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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	Case No. 25-33487-MVL-7
	§	
TRICOLOR HOLDINGS, LLC, <i>et al.</i>,¹	§	Chapter 7
	§	
DEBTOR.	§	

**DALLAS COUNTY’S LIMITED OBJECTION TO SALEHOUN FAMILY L.P.’S
MOTION FOR RELIEF FROM AUTOMATIC STAY**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Now comes Dallas County, on behalf of itself, Dallas Independent School District, City of Dallas, Dallas College, and Parkland Hospital District (“Dallas County”), and files this limited objection to Salehoun Family L.P.’s (“the Landlord”) Motion for Relief from Automatic Stay (the “Motion”), and would respectfully show the Court as follows:

1. Dallas County and the taxing entities for which it collects are each a unit of local government in the State of Texas which possess the authority under the laws of the State of Texas to assess and collect ad valorem taxes on real and personal property. Dallas County asserts an unavoidable, perfected, first priority pre-petition secured claim, as of the petition date, in the amount of \$236,825.47 for ad valorem property taxes assessed for tax year 2025 against the Debtor’s tangible personal property located within the taxing entities’ respective taxing

¹ The Debtors’ in these chapter 7 cases are as follows: Tricolor Holdings, LLC, TAG Intermediate Holding Company, LLC, Tricolor Auto Group, LLC, Tricolor Auto Acceptance, LLC, Tricolor Insurance Agency, LLC, Tricolor Home Loans LLC dba Tricolor Mortgage, Tricolor Real Estate Services, LLC, TAG California Holding Company, LLC, Flexi Compras Autos, LLC, TAG California Intermediate Holding Company, LLC, Tricolor California Auto Group, LLC, Tricolor California Auto Acceptance, LLC, Risk Analytics LLC, Tricolor Tax, LLC, Tricolor Financial, LLC, Tricolor Auto Receivables LLC, Tricolor Asset Funding LLC and Tricolor Financial LLC.



jurisdictions.² This claim is secured by unavoidable, perfected, first priority liens on the Debtor's tangible personal property pursuant to Texas Tax Code §§ 32.01 and 32.05. In pertinent part, § 32.01 provides:

- (a) On January 1 of each year, a tax lien attaches to property to secure the payment of all taxes, penalties, and interest ultimately imposed for the year on the property, whether or not the taxes are imposed in the year the lien attaches. The lien exists in favor of each taxing unit having power to tax the property.
- (b) A tax lien on inventory, furniture, equipment, or other personal property is a lien in solido and attaches to all inventory, furniture, equipment, and other personal property that the property owner owns on January 1 of the year the lien attaches or that the property owner subsequently acquires.
- ...
- (d) The lien under this section is perfected on attachment and ... perfection requires no further action by the taxing unit.

Texas Tax Code §32.05(b) provides in relevant part:

- (b) ... a tax lien provided by this chapter takes priority over:
 - (1) the claim of any creditor of a person whose property is encumbered by the lien;
 - (2) the claim of any holder of a lien on property encumbered by the tax lien...
- (b-1) The priority given to a tax lien by Subsection (b) prevails, regardless of whether the debt, lien, future interest, or other encumbrance existed before attachment of the tax lien.

2. The tax liens take priority over the claim of any holder of a lien on property encumbered by the tax lien, whether or not the debt or lien existed before the attachment of the tax lien. TEX. TAX CODE § 32.05(b). *See also Central Appraisal District of Taylor County v. Dixie-Rose Jewels, Inc.*, 894 S.W.2d 841 (Tex. App. 1995) (bank's foreclosure of its purchase money lien on personal property did not defeat or destroy the taxing units' statutory tax lien). The tax lien is also unavoidable. *See In re: Winns*, 177 B.R. 253 (Bankr. W.D. Tex. 1995).

3. In the Motion, the Landlord asserts the "Debtor granted Lessor a contractual lien, in addition to the statutory landlord's lien, upon all of the Debtor's goods, equipment, furniture,

² Amount subject to amendment.

fixtures, inventory, and other personal property.” *See Motion at page 3.* Further, the Landlord seeks relief from the automatic stay to allow Landlord to exercise its contractual and statutory remedies, including “removing and disposing of all of Debtor’s personal property remaining at the Premises.” *See Proposed Order attached to the Motion.* This personal property is encumbered by the statutory liens that secure Dallas County’s ad valorem property taxes, and as such, is Dallas County’s collateral. The Landlord’s requested relief to permit it to remove and dispose of this property jeopardizes Dallas County’s ability to recover its ad valorem property taxes from its collateral.

4. In order for Dallas County to evaluate the Debtor’s personal property and take steps to enforce its senior liens on the property, Dallas County requests that if the Court terminates the automatic stay as to the Landlord with respect to any of the Debtor’s tangible personal property at the Premises that it also terminates the automatic stay as to Dallas County.

WHEREFORE, PREMISES CONSIDERED, Dallas County prays that the Court deny the relief requested in the Landlord’s Motion unless Dallas County is granted commensurate relief from the automatic stay.

Dated: October 9, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served electronically or via first class U.S. Mail on the 9th day of October 2025, on the parties listed below and on all parties receiving electronic notice from the Court.

/s/ Sherrel K. Knighton
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