# THE MARSHALL CHRONICLES VOLUME X, NUMBER 8

# **46th Annual NACTT** Anaheim, California Went To Disney

The MVP of the Super bowl and the MVP of the NBA always get to go to Disney. I have always been jealous because those guys are interviewed the morning after the big game and they are always excited to tell Matt Lauer on the NBC Today show: "I am going to Disney." I guess you can say that Jan Hamilton, Chapter 13 Trustee (Topeka, KS), got to go to Disney also after he took the case of Hamilton v. Lanning to the Supreme Court. Win or lose, he is the MVP. The cool thing is that we all tagged along to Disney with Jan.

The 46th Annual Conference of the NACTT was held August 4th-6th in Anaheim, at the Marriott Anaheim. Normally I

have a lot to tell you about how wonderful the hotel is, the great location of the hotel and what is within walking distance, etc. This time, I have to skip that part, because there is nothing in Anaheim close to the Marriott but Disney.

The program officially opened Thursday, with the welcome address from Michael B. Joseph, NACTT President (Wilmington, DE), Robert G. Drummond, NACTT Vice President, Chapter 13 Trustee (Great Falls, MT), Pro-

fessor Michaela M. White, Editor and Advisor, NACTT Academy for Consumer Bankruptcy Education, Clifford J. White, III, Director, Executive Office for U. S. Trustee, United States Department of Justice (Washington, DC) and James Wannamaker, Staff Attorney, Judges Division, Administrative Office of the United States Courts (Washington, DC).

I didn't realize until a day before the conference that the program titles were taken from songs by the Beach Boys. The first session, "Hot Fun in the Summer Time: Post Lanning/Ransom Development," was interesting and very good. The panelist, The Honorable Roger L. Efremsky, United States Bankruptcy Court for the Northern District of California (Oakland, CA), Jan Hamilton, Chapter 13 Trustee (Topeka, KS), Gilbert B. Weisman, Becket & Lee, LLP (Malvern, PA, Fredrick E. Clement, Attorney at Law (Redding, CA), Christopher P. Burke, Law Office of Christopher O. Burke (Las Vegas, NV), and Jake Miller, United States Trustee Region 18 (Seattle, WA) were very good.

Lanning and Ransom were served sunny-side up, scrambled,

poached, and even over-easy throughout the seminar. As a souvenir and summary here is a

**Projected Disposable Income** 

The Bankruptcy Code explicitly

defines disposable income as

current monthly income ("CMI")

less certain expenditures rea-

sonably necessary for the debtor

to provide for himself and his de-

pendents. The Supreme Court

has ruled that disposable income

is not necessarily the same thing

as projected disposable income.



Hamilton v. Lanning before the Supreme Court.

# A. The Supreme Court

#### 1. Hamilton v. Lanning, 130 S. Ct. 2464 (2010).

The Supreme Court held that "when a bankruptcy court calculates a debtor's projected disposable income, the court may account for changes in the debtor's income or expenses that are known or virtually certain at the time of confirmation." (emphasis added). The Court directs bankruptcy courts to

(Continued on page 2.)

# "I Went To Disney!" (Continued from page 1.)

exercise judicial discretion in making changes to the debtor's disposable income, typically only in unusual cases (disposable income will equal projected disposable income in most instances). The Court premises support for its approach on the inclusion of forward-looking language in the Bankruptcy Code. Specifically, the Court looked to "projected," "to be received in the applicable commitment period," and "as of the effective date of the plan" as evidence of an instruction to consider changes to income and expenses. The Court also considered pre-BAPCPA practice, i.e., to consider changes to income and expenses, since Congress did not clearly indicate a departure from such practices.

Further, Congress did not intend the "senseless results" flowing from a mechanical, non-discretionary approach. More specifically, Congress had no intention to deny easily affordable repayments to creditors by a debtor whose post-confirmation disposable income exceeded pre-petition disposable income. Nor did Congress intend to deny bankruptcy protection to a

### THE MARSHALL CHRONICLES

The Editorial Staff: Cheryl Jones, HVB and Dave Latz.

