

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CTN Holdings, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

Related Docket No. 148

**SUPPLEMENTAL DECLARATION OF KEVIN WILKES IN SUPPORT OF DEBTORS’
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF BDO USA, P.C. AS TAX CONSULTANT TO THE DEBTORS**

Pursuant to 28 U.S.C. § 1746, I, Kevin Wilkes, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

I am a Principal of BDO USA, P.C. (“BDO USA”). This declaration supplements my original declaration filed in support of the application (the “Application”) [Docket No. 148] of CTN Holdings, Inc. , et al. (the “Debtors”) in the above captioned chapter 11 cases (the “Chapter 11 Cases”). [Docket No. 148]

1. I submit this supplemental declaration in response to a request for clarification raised by the Office of the United States Trustee regarding BDO USA’s disclosures of its connections to certain equity holders of the Debtors, as set forth in Schedule 2 attached to my declaration in the Application.

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification numbers, are CTN Holdings, Inc. (9122), CTN SPV Holdings, LLC (8689), Make Earth Green Again, LLC (4441), Aspiration QFZ, LLC (1532), Aspiration Fund Adviser, LLC (4214), Catona Climate Solutions, LLC (3375) and Zero Carbon Holdings, LLC (1679). The mailing address for the Debtors is 548 Market Street, PMB 72015, San Francisco, CA 94104-5401.



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2. Pursuant to such request and after reviewing BDO USA records, and I can confirm BDO USA's disclosed connections to the equity holders are wholly unrelated to the Debtors and the Chapter 11 Cases.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: May 28, 2025

/s/ Kevin Wilkes
Kevin Wilkes