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*Attorneys for Lennard W. Stillman, Special  
Deputy Liquidator of Western Insurance Company,  
in Liquidation*

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**IN THE THIRD JUDICIAL DISTRICT COURT OF SALT LAKE COUNTY  
STATE OF UTAH**

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In Re:  
WESTERN INSURANCE COMPANY

**PETITION FOR TURNOVER OF  
ASSETS PURSUANT TO UTAH  
CODE ANN. § 31A-27a-501(4)  
(RUDY L. LEDBETTER)**

**Case No. 110917050**

**Judge Robin Reese**

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Pursuant to Utah Code Ann. § 31A-27a-501(4) Lennard W. Stillman, Special Deputy Liquidator of Western Insurance Company (“Western”) in Liquidation (the “Liquidator”) hereby petitions the Court for an order requiring Rudy L. Ledbetter (the “Indemnitor”) to turnover funds and/or property held as a collateral security to

Western Insurance Company in the amount of \$465,846.10. The grounds for this Petition are as follows:

1. The Indemnitor is a party to a Continuing Agreement of Indemnity Contractors Form (“Indemnity Agreement”) under which he agreed to either pay or turnover security to Western sufficient to repay amounts paid by Western on certain bonds.

2. On or about November 27, 2013, Western delivered a Demand Notice to the above-referenced Indemnitor pursuant to Utah Code Ann. § 31A-27a-501(1)(a) requesting turnover of funds or property in his possession that is rightfully the property of the Western estate. A true and correct copy of that Demand Notice is attached Exhibit A and incorporated herein. Documents reflecting the delivery of Exhibit A are attached and incorporated as Exhibit B.

3. The Indemnitor has not delivered funds or other property to the Liquidator as demanded, and neither has he filed a pleading the with Court setting out his right to retain the funds or property pursuant to Utah Code Ann. § 31A-27a-501(1)(b).

4. Based on the above and pursuant to Utah Code Ann. § 31A-27a-501(4), the Liquidator hereby petitions the Court for an order directing the immediate delivery of funds and/or property in the possession of the Indemnitor to the Liquidator in the amount of \$465,846.10. A proposed form of Order accompanies this Petition.

Dated this 18th day of December, 2013

VAN COTT, BAGLEY, CORNWALL &  
MCCARTHY, P.C.

By: /s/ Mary Jane E. Galvin-Wagg

Scott M. Lilja  
Gerald H. Suniville  
Mary Jane E. Galvin-Wagg

*Attorneys for Lennard W. Stillman, Special  
Deputy Liquidator of Western Insurance  
Co., in Liquidation*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of December, 2013, I served true and correct copies of the foregoing **PETITION FOR TURNOVER OF ASSETS PURSUANT TO UTAH CODE ANN. § 31A-27a-501(4) (RUDY L. LEDBETTER)** upon the persons who have elected to receive notices in this liquidation proceeding under Utah Code Ann. § 31A-27a-107(c). In addition, I served the following by placing the foregoing in the United States Mail, postage prepaid, addressed as follows:

Rudy L. Ledbetter  
1718 N. 2nd St.  
El Cajon, California 92021

Rudy L. Ledbetter  
12503 Ridgeton Dr.  
Lakeside, California 92040

Rudy L. Ledbetter  
2179 Valley View Blvd.  
El Cajon, California 92019

/s/ Mary Jane E. Galvin Wagg\_\_\_\_\_

# EXHIBIT A



**DEMAND NOTICE**

**[THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND  
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE]**

November 27, 2013

Rudy L. Ledbetter  
1718 N 2<sup>nd</sup> St  
El Cajon CA 92021

Rudy L. Ledbetter  
12503 Ridgerton Dr  
Lakeside CA 92040

Rudy L. Ledbetter  
2179 Valley View Blvd  
El Cajon CA 92019

Re: Funds and/or Property due to Western Insurance Company for collateral security and funds pledged under the Continuing Agreement of Indemnity Contractors Form  
WIC Reference No.: ZC1064 – CAC20003, BDC11506 and CAC20001

Dear Indemnitors:

The Liquidator has determined that you hold funds and/or property that are rightfully the property of the Estate of Western Insurance Company, In Liquidation (WIC). Specifically, WIC has paid the items listed on Exhibit "A" attached hereto pursuant to the Bond(s) on which you are the indemnitors. Exhibit "A" details payments made by WIC and the Bond under which the payment was made in the amount of \$465,846.10. Under the terms of the Continuing Agreement of Indemnity Contractors Form ("Indemnity Agreement") you are required to pay and/or turn over security to WIC sufficient to repay the above amount paid by WIC under the Bond. The amount owed to WIC is \$465,846.10. The amounts or security you owe to WIC by reason of WIC's payment under the Bond are referred to herein as the "WIC Property."

