

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: EXPRESS GRAIN TERMINALS, LLC

CHAPTER 11

BANKRUPTCY CASE NO: 21-11832-SDM

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FARM GROUP I'S OBJECTIONS TO UMB BANK, N.A.'S OFFICIAL FORM FOR  
ASSERTION OF INTEREST IN GRAIN (DKT. #1417)

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Farm Group I<sup>1</sup> files this Objections to UMB Bank, N.A.'s ("UMB's") Official Form for Assertion of Interest in Grain (Dkt. #1417), and in support states the following:

1. Under Mississippi law, warehouse receipts cannot be issued without an actual delivery of grain into the warehouse from which the warehouse receipts are issued, nor shall a warehouse receipt be issued for a greater quantity than was delivered, nor shall more than one (1) receipt be issued for the same lot of grain. Miss. Code Ann. § 75-44-61 (Rev. 2016). *See also* regulations issued by the Mississippi Department of Agriculture and Commerce, Subpart 2 – Administrative Rules; Chapter 10 Grain Warehouses; sections 110.02 and 110.03. The warehouse receipts in this case violate every one of these mandates.

2. In violation of Mississippi law, UMB did not actually deliver any soybeans to the Business Debtors<sup>2</sup> at any time, although the UMB warehouse receipts all indicate the delivery method is via "truck."

3. UMB did not actually purchase any grain from the Business Debtors. Instead,

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<sup>1</sup> Farm Group I consists of the following: Adron Farms, Ashton Planting Company, BC Farms, Black Dog Farms, Buck Harris Planting Company, Champion Farms, D.W. Clark, Jr., Tonia T. Clardy, Corley Moses Farms, DLH Farms, David Bratton Farms, Davis and Davis Farms, DeLoach Farms, Dodson Planting Company, Fulgham Farms, Tyler Gilliland, Highlandale Planting Company, Howard Farms, Idlewood Plantation, Jennings Planting Company, KMC Farms, Jacob Lindsey, Lake Lindsey, Little Bee Lake Farms, LLC, Jim Locke, MBM Farms, Inc., O'Neal Planting Company, Poe Planting Company, Fred J. Poindexter, Porter Farms, Prestidge Farms II, Ridgecrest Farms, Scott Farms, Mary Annette Morgan Smith, Tackett Planting Company II, Taylor Farms, Kelsie Fennell Tribble, VK Farms, W B Farms, W.M. Jennings & Son, Westwood Farms, Lawyer Wheeler and Wolf Run Farms.

<sup>2</sup> Express Grain Terminals, LLC, Express Biodiesel, LLC, and Express Processing, LLC are referred to collectively as "Business Debtors."

they took warehouse receipts as collateral. The warehouse receipts do not indicate on their face that they are for grain owned by the Business Debtors as required by Mississippi law. Miss. Code Ann. §75-44-63 (Rev. 1996). As such, the warehouse receipts are invalid.

4. With respect to the warehouse receipts for grain at Sidon, UMB knew the grain it proposed to hold as collateral was commingled while being held at the Business Debtors' facilities. However, in violation of Mississippi law, Miss. Code Ann. § 75-44-61 (Rev. 1996), there was not sufficient grain on hand to support the totality of receipts.

5. With respect to the warehouse receipt for grain at Minter City, while there was sufficient grain at the elevator when the warehouse receipt was issued on January 27, 2021, according to the Daily Position Report for Minter City, on July 30, 2021, there was no grain at Minter City.

6. UMB knew that the soybeans were being used by the Business Debtors in crushing operations. Once the Business Debtors used the farmers' soybeans in that operation, they were gone. Warehouse receipts do not create a floating lien that attaches to all soybeans that come into the Business Debtors' possession at various times. Indeed, this shortage of beans is why Mississippi law requires that warehouse receipts only be issued for grain that is actually delivered to the warehouse and only in the amount delivered for storage.

7. On October 22, 2020, the Business Debtors issued warehouse receipt #MS 3138 to UMB for 385,000 bushels of soybeans to be stored at Sidon. (557 Report Supplement at page 2, Dkt. #1204-1). The Business Debtors' records indicate that there were 2,854,181 bushels of soybeans at Sidon on that date, but they were still short 230,819 bushels to support the warehouse receipts totaling 3,089,000 bushels of beans to be held at Sidon. (Business Debtors' Daily Position Reports, EGT DPR 2020 and EGT DPR 2017 – 2020 and EGT Daily Inventory Roll Forward 09.20.20).

