

United States Bankruptcy Court
Eastern District of Michigan, Southern Division
231 West Lafayette Street
Detroit, Michigan 48226

Hon. Steven W. Rhodes, Presiding Judge

Re: ~~Objection to Discharge of Debt~~ ^{ELIGIBILITY}: City of Detroit, Michigan under Chapter 9, Case No. 13-53846

May it please the Court:



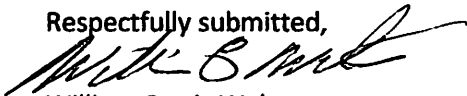
This comes in response to the commencement of the "Chapter 9 Case", filed by the City of Detroit, Michigan, on July 18, 2013, under chapter 9, of title 11 of the United States Code (the "Bankruptcy Code"), in the United States Bankruptcy Court for the Eastern District of Michigan, Southern Division (the "Bankruptcy Court").

I, William Curtis Walton, having been identified as a Debtor of the City of Detroit, as a retired Supervising Building Inspector, having served the City for 32 years, thus earning a full service retirement with benefits, which went into effect on October 27, 2012, hereby file my objection to this action by the City of Detroit and seek an exception in this case, for the reasons listed herein:

1. I entered civil service at the City of Detroit, Department of Works, on May 15, 1978. Upon certification to the title of Junior Construction Inspector, I was given a package of documentation, which included the benefits of a full service retirement, which would be earned upon the completion of 30 years of service;
2. I received promotions to Construction Inspector, Building Inspector and finally Supervising Building Inspector, and worked as a dedicated City employee from that time until October 27, 2012, with the one interruption in that continuous period for an involuntary layoff, from June of 1982 until March of 1984.
3. Upon my retirement, I was given a package, reaffirming the benefits I earned for my 32 documented years of dedicated service, including:
 - a. My service pension
 - b. A full medical benefits plan
 - c. A dental plan
 - d. A vision plan
 - e. Life insurance coverage
 - f. The balance of my Annuity fund held by the City in the amount of \$45,030.64, as of 11/9/2012;

4. Throughout my career, City employees have suffered losses in equitable quality of life through imposed wage freezes and concessions, furloughs and other measures taken by the City due its leadership's failure to assure that its tax base would remain financially viable, by at least retaining residency requirements for its municipal employees. In the 1990's under the Archer Administration, when the so-called "Residency Rule" was lost, I could have left the City and would have received a tax benefit of a municipal income tax cut. However, I remained a loyal resident, property owner, taxpayer and inhabitant of the City of the Detroit, and remain so today. Further, as a city employee and a member of the Detroit City Employees Retirement System, the City has borrowed certain funds from that System, which need to be repaid in order for the fund to remain solvent. Allowing this bankruptcy to go forward would, in my opinion, have a "domino-like" effect of causing future such filings.
5. Any loss of the retirement income and/or benefits which I have earned would cause me serious and irreparable financial harm, because being over 50 years of age, employment opportunities are not so plentiful in this area, that I can readily resume my career. Therefore, it is my hope that this letter of objection finds favor with the Court and an exception is granted to me and my spouse and beneficiary, Trevay Y. Walton, in the event of my death.

Respectfully submitted,



William Curtis Walton

SSN [REDACTED]-7010

Pension # [REDACTED]62



Supervising Building Inspector, Retired

4269 Glendale

Detroit, Michigan 48238-3211

(313) 736-2547

Cc: Powers, Chapman, PC, Attorneys and Counselors file # 714704
3001 West Big Beaver Rd, Ste. 704, Troy, Michigan 48084

ADDENDUM:

6. THE CITY OF DETROIT HAS NOT BARGAINED WITH ME IN GOOD FAITH AND HAS NOT ATTEMPTED TO CONTACT ME FOR ANY NEGOTIATION.

7. I FURTHER CHALLENGE THE AUTHORITY OF KEVYN OHR AS A STATE APPOINTED EMERGENCY MANAGER TO FILE THIS ACTION AS BEING THE "CITY OF DETROIT".

THEREFORE, I REQUEST THAT THIS ACTION BE DISMISSED.



City of Detroit

GENERAL RETIREMENT SYSTEM

APPLICATION FOR SERVICE RETIREMENT

To the Board of Trustees, City of Detroit
General Retirement System:

| | |
|------------------------|-----------------------------|
| PENSION NUMBER | R-199462 |
| SOCIAL SECURITY NUMBER | XXXXXXXXXX 70110 |

I, William Walton, a member of the Retirement System, hereby apply for service retirement in accordance with the provisions of the law and related rules and regulations.

| | |
|---|--|
| My date of birth is: | I request my retirement to be effective: |
| Month <u>4</u> Day <u>15</u> Year <u>1955</u> | Month <u>10</u> Day <u>27</u> Year <u>2012</u> |

| | |
|--|--|
| I desire my retirement allowance benefits sent to: | My title on the payroll is: |
| No. <u>4269</u> Street <u>Glendale</u> | <u>Supr PD Inspector</u> |
| City <u>Detroit</u> State <u>Mi 48238</u> | Department employed in: <u>Bldg + Safety</u> |

In connection with my application for retirement on 10-27-2012, I request a refund of \$ leave from my Annuity Savings Fund.

