

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) CHAPTER 11
)
RYNE JOSEPH VITUG,) CASE NO. 25-13120
)
DEBTOR.) HON. DAVID D. CLEARY

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on **Wednesday, December 17, 2025, at 10:00 a.m.**, I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, **either** in courtroom 644 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the **UNITED STATES TRUSTEE'S MOTION TO CONVERT OR DISMISS A CHAPTER 11 CASE PURSUANT TO 11 U.S.C. § 1112(b) AND TO SHORTEN NOTICE**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is **161 122 6457** and the passcode is **Cleary644**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/ Joshua D. Greene
Joshua D. Greene, Trial Attorney
U.S. Department of Justice
Office of the United States Trustee
219 S. Dearborn Street, Room 873
Chicago, Illinois 60604
(202) 538-4834
joshua.d.greene@usdoj.gov

CERTIFICATE OF SERVICE

I, Joshua D. Greene,

- an attorney, certify
- or -
 a non-attorney, declare under penalty of perjury under the laws of the United States of America

that on December 4, 2025, I caused to be served copies of this Notice, the attached Motion and proposed order on the ECF Registrants shown below *via* the Court's Electronic Notice for Registrants and for all other entities listed on the service list, *via* First Class US Mail by BMC Group. A supplement to this Certificate of Service from BMC Group will be filed.

/s/ Joshua D. Greene

SERVICE LIST

Registrants Served Through the Court's Electronic Notice for Registrants

- **Ira Bodenstein** iratrustee@cozen.com, IL29@ecfcbis.com
- **Adam G. Brief** Ustpregion11.es.ecf@usdoj.gov
- **David C. Christian** dchristian@dca.law

Registrants Served Via First Class Mail

- See attached mailing matrix

Case 25-13120 Doc 50 Filed 12/04/25 Entered 12/04/25 12:40:56 Desc Main Document Page 3 of 24
Label Matrix for local noticing
0752-1
AARON AND ANGELA PIPPIN
2049 S FOX TROOP PL
EAGLE, ID 83616
ADRIAN GUTIERREZ
299 LAUREL ST
ELK GROVE VILLAGE, IL 60007-4314

Northern District of Illinois
Eastern Division
Thu Dec 4 11:32:54 CST 2025

ALBERTO MAGANA
415 SUNSET AVE
AZUSA, CA 91702-4433

ALEJANDRO ALVARADO
12205 HILLSDALE AVE
SYLMAR, CA 91342-5136

ALEX BENSAOUN
1141 AUBREY SPRINGS AVE
HENDERSON, NV 89014-6818

ALEX MAGANA
8241 MELBA AVE
WEST HILLS, CA 91304-3534

ALEXANDER BAILEY
1144 BAKERS EDGE CT
DANVILLE, IN 46122-0050

ALEXANDER CLAVERIA
997 LONGFORD RD
BARTLETT, IL 60103-1917

ALLISON LINDSEY
1813 E 3550 N
NORTH LOGAN, UT 84341-7091

ALYSSA SALVADOR
1142 KAMAILE ST
HONOLULU, HI 96814-2805

AMANDA HERMOSILLO
5438 CLYDESDALE ST
LAS VEGAS, NV 89119-2801

ANGIE JIMENEZ
2437 W LELAND AVE
CHICAGO, IL 60625-2913

ANNDI ANDERSON
1210 N 170 WAY
ANGOLA, IN 46703-9416

ANNETTE TOSCANO
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

APRIL TORRES
2121 N MAPLE ST
BURBANK, CA 91505-1430

ARLENE MORAN
9328 HONEYSUCKLE AVE
FOUNTAIN VALLEY, CA 92708-1405

ASHLEY ALVA
11000 VALLEY BLVD
SUITE 115
EL MONTE CA, 91731

AYOUB ADEM
209 CHAUNCEY ST
BROOKLYN, NY 11233-2114

Abraham Gonzalez
2121 N Deodar st
Santa Ana, CA 92705-7914

Adam Phillips
995 TWILIGHT GLOW CT
HENDERSON, NV 89015-5830

Amy Foote
940 Appaloosa Ct
Sleepy Hollow, IL 60118-2517

Andrew Tressler
1919 Wateree Rd
Winnsboro, SC 29180-7232

Anna Sundholm
7204 SW 5th Ave
Portland, OR 97219-2232

Ashley West
16610 N Liverpool Ln
Nampa, ID 83687-9441

BARCLAYS CARD SERVICES
PO BOX 8801
WILMINGTON, DE 19899-8801

BMO BANK NA
LEGAL DEPARTMENT
111 W MONROE ST
CHICAGO, IL 60603-4096

(p)BMW FINANCIAL SERVICES
CUSTOMER SERVICE CENTER
PO BOX 3608
DUBLIN OH 43016-0306

BMW Financial Services NA, LLC
c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

BMW Financial Services NA, LLC, c/o AIS Port
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

BRAILYN GARCIA
2576 CORAL SKY CT
LAS VEGAS, NV 89142-1207

BRANDON AND TERRA ARNOLD
1820 HIGHWOOD AVE
PEKIN, IL 61554-6436

BRAYDON AND NICOLE BARLOW
57 W 1124 N
APT 3
LOGAN, UT 84341-6851

BRYAN STAHL
10125 MEADOW LN
DES PLAINES, IL 60016-1532

BRYCE AND KARMEN MAXWELL
407 S 10 W
FARMINGTON, UT 84025-2204

BRYCE DAYAP
2 CLEARWATER CV
BUENA PARK, CA 90621-1659

(p)WESTLAKE COMMUNITY HOSPITAL
123 N WACKER DRIVE
SUITE 1800
CHICAGO IL 60606-1770

Brian Bui
276 Racine Pl
San Jose, CA 95111-4612

Brianna Parks
10969 Winter Rise St
Las Vegas, NV 89141-6160

Adam G. Brief
Office of the U. S. Trustee, Region 11
219 South Dearborn
Room 873
Chicago, IL 60604-2027

