

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In Re:

GENESYS RESEARCH INSTITUTE, INC.

DEBTOR

**Chapter 11
Case No. 15-12794-JNE**

2016 OCT 3 AM 10 03

US BANKRUPTCY COURT

**Motion by Interested Party Clare Lamont to Compel Trustee to Produce
Tax Documents of the Estate**

I, Clare Lamont, an interested party in this case, hereby motion the Court to compel that the Trustee provide me, and other interested parties upon request, and without condition, any and all federal and state tax returns that have been prepared for Genesys for the fiscal years **Oct. 1, 2013-Sept. 30, 2014**, (including the Federal **2013 Form 990**); and **Oct. 1, 2014-Sept. 30, 2015** (including the Federal **2014 Form 990**). To date, the latest tax return on file for GRI is the Federal 2012 Form 990 covering a period ending Sept 30, 2013, which is now over three years ago, and over 21 months before GRI filed petition for bankruptcy.

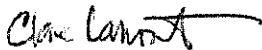
I further motion that completed copies of any "Forms PC" for Genesys, as are also to be filed annually by Massachusetts nonprofits with the Massachusetts Attorney General, covering any period from Oct. 1, 2013 onward, be provided me, and other interested parties upon request, without condition.

On Oct. 30, 2015, the Trustee filed an application, which was granted, to retain Verdolino & Lowey P.C. as accountants and financial advisors (Doc. 199). Services to be performed by Verdolino & Lowey as necessary included to "Assist with and prepare and/or review federal and state income tax returns". Verdolino & Lowey submitted their "*First Interim Application for Fee and Expenses of Accountants and Financial Advisors to the Trustee*" (Doc. 496, covering Nov. 2015, through July, 2016) for a sum of \$60,451.50. Doc 496-1 stating as a line expense for tax work (page 7), "Preparation of 2015 federal & state tax returns including any necessary tax paperwork" were done on 6/14/2016. It is unclear what precisely is meant by the "2015 federal & state tax returns", since GRI is on a fiscal year ranging from Oct. 1 through Sept. 30, so that the "2015" form should have been used for the period Oct. 1, 2015 through Sept. 30, 2016, a period not yet complete by the stated June 14, 2016 date of

preparation. Nevertheless, this motion should be considered a motion to compel production of any and all tax returns prepared to date, both to myself and to any interested parties upon request, free of any conditions.

It is noted that before approaching the Court with this request, I did repeatedly contact the Trustee's firm, but to date, these documents have not been forthcoming. I regret to say this is the same pattern as when I requested other documents for a Rule 2004 exam and also as an exercise of rights afforded under 11 USC §704(a)(7): "§ 704. Duties of trustee (a) The trustee shall—(7) unless the court orders otherwise, furnish such information concerning the estate and the estate's administration as is requested by a party in interest."

Respectfully,



Clare Lamont
93 E. Central St. #22
Natick, MA 01760

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GENESYS RESEARCH INSTITUTE, INC.

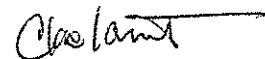
DEBTOR

Chapter 11

Case No. 15-12794-JNF

CERTIFICATE OF SERVICE

I, Clare Lamont, do hereby certify that I have sent through postal mail notice and copies of the **Motion by Interested Party Clare Lamont to Compel Trustee to Produce Tax Documents of the Estate, Chapter 11, Case No. 15-12794-JNF** to the parties listed on the annexed service list.



Clare Lamont
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781-929-8316

DATED: June 14th, 2016

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