

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 16-02825

VÍA NIZA, INC.

CHAPTER 11

DEBTOR(S)

MOTION SUBMITTING DOCUMENTS

TO THE HONORABLE COURT:

COMES NOW, Debtor represented by the undersigned counsel and very respectfully states:

1. Today the present case was filed with the Court. In an apparent defect on the electronic filing program, the only documents filed were the corporate resolution and the list of creditors.

2. Upon contacting the Clerk's office we were instructed to file the documents intended to be filed as attachments to the present motion. These documents are: the voluntary petition with the attached corporate resolution, the declaration under penalty of perjury for non-individual debtors, the list of the 20 largest unsecured creditors, attorney disclosure of compensation, list of equity security holders, the verified creditor matrix and the corporate ownership statement.

3. A stay order was issued and a case number assigned.

Motion Submitting Documents  
Case No. 16-02825  
Page 2

**WHEREFORE**, for the reasons stated above it is respectfully requested from the Court to take notice of the above, and to allow the filing of the attached documents as part of the present case.

**RESPECTFULLY SUBMITTED.**

In Bayamón, Puerto Rico, this 11<sup>th</sup> day of April 2016.

**HERMAN F. VALENTÍN & ASSOCIATES**

P.O. Box 1888  
Bayamón, PR 00960-1888  
Tel. (787) 200-5426  
Fax (787) 200-5428

By: /s/Herman F. Valentín Figueroa  
Herman F. Valentín Figueroa  
USDC-PR # 201904

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:  
 DISTRICT OF PUERTO RICO

---

Case number (if known) 16-02825 Chapter 11

Check if this an amended filing

Official Form 201

**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

4/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name VIA NIZA, INC.

2. All other names debtor used in the last 8 years  
 Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 66-0702216

|   |  |
|---|--|
| <p>4. Debtor's address</p> <p><b>Principal place of business</b></p> <p><u>Metro Medical Center Condominium</u><br/> <u>Suite 306-307</u><br/> <u>Bayamon, PR 00959</u><br/>       Number, Street, City, State &amp; ZIP Code</p> <p><u>Bayamon</u><br/>       County</p> | <p><b>Mailing address, if different from principal place of business</b></p> <p>_____</p> <p>P.O. Box, Number, Street, City, State &amp; ZIP Code</p> <p><b>Location of principal assets, if different from principal place of business</b></p> <p>_____</p> <p>Number, Street, City, State &amp; ZIP Code</p> |
|---|--|

5. Debtor's website (URL) \_\_\_\_\_

6. Type of debtor  
 Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
 Partnership (excluding LLP)  
 Other. Specify: \_\_\_\_\_

Debtor VIA NIZA, INC.  
Name

Case number (if known) 16-02825

**7. Describe debtor's business**

A. Check one:

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Railroad (as defined in 11 U.S.C. § 101(44))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- Clearing Bank (as defined in 11 U.S.C. § 781(3))
- None of the above

B. Check all that apply

- Tax-exempt entity (as described in 26 U.S.C. §501)
- Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.  
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

- Chapter 7
- Chapter 9
- Chapter 11. Check all that apply:

- Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
- The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- A plan is being filed with this petition.
- Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the attachment to *Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

Chapter 12

**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- No.
- Yes.

If more than 2 cases, attach a separate list.

|                |            |                   |
|----------------|------------|-------------------|
| District _____ | When _____ | Case number _____ |
| District _____ | When _____ | Case number _____ |

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

- No.
- Yes.

List all cases. If more than 1, attach a separate list

|                |  |
|----------------|--|
| Debtor _____   | Relationship _____                     |
| District _____ | When _____ Case number, if known _____ |

Debtor **VIA NIZA, INC.**  
Name

Case number (if known) **16-02825**

11. Why is the case filed in this district? *Check all that apply:*

Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.

A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

No

Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention? (Check all that apply.)**

It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
What is the hazard? \_\_\_\_\_

It needs to be physically secured or protected from the weather.

It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

Other \_\_\_\_\_

**Where is the property?** \_\_\_\_\_  
Number, Street, City, State & ZIP Code

**Is the property insured?**

No

Yes. Insurance agency \_\_\_\_\_  
Contact name \_\_\_\_\_  
Phone \_\_\_\_\_

**Statistical and administrative information**

13. Debtor's estimation of available funds *Check one:*

Funds will be available for distribution to unsecured creditors.