Western Insurance Company was placed in Liquidation by the State of Utah, on September 13, 2011, pursuant to the Liquidation Order, Declaration of Insolvency and Restraining Orders "Order", issued by the Third District Court of Salt Lake County, State of Utah, in *In Re: Western Insurance Company*, Case No. 110917050 (the "Receivership Court"). A copy of this Order can be found on the WIC website at: [www.westerninsurancecompany.net](http://www.westerninsurancecompany.net).

Pursuant to Utah Code Ann. § 31A-27a-501, *et seq.* you are hereby notified that you must file any claim of right you may claim to have to the WIC Property with the Receivership Court within 20 days of the day on which you receive this written demand. A copy of your claim filed with the Receivership Court must also be sent to the Liquidator at the following one of the following addresses:

This communication is an attempt to collect a debt and any information obtained will be used for that purpose. Should the recipient of this letter have filed bankruptcy, please provide copies of your petition to the undersigned and no further collection will be pursued.

P.O. Box 21030 Reno, NV 89515  
Telephone: 847-241-6517



By regular mail: P.O. Box 21030, Reno, NV 89515  
By overnight delivery: 675 West Moana Lane, Reno, NV 89509

Utah Code Ann. § 31A-27a-501, *et seq.* is available on-line by entering the cited reference in an internet search engine. Electronic tracking of the delivery date of this notice has been established by the Liquidator.

You must either deliver funds or turn over collateral pledged under the Indemnity Agreement sufficient to satisfy the \$465,846.10 owed to WIC. Pledged items include but do not limit the following items:

- (a) All right, title and interest of the [indemnitors] in and all machinery, equipment, plant, tools and materials which are, on the date of execution of any such Bond or Bonds, or may thereafter be, about or upon the site of the work to be performed under the contract referred to in and guaranteed by such Bond, or elsewhere for the purpose thereof, including as well materials purchased for or chargeable to said contract which may be in process of construction or in storage elsewhere or in transportation to said site;
- (b) All rights of the [indemnitors] in, or growing in any manner out of, said contract or any extensions, modifications, changes or alterations thereof or additions thereto;
- (c) All rights, actions, causes of action, claims and demands whatsoever which the [indemnitors] or any of them may have or acquire in any subcontract in connection with said contract, and against any subcontractor or any person, firm or corporation furnishing or agreeing to furnish or supply labor, materials, supplies, machinery, tools or other equipment in connection with or on an account of said contract, and against any surety or sureties of any such materialmen, subcontractor, laborer or other person, firm or corporation;
- (d) All right, title and interest of the [indemnitors] in and to any and all percentages retained by the Obligee under said contract, and any and all estimated, payments, extras, final payments and other sums that, at the time of abandonment, forfeiture or breach of said contract or such Bond or Bonds or of the terms of this Agreement or at the time of any advance, payment or guaranty by the Surety for the purpose of *avoiding* such abandonment, forfeiture or breach, may be due or may thereafter become due under said contract to or on behalf of the Undersigned, together with any and all sums due which may thereafter become due under or on all other contracts, bonded or unbonded, in which any or all of the Undersigned *have* an interest.
- (e) Any Deeds of Trust, Letters of Credit, Letters of Intent, motor vehicle titles or other security assigned to Western Insurance Company or any other assets pledged or assigned to Western Insurance Company.

Details of pledged items specific to CDM Construction, Inc. and you as indemnitors under the Indemnity Agreement are set forth on Exhibit "B" attached hereto.

You are required to deliver funds and/or property sufficient to satisfy your obligation under the Indemnity agreement to the Liquidator within 20 days of receipt of this demand. Make your check or money order payable to Western Insurance Company and remit no later than 20 days from receipt of this letter, using one of the delivery options listed below:

This communication is an attempt to collect a debt and any information obtained will be used for that purpose. Should the recipient of this letter have filed bankruptcy, please provide copies of your petition to the undersigned and no further collection will be pursued.

