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9 UNITED STATES BANKRUPTCY COURT
10 EASTERN DISTRICT OF WASHINGTON

11 In re:

12 CRAIG R. SCHULTZ,
13
14 Debtor.

15 Case No. 09-05025-WLH7

16 UNITED STATES OF AMERICA'S
17 OBJECTION TO APPLICATION
18 FOR PAYMENT OF UNCLAIMED
19 FUNDS

20 THE UNITED STATES OF AMERICA, by and through Vanessa R.
21 Waldref, United States Attorney for the Eastern District of Washington, and
22 Brian M. Donovan, Assistant United States Attorney, objects to the two
23 Applicant [*sic*] for Unclaimed Funds submitted on July 20, 2023 (ECF Nos.
24 542 & 543).

25 The two Applications, combined for publicly accessible viewing at ECF
26 No. 542, were purportedly filed by Alan Hodish, an attorney with the law firm
27 "Alan B. Hodish LLC," a law firm in Garden City, New York. *Id.* The
28 Applications seek disbursement of \$27,288.00 in unclaimed funds purportedly
on behalf of James Hurley. *Id.*

The Application includes a purported "Assignment of Interest in
Unclaimed Funds" allegedly executed by Hurley and Mr. Hodish (although

1 the signature line for Mr. Hodish is blank). *Id.* at 7-10. That Assignment is
2 purportedly notarized by Jane Croft, a notary public in Nassau County, New
3 York. *Id.* at 2, 10. Because two applications were filed, there is a second, but
4 different, purported “Assignment of Interest in Unclaimed Funds” allegedly
5 executed by Hurley. *Id.* at 11-13. The second Assignment is purportedly
6 notarized by Wendy Slutzkin, a notary public in Nassau County, New York.
7 *Id.* at 13.

8 The Applications also include purported banking information and a
9 purported driver’s license is supplied by “Alan Hodish.” ECF No. 543.

10 Both Applications are fraudulent and should be denied. Although Alan
11 B. Hodish, NY Bar #2300747, is actually an attorney who owns and operates
12 the firm Alan B. Hodish PLLC, he denies filing the Applications and has
13 confirmed to undersigned counsel that the Applications are fraudulent. *See*
14 Attachment 1. He does not represent Hurley and he did not execute any of the
15 purported documentation. *Id.*

16 In addition to Mr. Hodish’s confirmation of the fraudulent
17 Applications, there are numerous other indicia of fraud:

- 18 - The cover letters for the Applications do not use firm letterhead
19 (ECF 542 at 5-6);
- 20 - The email address used in the cover letters and Applications,
21 lawofficeofalan.b.hodishllc@gmail.com, (*Id.* at 5-6) is not Mr.
22 Hodish’s work or personal email;
- 23 - The cover letters contain grammatical errors, such as incorrect
24 capitalization of “alan b hodish, Llc”, and the purported
25 “Assignments” contain numerous grammatical and spelling errors;
- 26 - The Applications collectively use four addresses for Mr. Hodish –
27 East Meadow, NY (ECF No. 543), Mineola, NY (ECF No. 542 at 2),
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Yakima, WA (*Id.* at 1), Garden City, NY (*Id.* at 7). The correct address for the firm Alan B. Hodish, LLC is 100 Quentin Roosevelt Boulevard - Suite 511, Garden City, New York 11530 (Attachment 1);

- The purported notaries have the same expiration date, which is a non-existent date of September 31, 2027 (ECF No. 542 at 2, 4, 10, 13, 14);
- The Citi Bank bank account and the “TD” bank account used in the Applications (ECF No. 543) are not associated with Mr. Hodish or his firm;
- The phone numbers supplied in the Application, 323-238-4733 (ECF No. 543) and 914-500-8872 (ECF No. 542 at 2), are not associated with Mr. Hodish;
- The driver’s license is fake and the photo used in the license does not resemble Mr. Hodish (<https://www.liherald.com/stories/all-in-a-lifes-work-for-alan-hodish,31992?page=1>);
- Although the Application is purportedly filed by Mr. Hodish, an attorney in New York, it was not electronically filed but was instead mailed to the Court from an unknown location.

Based on the foregoing, the United States requests that the Court deny the application for unclaimed funds.

DATED this 28th day of July, 2023.

Vanessa R. Waldref
United States Attorney

s/ Brian M. Donovan
Brian M. Donovan
Assistant United States Attorney