CAITLIN REILLY
550 HICKORY LN
PASADENA, CA 91103-3216

CAITLYN DORIS
2576 CORAL SKY CT
LAS VEGAS, NV 89142-1207

CALVIN CURTIS
407 COLUMBIA AVE
CLE ELUM, WA 98922-1319

CALVIN JIE YEUNG
167-10 CROCHERON AVE
3A
FLUSHING, NY 11358-2121

CAMILLE LINDSEY
1813 E 3550 N
NORTH LOGAN, UT 84341-7091

CANDY ANAYA
2050 RALMAR AVE
EAST PALO ALTO, CA 94303-1829

CAPITAL ONE
PO BOX 30285
SALT LAKE CITY, UT 84130-0285

CAROL FORMOSO
8066 ST CLAIRE AVE
NORTH HOLLYWOOD, CA 91605-1321

CATHERINE, SILVA
1029 MONTGOMERY ST
SAN CARLOS, CA 94070-3219

CELIA KHONG
826 N FORMOSA AVE
APT 3
LOS ANGELES, CA 90046-7690

CHARLENE ALMOCERA
PO BOX 5608
SHASTA LAKE, CA 96089-5608

CHERRY SILOS
201 PARK ROAD NORTH
ROYAL PALM BEACH, FL 33411-4743

CHERYL GALDONES
99-352 POOPAA PL
AIEA, HI 96701-4010

CHRISTINA THEISGEN
13412 BURBANK BLVD
UNIT 6
SHERMAN OAKS, CA 91401-5367

CHRISTOPHER PALMESE
701 ELSIE DR
MELROSE PARK, IL 60160-2362

CHRISTYL BARBA
29470 ELM HILL LANE
YORBA LINDA, CA 92886

CLARISSA ISABELLE ACEVEDO
15235 GOLDEN CT
SYLMAR, CA 91342-5492

Capital One, N.A., successor by merger to Di
PO Box 3025
New Albany, OH 43054-3025

Chris Arevalo
17942 W Elsbury St
Gurnee, IL 60031-4563

David C. Christian II
David Christian Attorneys LLC
105 W. Madison St.
Suite 2300
Chicago, IL 60602-4647

DANA BAY
16242 CHASE ST
NORTH HILLS, CA 91343-6204

DANA FECHTNER
1925 HAMEL RD
WILLIAMS LAKE, BC V2G5G8

DANA SUGIMOTO
7875 BARBI LN
LA PALMA, CA 90623-1670

DANIEL MAXWELL
401 S. 10 W
Farmington, UT 84025-2204

DANIELLE DI FILIPPO
3344 LINGO STREET
LAS VEGAS, NV 89129-6912

DANIELLE SAUNDERS
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

DAVID CANTWELL
1202 W SANDY CT
MERIDIAN, ID 83646-5161

DAVID CHRISTIAN ATTORNEYS LLC
ATTN: DAVID CHRISTIAN
105 W MADISON ST
SUITE 2300
CHICAGO, IL 60602-4647

DAVID LEW
11219 WILBUR AVE
PORTER RANCH, CA 91326-2466

(p) DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Darin B Brimhall
2609 Fallow Fields Terrace
Henderson, NV 89052-2878

Dawn Barnhart
28 Richmond Lane
Aurora, IL 60504-3208

Department of Treasury
Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Department of the Treasury
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Dianne Bautista
46 Second St.
Raritan, NJ 08869-1812

EHREN ALESSI
2 EL NIGUEL CT
HENDERSON, NV 89052-6523

ELIZABETH CHAVEZ
24234 LEMA DR
SANTA CLARITA, CA 91355-2320

ELIZABETH RODRIGUEZ
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

ELIZANDRO ACEVEDO
15235 GOLDEN CT
SYLMAR, CA 91342-5492

ERIC WATSON
12530 FAIRWOOD PKWY
SUITE 102 NUMBER 332
BOWIE, MD 20720-6356

ERIN FIELD
1848 BLAZEWOOD ST
SIMI VALLEY, CA 93063-7426

FLORENCE PANGILINAN
27022 VICTORIA LN
UNIT 84
VALENCIA, CA 91355-5133

FRANCISKO VALLE
1010 SACRAMENTO AVE
UNIT 118
SOUTH PASADENA, CA 91030

FRANKIE ROMANO
2573 LITTLE BEAR CT
HENDERSON, NV 89052-2985

GABRIELLE WITTMAN
2 EL NIGUEL CT
HENDERSON, NV 89052-6523

Genevieve Kershaw
333 East Juanita Avenue
Glendora, CA 91740-5648

IDALINA SANCHEZ
9101 SONGWOOD CT
LAS VEGAS, NV 89129-7050

ISELA DORAME
1710 SAN FRANCISCO DR
SAN DIEGO, CA 92154-6702

Internal Revenue Service
Mail Stop 5014CHI
230 S. Dearborn Street, Room 2600
Chicago, IL 60604-1705