P.O. Box 21030 Reno, NV 89515  
Telephone: 847-241-6517



By regular mail: P.O. Box 21030, Reno, NV 89515  
By overnight delivery: 675 West Moana Lane, Reno, NV 89509

Payments or property not received within 20 days of the receipt of this letter will result in the Liquidator petitioning the Receivership Court to issue a summary order with regard to the WIC Property in favor of the WIC Estate.

Upon receipt of final payment of the amounts set forth above, and confirmation there are no Proofs of Claim filed against the Bond(s) as they relate to you as the Indemnitor or as the Principal, WIC will release any and all collateral pledged in excess of your obligation.

Should you have any questions regarding this collection letter, please contact: Tina Zinkgraf via email at [tzinkgraf@stillmanconsulting.com](mailto:tzinkgraf@stillmanconsulting.com), Bonnie Hunt via email at [bhunt@westerninsurancecompany.net](mailto:bhunt@westerninsurancecompany.net) or leave a message at our toll free number (847)-241-6517, extension 1.

Your prompt attention is required,

A handwritten signature in blue ink that reads "Tina Zinkgraf". The signature is written in a cursive style.

Tina Zinkgraf  
For the Liquidator

cc: All Indemnitors on file have been sent a copy.

This communication is an attempt to collect a debt and any information obtained will be used for that purpose. Should the recipient of this letter have filed bankruptcy, please provide copies of your petition to the undersigned and no further collection will be pursued.