I elect to receive my retirement allowance in the following form of payment:
(place one X in a square on each line; a total of two X's.)

| | | |
|--|---|---|
| <input type="checkbox"/> STANDARD | <input checked="" type="checkbox"/> EQUATED Increased to Age <u>62</u> & Decreased Thereafter | If you selected this option please initial <u>(W)</u> |
| <input type="checkbox"/> REGULAR STRAIGHT LIFE Allowance | <input type="checkbox"/> OPTION 1 Cash Refund Annuity | <input type="checkbox"/> OPTION 2 Joint and 100% Survivorship |
| <input type="checkbox"/> OPTION 3 Joint and 50% Survivorship | <input checked="" type="checkbox"/> OPTION A Joint and 75% Survivorship | <input type="checkbox"/> OPTION B Joint and 25% Survivorship |

(Write plan of retirement elected) Option A 75% w/ Pop-Up Increased to age 62

If option 2, 3, A or B elected, do you desire Pop-Up Plan Protection? Yes No

William Walton
Signature of Member

| | | |
|--------------------------------|---|-----------------------------------|
| I nominate as my beneficiary: | Beneficiary's date of birth: | |
| <u>Treyay Walton</u> | Month <u>4</u> Day <u>26</u> Year <u>1963</u> | |
| Beneficiary's Address | Beneficiary's place of birth: | Beneficiary's Soc. Sec. Number: |
| No. _____ Street <u>-Same-</u> | <u>Michigan</u> | XXXXXXXXXX <u>5411</u> |
| City _____ State _____ | Beneficiary's relationship to me: | Sex |
| | <u>Spouse</u> | <u>Female</u> |

PROOF OF BIRTH DATE OF BENEFICIARY REQUIRED IF OPTION 2, 3 A OR B, IS ELECTED

Dated at Detroit, Mi this 13th day of Nov 20 12

| | |
|--|---|
| <u>Jasha Moon-Carter</u> Signature of Witness | <u>William Walton</u> Signature of Retiring Member |
|--|---|

Any balance under Option 2, 3, A or B is to be paid to my _____ Relationship _____

_____ date of birth _____

_____ Name of Beneficiary _____

_____ Dated _____

_____ Signature of Witness _____ Signature of Member _____

ANN-002
11/13/12 12:24 pm

Retirement Systems City of Detroit
Annuity Balance Report

WALTON, WILLIAM

Pension Number ~~██████████~~ Revenue Group General City

Vested? No Annuity Status Active Payroll Status Active

Address 4269 GLENDALE DETROIT, MI 48238

(Post Tax) Non-Taxable Contribution \$28,765.72 Last Annuity Date 11/09/2012

(Pre Tax) Taxable Contribution \$0.00

Total Contribution \$28,765.72

Taxable Interest \$15,268.89

Adjustments \$996.03

TOTAL ANNUITY \$45,030.64

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

CITY OF DETROIT

Debtor.

CASE NO: 13-53846
CHAPTER: 9
JUDGE: STEVEN W. RHODES

PROOF OF SERVICE

I hereby certify that on AUGUST 19, 2013 (date of mailing), I served

copies as follows:

1. Document(s) served: OBJECTION TO DISCHARGE OF DEBT

2. Served upon [name and address of each person served]:

CITY OF DETROIT
2 WOODWARD AVE. STE 1126
DETROIT MI 48226
WAYNE COUNTY
TAX ID EIN 38-6004606

AND BY ATTORNEYS: JONATHAN S. GREEN
150 ~~W. JEFFERSON~~ W. JEFFERSON STE. 2500
DETROIT MI 48226

SEE ATTACHED
FOR FULL LIST

3. By First Class Mail.

Dated: 8-19-2013

(u)

William C. Walton
(Signature of Debtor)

Print Name: WILLIAM C. WALTON

(Signature of Co-Debtor)

Print Name: _____

**U.S. Bankruptcy Court
Eastern District of Michigan (Detroit)
Bankruptcy Petition #: 13-53846-swr
Internal Use Only**

Date filed: 07/18/2013

Assigned to: Judge Steven W. Rhodes
Chapter 9
Voluntary
No asset

Debtor In Possession
City of Detroit, Michigan
2 Woodward Avenue
Suite 1126
Detroit, MI 48226
WAYNE-MI
Tax ID / EIN: 38-6004606

represented by **Jonathan S. Green**
150 W. Jefferson
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Heather Lennox
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212-326-3939
Email: hlennox@jonesday.com

U.S. Trustee
Daniel M. McDermott

represented by **Sean M. Cowley (UST)**
United States Trustee
211 West Fort Street
Suite 700
Detroit, MI 48226
(313) 226-3432
Email: Sean.cowley@usdoj.gov

Judge
Gerald Rosen

| Filing Date | # | Docket Text |
|-------------|----------|--|
| 07/18/2013 | <u>1</u> | Chapter 9 Voluntary Petition . Fee Amount \$1213. Filed by City of Detroit, Michigan (Heiman, David) (Entered: 07/18/2013) |
| 07/18/2013 | | Receipt of Voluntary Petition (Chapter 9)(13-53846) [misc,volp9at] (1213.00) filing fee. Receipt number 20671086, amount . (U.S. Treasury) (Entered: 07/18/2013) |
| 07/18/2013 | <u>2</u> | Notice of Appearance and Request for Notice Filed by Creditor National Public Finance Guarantee Corporation. (Novetsky, Eric) (Entered: 07/18/2013) |