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

JAMES AND KRISTEN DONALDSON
752 VALLEY RISE DR
HENDERSON, NV 89052-5753

JAROM SHURTLIFF
1043 E REGATTA LN
SARATOGA SPRINGS, UT 84045-5584

JEFFREY MCDONALD
7535 LIQUORI CT
INDIANAPOLIS, IN 46214-2204

JELAH LUGUE
10636 WOODLEY AVE
UNIT 12
GRANADA HILLS, CA 91344-6939

JENELLE CAYAS
7218 FILMORE DR
BUENA PARK, CA 90620-3809

JENNIFER MYERS
19360 RINADLI ST
NUMBER 604
PORTER RANCH, CA 91326-1607

JENNIFER WITTMAN
2 EL NIGUEL CT
HENDERSON, NV 89052-6523

JIMCER TORRES
2121 N MAPLE ST
BURBANK CA 91505-1430

JOEL AND MARIA VITUG
21 KRISTIN DR
APT 919
SCHAUMBURG, IL 60195-3337

JOHN AND EMMA HOOD
10540 BALBOA BLVD
APT 120
GRANADA HILLS, CA 91344-6322

JON ALBANO
2071 BRAVO LOOP
UNIT 6
CHULA VISTA, CA 91915-3241

JONATHAN CALDERO
111 NORTH PRANDLE AVE
ARLINGTON HEIGHTS, IL 60004-6535

JONATHAN STONEKING
28642 OAK VALLEY RD
CASTAIC, CA 91384-3062

JOSE MAGANA
719 N LAZARD ST
SAN FERNANDO, CA 91340-1928

JOSE MANLAPAZ
9250 SUNLAND BLVD
NUMBER 3
SUN VALLEY, CA 91352-2068

JOSEPH CLUCHEY
12931 WOODLAND TRAIL
HUNTLEY, IL 60142-7818

JOSHUA LEONG
45-531 LOIHI PL
KANEOHE, HI 96744-1842

JOSHUA MEE
1522 SILVER SUNSET DR
HENDERSON, NV 89052-4103

JUDY MACEO
10039 SKY PARLOR RD
LAS VEGAS, NV 89178-8807

JULIAN SOTO
124 TRUMPHET LILLY AVE
LAS VEGAS, NV 89183-5574

JULIE CANELA
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

JUSTIN FORONDA
16308 SEPTO ST
NORTH HILLS, CA 91343-1309

(p) JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Jeffrey Wright
18n630 spring bluff dr
West Dundee, IL, 60118, IL 60118-9559

