

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

In re:

Chapter 11

1 GLOBAL CAPITAL LLC, d/b/a  
1GC COLLECTIONS, *et al.*,<sup>1</sup>

Case No. 18-19121-RAM

Debtors.

Jointly Administered

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS’  
OBJECTION TO CLAIM NOS. 2561 AND 2563 FILED BY SNOWFLAKE**

**IMPORTANT NOTICE TO CREDITOR:  
THIS IS AN OBJECTION TO YOUR CLAIM**

**An Objection has been filed to your claim in these bankruptcy cases. This Objection seeks either to disallow your claim, reduce the amount of your claim, or change the priority of the claim filed by you or on your behalf.**

**If you disagree with the Objection or the relief requested, you must file a written response WITHIN 30 DAYS of the date of service of this Objection. The written response must be filed with the Clerk of the United States Bankruptcy Court, 301 North Miami Avenue, Room 150, Miami, FL 33128 with copies to Scott A. Stichter, Esq., Stichter Riedel Blain & Postler, P.A., 110 E. Madison Street, Ste. 200, Tampa, Florida 33602-4718, and John Dodd, Esq., Greenberg Traurig, LLP, 333 S.E. 2<sup>nd</sup> Ave., Ste. 4400, Miami, Florida 33131, and must include the following: (i) the case name, (ii) the case number; and (iii) a short statement explaining why your claim should be allowed as presently filed.**

The Official Committee of Unsecured Creditors (the “Committee”), pursuant to Federal Rule of Bankruptcy Procedure 3007 and Local Rule 3007-1, hereby files this objection (the “Objection”) to Claim Nos. 2561 and 2563 (the “Claims”) filed by Snowflake (“Snowflake”),

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the business addresses and the last four (4) digits of each Debtor’s federal tax identification number, if applicable, are: 1 Global Capital LLC, 1250 E. Hallandale Beach Blvd., Suite 409, Hallandale Beach, FL 33009 (9517); and 1 West Capital LLC, 1250 E. Hallandale Beach Blvd., Suite 409, Hallandale Beach, FL 33009 (1711).

and states as follows:

1. On July 27, 2018 (the “**Petition Date**”), the Debtors commenced these cases (the “**Chapter 11 Cases**”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Florida (the “**Court**”).

2. On September 7, 2018, the United States Trustee for Region 21 appointed the Committee in these Chapter 11 Cases.

3. On December 4, 2018, Snowflake filed Claim No. 2561 which asserts an entitlement to an unsecured claim in the amount of \$100,000.00.

4. On December 4, 2018, Snowflake filed Claim No. 2563 which asserts an entitlement to an unsecured claim in the amount of \$962,610.35.

5. Each of the claims assert such amounts are owed for “money loaned.”

6. The Claim is signed by Svetlana Ruderman. Upon information and belief, Svetlana Ruderman is related to Carl Ruderman. Mr. Ruderman was the former president of 1 Global Capital LLC (“**1 Global**”). On the Petition Date, the membership interests in 1 Global were owned by the Ruderman Family Trust.

7. On July 22, 2019, the First Amended Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors [ECF No. 805] (the “**Plan**”), as supplemented [ECF Nos. 875 and 968] was filed with the Court.

8. Class 8 of the Plan consisted of Subordinated Claims, a term that was defined in the Plan to include Insider Claims (Plan, § 1.112). The definition of “Insider” under the Plan has the same meaning as used in Section 101(31) of the Bankruptcy Code.

9. On September 20, 2019, this Court entered its Order Confirming First Amended

Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors [ECF No. 1197].

10. Snowflake is an insider as such term is defined by Section 101(31). As a result, the Claims were subordinated under the Plan and are not properly filed as an unsecured claim.

11. To the extent the Objection is not sustained, the Debtors and the Committee reserve all other objections to the Claims.

WHEREFORE, the Committee respectfully request that the Court (1) reclassify the Claims as Subordinated Claims under the Plan; and (2) grant such other and further relief as is just and appropriate.

/s/ Scott A. Stichter

Scott A. Stichter (FNB 0710679)

Matthew B. Hale (FBN 0110600)

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**COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS**

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of the foregoing *Official Committee Of Unsecured Creditors' Objection to Claim Nos. 2561 and 2561 Filed by Snowflake 1<sup>st</sup> Global Capital* has been furnished by transmission of a *Notice of Electronic Filing* generated by

CM/ECF upon those counsel or parties who are authorized to receive electronic notice in these jointly administered cases on this 12th day of November, 2019, and/or by U.S. Mail to:

Svetlana Ruderman  
Snowflake  
20165 N.E. 39<sup>th</sup> Place  
Aventura, FL 33180

/s/ Scott A. Stichter  
Scott A. Stichter (FBN 0710679)

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