you advised me that you had had no income and that your accountant would get something to me with regard to 2005. Unfortunately we will have to have that.

Also, Texas is a community property state. Your wife's bank account IS YOURS TOO. The Trustee wants copies of those bank statements. He will probably ask for the company bank statements as well so you might as well bring those too. If you have questions call me.

Barbara M. Rogers
Rogers, Anderson & Bensey, PLLC
2200 North Loop West, Ste 310
Houston, TX 77018
(713) 957-0100, Ext. 100
(713) 957-0105 (fax) 713-816-4133 (cell)

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent: To:

Monday, May 22, 2006 2:56 PM

'ilmmy.sissom'

Subject:

Dealers Management Bank Accounts

In reviewing these accounts and the cancelled checks it appears that you were paying personal expenses from this account (ie., Target, Macys, haircuts, etc.). Technically, this is income to you for which you should receive a 1099. It is difficult for me to read the checks that were faxed. Please calculate the amounts that should be income to you during that six month period and let me know so I can amend according. It will not change Lo and prepared the outcome.

Barbara M. Rogers Rogers, Anderson & Bensey, PLLC 2200 North Loop West, Ste 310 Houston, TX 7701B (713) 957-0100, Ext. 100

(713) 957-0105 (fax) 713-816-4133 (cell)

From: Sent:

To:

Barbara M. Rogers [b.m.rogers@att.net] Wednesday, May 24, 2006 12:11 PM

'jimmy sissom'

Subject:

Info Requested by Trustee

Attachments:

Ltr re info Trustee Requested at 341 mtg.pdf



Ltr re info rustee Requested .

Attached is a letter outlining what the Trustee requested. I suspect we will get a notice of 2004 examination with a request for documents sometime in the next few weeks (from the Bank). I will keep you posted. As for Chase, if those charges are your wife's and you and she are getting divorced, then you need to decide who is going to repay that debt. I don't want you signing a reaffirmation agreement if she is out trying to run up all of your credit cards. If that is not the case, then fine, but you need to talk to your divorce attorney if it is the case. If you have questions please call.

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent:

Tuesday, May 30, 2006 11:28 AM

To: 'jimmy sissom'

Subject:

2004 EXAM, DOCUMENTS AND DAVID HERNANDEZ

PLEASE CALL ME ASAP REGARDING THE ABOVE TOPICS.

From: Barbara M. Rogers [b.m.rogers@att.net]

Sent: Wednesday, May 31, 2006 11:55 AM

To: 'jimmy sissom'

Subject: RE:

Jimmy, I do not understand your business but I will take your word for it. I have talked to Denum's assistant this morning. Denum is on vacation until the 9th. The Trustee told them not to schedule another 2004 until after the next scheduled creditors' meeting (which should not go forward since we should have all the documents to him by then). That is because the Trustee wants to see all of the documents before any 2004 exam. I told Denum's assistant that you were hot and I thought you had cause to sue the Bank and if they did not back off and treat you with respect that this thing was going to blow up in their faces. She acknowledged my thoughts and promised to pass them on the Craig Denum. Just cool your jets for now and let this thing play out a little more.

Barbara-

From: jimmy sissom [mailto:jsissom@houston.rr.com]

Sent: Wednesday, May 31, 2006 11:48 AM

To: 'Barbara M. Rogers'

Subject:

Barbara.

Good Morning- something else I was thinking that throws me a curve ball is that the Bank has notes that are renewed contracts.

Example: \$250,000 collateralizing \$100,000 loan at the end of the payout the n/r will still be about the same \$250,000(2 years later) because those contracts have been reposessed and recontracted. Therefore the Bank has still enough accounts to pay back the debt and then some. CUSTOMERS WILL NOT PAY OUT. It is impossible for these people to payout a 2 to 3 year contract. Only 15% will ever pay out so your always recycling the same money. So where is the loss.

I guess what I am not understanding is that those notes will continue to recycle and they know it and why are they acting like they are shorted money, not to mention did they sell those notes to Dixon. Certainly if they did there was not a concern for Royal Oaks Bank to get whole, only to get David's little friend at Dixon Motors more money in his pocket.

Thanks, Jimmy Sissom

From:

Barbara M. Rogers [b.m.rogers@att.net] Monday, June 05, 2006 2:50 PM

Sent:

'limmy sissom' To:

Subject:

Information for trustee

I am still waiting for the information the Trustee requested. Please get that to me as soon as possible.

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent: To: Tuesday, June 06, 2006 10:22 AM

'jimmy sissom'

Subject:

Ínfo

I got the stuff. I have some questions. Please call me.

