

UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT
OF GEORGIA, AUGUSTA DIVISION

In re: Jubabes Heating & Cooling, LLC; Smite the Blight
Community; Hairs of Ancestral Indian Lands; Jubabe’s Heating &
Cooling, LLC, Rhonda Williams; OJ’s Landscaping, LLC Jason
Evans; Smite the Blight Community, Nzinga Begum; You People
Tenant Association; Heir of Ancestral Indian Lands, L.P.; Njinga
Begum; Rozina Kimani Muthoka; and Rhonda Williams

No. 25-00101, United States Bankruptcy Court for the Southern District of Georgia, Augusta Division
(December 30, 2025)

SUMMARY

The United States Bankruptcy Court for the Southern District of Georgia issued a Supplemental Opinion and Order concerning seven additional pro se involuntary bankruptcy petitions filed by the petitioners. The court found the submissions deficient and incoherent, directed that they be maintained under seal and reviewed in camera, referred them to the U.S. Attorney and U.S. Trustee for investigation, and set a show-cause hearing regarding dismissal of the miscellaneous proceeding.

CASE DETAILS

COURT	United States Bankruptcy Court for the Southern District of Georgia, Augusta Division
WRITING FOR THE COURT	Susan D. Barrett
JURISDICTION	United States Bankruptcy Court for the Southern District of Georgia, Augusta Division
DECIDED	December 30, 2025
DOCKET	25-00101
DISPOSITION	other
PROCEDURAL POSTURE	The bankruptcy court reviewed seven additional pro se purported involuntary bankruptcy petitions submitted as supplemental filings and entered a supplemental opinion and order directing that the filings be maintained under seal, subject to in camera review, and referred for investigation.

STANDARD OF REVIEW	The court conducted an in camera review and applied the threshold requirements for involuntary petitions under 11 U.S.C. § 303, along with the court’s authority to protect filings and preserve the integrity of the judicial process.
PRECEDENTIAL VALUE	Unknown
PARTIES	Jubabes Heating & Cooling, LLC, Smite the Blight Community, Hairs of Ancestral Indian Lands, Jubabe’s Heating & Cooling, LLC, Rhonda Williams, OJ’s Landscaping, LLC, Jason Evans, Nzinga Begum, You People Tenant Association, Heir of Ancestral Indian Lands, L.P., Njinga Begum, Rozina Kimani Muthoka

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the supplemental pleadings satisfied the threshold requirements for commencing involuntary bankruptcy proceedings under 11 U.S.C. § 303.
2. Whether the court could prevent public electronic docketing and maintain the supplemental pleadings under seal to protect alleged debtors from immediate harm.
3. Whether the court could require in camera review of future pro se involuntary petitions and impose sanctions for frivolous or inappropriate filings.

HOLDINGS

1. The supplemental pleadings failed to meet the threshold requirements for involuntary petitions because they were materially deficient, including being incoherent, unsigned by the petitioning creditors, and unaccompanied by filing fees.
2. The court could direct that the supplemental pleadings not be entered into the public electronic docket and instead be maintained in paper format under seal after in camera review.
3. The court could require in camera review before public docketing of any subsequent pro se involuntary petition filed by Petitioners and could impose sanctions for frivolous or inappropriate filings.

KEY QUOTATIONS

“There are few stronger provisions of the Bankruptcy Code, or the law in general, than filing an involuntary bankruptcy petition—forcing someone into bankruptcy without their consent.”

“To be clear, the Court is not blocking Petitioners’ access to the judicial system, just their abuse of the process.”

FACTUAL BACKGROUND

Petitioners submitted seven additional pro se pleadings labeled as supplemental involuntary bankruptcy petitions against various entities. The pleadings were largely incoherent, were not signed by the petitioning creditors, and were submitted without additional filing fees. The court found that public filing of frivolous involuntary petitions could immediately harm alleged debtors through public exposure, credit reporting consequences, and reputational injury.

PROCEDURAL HISTORY

On December 24, 2025, the court entered an earlier opinion and order concerning 51 initial involuntary petitions. On December 30, 2025, the Clerk received seven additional purported involuntary petitions, which were accepted and filed but forwarded to chambers for review. The court found the supplemental pleadings incoherent, unsigned, deficient, and lacking filing fees, and directed protective and screening measures while setting a show-cause hearing regarding dismissal.

DISPOSITION

other

CASES CITED

- In re Risby, No. 4:08-mp-101, 2008 WL 116701, at *4–5 (Bankr. E.D. Ark. Jan. 7, 2008)
- In re Walsh, 306 B.R. 738, 741–43 (Bankr. W.D.N.Y. 2004)
- In re Thomas, No. 16-MP-2001, 2016 WL 386143, at *4–5 (Bankr. W.D.N.Y. Jan. 29, 2016)

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