8. On August 31, 2021, the Business Debtors issued warehouse receipt #MS 3163 to UMB for 600,000 bushels of soybeans to be stored at Sidon. (557 Report Supplement at page 2, Dkt. #1204-1). The Business Debtors' records indicate there were only 380,464 bushels of soybeans at Sidon on that date. Moreover, there were warehouse receipts issued and outstanding that pertained to 3,535,000 bushels of soybeans to be stored at Sidon. Therefore, the Business Debtors were short at Sidon of 3,154,536 bushels to cover outstanding warehouse receipts. (Business Debtors' Daily Position Reports, EGT DPR 2020 and EGT DPR 2017 – 2020 and EGT Daily Inventory Roll Forward 09.20.20).

9. The majority of the outstanding warehouse receipts were issued before the farmers had delivered most of their soybeans for 2021. Based on the facts available to the farmers, as contained in the Business Debtors' Amended Schedule (Dkt. #1695), as of the "start of day" on September 28, 2021, the Business Debtors held 3,264,857 bushels of soybeans. According to the Amended Grain Report (Dkt. #1693), the Business Debtors shipped out (sold) 231,693.66 gross bushels of soybeans on September 28 and 29, 2021, leaving 3,033,163.34 bushels. Importantly, according to the initial Grain Report (Dkt. #1156-2), 3,130,954.22 net bushels of soybeans were delivered to the Business Debtors by the farmers in the twenty (20) days prior to the bankruptcy, meaning they were not sitting in a warehouse to cover the outstanding warehouse receipts. Additionally, CR3 indicates in a Break-Even Analysis that in the period between the week ended September 3, 2021, through October 1, 2021, the Business Debtors crushed an average of 160,000 bushels of soybeans per week. Total warehouse receipts on the date of bankruptcy were for 4,815,000 bushels of soybeans.

10. Not only does UMB not have a valid ownership claim in grain stored by the Business Debtors on September 29, 2021, but it also does not have a perfected security interest in that grain pursuant to the warehouse receipts.

11. UMB's Assertion of Interest states the Business Debtors granted a security interest to it in "the Personal Property Collateral" pursuant to the Fourth Amended and Restated Loan and Security Agreement. (Dkt. #1417). The agreement does not appear to have a definition for "Personal Property Collateral" but defines "Collateral" as including "all Warehouse Receipts, bills of lading and other documents of title . . . ."

12. As noted above, at the time the warehouse receipts were issued at Sidon there was not enough grain stored at the specified facility to cover UMB's warehouse receipts and the warehouse receipts issued to others. And the grain at Minter City was gone by July of 2021. As such, there was no valid warehouse receipt to which the security interest could attach.

13. For a security interest to be enforceable, it must attach to the collateral. A security interest does not attach to collateral unless: (1) value has been given; (2) the debtor has rights in the collateral; and there is an agreement that it attach. *In this case*, there were not enough soybeans at the specified facilities when the warehouse receipts were issued (nor thereafter) to cover all of the Business Debtors' issued warehouse receipts and the Business Debtors had no rights in any soybeans to which UMB's security interest could attach. As such, UMB has no security interest in any "Personal Property Collateral."

14. Farm Group I objects to the Assertion of Interest filed by UMB (Dkt. #1417 ) on the basis that the grain at issue is not property of the bankruptcy estate. A constructive trust arose as a matter of law in favor of the producers/farmers based on the fraud of Express Grain Terminals, LLC in soliciting producers/farmers to sell grain to it in 2021 and fraud committed by Express Grain Terminals, LLC in obtaining its licenses to operate a grain warehouse in 2021, which licenses were revoked and held to be void *ab initio* by the Mississippi Department of Agriculture and Commerce by order dated February 10, 2022.

This 14th day of March, 2022.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I, Jim F. Spencer, Jr., do hereby certify that I have caused to be served the above and for going pleading on all parties requesting notice by using the ECF filing system of the court and on the following by service upon the attorney of record or by U.S. Mail postage pre-paid as indicated:

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