#### **Contents and Contributors:**

#### Newsletter Information:

If you would like to contact us or submit ideas or articles for the newsletter, you can do so by:

- ✓ e-mailing us at newsletter@chi13.com,
- ✓ dropping your submission or idea in the anonymous newsletter folder located in the mail room, or
- ✓ leaving them with Dave Latz.

Please remember when making a submission to the newsletter, it must be:

- ✓ type-written and
- ✓ submitted by the third Wednesday of the month via e-mail, a Word document or an ASCII file.

We also ask that anyone who attends a seminar please be prepared to furnish the committee with a detailed article on its subject.

You may also view this edition of THE MARSHALL CHRONICLES, as well as all the previously published issues, all in full color, on the Chapter 13 Trustee website at <a href="http://www.chicago13.com/">http://www.chicago13.com/</a>.

debtor forced to propose an unfeasible plan because her mechanically calculated pre-petition income exceeded her real ability to pay. The Court rejected as flawed and unsatisfactory each of the "escape strategies" and "maneuvers" that the trustee urged to circumvent this exigency.



The Marriott Anaheim

In making this decision, the Court affirmed the Circuit Court for the Tenth Circuit. In *Hamilton v. Lanning*, 545 F.3d 1269 (10th Cir. 2008), the court found that, for the purposes of calculating income *only*, CMI is the presumptive starting point for projected disposable income, subject to a showing of substantial change of circumstances, to be determined by a bankruptcy court on a case by case basis. The Supreme Court essentially extended the Tenth Circuit's decision with regard to income to include expenses.

### 2. Ransom v. FIA Card Servs., N.A., 131 S. Ct. 716 (2011).

The Supreme Court held, based on the Bankruptcy Code's **statutory text, context, and purpose**, that a debtor who owns his car unencumbered by a loan or lease may not expense an allowance for car ownership costs (thereby increasing the amount he will pay into his chapter 13 plan) in calculating his projected disposable income that he must pay his unsecured creditors. The Bankruptcy Code states that a debtor's monthly expenses shall be the debtor's *applicable* monthly expense amounts specified under the National Standards and Local Standards. The Court decided that an expense is "applicable" if a debtor incurs costs that correspond to it – more precisely, "only if the debtor will incur that kind of expense during the life of the plan." According to the Court, any other interpretation would render "applicable" surplusage.

Second, the Court, in examining the statutory context of the means test, particularly its use in the calculation of a chapter 13 debtor's projected disposable income, reasoned that if a debtor will not pay a particular expense during the life of his plan, then an allowance for a wholly fictional expense is not "reasonably necessary" (a chapter 13 requirement).

Finally, the Court reminded that Congress purposed, in its 2005 amendments to the Bankruptcy Code (enacted as the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005), to ensure that a debtor repays to his creditors the maximum affordable amount. Allowing the debtor to deduct an expense that he does not pay would, according to the Supreme Court, thwart this purpose.

The next general session, "Good Vibrations: Supreme Court Review – Where We've Been, Where We Are Now and Where

(Continued on page 3.)

# "I Went To Disney!" (Continued from page 2.)

We Are Going" followed, with Erwin Chemerinsky, Dean and Distinguished Professor Law, University of California, Irvine School of Law (Irvine, CA), The Honorable Barry Russell, United States Bankruptcy Court for the Central District of California (Los Angeles, CA) and Richard V. Fink, Chapter 13 Trustee (Kansas, City, MO) as panelists. The panelists reviewed cases of interest to bankruptcy judges and practitioners. In the materials was a list of the cases that have gone to the Supreme Court under the following headings: Civil Procedure, First Amendment, Criminal Law, Arbitration, Civil Rights, Federalism, and Bankruptcy and related law,

The afternoon continued with breakout sessions with choices for Trustees, Debtor Attorneys, Creditor Attorneys, and Staff Attorneys. Stewart Chapman, Keisha Hooks, and Anthony Olivadoti, Staff Attorneys in my office, accompanied me to Anaheim and each had selected sessions of interest to attend so that none of us would miss anything. The choices were:

"Do you Wanna Dance?: Negotiable Instruments"

"Do it Again: Post Confirmation and Plan Modification Issues"
"With a Little Help from my Friends: Educating New Attorneys"
"Help Me Rhonda: Proof of Claims and Mortgage Issues"

"Wouldn't it be Nice: PDI- I and J or " Modified" B22C"

Thursday was a full day and very taxing on the brain. After all of that education, there was a President's Reception from 7:00 PM to 11:00 PM, but I slept right through the reception.

