

OFFICE OF THE CLERK
UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
100 EAST VINE STREET, SUITE 200
LEXINGTON, KENTUCKY 40507

NATHAN W. LEE
CLERK

TELEPHONE
(859) 233-2608

TO: Madison Mahayla Drake
445 Darbyshire Dr
Wilmington, OH 45177

RE: Lexington Blue, Inc. – 25-50863
Objection to Debtor's Discharge of Debts

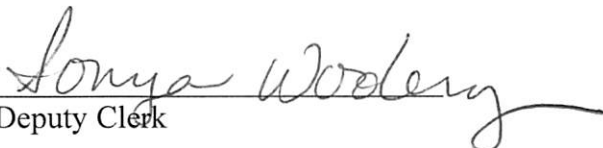
This will acknowledge receipt of your letter on behalf of Madison Mahayla Drake objecting to the discharge of the debtor or the dischargeability of a debt in the above-styled bankruptcy case.

There is a \$ 350.00 fee for filing a complaint. Additionally, it is helpful for a party filing an adversary proceeding to complete and file Form 1040, the Adversary Proceeding Cover Sheet (enclosed for convenience). The cover sheet summarizes basic information about the adversary proceeding, which the clerk of court needs to process it and to prepare required statistical reports.

The Court will take no further action on your letter. If you wish to pursue this matter, please submit your objection in the form of a complaint and include the appropriate filing fee. (No personal checks are accepted.)

Dated: July 8, 2025

Enclosure


Deputy Clerk

B1040 (FORM 1040) (12/24)

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (Court Use Only)
PLAINTIFFS	DEFENDANTS	
ATTORNEYS (Firm Name, Address, and Telephone No.)	ATTORNEYS (If Known)	
PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED)		
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)		
FRBP 7001(a) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(b) – Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(c) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(d) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(e) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(f) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div>	FRBP 7001(f) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(g) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(h) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(i) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment FRBP 7001(j) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)	
<input type="checkbox"/> Check if this case involves a substantive issue of state law <input type="checkbox"/> Check if a jury trial is demanded in complaint	<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23 Demand \$	
Other Relief Sought		

B1040 (FORM 1040) (12/24)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR		BANKRUPTCY CASE NO.
DISTRICT IN WHICH CASE IS PENDING	DIVISION OFFICE	NAME OF JUDGE
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF)		
DATE		PRINT NAME OF ATTORNEY (OR PLAINTIFF)

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

United States Bankruptcy Court **RECEIVED**

Eastern District of Kentucky - Lexington Division.

In Re: Brad Pagle, Debtor

JUL 07 2025

Case No: 25-50863 - grs

CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY

Chapter 11

(Objection to debtor's Discharge of Debts)

To the honorable Gregory Schaaf - US Bankruptcy Judge,

I, Madison Drake, a former employee of Lexington Blue, respectfully submit this objection to the discharge of debts owed by the debtor, Brad Pagle, to myself and other former employees, customers of Lexington Blue. This is on the grounds that the debtor's conduct demonstrates bad faith, willful misconduct, and harm that warrants denial of discharge for the debts owed to us.

The Debtor, engaged in egregious, intentional, and harmful conduct towards myself and other former employees, which directly resulted in financial, emotional, and psychological damages. These actions render the debts owed to us non-dischargeable and justify denying the debtor's relief. Specifically the debtor's conduct includes, but is not limited to, the following:

1.) Coercion and cult-like activities: The debtor created a toxic and oppressive workplace by fostering a cult-like atmosphere. We were subjected to intense pressure to conform to his personal ideologies and demands, which isolated us from our families and support systems, causing emotional distress.

continued on next page.

2. Drug related misconduct: The Debtor attempted to pressure employees, including myself, into using drugs, creating an unsafe work environment.

3. Invasive Monitoring and harassment: The debtor excessively monitored employees activities, both during and outside of work hours, including sending incessant communications to our personal phones as late as 4:00am.

4. Mental and emotional abuse: The debtor engaged in systematic mental and emotional abuse, manipulating and destabilizing employees through tactics designed to undermine our autonomy and well-being. This abuse left many of us traumatized with lingering effects that made transitioning to other workplaces challenging.

5. Sexual harassment: The debtor sexually harassed female employees, creating a discriminatory and unsafe workplace in violation of federal and state employment laws. Such conduct constitutes willful and malicious injury, rendering related debts non-dischargeable under 11 U.S.C. § 523(a)(6).

6. Imposition of religious beliefs: The debtor improperly imposed his personal religious beliefs on employees, further contributing to a coercive and hostile work environment. This conduct violated our rights to a workplace free of discrimination based on religion.

7. Intentional brainwashing/psychological harm: The debtors actions were designed to manipulate and control employees through brainwashing tactics, resulting in profound emotional and psychological trauma.

Continued.

Legal grounds for objection:

1. Willful & malicious injury. The debtors actions, including sexual harassment, emotional abuse, and coercion, constitute willful and malicious conduct that caused harm to myself & other employees. These debts are non-dischargeable.
2. Bad faith and lack of accountability: The debtors failure to appear in person for court proceedings demonstrate a lack of remorse and accountability for his actions.
3. Public policy considerations: Granting relief from these debts would undermine public policy by shielding him from accountability for egregious workplace misconduct. The bankruptcy code is not intended to reward bad actors who cause intentional harm.

I respectfully request that the court deny the discharge of debts owed by the debtor, Brad Pagle. Pursuant to 11 U.S.C. § 523(a)(6) and any other applicable provisions.

Respectfully submitted,
Madison Mahayla Drake
445 Darbyshire Dr. Wilmington, OH 45177
(859) 509-9967

madisondrake46@icloud.com

July 1, 2025

* Attention: 25-50863-grs *

Madison Drake
445 Darbyshire Dr.
Wilmington, OH 45177

CINCINNATI OH 450

5 JUL 2025 PM 5 L

RECEIVED
JUL 01 2025
United States Bankruptcy Court
Eastern District of Kentucky
100 E. Vine Street Ste. 200
Lexington, KY 40507-1430



40507-145199