P.O. Box 21030 Reno, NV 89515  
Telephone: 847-241-6517



EXHIBIT A

Date	Trans Description	Debit Amt	Credit Amt	Balance
11/3/08	The Faux Law Group - CDM Constructor	2,006.83		
12/18/08	The Faux Law Group - CDM Construction - CA	8,264.02		
12/18/08	The Faux Law Group - CDM Construction CA	7,615.00		
3/13/09	The Faux Law Group - CDM Construction - CA	2,454.30		
3/13/09	The Faux Law Group - CDM construction - CA	2,767.03		
3/13/09	The Faux Law Group - CDDM Construction - CA	6,180.65		
3/19/09	John A. Clinnin Esq - Claim Settlement - CDM Construction	18,000.00		
4/20/09	The Faux Law Group - CDM Construction - CA February & Marcl	10,231.12		
5/11/09	Magnesite Specialties, Inc - CDM Construction, Inc. Bond # CAC20003 - CA	22,113.00		
6/1/09	Hedges Electric - CDM Construction Claim Settlement- CA	21,600.00		
6/8/09	The Faux Law Group - CDM Constructor	1,856.06		
6/12/09	Soloman Ward Seidenwurn & Smit - Claim # B200836 Bond # CAC20003 CA	90,942.17		
8/17/09	CDM Construction , Inc	1,776.00		
8/17/09	CDM Construction, Inc	5,225.90		
8/27/09	Aileen Longfellow - CDM Claims Report Asset Searche	390.00		
8/28/09	Consolidated Electrical Distri - CDM Construction, Inc Bond # CAC20003	68,000.00		
8/30/09	The Faux Law Group - CDM Constructor	92.50		
8/30/09	The Faux Law Group - CDM Constructor	7,765.88		
8/31/09	The Faux Law Group - CDM Constructor	2,339.97		
9/7/09	William Ward, Attorney - CDM Construction, Inc Bond # CAC20003	80,000.00		
9/15/09	Prestige Concrete - CDM Construction Bond # BDC11506	9,547.90		
10/8/09	Standard Electronics - CDM Construction Bond # CAC20003 Standard	57,000.00		
10/9/09	William J Ward Trust - CDM Construction Bond # CAC20003	51,227.77		
10/16/09	The Faux Law Group - CDM Construction, Inc	20,162.71		
10/29/09	A and H Management, Inc. - CDM -CA	240.00		
10/29/09	A and H Management, Inc. - CDM - CA	885.00		
10/29/09	A and H Management, Inc. - CDM - CA	1,321.00		
10/29/09	A and H Management, Inc. - CDM - CA	123.00		
<b>10/30/09</b>	<b>CDM - San Diego USD - Remaining Contract Funds - Claim Recovery</b>		<b>48,783.29</b>	
11/5/09	The Faux Law Group - CDM Construction Inv 19518		675.00	
11/5/09	The Faux Law Group - CDM Construction Inv 19518	4,265.84		
1/25/10	The Faux Law Group - CDM Constructor	135.00		
2/1/10	The Faux Law Group - CDM Construction CAC20003	2,148.15		
2/1/10	The Faux Law Group - CDM Construction CAC20003 5666-157		148.00	
2/1/10	The Faux Law Group - CDM Construction CAC20003	148.00		
2/1/10	The Faux Law Group - CDM Construction CAC20003 5666-105		37.00	
2/12/10	The Faux Law Group - CDM Construction CAC10003 5666-105	274.45		
4/6/10	The Faux Law Group - CDM Constr CAC20003 5666-105	994.10		
4/20/10	The Faux Law Group - CDM Construction CAC20003 22346	18.50		
4/20/10	The Faux Law Group - CDM Construction CAC20003 22302	1,042.38		
6/4/10	The Faux Law Group - CDM Construction CAC20003 22996	764.04		
6/29/10	Reclassify Expense Report posting Check 13071 Dtd 05/07/10 COM CAC20003 Judgement Collection	297.00		
7/1/10	The Faux Law Group - CDM Constr CAC20003 23245	1,054.64		
8/2/10	The Faux Law Group - CDM Construction CAC20003	523.86		
9/1/10	The Faux Law Group - CDM Construction CAC20003 5666-105	372.46		
10/5/10	The Faux Law Group - CDM Construction 5666-105 CAC20003	175.75		
4/22/11	A and H Management, Inc. - Claims Expense CDM CAC20001	165.00		
12/13/11	The Faux Law Group - CA: CDM Construction CAC20003 - Matter 5666-105	92.50		
3/27/12	Faux Law Group-Inv 28156-#5666-105 - CA - CDM Construction CAC20003	18.50		
5/10/12	Faux Law Group-Inv 28238-#5666-105 CAC20003	63.95		
5/20/11	A and H Management, Inc. - CAC20001	84.00		
2/10/11	The Faux Law Group - California Invoices-Inv25050 CDM Construction CAC20003	1,292.76		
4/15/11	The Faux Law Group - balance of January invoices-Inv25255 CDM Construction CAC20003	250.40		
5/16/11	The Faux Law Group - California - Inv 25640 CDM Construction CAC20003	127.70		
5/24/11	The Faux Law Group - remaining balance March invoice - California-Inv25894 CDM Construction CAC20003	111.90		
7/14/11	The Faux Law Group - June 15 invoices California-Inv26356 CDM Construction CAC20003	940.70		
	<b>Due on Indemnity Agreement and/or Promissory Note</b>	<b>515,489.39</b>	<b>49,643.29</b>	<b>465,846.10</b>
	<b>Premiums due on bonds</b>			-
	<b>Other</b>			-
	<b>TOTAL AMOUNT DUE</b>	<b>515,489.39</b>	<b>49,643.29</b>	<b>465,846.10</b>

**EXHIBIT B**  
**CDM Construction, Inc.**

**Collateral Disclosed at Bonding**

Type	Description	Source	Value
IRA/Life Ins	IRA - \$50,000 and Life Ins. Cash Surrender Value - \$20,000	PFS 2006	70,000.00
Stocks/Bonds	Pepsi - \$12,000, Merrill Lynch - \$50,000, CDM Construction \$100,000	PFS 2006	162,000.00
Vehicles	2005 XLR Cadillac	PFS 2006	75,000.00
	2002 XLR Cadillac	PFS 2006	30,000.00
	2001 Hallmark Trailer	PFS 2006	10,000.00
	ATV's	PFS 2006	30,000.00
	2002 Custom Harley	PFS 2006	30,000.00
	2006 Custom Harley	PFS 2006	25,000.00
	2000 Custom Harley	PFS 2005	60,000.00
	(2) Golf Carts	PFS 2006	30,000.00
	Trailer	PFS 2006	3,500.00
	Dune Buggy	PFS 2006	50,000.00
	2006 Monaco Motorhome	PFS 2006	250,000.00
	2005 Chevy Truck	PFS 2006	45,000.00
	2003 Ford Truck	PFS 2006	20,000.00
	1941 Ford Hot Rod	PFS 2005	100,000.00
	1996 Mercedes 500 SL	PFS 2005	45,000.00
	2001 Beaver Coach	PFS 2005	210,000.00
	Z-98 Wave Runners	PFS 2005	20,000.00
<b>Total</b>			<b>1,265,500.00</b>