There were only two sessions on Friday: I guess that is why "I Get Around: Ethical Issues in Social Networking" was one of them since you could not very well afford to miss the ethics credit. The Honorable Steven W. Rhodes, United States Bankruptcy Court for the Eastern District Michigan (Detroit, MI), Professor Nancy B, Rapoport, Professor Gordon Silver, William S. Bound School of Law, University of Nevada (Las Vegas, NV) and Peter C. Fessenden, Chapter 13 Trustee (Brunswick, ME) were the panelists. Social networking refers to building online communities of people who share interests or activities, or who are interested in exploring the interests and activities of others. These web-based applications allow users to create and edit personal and professional "profiles" that contain information and content that can be viewed by others in electronic networks that the users can create or join. There is a distinction between social networks that offer personal connection and professional networks that market a business or accomplish other business-related goals.

"Little Old Lady From Pasadena: Chapter 13 Debtor 'Demographics'" with Professor Jean Braucher, Roger C. Henderson, Professor of Law, University of Arizona, James E. Rogers, College of Law (Tucson, AZ), Joan Rao, National Consumer Center (Boston, MA) and William T. Rule, Senior Economist,

Bankruptcy Judges Division, Administrative Office of the United States Courts (Reston, VA), as panelists and this concluded the Friday sessions.

There were no afternoon sessions, so, Kathy Dockery, Chapter 13 Trustee (Los Angeles, CA) acting as tour-guide and host, took us on a road trip. Laguna Beach was beau-



tiful. The homes, shops, restaurants and beach were everything you read about. We would have stayed all evening but Fifth Third Bank sponsored a dinner and tickets to Disney and I wanted to go to Disney. I had fun at Disney. After two scenic rides, Stewart, Keisha and Anthony talked me into going on the Indiana Jones ride; they said it was like the teapot. Ha-Ha! I found my way back to the bus and I left them at the theme park.

Early Saturday morning, it was the Beach Boys – A live Case Law Update, The Honorable Keith Lundin, United States Bankruptcy Court of the Middle District of Tennessee (Nashville, TN), the Honorable William H. Brown, Retired (Thompson's Station, TN), and Henry E. Hildebrand, III, Chapter 13 Trustee (Nashville, TN), never disappoint. You always bring your yellow highlighter to keep track of the decisions reviewed. Both Judge Lundin and Hank referred to The Honorable Judge Eugene Wedoff decision in In Lisa Davis several times. In that case a major issue in dispute was whether §1325 (b) applies to motions to modify a confirmed plan. It does not.

Saturday afternoon included a choice of breakout sessions for non-trustee attendees. For the trustees there was the Current Issues for Trustees with Michael Joseph, Doreen H. Solomon, Assistant Director, Office of Oversight, Executive Office for the U. S. Trustees, U. S. Department of Justice (Washington, DC) and Clarkson McDow, Jr., U.S. Trustee. Region 4. This session was very informative and always includes updates from EOUST.

Finally, to close the conference, everyone dressed-up for the final night banquet which was not very well attended. There was just too much food and Terry Long, Creditor Attorney(Chicago, IL) and I could not figure out which way to turn the lazy-Susan type-serving tray that served as a centerpiece with all of the food on it. I did not get a chance to discuss important events of the conference with Jerry Mylander, Staff Attorney, Glenn Stearns' office (Lisle, IL), who was sitting next to me because the band was playing too loud. The highlight of the banquet was getting to see Mr. Xioming Wu, Debtor Attorney (Chicago, IL), and his little son, who has attended every banquet since he was a little baby.

I was at the airport at 6:00 a.m. to catch the earliest morning flight on Sunday back to Chicago. There is no place like home.

\*\*Marilyn O. Marshall, Trustee\*\*



# Information Services How Much Check Would A No Check Check?

All of it!