Jennifer Brix

27 Cape Court

Pekin, IL 61554-5115

KARLI PROVOST

1148 W KENILWORTH AVE

PALATINE, IL 60067-5965

KATHERINE RODRIGUEZ

15033 ANOLA ST

WHITTIER, CA 90604-2110

KATHY ALBANO

2040 BRAVO LOOP

UNIT 1

CHULA VISTA, CA 91915-3207

KRISTEN MRDJANOV

8815 MONOGRAM AVE

NORTH HILLS, CA 91343-4619

Kanokwan Maenmuean

7412 44ave

Elmhurst, NY 11373

Kert Lasdoce and Rivy Oponda

3565 86th Street, apt 6E

Jackson Heights, NY 11372-5602

Kimberly Rock

9437 Warm Waters Ave

Las Vegas, NV 89129-7867

LANA FELLA

2271 KASKASKIA CT

NAPERVILLE, IL 60565

LARRY REY DIAMOND

6825 ANDASOL AVE

VAN NUYS, CA 91406-4317

LAWRENCE PI

24234 LEMA DR

SANTA CLARITA, CA 91355-2320

LESLY HANSEN

2229 JUNIPER BERRY DR

LAS VEGAS, NV 89134-0161

LIEZL YABUT

36 WOOK OAKS DR

SOUTH BARRINGTON, IL 60010-1092

LUCILI SANTIAGO

16308 SEPTO ST

NORTH HILLS, CA 91343-1309

LYLE DEL MUNDO

2324 EASTRIDGE AVE

MENLO PARK, CA 94025-6715

Lisa Marie Furtado

1323 Hollyburne Ave

menlo park, CA 94025-1309

Liz Bauer

5495 Sunlight St

Simi Valley, CA 93063-5756

Lucas D Sopcak

39W802 Bowdish Drive

Geneva, IL 60134-3548

MADONNA TORRES

2140 N LINCOLN ST

BURBANK, CA 91504-3337

MANDY ANAYA

907 W 126TH CT

CROWN POINT, IN 46307-9251

MARC HALL

3315 E RUSSELL RD

SUITE A-4 NUMBER 106

LAS VEGAS, NV 89120-3440

MARCELA PENHA

3235 BELCASTRO ST

LAS VEGAS, NV 89117-3159

MARIA GARCIA

12749 W WAKEFIELD DR

BEACH PARK, IL 60083-3021

MARIA ISABEL SIU

4213 STONEBRIDGE LN

LAS VEGAS, NV 89108-2028

MARIA LUISA MORALES

5936 DRONBERGER WAY

LAS VEGAS, NV 89110-5033

MARICRIS ILETO

166-50 16TH RD

WHITESTONE, NY 11357-3303

MARK ANGELES

2911 EMERSON ST

FRANKLIN PARK, IL 60131-2616

MARK GLENIE

2035 ROCKDALE AVE

SIMI VALLEY, CA 93063-3703

MASON SATEREN
169 PACE AVE
HENDERSON, NV 89011-1038

MAURICE RIVERA
8526 SHOUP AVE
WEST HILLS, CA 91304-2217

MAX MENDELSON
180 N LASALLE ST
SUITE 2510
CHICAGO, IL 60601-2705

MELIANA ANTUNES
10855 CARBERRY HILL ST
LAS VEGAS, NV 89141-4383

MELINDA SZKLENNIK
202 ELLINGTON DR
SCHAUMBURG, IL 60194-4038

MELISSA CHIRCHIRILLO
1319 SADDLEBROOK RD
BARTLETT, IL 60103-1843

MELISSA PASCUA
94-1052 OLI LP
WAIPAHU, HI 96797-4263

MICHAEL MERRICK
15251 OLEANDER CT
CANYON COUNTRY, CA 91387-4420

MICHELLE CRUZ
818 FISCHER RD
CREVE COEUR, IL 61610-3906

MIKE ANZ
5836 S PECOS RD
NUMBER 111
LAS VEGAS, NV 89120-3418

MIRIAM ESPINOZA
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

MONICA DENISE WEST
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

Mail Stop 5014CHI
230 S. Dearborn Street, Room 2600
Chicago, IL 60604

Maria Christina Theisgen
13412 Burbank Blvd.
6
Sherman Oaks, CA 91401-5367

Marija Djurovic
301 Oakrun Court
Las Vegas, NV 89138-4637

Mark Anthony Glennie
2035 Rockdale Ave.
Simi Valley, CA
93063
Simi, CA 93063-3703

Matthew Jenski
132 Fernwood Lane
Bloomingdale, IL 60108-2523

Matthew Martin
21255 West Crimson Court
Plainfield, IL 60544-6327

Megan Flynn Rancatore
39w667 Schoolhouse Lane
Geneva, IL 60134-6022

Michael and Elizabeth Oine
17318 Fieldstone Dr.
Marengo, IL 60152-8266

Midland Credit Management, Inc.
PO Box 2037
Warren, MI 48090-2037

NATHAN NEPO
43845 GENERATION AVE
LANCASTER, CA 93536-8206

NATHAN NIEBLAS
11000 VALLEY BLVD
SUITE 115
EL MONTE, CA 91731

NOEMI PRUSIEWICZ
1246 W BRIARHOLLOW WAY
HIGHLANDS RANCH, CO 80129-5642

OLIVIA HOLLAND

ORION KIRSCH
7620 CROSBY DR
LONE TREE, CO 80124-8937

OTTAVIO OLIVARES
12864 SIMPSON AVE
SYLMAR, CA 91342

PHIL KEN ALBANO
2052 QUARTET LOOP
UNIT 3
CHULA VISTA, CA 91915-2731

PIOTR SARNECKI
6145 W LELAND AVE
CHICAGO, IL 60630-4910

Patricia Mateo
2518 Vintage Rose Ave
Henderson, NV 89052-5606

Paulo Antonio Gernade
127-03 95th Avenue
South Richmond Hill, NY 11419-1526

Quantum3 Group LLC as agent for
Concora Credit Inc.
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Crown Asset Management LLC
PO Box 788
Kirkland, WA 98083-0788