**Additional Collateral Identified**

Type	Description	Source	Value
	None found but not excluded		
<b>Total</b>			-
<b>Grand Total</b>			<b>1,265,500.00</b>

# EXHIBIT B

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Tracking Number: **9405503699300138416901**

Scheduled Delivery Day: **November 30, 2013**

## Product & Tracking Information

## Available Options

Postal Product:  
Priority Mail 2-Day™

Features:  
\$50 insurance included

USPS Tracking™

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
November 29, 2013, 12:20 pm	Delivered	EL CAJON, CA 92021
November 29, 2013, 8:26 am	Out for Delivery	EL CAJON, CA 92021
November 29, 2013, 8:16 am	Sorting Complete	EL CAJON, CA 92021
November 29, 2013	Depart USPS Sort Facility	SAN DIEGO, CA 92199
November 29, 2013, 4:43 am	Arrival at Post Office	EL CAJON, CA 92021
November 28, 2013, 11:39 pm	Processed through USPS Sort Facility	SAN DIEGO, CA 92199
November 27, 2013	Depart USPS Sort Facility	RENO, NV 89510
November 27, 2013, 10:28 pm	Processed at USPS Origin Sort Facility	RENO, NV 89510
November 27, 2013, 9:13 pm	Accepted at USPS Origin Sort Facility	RENO, NV 89509
November 27, 2013	Electronic Shipping Info Received	

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Scheduled Delivery Day: **November 30, 2013**

## Product & Tracking Information

## Available Options

**Postal Product:**  
Priority Mail 2-Day™

**Features:**  
\$50 insurance included

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**Email Updates**

DATE & TIME	STATUS OF ITEM	LOCATION
November 29, 2013 , 1:44 pm	Delivered	LAKESIDE, CA 92040
November 29, 2013 , 10:04 am	Out for Delivery	LAKESIDE, CA 92040
November 29, 2013 , 9:54 am	Sorting Complete	LAKESIDE, CA 92040
November 29, 2013 , 8:02 am	Arrival at Post Office	LAKESIDE, CA 92040
November 29, 2013	Depart USPS Sort Facility	SAN DIEGO, CA 92199
November 28, 2013 , 11:59 pm	Processed through USPS Sort Facility	SAN DIEGO, CA 92199
November 27, 2013	Depart USPS Sort Facility	RENO, NV 89510
November 27, 2013 , 10:22 pm	Processed at USPS Origin Sort Facility	RENO, NV 89510
November 27, 2013 , 9:07 pm	Accepted at USPS Origin Sort Facility	RENO, NV 89509
November 27, 2013	Electronic Shipping Info Received	

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Tracking Number: **9405503699300138416932**

Scheduled Delivery Day: **November 30, 2013**

## Product & Tracking Information

**Postal Product:**  
Priority Mail 2-Day™

**Features:**  
\$50 insurance included

USPS Tracking™

### Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
November 29, 2013 , 7:50 pm	Delivered	EL CAJON, CA 92020
November 29, 2013 , 9:15 am	Out for Delivery	EL CAJON, CA 92020
November 29, 2013 , 9:05 am	Sorting Complete	EL CAJON, CA 92020
November 29, 2013 , 8:32 am	Arrival at Post Office	EL CAJON, CA 92020
November 29, 2013	Depart USPS Sort Facility	SAN DIEGO, CA 92199
November 28, 2013 , 11:56 pm	Processed through USPS Sort Facility	SAN DIEGO, CA 92199
November 27, 2013	Depart USPS Sort Facility	RENO, NV 89510
November 27, 2013 , 10:29 pm	Processed at USPS Origin Sort Facility	RENO, NV 89510
November 27, 2013 , 9:14 pm	Accepted at USPS Origin Sort Facility	RENO, NV 89509
November 27, 2013	Electronic Shipping Info Received	

## Available Options

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