In TNG, a "No Check Code" is a control that can be placed on a Payee record to prevent a disbursement or check from being creat-

ed for a claim. It is the equivalent of turning off "OK to allocate" in CaseNET.

For those that have been given modify rights to this field, this is the pop-up you would see on the Payee screen.

No Check Code:

Debtor Responsible
Claim disallowed
Late filed claim
Duplicate claim filed
Stay modified/annulled: stop disbursing
Stay modified/annulled by notice: stop disbursing
Claim withdrawn
Check Returned by Creditor

A blank No Check Code means there are no restrictions on the claim. A "Debtor Responsible" No Check Code obviously means the debtor, not the Trustee, is paying that creditor.

Remember in CaseNET we have plan groups which roughly translate to Creditor Types in TNG. Creditor Types, like plan groups, determine the order of payment of debts. You may notice that instead of having a Creditor Type of Debtor Responsible we have a No Check for it. This is because if we were to create a creditor type for it, we would lose the type of debt (current mortgage, secured, unsecured) that it is. The alternative would be to duplicate all of our creditor types and have one for Trustee disbursing and one for debtor disbursing. Too confusing!

The other No Check Codes may look familiar to you. I basically did an analysis of the docket entries that our staff makes when "turning off" a claim and made them each a No Check Code. This list includes reasons we would NOT be paying a claim.

The other Payee control that will be in place in TNG is the Reserve Flag Code. If a Payee has a Reserve Flag Code placed on it, this will allow money to be allocated to that payee but not disbursed. What is the CaseNET equivalent to this condition? Turning off "OK to disburse."

User access controls have also been placed on this field and those who do have access will see the following pop-up on the Payee screen.



Similar to the No Check Code, a blank Reserve Flag Code means we are not reserving on a Payee.

Each Reserve Flag Code has the same effect (except for the ones which say "Reserve for 1 disbursement cycle" and "Reserve for 9 disbursement cycles." I'll come back to those.)

You can see by reviewing the list, that these are the reasons we would be reserving the money on a claim and not paying it out. For example, "Reserve – Check Returned by Post Office" is the Reserve Flag Code Ms. Marshall will select when she has voided a returned disbursement check. The Reserve Flag Code remains on the Payee so that while the Financial Department researches a good address for the creditor, the money continues to allocate or "reserve" for that claim, just not go out on a check.

When a good address is found, the Reserve Flag Code will be removed from the Payee and the money that has been building up in the Reserve Amount will be disbursed to the creditor.

"Reserve for 1 disbursement cycle" and "Reserve for 9 disbursement cycles" Reserve Flag Codes are set if you want to hold the money for just one month (or nine months) and then have the money go out without needing to go back and remove the Reserve Flag Code.

Just as in CaseNET, I have been building Crystal Reports that the Financial Department will run to keep track of claims where the money is not being disbursed. So, just because the terminology may be different, you will still be getting Ms. Marshall's monthly email titled "Who Has Checks?"

Sandra Pillar, Director of Office Systems

## **Quick Money Tip**

Did you know that online banking is actually safer than banking at a brick-and-mortar institution? Banks are required to secure their online sites and are among the most secure on the Internet. By paying your bills using your bank's online bill pay service, you will also avoid the risk of old-fashioned identity theft by thieves who raid your mailbox.



# Financial Living In A World Of Voided Creditor Returns!

The last thing a Trustee wants to see in the "mail" are returned checks by the post office as undeliverable or returned checks to the Trustee on issued creditor disbursements. The reasons are threefold: First, the creditor did not receive their money. Second, the Trustee must reverse the fee taken on that disbursement. And third, the debtor who sent the funds is a bit further from paying off the case.

Most importantly, though, the fact a creditor did not get their disbursement hinders the responsibility of the Trustee to administer on bankruptcy cases effectively. There are many reasons that a creditor disbursement would be returned. The creditor moved and did not supply a new address to the Bankruptcy Court, the Creditor did not file a proper claim with the Bankruptcy Court, the forwarding address has expired with the post office,

the claim was transferred to a new creditor and the proper claim transfer had not been filed. Or in our District, the Trustee paid according to the confirmed model plan and the creditor listed in the plan by the Debtor Attorney was not correct.