ROBERT AND MELANIE GODUTO
357 PAINE ST
SOUTH ELGIN, IL 60177-3225

ROBERT CLAVERIA
997 LONGFORD RD
BARTLETT, IL 60103-1917

ROBERT SATEREN
2573 LITTLE BEAR CT
HENDERSON, NV 89052-2985

RONA PANKEY
2613 FALLOW FIELDS TERRACE
HENDERSON, NV 89052-2878

RUBI SANTIAGO
20340 COLINA DR
SANTA CLARITA, CA 91351-6945

RUDY MUOZ
11513 VALJEAN AVE
GRANADA HILLS CA 91344-3052

RYEL ROMERO
3011 SEASONS AVE
HENDERSON, NV 89074-6992

RYNE JOSEPH VITUG
21 KRISTIN DR
APT 919
SCHAUMBURG, IL 60195-3337

Richard Rama
2835 Webb Avenue
APT 2C
Bronx, NY 10468-2123

Rudy Ben Munoz
11513 VAL JEAN AVE
Moorpark, CA 93021

Ryel Reyna Romero
3011 Seasons Ave
Henderson, NV 89074-6992

SANDRA SANDOVAL
12864 FENTON AVE
SYLMAR, CA 91342-4836

SCOTT IGTANLOC
4581 PATRICIA CIR
LA PALMA, CA 90623-1667

SEBASTIAN GOLIK
907 N ROHLWING RD
PALATINE, IL 60074-3736

SERGIO GARCIA AND MELISSA CALZADILLAS
1560 MARION DR
LAS VEGAS, NV 89110-1423

Shane & Dolores Rettberg
4178 E Trail Ride Road
KINGMAN, AZ 86401-8775

Sheara Garrison Bonilla
830 Thornwood Dr
St Charles, IL 60174-5017

Sonya Seguritan
91-1070 Hokuwela St
Kapolei, HI 96707-3013

Susanna DeCrescenzo
11 Oxford Pl
Rockville Centre, NY 11570-1829

TAMMARA WILLIAMS
181 YELLOW BIRCH LOOP
MOORSEVILLE, NV 28117-9592

TAYVIN DONALDSON
752 VALLEY RISE DR
HENDERSON, NV 89052-5753

TERESITA GRAVITT
467 DOVER CIR
BREA, CA 92821-6024

THERESA HARDING
14311 ADDISON ST
NUMBER 213
SHERMAN OAKS, CA 91423-1819

TIM FARRANDS
2828 COCHRAN ST
NUMBER 141
SIMI VALLEY, CA 93065-2780

TIMOTHY SPECHT
8461 WESTBROOK DR
STURTEVANT, WI 53177-2893

TRISTEN WARD
9067 CHURCH RD
BROWNSBURG, IN 46112-8653

Teresa Langdon
1209 Augusta Dr
Jackson, MO 63755-3343

Tony Nguyen
12028 Prada Verde Drive
Las Vegas, NV 89138-6091

UPSTART NETWORK, INC.
PO BOX 1503
SAN CARLOS, CA 94070-7503

VICTOR GONZAGA
466 FOOTHILL BLVD
SUITE 100
LA CANADA, CA 91011-3518

VICTOR KOOPONGSAKORN
20550 CHERYL LN
SANTA CLARITA, CA 91350-5719

VIVIAN DURDOV
1521 S FAIRVIEW AVE
PARK RIDGE, IL 60068-5211

Veronica Tosino
1517 Vera Boulevard
Danville, IN 46122-0037

Vincent Rodriguez
510 Paddock ln
Celina, TX 75009-4643

Ryne Joseph Vitug
21 Kristin Dr.
Schaumburg, IL 60195-3398

WADE JOHNSON
8988 N PINE HOLLOW DR
CEDAR HILLS, UT 84062-8033

WALTER GEYER
9955 ARROW RD
TREMONT, IL 61568-9344

WILLIAM MATTHEW PRESTON
20300 SW NANCY LN
BEAVERTON, OR 97007-6083

ZACHARY BUHER
298 DOVETREE DR
DANVILLE, IN 46122-5500

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

BMW FINANCIAL SERVICES
PO BOX 3608
DALTON, OH 43016

Ira Bodenstein
Cozen O'Connor
123 N. Wacker Drive
Suite 1800
Chicago, IL 60606

DISCOVER
PO BOX 8003
HILLIARD, OH 43026

Jefferson Capital Systems, LLC
PO BOX 7999
SAINT CLOUD, MN 56302-9617

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ALISA CARLSON

(u)ALLISON FRANKLIN

(u)AMY FOOTE

(u)AMYLOU DENISE SARION

(u)ANDREW ZELL

(u)ANGELA AND JOSEPH GEYER

(u)ANNE ZELL

(u)ANTHONY LIM

(u)ARTURO MARIN

(u)Jason Anderson

(u)BEN AND SARAH HAWKINS

(u)BERNARD BUFFORD

(u)BRENDA BECERRA

(u)BRIAN BUI

(u)BRIANNA PARKS

(u)CAISON WARREN

(u)CARA KURTH

(u)CARL ANDREW HERNANDEZ

(u)CHRIS ALEXANDER

(u)CHRISTINA HUGHES

(u)CHRISTOPHER AREVALO

(u)DANIELLE BRENNAN-DEFILIPPO

(u)DAVE AND SONYA HILLRICH

(u)DEBBIE EVERETT

(u)DENNIS SULIT

(d)Department of the Treasury
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

(u)EDITA GOMEZ

(u) EUGENIA CHO

(u) FRANSISCO SEGURA

(u) GALE GEYER

(u) GENEVIEVE BENNETT

(u) Goodman Tovrov Hardy & Johnson LLC

(u) HARRIS MACEO

(u) IVAN VALDEZ

(d) Internal Revenue Service
Mail Stop 5014CHI
230 S. Dearborn Street, Room 2600
Chicago, IL 60604-1705

(u) JADEN VIANA

(u) JARED NAJERA

(u) JASON GACEK

(u) JEANIE AND STAN GALAT

(u) JEFFREY FAMA

(u) JENNIFER BRIX

(u) JENNIFER OLIVER

(u) JESSICA AND BRAD CASALE

(u) JESSICA GUIGNI

(u) JO RUBIO

(u) JOANNA GEYER

(u) JOIE SATEREN

(u) JUAN ANDRADE

(u) KALI GOINGS

(u) KELSI GOINGS

(u) KEVIN SCOTT

(u) LINDA CORDERO

(u) MARIJA DJUROVIC

(u) MARION JELCEY WHITLOCK

(u) MCKENNA GALARZA

(u) MEGAN RANCATORE

(u) MELANIE PALMEA

(u) MICHAEL OINE

(u) MICHAEL TEREK

(u) MIKE STEVENS

(u) MOISES CORDERO

(u) Daniel Maxwell

(u) NORMA ESPINOZA

(u) OMAR NERVEGNA

(u) PAM WRIGHT

(u) PAULA RAMOS

(u) PEERASORN CHAIDAIISUK

(u) PETER TOLENTINO

(u) RACHEL AND ADAM STUBER

(u) RACHEL MERCED

(u) RAUNEL VARGAS

(u) RAZVAN TIMINGERIU

(u) RHEA BELL

(u) ROSA HANDEROS

(u) ROXANA ARECHIDA

(u) Robinson Stewart Montgomery & Doppke LLC

(u) SARINA FIFER

(u) SHARI PIERCE

(u) SHEARA GARRISON

(u) SHELBY OFARREL

(u) STEPHAN HILLRICH

(u)TONY NGUYEN

(u)VINCENT RODRIGUEZ

End of Label Matrix	
Mailable recipients	227
Bypassed recipients	95
Total	322

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) CHAPTER 11
)
RYNE JOSEPH VITUG,) CASE NO. 25-13120
)
DEBTOR.) HON. DAVID D. CLEARY