After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

|  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000   | <input type="checkbox"/> 25,001-50,000     |
| <input type="checkbox"/> 50-99           | <input type="checkbox"/> 5001-10,000   | <input type="checkbox"/> 50,001-100,000    |
| <input type="checkbox"/> 100-199         | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999         |  |  |

15. Estimated Assets

|   |  |  |
|---|--|--|
| <input type="checkbox"/> \$0 - \$50,000                   | <input type="checkbox"/> \$1,000,001 - \$10 million    | <input type="checkbox"/> \$500,000,001 - \$1 billion     |
| <input type="checkbox"/> \$50,001 - \$100,000             | <input type="checkbox"/> \$10,000,001 - \$50 million   | <input type="checkbox"/> \$1,000,000,001 - \$10 billion  |
| <input checked="" type="checkbox"/> \$100,001 - \$500,000 | <input type="checkbox"/> \$50,000,001 - \$100 million  | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million          | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion          |

16. Estimated liabilities

|   |  |  |
|---|--|--|
| <input type="checkbox"/> \$0 - \$50,000                     | <input type="checkbox"/> \$1,000,001 - \$10 million    | <input type="checkbox"/> \$500,000,001 - \$1 billion     |
| <input type="checkbox"/> \$50,001 - \$100,000               | <input type="checkbox"/> \$10,000,001 - \$50 million   | <input type="checkbox"/> \$1,000,000,001 - \$10 billion  |
| <input type="checkbox"/> \$100,001 - \$500,000              | <input type="checkbox"/> \$50,000,001 - \$100 million  | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input checked="" type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion          |

Debtor **VIA NIZA, INC.**  
Name

Case number (if known) **16-02825**

**Request for Relief, Declaration, and Signatures**

**WARNING** – Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature of authorized representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.  
I have been authorized to file this petition on behalf of the debtor.  
I have examined the information in this petition and have a reasonable belief that the information is true and correct.  
I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2016  
MM / DD / YYYY

**X /s/ Sylvia M. Garcia Ortiz**  
Signature of authorized representative of debtor  
  
Title President

**Sylvia M. Garcia Ortiz**  
Printed name

**18. Signature of attorney**

**X /s/ Herman F. Valentin Figueroa**  
Signature of attorney for debtor

Date **April 11, 2016**  
MM / DD / YYYY

**Herman F. Valentin Figueroa**  
Printed name

**Herman F. Valentin & Associates**  
Firm name

**PO Box 1888**  
**Bayamon, PR 00960-1888**  
Number, Street, City, State & ZIP Code

Contact phone 787-200-5426

Email address hfv@hvalentinassoc.com

**201904 - USDCPR**  
Bar number and State

**CORPORATE RESOLUTION**

I Sylvia M. Garcia Ortiz, Secretary of Via Niza, Inc. hereby certify that in the meeting held by the Board of Directors of Via Niza, Inc. on April 6, 2016 it was agreed to file a bankruptcy petition for the corporation under Chapter \_\_ of the Bankruptcy Code.

It was also agreed to authorize Sylvia M. Garcia Ortiz, President of the corporation to seek counsel, provide all necessary information, sign documents, appear and testify in the corporation's behalf at all meetings or hearings scheduled either by the trustee, the Office of the U.S. Trustee or the Bankruptcy Court, and in all matters that pertain the bankruptcy case.

In Bayamon, Puerto Rico, this 6th day of April 2016.



(Corporate Seal)

A handwritten signature in black ink, appearing to read "Sylvia M. Garcia Ortiz".

Secretary  
Via Niza, Inc.

Fill in this information to identify the case:

Debtor name VIA NIZA, INC.  
United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO  
Case number (if known) 16-02825

Check if this is an amended filing

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- Schedule A/B: Assets--Real and Personal Property* (Official Form 206A/B)
- Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- Schedule H: Codebtors* (Official Form 206H)
- Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- Amended Schedule*
- Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- Other document that requires a declaration \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2016

X /s/ Sylvia M. García Ortiz  
Signature of individual signing on behalf of debtor

Sylvia M. García Ortiz  
Printed name

President  
Position or relationship to debtor



**Fill in this information to identify the case:**

Debtor name VIA NIZA, INC.  
 United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO  
 Case number (if known): 16-02825

