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United States of America
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:

VISION2SYSTEMS LLC,

Debtor.

CASE NO. 25-40583-MXM-11
CHAPTER 11

**UNITED STATES' (SBA) JOINDER TO UNITED STATES TRUSTEE'S
MOTION TO CONVERT TO CHAPTER 7 UNDER 11 U.S.C. § 1112(b),
OR IN THE ALTERNATIVE, FOR APPOINTMENT OF A CHAPTER 11
TRUSTEE UNDER 11 U.S.C. § 1104(a)
[Dkt # 87, 88]**

The United States of America, on behalf of its agency the Small Business Administration, files this Joinder to the United States Trustee's Motion to Convert to Chapter 7 under 11 U.S.C. § 1112(b), or in the Alternative, for the Appointment of a Chapter 11 Trustee under 11 U.S.C. § 1104(a) filed at Dkt. #s 87 and 88 (the "Trustee's Motion"), and joinder to the exhibits filed by the U.S. Trustee on her Witness & Exhibit List filed at Dkt # 128.

As shown by the Trustee's Motion, this case should not proceed to the disclosure statement stage of a chapter 11 case, which would allow the debtor to expend precious funds to solicit votes for, and the disclosure of, a plan of liquidation that violates the Bankruptcy Code. Instead, The Court should either appoint a chapter 11 trustee or convert the case to chapter 7 to

allow an independent trustee to ascertain via professionals the real assets and claims of the debtor because as the U.S. Trustee and the UCC point out, the numbers by the debtor continually change since it is the debtor's own insiders that are reporting these ever-changing amounts and claims, while they are also defendants in four lawsuits for various claims including breach of fiduciary duty. Also, as the Trustee's Motion points out, this case was not filed in good faith, and the conflicts of interest are abound this case.

For the reasons set forth in the Trustee's Motion and the exhibits filed by the U.S. Trustee in this case, the SBA joins in the U.S. Trustee's motion to convert to chapter 7, or in the alternative for the appointment of a chapter 11 trustee, and for the Court to remove the debtor's insiders, Messrs. Baldwin and Tierney.

WHEREFORE, the United States on behalf of the Small Business Administration files this Joinder to the U.S. Trustee's Motion to Convert to Chapter 7 under 11 U.S.C. § 1112(b), or in the Alternative, for the Appointment of a Chapter 11 Trustee under 11 U.S.C. § 1104(a) filed at Dkt. #s 87 and 88.

Date: September 22, 2025.

Respectfully submitted,

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Certificate of Service

I hereby certify that on September 22, 2025, I electronically submitted the foregoing document with the Clerk of the U.S. Bankruptcy Court, Northern District of Texas, using the electronic case filing system. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ David G. Adams
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