**UNITED STATES TRUSTEE'S MOTION TO DISMISS OR CONVERT
CASE PURSUANT TO 11 U.S.C. § 1112(b) AND TO SHORTEN NOTICE**

Adam G. Brief, the Acting United States Trustee for the Northern District of Illinois (the “U.S. Trustee”), by and through his attorney, Joshua D. Greene, moves pursuant to 11 U.S.C. § 1112(b), for an order converting the above captioned Chapter 11 case to one under Chapter 7 for “cause,” or in the alternative, dismissing the case (the “Motion”) and to shorten notice. In support of the Motion, the U.S. Trustee states as follows:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334.
2. This is a core proceeding concerning the administration of the estate pursuant to 28 U.S.C. § 157(b)(2)(A) which this Court may hear and determine in accordance with the referral contained in IOP 15(A) and LR 40.3.1 of the United States District Court for the Northern District of Illinois.
3. Venue of this case in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
4. The U.S. Trustee has standing to file the Motion under 11 U.S.C. § 307 and 28 U.S.C. § 586(a)(3).

FACTUAL SUMMARY

5. On August 26, 2025 (the “Petition Date”), Ryne Joseph Vitug (“Debtor”) filed a voluntary petition for relief under Chapter 11 of the U.S. Bankruptcy Code, thereby commencing the Case.

6. Ira Bodenstein was appointed as Subchapter V trustee and continues to serve in that capacity.

7. The Debtor is represented in the bankruptcy case by David Christian, though as of the date of this motion, Mr. Christian has not filed an application to employ himself as bankruptcy counsel.

8. The Debtor is an Illinois licensed attorney who was previously employed as an in-house attorney at a large commercial insurance company. Sometime in 2022 or 2023 he began operating a business called Vitug Travel, where he arranged travel and entertainment for individuals and their families.

9. The Debtor’s customers paid deposits directly to the Debtor for vacations or entertainment, typically through Zelle or Paypal, but many of customers never received the booking that was paid for, and many of the customers never received a refund of the amount paid to the Debtor as a deposit for their bookings. The schedules on file in the bankruptcy case indicate that the Debtor is indebted to over a hundred claimants in an amount totaling over \$1.8 million. As of the date of this Motion, the claims register reflects 100 claims totaling \$862,092.15, most of which are travel-related claims.

10. Numerous people who were owed refunds began contacting Debtor seeking refunds of their deposits that were never refunded, which eventually resulted in several lawsuits against the Debtor, an ARDC investigation, and the Debtor being terminated by his employer. As of the

date of this Motion, the Debtor is not employed.

11. The U.S. Trustee held the initial Meeting of Creditors on October 1, 2025 and the continued meeting on November 20, 2025, at which the Debtor appeared and answered questions. Over 100 individuals attended the initial meeting of creditors in this case, with many of them seeking information about their deposits or when they would be refunded. At the meeting when pressed to provide information about how the deposits were used, the Debtor stated that some of the customer deposits were used to book vacations for individuals who had previously made deposits, or to refund amounts to customers that had been previously deposited. The Debtor's use of new deposits from clients to pay back prior deposits shows characteristics of a Ponzi scheme. *See In re: Lake States Commodities, Inc.*, 253 B.R. 866, Fn. 2 (Bankr. N.D. Ill. 2000)(“In a Ponzi scheme, an enterprise makes payments to investors with monies received from newly attracted investors, rather than from profits of a legitimate business venture.”)

12. After the Initial Meeting of Creditors, the U.S. Trustee requested certain information from the Debtor, including: (1) bank statements for all of the Debtor's bank account, Paypal or Venmo accounts; (2) tax returns; (3) copies of all complaints listed on the Statement of Financial Affairs; (4) copies of any spreadsheets reflecting the use of any funds tendered to the Debtor by any creditor, and (5) any emails confirming the booking of travel or entertainment arrangements for any of the creditors. In response the Debtor only provided copies of his tax returns, claiming to have no other records. To date, the Debtor has provided no accounting of how the many deposits he received were actually used.

13. On November 24, 2025, the last date for filing of a plan under Section 1189 of the Bankruptcy Code, the Debtor filed a Subchapter V Plan of Reorganization (the “Plan”). The Plan contains no projections or liquidation analysis as required by Section 1190 of the Bankruptcy

Code. The Plan places “Travel & Entertainment Claims” into Class 2 and “Loan Claims” into Class 3. The Plan proposes to pay each creditor in Classes 2 and 3 10% of “the Debtor’s reasonable and necessary living expenses, over the five (5) year period after the Effective Date, as reflected in the Budget attached hereto as Exhibit B.” *See Plan*, Dkt. 44, pp. 7-8. No budget is attached identifying the Debtor’s expected living expenses.

14. While the case has been pending for over three months, the Debtor has not filed a single operating report. While the Debtor has no income and testified that he resides with his parents, it is unclear how he lives day to day. The Debtor has not opened a Debtor in Possession Account and has provided no accounting of how he makes ends meet.

ARGUMENT

CAUSE EXISTS TO CONVERT OR DISMISS THIS CASE

15. In relevant part, Section 1112(b) of the Bankruptcy Code provides that on the request of a party in interest, and after notice and a hearing, the court shall convert the case to Chapter 7 or dismiss the case, whichever is in the best interests of creditors of the estate, so long as the movant establishes “cause.” See 11 U.S.C. § 1112(b)(1).