Our number one job in the financial area is to make sure that the receipts received in our office flow out of our office just as effectively. Therefore, we are constantly working on checks returned to the Trustee to find their proper disbursement name and address. Once the checks are returned to our office, they are stamped voided and processed under dual control in the mailroom and the process begins.

We start by looking to see if we can contact the creditor from the original proof of claim filed. In many cases they did not know or they simply forgot to file an amended claim or a change of address with the bankruptcy court. Once this is done we can get an upload from the court and reissue the funds. We do not accept addresses over the phone or by fax in our office. The only official record of a creditor address should be at the Bankruptcy Court.

In some cases, the claim was sold and transferred to another company and no one bothered to inform the court that a claim was transferred. We will start by calling the original creditor; they will normally inform our office that the claim has been sold to another company and will provide the name and phone number. It then becomes our responsibility to verify that claim transfer with the new creditor and get them to file it with the Bankruptcy Court.

The Northern District of Illinois will pay according to the confirmed model plan. Therefore, if a creditor is listed in the plan and if the address and account number for this debt appear on schedule D match, we will issue a check to this secured creditor in some cases before they may provide a claim. If this disbursement is returned, then we must first contact the Debtor Attorney and Debtor to make sure that the information provided is correct. It could be possible the information was inadvertently typed into the schedule or the plan with the wrong name. Like Citimortgage, instead of Chase Home

Finance or maybe the credit report from which the information was taken was wrong. In any case, it becomes our job to find the correct name and address for the creditor. Many times, the debtor may have an invoice or monthly statement that will provide us

with a lead to who is the correct creditor. If the name or address turn out to be incorrect, many times the Debtor's attorney will amend the schedule D to correct the address along with the account number immediately so we work closely with each attorney. We have even seen the Debtor's attorney do a motion to amend the plan to correct the information in the plan if the name is proven wrong. Then, once this is presented in court and becomes the new official part of the plan, we can again begin to pay this creditor.

Many times, debtors are unaware that when they bought furniture or a computer at "Harlem Furniture" or at "Best Buy," the real owner of the debt is a finance company. They may list Harlem

Furniture as the debt on schedule D but in actuality the debt belongs to, say, Great American Finance or World Financial Network. So we are like private eyes looking and investigating to correct any error to the name and address so the disbursement can find its proper home.

We utilize many tools along the way to aid us in finding the correct name and address. We will use the schedules from the Petition, we will use the confirmed plan, Internet search engines, help from the Debtors and the Debtor's Attorney. We will make endless calls to Creditors and even keep a list of names and contacts in case further instances should arise should we need to contact that creditor again. But the bottom line for the Trustee to truly provide proper administration of a case is to make those monthly disbursements to the correct and accurate creditors in a timely and effective manner each month.

Mark Caffarini, Closing Audit Specialist

# Legal Case Reinstated

As Paralegals, one of our responsibilities is to change the status of a case once any of the following scenarios have taken place: a motion has been granted to vacate the order that was previously entered dismissing a case, denying the confirmation of the plan, converting of a case, or the case has been transferred to a different Chapter 13 Trustee's office. A motion to dismiss, convert or transfer a case can be filed by the U.S. Bankruptcy Court, Chapter 13 Trustee, Debtor(s)/Debtor's Attorney and Creditor(s).

The U.S. Court can file a motion to dismiss a case for Debtor's failure to pay the filing fee for their case. The Standing Trustee or a party in interest can file a motion to dismiss a case for material default, unreasonable delay, missing documents, denial of plan confirmation, or for other issues that may have an adverse effect on the case. The Debtor(s)/Debtor Attorney can also file a voluntary dismissal on behalf of the Debtor(s) if they no longer wish to proceed with their bankruptcy case. Once the Motion has been filed, the Paralegal will receive an electronic copy (via email) of that motion and set the motion in CaseNET. There are several actions that can take place when the motion goes before the Judge: the Judge can issue a continued date, withdraw, deny, or grant the motion. If the motion gets granted and the case gets dismissed, converted or transferred, the Paralegal will change the status of that case in CaseNET to that result.

