UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re: ATW LINE PAINTING, LLC, Debtors.	CHAPTER 7 CASE NO. 23-11607-CJP
DONALD LASSMAN, CHAPTER 7 TRUSTEE OF THE BANKRUPTCY ESTATE OF ATW LINE PAINTING, LLC, Plaintiff, v. BOTTOM LINE CONCEPTS, LLC, dba BOTTOM LINE SAVINGS, Defendant.	ADV. PROC. NO. _____

ADVERSARY COMPLAINT

PARTIES

1. Donald Lassman (the "Trustee") is the Chapter 7 of the bankruptcy estate of ATW Line Painting, LLC (the "Debtor"), and maintains the right to bring and prosecute all actions against the Defendant pursuant to §§ 547 and 550 of the Bankruptcy Code.

2. The Defendant, Bottom Line Concepts, LLC dba Bottom Line Savings (the "Defendant"), is a Florida limited liability company with a principal place of business located at 3323 NE 163rd Street, Suite 302, North Miami, FL 33160, and a registered agent address of Bryn Law Group, 2 South Biscayne Blvd, Suite 2600, Miami, FL 33131.

JURISDICTION AND VENUE

3. The Trustee brings this adversary proceeding pursuant to Sections 547 and 550 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1330, and Rule 7001 of the Federal Rules of Bankruptcy Procedure.

4. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §§ 157(a), 157(b)(1) and 1334(b). This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(F)

5. Venue in this District is proper pursuant to 28 U.S.C. § 1409(a) because this proceeding arises under title 11.

GENERAL ALLEGATIONS

6. On September 29, 2023 (the "Petition Date"), an involuntary petition under Chapter 7 of the Bankruptcy Code was filed against the Debtor.

7. On October 31, 2023, an Order for Relief under Chapter 7 of the Bankruptcy Code was entered against the Debtor.

8. On November 1, 2023, the Trustee was appointed as the Chapter 7 trustee of the Debtor's bankruptcy estate.

9. The Debtor's financial records indicate that within ninety (90) days before the Petition Date (the "Preference Period"), the Debtor made a payment to the Defendant on September 27, 2023, in the amount of $22,605.60 (the "Preference Payment").

10. On October 8, 2025, the Trustee sent a demand (the "Demand Letter") to the Defendant requesting the Preference Payment either be returned, or in the alternative, that the Defendant advise the Trustee of any defenses it claimed.

11. Based on the Trustee's review of the Debtor's financial information, proofs of claim filed against the Debtor and other documents and information available to the Trustee and his accountants, the Trustee does not believe that the Defendant has any defenses to the avoidance and recovery of the Preference Payment by the Trustee.

COUNT I
(Avoidance and Recovery of the Preference Payment)

12. The Trustee incorporates by reference each and every allegation set forth above as if fully recited herein.

13. The Preference Payment constitutes a transfer of an interest of the Debtor in property.

14. The Preference Payment was made to or for the benefit of the Defendant.

15. The Preference Payment was made for or on account of an antecedent debt owed by the Debtor to the Defendant before such payment was made.

16. The Preference Payment was made within ninety (90) days before the Petition Date.

17. The Preference Payment was made while the Debtor was insolvent.

18. The Preference Payment enabled the Defendant to receive more than it would have received in a case under Chapter 7 of the Bankruptcy Code if the Preference Payment had not been made, and the Defendant received payment of such debt to the extent provided by the provisions of the Bankruptcy Code.

19. Prior to bringing this action the Trustee conducted reasonable due diligence and took into account the Defendant's known or reasonably knowable affirmative defenses.

20. The Defendant was the initial transferee of the Preference Payment and the entity for whose benefit the Preference Payment was made.

21. The Preference Payment constitutes a preferential transfer of property within the meaning of 11 U.S.C. § 547(b).

WHEREFORE, the Trustee respectfully requests that this Court enter judgment against the Defendant:

a. Avoiding the Preference Payment as a preferential transfer under § 547(b) of the Bankruptcy Code;

b. Awarding the Trustee judgment against the Defendant, under § 550 of the Bankruptcy Code, in the amount of $22,605.60, plus statutory interest thereon;

c. Awarding the Trustee his costs and expenses incurred in prosecuting this adversary proceeding, including without limitation, reasonable attorneys' fees and costs; and

d. Granting the Trustee such other and further relief as the Court deems just and proper.

Respectfully submitted,

DONALD LASSMAN, TRUSTEE OF THE BANKRUPTCY ESTATE OF ATW LINE PAINTING, LLC,

By his attorneys,

/s/ Jonathan M. Horne

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