16. Section 1112(b)(4) sets forth a list of sixteen grounds that constitute “cause” for conversion or dismissal. See 11 U.S.C. § 1112(b)(4)(A)-(P). This list is not exhaustive, and a case may be dismissed or converted for causes other than those specifically identified in section 1112(b)(4). *See In re Tekena USA, LLC*, 419 B.R. 341, 346 (Bankr. N.D. Ill. 2009); *In Matter of Strug-Division, LLC*, 375 B.R. 445, 448 (Bankr. N.D. Ill. 2007).

17. “The court must convert a case to chapter 7 or dismiss the case if there is ‘cause’ to do so” unless the debtor can establish one of the exceptions. *See In re Aurora Memory Care, LLC*, 589 B.R. 631, 638 (Bankr. N.D. Ill. 2018). Once cause is established, the debtor has the burden of

proving the required exceptions to fend off conversion or dismissal. *Id.* To fend off conversion or dismissal, the court must find “unusual circumstances” “establishing that converting or dismissing the case is not in the best interest of creditors and the estate.” 11 U.S.C. § 1112(b)(2).

18. Multiple reasons exist to convert or dismiss the present case. First, the Debtor has failed to fulfill basic obligations as a Debtor in possession by failing to file monthly operating reports, failing to file a complete plan prior to the 90 day deadline and failing to provide information requested by the United States Trustee. Second, the Debtor has no reasonable likelihood of reorganizing

I. Failure to Fulfill Duties as Debtor in Possession

A. The Debtor Has Failed to File Required Monthly Operating Reports

19. The “unexcused failure to satisfy timely any filing or reporting requirement established by this title or by any rule applicable to a case under this chapter” constitutes “cause” to convert or dismiss a case. *See* 11 U.S.C. § 1112(b)(4)(F); *see also In re Draiman*, 450 B.R. 777, 826 (Bankr. N.D. Ill. 2011). Debtors are required to timely file reports during the pendency of a Chapter 11 case. *See* 11 U.S.C. §§ 704(a)(8), 1106(a)(1), 1107(a).

20. “Timely and accurate financial disclosure is the life blood of the Chapter 11 process.” *In re Berryhill*, 127 B.R. 427, 433 (Bankr. N.D. Ind. 1991). The reports are necessary to provide financial information about the debtor, and “a report filed late may be the practical equivalent of a failure to file any financial information at all.” *In re Hyperion Found., Inc.*, No. 08-51288-NPO, 2009 WL 2477392, at *6 (Bankr. S.D. Miss. Aug. 11, 2009). A Chapter 11 debtor who fails to timely file monthly operating reports thus fails to “satisfy timely [a] filing or reporting requirement established by” the Bankruptcy Code, which in turn constitutes “cause to convert or dismiss” the debtor’s case. *See* 11 U.S.C. §§ 1112(b)(1) & (b)(4)(F); *see also In re Tornheim*, 181

B.R. 161, 164 (Bankr. S.D.N.Y. 1995) (“Refusal or inability to provide financial disclosure sounds the death knell of a chapter 11 case. The failure to file monthly operating statements...whether based on inability to do so or otherwise, undermines the Chapter 11 process and constitutes cause for dismissal or conversion of the Chapter 11 proceedings,”) (internal quotations and citations omitted).

21. The Debtor has failed to file any operating report for any of the months in which he has been in bankruptcy. While he testified he is unemployed and living with his parents, the Debtor can still file operating reports and provide an accounting of his monthly expenses during the pendency of the bankruptcy case.

B. The Debtor Has Failed to Comply with the U.S. Trustee’s Request for Information

22. The case should also be dismissed because the Debtor has failed to comply with the U.S. Trustee’s request for information. Section 1112(b)(4)(H) provides that a chapter 11 may be dismissed for “failure to timely provide information or attend meetings reasonably requested by the United States Trustee...” 11 U.S.C. 1112(b)(2)(H). At the Initial Meeting of Creditors, the United States Trustee requested numerous basic documents that would answer crucial questions about the Debtor’s financial affairs, including documents that would reflect pre-petition transfers or bookings made on behalf of clients. The only documents the Debtor provided were tax returns and emails between his attorney and clients demanding refunds. The Debtor provided no bank statements and no documentation of any money received or spent, simply claiming he had nothing. The Debtor has made no efforts to obtain these documents.

23. Disclosure is a fundamental component of the bankruptcy process. *See In re: Midwest Properties of Shawano, LLC*, 442 B.R. 278, 286, fn. 9 (Bankr. D. Del. 2010)(Finding

that debtor's failure to provide documents requested by U.S. Trustee constituted "cause" for dismissal under 1112(b)(4)(H)). The U.S. Trustee and parties in interest should not be required to subpoena third parties for basic documents evidencing the Debtor's financial affairs. The Debtor, as Debtor in Possession and fiduciary to creditors, has an obligation to do this on his own. The Debtor has made no efforts to obtain bank statements on his own, has made no efforts to document any amounts that he received as deposits and has made no efforts to provide an accounting of how he conducted his pre-petition business affairs. As such, the Debtor's failure to provide these documents requested by the U.S. Trustee constitutes "cause" for dismissal or conversion.

C. The Debtor Has Failed to Timely File A Plan

24. Another basis to convert or dismiss this case is because the Debtor has failed to timely file a Subchapter V plan in accordance with section 1189(b). Section 1112(b)(4)(J) of the Bankruptcy Code provides that a chapter 11 plan may be dismissed for "failure to timely file a disclosure statement, or to file or confirm a plan, within the time fixed by this title or by order of the court." 11 U.S.C. §1112(b)(4)(J).