From: Sent:

Barbara M. Rogers [b.m.rogers@att.net]

To:

Thursday, June 22, 2006 9:44 AM 'jimmy sissom'

Subject:

341 meeting

If you are out there I need you to call me ASAP. Your reset 341 meeting was yesterday and you did not show up. It has been reset to July 5 at 9:30. If you do not show up on that date, the Trustee intends to get a Court order and the U.S. Marshalls will find you and bring you to the Federal Building. You do not want that to happen!!

From: Sent:

Mail Delivery System [MAILER-DAEMON@clmboh-mx-07.mgw.rr.com] Thursday, June 22, 2006 9:45 AM

b.m.rogers@att.net

To: Subject:

Delivery Status Notification (Failure)

Attachments:

details.txt; 341 meeting (982 bytes)





details.txt (352

341 meeting

(982 bytes)

The following message to <jsissom@houston.rr:com> was undeliverable. The reason for the problem:

5.1.0 - Unknown address error 550-'5.1.1 unknown or illegal alias: jsissom@houston.rr.com'

From: Sent: Barbara M. Rogers [b.m.rogers@att.net] Thursday, June 22, 2006 10:04 AM Bob Pickelner (rpickelner@aol.com)

To: Subject:

Jimmy Sissom

Jimmy had a reset creditors' meeting yesterday at 9:30 that he did not show up for. His schedules were an absolute mess. I have attempted to get all the information from him to correct them and I don't think he has any real problems except maybe with the Bank but if he doesn't show up then the Trustee (Ron Sommers) will get the Marshalls to go get him and that will not be a pretty picture. His phone number doesn't work and I don't think he is getting his mail at the Waterlily Court address. His email is bouncing back undeliverable. Do you have any idea how to contact him?

From:

Rpickelner@aol.com

Sent:

Thursday, June 22, 2006 11:41 AM

To:

b.m.rogers@att.net

Subject: Re: Jimmy Sissom

Barbara,

I just spoke to Jimmy on his cell phone at 832-496-5921. He said he would be calling you right away. He also indicated that his email address is no longer in effect. He gave me 1911 Trixie, Houston, Texas 77042 as his "temporary" mailing address.

I hope this is helpful.

Cory Y. Nelson

Legal Assistant to Robert S. Pickelner (713) 665-7000

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent:

Wednesday, August 02, 2006 8:34 AM

Ta:

'Dealer's Management Group Inc'

Subject: RE: 2006 dmg deposits

I sent you their statements in the last package that came to your house. The statements were attached to the lawsuit. Please look at them and tell me what charges are not yours.

From: Dealer's Management Group Inc [mailto:autogroupetc@yahoo.com]

Sent: Wednesday, August 02, 2006 8:32 AM

To: barbara rogers

Subject: re: 2006 dmg deposits

Good Morning,

Attatched is a word file and before I forget we did not have a 16000 balance with chase - so i guess the best thing to do is them to provide a statement.

JIMMY SISSOM 713-805-3770

Groups are talking. We're listening. Check out the handy changes to Yahoo! Groups.

From: Barbara M. Rogers [b.m.rogers@att.net]

Sent: Wednesday, August 02, 2006 8:34 AM

To: 'Dealer's Management Group Inc'

Subject: RE: 2006 dmg deposits

I sent you their statements in the last package that came to your house. The statements were attached to the lawsuit. Please look at them and tell me what charges are not yours.

From: Dealer's Management Group Inc [mailto:autogroupetc@yahoo.com]

Sent: Wednesday, August 02, 2006 8:32 AM

To: barbara rogers

Subject: re: 2006 dmg deposits

Good Morning,

Attatched is a word file and before I forget we did not have a 16000 balance with chase - so i guess the best thing to do is them to provide a statement.

ЛММҮ SISSOM 713-805-3770

Groups are talking. We're listening. Check out the handy changes to Yahoo! Groups.

From:

Barbara M. Rogers [b.m.rogers@att.net]

Sent:

Wednesday, August 02, 2006 8:35 AM

To:

'Dealer's Management Group Inc'

Subject: RE: 2006 dmg deposits

Sorry, but I cannot open the attachment. What format is it in??

From: Dealer's Management Group Inc [mailto:autogroupetc@yahoo.com]

Sent: Wednesday, August 02, 2006 8:32 AM

To: barbara rogers

Subject: re: 2006 dmg deposits

Good Morning,

Attatched is a word file and before I forget we did not have a 16000 balance with chase - so i guess the best thing to do is them to provide a statement.

JIMMY SISSOM 713-805-3770

Groups are talking. We're listening. Check out the handy changes to Yahoo! Groups.

