

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

IN RE: TRICOLOR HOLDINGS, LLC, et al.,¹ Debtors	§ § § § §	Chapter 7 CASE NO. 25-33487-mvl7
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**SUPPLEMENT TO 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**
[Related to Docket No. 184]

COMES NOW, RKJS Investments, L.L.C. (“RKJS” or “Landlord”), and files this SUPPLEMENT to its Motion for Relief from the Automatic Stay Against Non-Exempt Property Located at 9326 North Freeway, Houston, TX 77037 (the “Motion”)², and respectfully shows as follows:

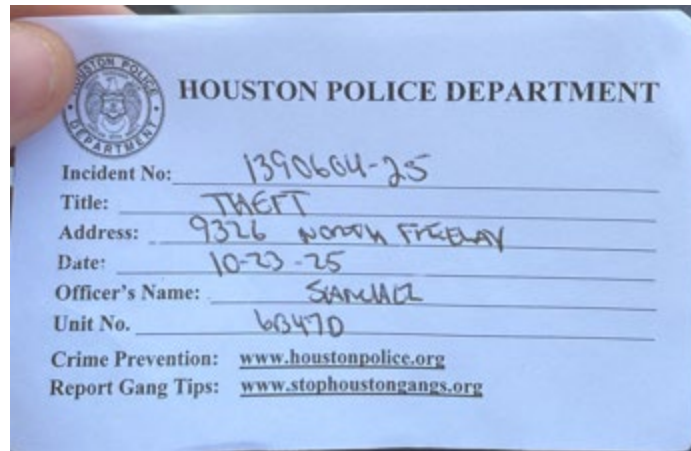
As RKJS identified in the Motion, the Debtors’ physical abandonment of the Premises, combined with the Trustee’s refusal to pay post-petition rent, and/or properly secure the Premises creates undue risk to the Landlord. On October 23, 2025, the Premises was vandalized, the electrical panels were stripped, and all copper (and other metals) stolen from the Premises.

A police report was filed with the Houston Police Department and has been assigned Incident No. 1390604-25. Photographs of the damages have been provided to the Chapter 7 trustee.

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.

² Defined terms not described herein shall have the meanings ascribed to them in the Motion.





HOUSTON POLICE DEPARTMENT

Incident No: 1390604-25
Title: THEFT
Address: 9326 NORTH FREELAY
Date: 10-23-25
Officer's Name: SANCHEZ
Unit No. 60470
Crime Prevention: www.houstonpolice.org
Report Gang Tips: www.stophoustongangs.org



By the Chapter 7 Trustee's own admission in her pending cash collateral motion, the bankruptcy estates will not pay November rent and will not spend any funds on preserving or protecting the Premises. The Landlord does not agree to finance these cases for the benefit of the purported secured lenders.

WHEREFORE, RKJS Investments, L.L.C., respectfully request that the Court immediately terminate the automatic stay to allow the Landlord to regain possession of the Property.

Respectfully submitted,

ANDREWS MYERS P.C.

/s / T. Josh Judd

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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, pursuant to Rule 4001 and Local Rule 4001-1(a), I caused a true and correct copy of the foregoing Supplement 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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