25. Section 1189(b) of the Bankruptcy Code provides that "The debtor shall file a plan not later than 90 days after the order for relief under this chapter, except that the court may extend the period if the need for the extension is attributable to circumstances for which the debtor should not justly be held accountable." Section 1190 then provides that "A plan filed under this subchapter-(1) shall include-(A) a brief history of the business operations of the debtor; (B) a liquidation analysis; and (C) projections with respect to the ability of the debtor to make payments under the proposed plan of reorganization." 11 U.S.C. §1190(1). Numerous bankruptcy courts have held that a plan that fails to include a liquidation analysis and projections fails to satisfy

section 1189(b)'s requirements. *See In re: United Safety and Alarms, Inc.*, 2024 WL 973674, *1 (Bankr. S.D. Fla. Mar. 6, 2024); *In re: Lashley*, 664 B.R. 408, 416 (Bankr. W.D. Ky. 2024).

26. Here, because the debtor did not file projections or a liquidation analysis with its plan within the 90 days required by sections 1189(b) and 1190, the Debtor failed to timely file a plan. Accordingly, the case should be dismissed or converted. Debtors are not entitled to file a placeholder plan and avoid the statutory requirements of Subchapter V.

II. Absence of a Reasonable Likelihood of Rehabilitation

27. This case should also be dismissed or converted because there is no reasonable likelihood of a successful reorganization. Section 1112(b)(4)(A) includes in the definition of "cause" the "substantial or continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation." 11 U.S.C. §1112(b)(4)(A). The issue of rehabilitation for purposes of section 1112(b)(4)(A) is not the technical one of whether the debtor can confirm a plan, but, rather, whether the debtor's business prospects justify continuance of the reorganization effort. *In re: LG Motors, Inc.*, 422 B.R. 110, 116 (Bankr. N.D. Ill. 2009).

28. Here, there is very little evidence that the Debtor can confirm a feasible plan. The Debtor has not been employed for many months. While the pleadings filed in this case allege that the Debtor continues to seek employment, there is no evidence he will find employment with sufficient income to fund a chapter 11 plan. Moreover, to the extent any employment is contingent on the Debtor continuing to be a licensed attorney, such continued employment is speculative given that he is party to ongoing ARDC investigations.¹

29. Because the Debtor's business prospects do not justify continuance of this chapter 11 case, the case should be dismissed or converted.

¹ The Debtor filed a motion to employ counsel to assist in any open ARDC investigations, which was granted by the court. Dkt. 22

CONCLUSION AND REQUEST FOR SHORTENED NOTICE

30. Based on the foregoing, the U.S. Trustee submits that cause exists under Section 1112(b) to dismiss or convert this case to Chapter 7. The question of whether conversion or dismissal is in the best interests of creditors and the estate is a question committed to the discretion of the bankruptcy court. *Aurora Memory Care*, 589 B.R. at 638. In answering that question, courts often weigh which course of action will lead to the largest number of creditors receiving the most amount of money in the shortest time. *Id.* at 643. Courts also compare how creditors would fare trying to collect from the debtor in bankruptcy court as opposed to outside of bankruptcy. *Id.* In comparing those two scenarios, a key question is the availability of estate assets for a bankruptcy trustee to liquidate and use to pay creditors the money the debtor owes them. *Id.*

31. The U.S. Trustee recommends that this case be dismissed instead of converted. The Debtor appears to have no access that would be liquidated by a trustee. The only potential asset would likely be avoidances actions to reclaim funds repaid to travel claimants. However, given the fact that most claims are under \$10,000, it is unlikely that any chapter 7 trustee would seek to file avoidance actions.

32. Finally, the U.S. Trustee also requests that notice of this motion be shortened from that required by FRBP 2002 for the reasons set forth herein.

WHEREFORE, the U.S. Trustee respectfully requests this Court enter an order dismissing this case, or in the alternative, converting it to a case under Chapter 7 of the Bankruptcy Code, and for such other relief as this Court deems just.

RESPECTFULLY SUBMITTED:

ADAM G. BRIEF
ACTING UNITED STATES TRUSTEE

Dated: November 25, 2025

By: /s/ Joshua D. Greene

Joshua D. Greene, Trial Attorney

U.S. Department of Justice

Office of the United States Trustee

219 S. Dearborn Street, Room 873

Chicago, Illinois 60604

(202) 538-4834

joshua.d.greene@usdoj.gov

Please wait...

If this message is not eventually replaced by the proper contents of the document, your PDF viewer may not be able to display this type of document.

You can upgrade to the latest version of Adobe Reader for Windows®, Mac, or Linux® by visiting http://www.adobe.com/go/reader_download.

For more assistance with Adobe Reader visit <http://www.adobe.com/go/acrreader>.

Windows is either a registered trademark or a trademark of Microsoft Corporation in the United States and/or other countries. Mac is a trademark of Apple Inc., registered in the United States and other countries. Linux is the registered trademark of Linus Torvalds in the U.S. and other countries.

Please wait...

If this message is not eventually replaced by the proper contents of the document, your PDF viewer may not be able to display this type of document.

You can upgrade to the latest version of Adobe Reader for Windows®, Mac, or Linux® by visiting http://www.adobe.com/go/reader_download.

For more assistance with Adobe Reader visit <http://www.adobe.com/go/acrreader>.

Windows is either a registered trademark or a trademark of Microsoft Corporation in the United States and/or other countries. Mac is a trademark of Apple Inc., registered in the United States and other countries. Linux is the registered trademark of Linus Torvalds in the U.S. and other countries.