Check if this is an amended filing

**Official Form 204**

**Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

| Name of creditor and complete mailing address, including zip code              | Name, telephone number and email address of creditor contact | Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)  | Indicate if claim is contingent, unliquidated, or disputed | Amount of claim                   |   |                 |
|--|--|--|--|-----------------------------------|---|-----------------|
|  |  |  |  | Total claim, if partially secured | Deduction for value of collateral or setoff | Unsecured claim |
| CRIM<br>DIVISION DE<br>COBROS<br>P.O. BOX 195387<br>SAN JUAN, PR<br>00919-5387 |  | Metro Medical Center Condominium, State Road #2, km 11.7, Suites A-306 / A-307, Bayamón, PR. The property is used as a medical and patient treatment o |  | Unknown                           | \$350,000.00                                | Unknown         |
| TRIANGLE REO PR CORP.<br>P. O. Box 9022946<br>San Juan, PR<br>00902-2946       |  | Metro Medical Center Condominium, State Road #2, km 11.7, Suites A-306 / A-307, Bayamón, PR. The property is used as a medical and patient treatment o |  | \$925,296.73                      | \$350,000.00                                | \$575,296.73    |

B2030 (Form 2030) (12/15)

United States Bankruptcy Court
District of Puerto Rico

In re VIA NIZA, INC.

Debtor(s)

Case No. 16-02825

Chapter 11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

Table with 2 columns: Description of compensation and Amount. Rows include: For legal services, I have agreed to accept; Prior to the filing of this statement I have received; Balance Due.

2. \$ 1,717.00 of the filing fee has been paid.

3. The source of the compensation paid to me was:

Debtor Other (specify):

4. The source of compensation to be paid to me is:

Debtor Other (specify):

5. I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
d. [Other provisions as needed]

Negotiations with secured creditors to reduce to market value; exemption planning; preparation and filing of reaffirmation agreements and applications as needed; preparation and filing of motions pursuant to 11 USC 522(f)(2)(A) for avoidance of liens on household goods.

7. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

Representation of the debtors in any dischargeability actions, judicial lien avoidances, relief from stay actions or any other adversary proceeding.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

April 11, 2016

Date

/s/ Herman F. Valentin Figueroa

Herman F. Valentin Figueroa 201904 - USDCPR

Signature of Attorney

Herman F. Valentin & Associates

PO Box 1888

Bayamon, PR 00960-1888

787-200-5426 Fax: 787-200-5428

hfvalentin@hvalentinassoc.com

Name of law firm

**United States Bankruptcy Court  
District of Puerto Rico**

In re VIA NIZA, INC. Debtor(s) Case No. 16-02825  
Chapter 11

**LIST OF EQUITY SECURITY HOLDERS**

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

| Name and last address or place of business of holder  | Security Class | Number of Securities | Kind of Interest |
|---|----------------|----------------------|------------------|
| <b>Sylvia García Ortiz<br/>Metro Medical Center Condominium<br/>Suite 306-307<br/>Bayamon, PR 00959</b> |                | <b>100%</b>          |                  |

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the **President** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date April 11, 2016 Signature /s/ Sylvia M. García Ortiz  
**Sylvia M. García Ortiz**

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. §§ 152 and 3571.*

**United States Bankruptcy Court  
District of Puerto Rico**

In re VIA NIZA, INC. Debtor(s) Case No. 16-02825  
Chapter 11

**VERIFICATION OF CREDITOR MATRIX**

I, the President of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: April 11, 2016

/s/ Sylvia M. Garcia Ortiz  
**Sylvia M. Garcia Ortiz/President**  
Signer/Title

VIA NIZA, INC.  
METRO MEDICAL CENTER CONDOMINIUM  
SUITE 306-307  
BAYAMON, PR 00959

HERMAN F. VALENTÍN FIGUEROA  
HERMAN F. VALENTIN & ASSOCIATES  
PO BOX 1888  
BAYAMON, PR 00960-1888

ALBERTO DE DIEGO, ESQ.  
P. O. BOX 79552  
CAROLINA, PR 00984-9552

CRIM  
DIVISION DE COBROS  
P.O. BOX 195387  
SAN JUAN, PR 00919-5387

SYLVIA GARCÍA ORTIZ  
METRO MEDICAL CENTER CONDOMINIUM  
SUITE 306-307  
BAYAMON, PR 00959

SYLVIA M. GARCÍA ORTIZ

TRIANGLE REO PR CORP.  
P. O. BOX 9022946  
SAN JUAN, PR 00902-2946