

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

IN RE:	§	Chapter 7
	§	
TRICOLOR HOLDINGS, LLC, et al.,¹	§	CASE NO. 25-33487-mvl7
	§	
DEBTORS	§	Hearing on Motion for Relief From Stay:
	§	
	§	November 4, 2025, at 1:30 p.m.

**AFFIDAVIT OF ROMIN JAHANGIRI IN SUPPORT OF RKJS INVESTMENTS,
L.L.C.'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY AGAINST NON-
EXEMPT PROPERTY LOCATED AT 9326 NORTH FREEWAY, HOUSTON, TX 77037**

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this date personally appeared Romin Jahangiri as Manager for RKJS Investments, L.L.C., in this proceeding who after being duly sworn by me, did depose and say as follows:

1. “My name is Romin Jahangiri. I am over eighteen (18) years of age and have never been convicted of a felony. I am an authorized representative of RKJS Investments, L.L.C. (“RKJS”), and I am authorized to execute this affidavit on its behalf. I have personal knowledge of each of the facts stated herein, or such facts are based upon my review of the books and records of RKJS, on the information and interviews conducted by me and the professional advisors of RKJS, and on my day-to-day participation in the management of RKJS’s operations. I submit this affidavit in support of RKJS’s Motion for Relief from the Automatic Stay.

2. RKJS, as Landlord, and TriColor Auto Group, L.L.C., as Tenant, entered into a Lease Agreement dated June 16, 2015, and amended pursuant to the Amendment & Extension Agreement dated June 1, 2020 (collectively, the “Lease”) whereby the Tenant leased the property located at 9326 North Freeway, Houston, Texas 77037 (the “Property”) for the monthly base rent of \$17,500.00.

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 Apoyo Financial, LLC.



3. Prior to the Petition Date, RKJS sent a default notice for non-payment of the September rent to the Tenant. Rent has not been paid since August 2025.

4. The Property is currently vacant with limited FF&E within the building. The lot has been cleared of all vehicles. The list of property attached as Exhibit B to the Motion for Relief from Stay is a true and complete list of all personal property located at the Property.

5. Leaving the Property vacant leaves the Property to significant risk of break-in and vandalism. Nonpayment of rent for the Property is creating a significant financial hardship for RKJS, as it relies on the rents to pay for the cost of ownership of the Property and to pay for the ad-valorem property taxes that will soon be owed for the tax year of 2025.

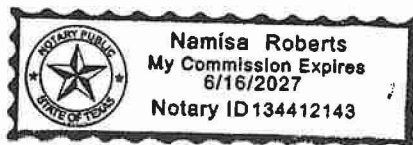
6. RKJS requests that the Court lift the automatic stay allowing RKJS to immediately take possession of the Property in order to change the locks and fully secure the Property, and for the Trustee to reject the Lease effective as of the Petition Date.

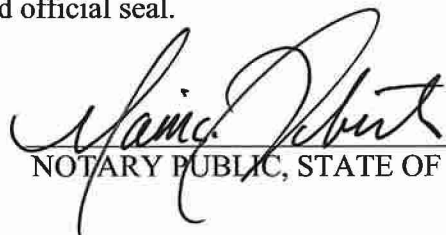
Further affiant sayeth not."


Romin Jahangiri

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

SUBSCRIBED AND SWORN TO before me on the 13 day of October 2025, to certify which witness my hand and official seal.




NOTARY PUBLIC, STATE OF TEXAS

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2025, pursuant to Rule 4001 and Local Rule 4001-1(a), I caused a true and correct copy of the foregoing Affidavit to be served upon the parties listed below by depositing same with the U.S. Postal Service via first class mail, or via electronic mail.

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