



**IN THE GRAND COURT OF BANKRUPTCY
FINANCIAL SERVICES DIVISION
CREDITORS PETITION**

CAUSE NO FSD 8 OF 2025 (MRHCJ)

**IN THE MATTER OF THE BANKRUPTCY ACT 1997
AND IN THE MATTER OF ERIN WINCZURA (A DEBTOR)**

PETITION

To the Grand Court:

The humble petition of the Black Gold Investment Holdings Inc, HCS Investment Holdings and Semper Luxembourg Holding (together the "**Petitioners**") shows that:

1. Erin Winczura had at the material time a place of residence at 24 Shamrock Road, George Town, Grand Cayman, Cayman Islands, of which she was the sole registered owner.
2. Ms Winczura is indebted to the Petitioners pursuant to a final judgment of the Grand Court of the Cayman Islands confirmed by an Order dated 11 October 2024 in Cause No FSD 163 of 2023 which requires her to pay:-
 - (a) Black Gold Investment Holdings Inc. the sum of USD 4,000,000 plus interest;

This Petition is filed by Ogier (Cayman) LLP, Attorneys-at-Law for the Petitioners, whose address for service is: 89 Nexus Way, Camana Bay, Grand Cayman KY1-9009, Cayman Islands (MG/427795.00001)

(b) HCS Investment Holdings, Ltd the sum of USD 1,000,000 plus interest; and

(c) Semper Luxembourg Holding the sum of USD 1,000,000 plus interest.

(the "**Judgement Debt**")

3. The amount of interest owing to each Petitioner is specified in the Interest Schedule appended to the 11 October 2024 Order.
4. On 30 October 2024 a Bankruptcy Notice was served upon Erin Winczura demanding payment of the Judgment Debt within 7 days.
5. Ms Winczura did not, within seven days after service of the Bankruptcy Notice, pay such amount or secure or compound it to the satisfaction of the Petitioners.
6. The Petitioners do not hold any security over Erin Winczura's estate, or on any part thereof, from which they might satisfy the Judgment Debt.

Your Petitioners therefore humbly pray that this Honourable Court make the following orders and directions:-

1. A provisional order that Erin Winczura be made bankrupt;
2. A direction that Ms Karen Scott of Chris Johnson Associates Ltd be appointed as agent of the Trustee in Bankruptcy pursuant to section 13(1) of the Bankruptcy Act (1997 Revision);

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3. A direction that Mr Kenneth Krys of Krys Global by appointed as conflict agent of the Trustee in Bankruptcy pursuant to section 13(1) of the Bankruptcy Act (1997 Revision);
4. An order providing for substituted service of all documents required to be served in these proceedings on Erin Winczura by email; and
5. Any other such orders as the Court thinks fit.

AND your petitioner will ever pray, etc.

DATED this 13 day of January 2025.



Ogier (Cayman) LLP

NOTE: This Petition is not intended to be served on any person.

TAKE NOTICE THAT the hearing of this Petition will take place at the Law Courts, George Town, Grand Cayman, Cayman Islands on the 18 day of February 2025. at 9:30 a.m.

Time estimate: The estimated time for the hearing of this petition is two hours.

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