In regards to cases where plan confirmation has been denied or the case has been dismissed and the Debtor(s)/Debtor Attorney resolved the issue(s) of the case in the interim; the Debtor(s)/Debtor Attorney can file a motion to vacate the order that was entered denying confirmation of the plan or dismissing the case to have the plan confirmed or the case reinstated. In the case where an order gets granted vacating denial of plan confirmation, the Paralegal will change the status of the case from Plan Confirmation Denied to Confirm-No-Order, conduct a review of the case and once the confirmation order is received, then the Paralegal will change the status of the case to Confirmed.

When a motion is filed to reinstate the case, the Paralegal has to follow additional procedures that involve the financial department. It is imperative that the Paralegal communicates with the financial department that there is a motion pending to have the case reinstated, so they will not run a final report on the case. The Paralegal does this by setting the motion in CaseNET and enters a request in the FileMaker Pro database to hold the final report of that case. This request must be updated every time the motion goes before the Judge to keep the financial department abreast on the status of the motion. If the Judge grants the motion and the case get reinstated, the Paralegal must process the order, email the order to their department manager asking them to change the status of the case to its last action before the case was dismissed. The financial department will also receive an update in FileMaker Pro that the case has been reinstated and there is no need to run a final report at this time. Sulethé Mason, Paralegal

### By the Numbers: Back To School

- Almost \$7.5 billion is spent at family clothing stores in August, reflecting the increase in back to school shopping.
- There are over 77 million children and adults enrolled in school throughout the United States, with 55.5 million of those enrolled in elementary through high schools.
- ☐ There are almost 99,000 public schools in the country and almost 34,000 private schools.
- ☼ The annual salary of public school teachers in California is \$65,800. In contrast, teachers in South Dakota receive the lowest pay in the nation at \$36,700. The national average is \$52,800.

Source: U.S. Census Bureau

## **September's Notable Events**

Happy **10th** Anniversary to **Trustee Marilyn O. Marshall** on September 1st!

Happy Birthday to Jenna Ball September 2nd!

All Staff Meeting on September 2nd.

**Labor Day** on September 5th (the office will be closed).

Happy Birthday to **Keisha Hooks** September 11th!

Patriot Day on September 11th.

Citizenship Day on September 17th.

End of Office Summer Casual Dress on September 18th.

International Talk Like a Pirate Day on September 19th.

Happy 2nd Apply account to Engineer Ordinal on

Happy **3rd** Anniversary to **Enrique Orejel** on September 22nd!

**Family Health and Fitness Day** on September 23rd. **Ancestor Appreciation Day** on September 27th. Happy Birthday to **Juliana Dunklin** September 30th!

### **Renter's Insurance**

Take a look around you. Everything you see has value, and you could be vulnerable if you don't have insurance. Many renters think that their possessions are covered by their



landlord's policy. But your landlord's policy typically only covers the structure and any liabilities the owner would face. Your possessions are not covered under this type of policy.

Why Do You Need Insurance? You may think your possessions aren't valuable enough to insure, but add up the cost of replacing everything you have. It is a significant amount of money. If you do not have enough savings to cover these expenses all at once, you need renter's insurance. Many policies also provide personal liability coverage, protecting you in the event that someone is injured at your home.

**Isn't It Expensive?** Renter's insurance can cost as little as \$15.00 a month. It all depends on how much coverage you want and where you live. Considering that you have no control over circumstances like fire, water damage, or burglary, this is a wise investment and gives you peace of mind.

Where Do I Get Renter's Insurance? Almost all insurance agents that sell homeowner's insurance also sell renter's insurance. Call several for quotes and choose the one that seems the most comprehensive and affordable for you. If you are interested in buying renter's insurance online, search for renter's insurance and you will find many companies willing to give you quotes by email.

### Happy Birthday, Dear Ice Cream Cone

September 22nd is widely accepted as the official anniversary of the invention of the ice cream cone. The ice cream cone is believed to have been invented by Italo Marchiony, an Italian immigrant, who was granted a patent in 1903 for a mold that could make waffle cups. He claimed to have been making them since September 22, 1886, and selling them from a cart on Wall Street in New York City.