From: Sent:

Barbara M. Rogers [b.m.rogers@att.net] Thursday, August 03, 2006 8:15 AM

To:

'Craig Denum'

Subject:

Sissom 2004

Is there any possibility to move the 2004 to the 10th. Sissom has gotten a family conflict. He will have his kids that day and I don't think you or I want to do this with a couple of small boys around.

From: Sent: Barbara M. Rogers [b.m.rogers@att.net] Tuesday, August 15, 2006 1:50 PM 'Dealer's Management Group Inc'

To: Subject:

Reset Creditors' Meeting

Your creditors' meeting reset is tomorrow at 9:30 a.m. Please be there. I am still trying to get Mr. Akard to get involved. I will not leave you in without counsel but you have to try harder to pay attention to what is going on. Try by reading what I have sent to you in the mail and attending tomorrow.

From: Barbara M. Rogers [b.m.rogers@att.net]

Sent: Thursday, August 17, 2006 6:48 AM

To: 'Dealer's Management Group Inc'

Cc: Bob Pickelner (rpickelner@aoi.com)

Subject: RE: Reset Creditors' Meeting

I am definitely not representing you anymore. It is impossible to get in touch with you. You were in the creditors' meeting when it was reset to August 2. Just before August 2 you and I talked and I advised you it had been reset to August 16 provided you kept Mr. Sommers advised of your progress. Most normal people keep a calendar. I could never remember when everything was without one. However, I always contact my Chapter 7 clients the day before a creditors' meeting to make sure they remember. The problem with you is that I can never get ahold of you. Jimmy, I have significant obligations as well — to my clients, my family, my church, etc. — I manage to show up when I am expected to be there. Mr. Akard is not interested in taking your case given the problems with getting in touch with you. I have called your cell phone six or seven times in the last week. Your voicemail is full and you don't answer. Texting gets to you unless you have changed cell phones again. You tried to email a purportedly Word document so I could get a paralegal to try to prepare the spreadsheet that Mr. Sommers is requesting: I advised you that the documents you sent was not in Word format (I have the latest version of Word on my computer and am very familiar with it). You told me you would resend it. You never did.

I still am willing to give you the benefit of the doubt that everything you have told me and Mr. Sommers is true. The problem is I have clients who need my attention who answer the phone when I call, keep calendars and show up at obligations they have with me and manage to get information to me when it is expected. I don't have anymore time to spend my time and wear and tear and on me, my car, etc. going to meetings and depositions where you never show up.

The Trustee is planning to file a motion for a bench warrant to get the U.S. Marshalls to pick you up for the next 341 meeting which is on August 30, 2006 at 9:30 a.m. In addition, Mr. Neville, attorney for Chase Bank, has provided me with an Agreed Judgment with regard to the credit card charges made by you and your wife shortly before and after the filing of the Chapter 7. You need to address this.

I will be copying your file and sending it to you with a letter explaining all of the outstanding items. I will also be filing a motion to withdraw today. Please let me know what address you want the file to go to.

Barbara M. Rogers

From: Dealer's Management.Group Inc [mailto:autogroupetc@yahoo.com]

Sent: Wednesday, August 16, 2006 10:12 PM

To: b.m.rogers@att.net

Cc: autogroupetc@yahoo.com

Subject: Re: Reset Creditors' Meeting

barbara,

EXHIBIT

68-R

i just got your email and the last time we had contact was Monday afternoon and you were going to get John Ackard in touch with me and now i see an email that you wanted me there at 9:30 this morning. I am not in Houston every day of the week. have other obligations and need more advance notice for my appointments. I do not check my emails every day. Again I am a little confused. I was told by you that you would not handle my case and now you reset an appointment without my approval. I would like to keep it a little more professional and in doing so I do not have appointments set for me within 12 hours without my consent. The way I do things is you request an appointment and then i confirm. That

keeps everyone in the loop with no confusion. I have not been impressed with your performance and lack of communication. I am very efficient and do not like being shown up - it has happened several times now. Makes me wonder who you really are representing - I would like it to be me but if not, by all means lets shake hands and move on!!

"Barbara M. Rogers" <b.m.rogers@att.net> wrote:

Your creditors' meeting reset is tomorrow at 9:30 a.m. Please be there. I am still trying to get Mr. Akard to get involved. I will not leave you in without counsel but you have to try harder to pay attention to what is going on. Try by reading what I have sent to you in the mail and attending tomorrow.

Barbara M. Rogers Rogers, Anderson & Bensey, PLLC 2200 North Loop West, Ste 310 Houston, TX 77018 (713) 957-0100, Ext. 100 (713) 957-0105 (fax) 713-816-4133 (cell)

ЛММҮ SISSOM 713-805-3770

Do You Yahoo!? Tired of spam? Yahoo! Mail has the best spam protection around http://mail.yahoo.com