

**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 SHERWIN JAHANGIRI IN SUPPORT OF KEVIN K. JAHANGIRI
AND SHERWIN JAHANGIRI D/B/A/ K&S PROPERTIES' MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AGAINST NON-EXEMPT PROPERTY LOCATED
AT 9316 NORTH FREEWAY, HOUSTON, TX 77037**

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this date personally appeared Sherwin Jahangiri for Kevin K. Jahangiri and Sherwin Jahangiri d/b/a K&S Properties, in this proceeding who after being duly sworn by me, did depose and say as follows:

1. “My name is Sherwin Jahangiri. I am over eighteen (18) years of age and have never been convicted of a felony. I am an authorized representative of Kevin K. Jahangiri and Sherwin Jahangiri d/b/a K&S Properties (“K&S”), and I am authorized to execute this affidavit. 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 K&S, on the information and interviews conducted by me and the professional advisors of K&S, and on my day-to-day participation in the management of K&S’s operations. I submit this affidavit in support of K&S’s Motion for Relief from the Automatic Stay.

2. K&S, as Landlord, and TriColor Auto Group, L.L.C., as Tenant, entered into a Commercial Gross Lease dated April 27, 2016, and amended pursuant to the Amendment & Extension Agreement dated June 1, 2020 (collectively, the “Lease”) whereby the Tenant leased

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.



the property located at 9316 North Freeway, Houston, Texas 77037 (the "Property") for the monthly base rent of \$8,000.00.

3. Prior to the Petition Date, K&S 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 K&S, 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.

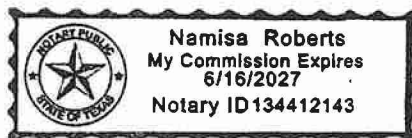
6. K&S requests that the Court lift the automatic stay allowing K&S to immediately take possession of the Property in order to change the locks and fully secure the Property, and for the Trustee to reject the Lease effective as of the Petition Date.

Further affiant sayeth not."

Sherwin 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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