Other reports say that the Menches Brothers first served ice cream in edible cones at the 1904 World's Fair in St. Louis, Missouri. Still others say that the true inventor was E. A. Hamwi, a Syrian immigrant pastry maker who was also at that World's Fair. When he saw that the ice cream vendors had run out of bowls, he fashioned his waffles into a cone shape and sold them to the vendors to use. There are, in fact, many others that claim that they were the first to invent the ice cream cone.

Regardless of who invented this convenient container, be sure to enjoy a scoop or two this September 22nd, in honor of the ice cream cone itself.

### **Back to School**

Are you looking for a change? It may be time to head back to school! Whether you've never attended college, or started and never got that degree, you may find that you now need more training and education to advance your career. Ex-



perts agree that one of the keys to bettering yourself and your family's future is higher education. Holders of a bachelor's degree earn an average of 50 percent more than someone with just a high school diploma. To decide if college is right for you, take these points into consideration.

#### Take a Test

Many colleges and universities offer career placement tests to help you discover your talents and interests. You may find that you really only need a two-year certificate, rather than a four-year program, to meet your goals. You can also get advice from a guidance counselor or librarian about careers that are projected to be in high demand in the future. One test you may be able to skip, however, is the SAT. Many colleges have modified their admissions criteria and offer alternative admissions tests. If you have never completed high school, you will need to get your GED before taking any admissions tests.

#### **Look Around**

Surprisingly, 40 percent of American college students are 25 years of age or older. Many colleges and universities offer programs specifically designed for working adults. You may find that you only need to attend classes one or two nights a week. Often, classes are scheduled to allow you to complete more courses in a shorter amount of time than traditional college degree programs. Some colleges offer on-site, low-cost day care and other services for parents. You may be able to take some of your classes by email, video, or Internet. Many colleges grant college credit for your life experiences, giving you a head start on your education.

### Save a Buck or Two

If you think that you don't have enough money in your budget for college, explore the numerous financial aid opportunities available to you. Scholarships and federal grants are designed to help you afford an education, and they don't have any age restrictions. Be sure to get infor-



mation on all the programs for which you qualify from the student financial services office. You can also contact the Federal Student Aid Information Center (FSAIC) at 1-800-4-FED-AID or studentaid.ed.gov for more information on government student aid programs. Many students are pleasantly surprised to discover all the funds that are available to them.

### Trivia Quiz: Silly Trivia

Can't get any sillier than this! Test your knowledge of useless trivia with this great quiz.

- 1. Where did the word "nerd" come from?
- 2. How many cows are needed each year to supply the NFL with enough leather to make its footballs?
- 3. How many seeds on average are on a McDonald's Big Mac?
- 4. What is the only mammal that cannot jump?
- True or false: Pound for pound, hamburgers cost more than new cars.
- 6. What do you call a group of rhinos?

- 7. What country has the world's longest rail-road tunnel?
- 8. About how many hot dog vendors are there in metropolitan New York?
- 9. Which king in a standard deck of playing cards is the only one without a moustache?
- 10. How many grooves are on the edge of a quarter?

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King of hearts.	6
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Ran the Zoo." 2. 3,000. 3. 178 seeds. 4. The elephant. 5. True.

1. Dr. Seuss in his book "If I



The Marshall Chronicles is now available in full color, both in print and on-line at www.chicago13.com

### Did You Know: Rice

September is National Rice Month.

- More rice is produced in Arkansas than in any other U.S. state, with over 46 percent of the U.S. rice production.
- Rice is grown on about three million acres of land in the U.S.
- Rice is the main dietary staple for more than half of the world's population.
- At the International Rice Research Institute Genetic Resources Center in the Philippines, there are over 80,000 different rice samples in cold storage.



- One seed of rice yields more than 3,000 grains.
- Americans eat about 24 pounds of rice per person per year. Asians eat 300 pounds per person.
- Fifty percent of all the world's rice is eaten within eight miles of where it is grown.
- White rice can be kept indefinitely on a pantry shelf, while brown rice should be used within six months.
- Rice is grown on every continent except Antarctica.