

FILED DATE: 10/11/2024 12:20 AM 20243007413

STATE OF ILLINOIS, CIRCUIT COURT COUNTY		SMALL CLAIMS COMPLAINT	For Court Use Only FILED 10/11/2024 12:20 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 20243007413 29742794
Instructions ▼	Jason Andersen Plaintiff (First, middle, last name) For updated information about your case, including hearings, subsequent filings and other case information, please visit our Online Case Search and search for your case: https://casesearch.cookcountyclerkofcourt.org Defendants (First, middle, last name or business name): Ryne J. Vitug and Joselito (Joe) T. Vitug		Case Number 20243007413
Directly above, enter the name of the county where you are filing the case.			
Enter your name as Plaintiff.			
Enter the names of all people or businesses you are suing as Defendants.			
The Circuit Clerk will add a Case Number.			
Jury Trial Request by Filing Separate Form. If you want your case decided by a jury instead of a judge, you have to file a <i>Jury Request</i> form. Jury trials can sometimes be more complicated and an additional fee may be required.			

In 1, enter your name.	1. I, <u>Jason Andersen</u> , am the Plaintiff. <i>First, Middle, Last</i>
In 2, enter the name and address of each Defendant. If you are suing more than 2 Defendants, use the <i>Additional Defendants (Small Claims Complaint)</i> form and attach it.	2. Defendant's name and address is: <u>Ryne Joseph Vitug</u> <i>First, Middle, Last</i> <u>1299 Zurich Way, Schaumburg, IL 60196</u> <i>Street, Unit # City State ZIP</i> Defendant #2's name and address is: <u>Joselito (Joe) T Vitug</u> <i>First, Middle, Last</i> <u>855 Franklin Avenue, South Elgin, IL 60177</u> <i>Street, Unit # City State ZIP</i> <input type="checkbox"/> I have listed additional Defendants on the attached <i>Additional Defendants (Small Claims Complaint)</i> form.
In 3, enter the amount of money that is owed to you. It must be \$10,000 or less. Do not include court costs. Check 3a , 3b , or 3c . If you have a written agreement, attach that contract or other document as proof of your agreement to this <i>Small Claims Complaint</i> , or explain why you cannot.	3. Defendants owe me <u>\$ 9,565.48</u> and (check one): <input type="checkbox"/> a. I have no written agreement with Defendants. <input checked="" type="checkbox"/> b. I have a written agreement with Defendants and it is attached. <input type="checkbox"/> c. I have a written agreement with Defendants but I have not attached it because:
In 4, check the box if it applies.	4. <input checked="" type="checkbox"/> I have demanded payment of the amount listed in Section 3 and Defendants have failed to pay in full.

In **5**, enter the reasons why Defendant owes this money to you.

If you need more space, complete the *Additional Reasons (Small Claims Complaint)* form and check the box.

5. Defendants owe me this amount of money because:

This statement details a small claims action by Jason Andersen against Ryne J. Vitug and Joselito (Joe) T. Vitug for fraud and breach of contract related to undelivered travel services. Background:

1. Introduction to Ryne Vitug: Mr. Andersen became acquainted with Ryne J. Vitug, who claimed to be a corporate lawyer and a provider of discounted travel through a supposed Las Vegas host.
2. Travel Arrangements: Mr. Andersen used Mr. Vitug's services for several travel bookings. Total payments made to Mr. Vitug amounted to \$10,916 over seven transactions.
3. Refund Promises: Mr. Vitug promised refunds for all bookings if canceled 24 hours before the event, claiming refunds would take 3-10 days. Total refunds promised - \$9,565.48

The Incident:

• Of the seven transactions:

- o Three transactions on 6/29 (\$1,070.28) and 8/4 (\$36) were fulfilled.
- o The third was a flight for \$244.24 taken from a refund credit on 8/7 without any issues.
- o The remaining five transactions, totaling \$9,565.48 , (accounting for the \$244.24 credit) were not satisfied:
 - 6/24: \$4,909.48 for a Disney trip (hotel, tickets, fast passes, dining) not delivered.
 - 6/24: \$1,034 for a business class ticket on Delta not provided.
 - 7/2: \$1,448 for Nashville trip (hotels, airfare) not completed.
 - 7/5: \$1,150 to upgrade two international flights to business class not executed.
 - 8/3: \$1,268.24 for additional upgrades to Nashville trip not realized.

Evidence of Transaction and Fraud:

☒ I have attached an *Additional Reasons (Small Claims Complaint)* form.

Under Illinois Supreme Court Rule [137](#), your signature means that you have read the document, that to the best of your belief, it is true and correct and that you are not filing it for an improper purpose, such as to cause delay.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete address, telephone number and email address, if you have one.

/s/ Jason Andersen
Your Signature

Jason Andersen
Print Your Name

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