

**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 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**

[Related to Docket No. 187]

COMES NOW, Kevin K. Jahangiri and Sherwin Jahangiri d/b/a K&S Properties ("K&S" or "Landlord"), and files this SUPPLEMENT to its Motion for Relief from the Automatic Stay Against Non-Exempt Property Located at 9316 North Freeway, Houston, TX 77037 (the "Motion")², and respectfully shows as follows:

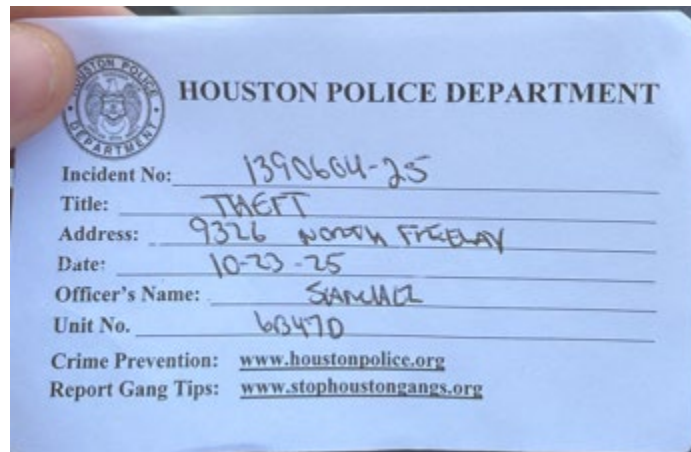
As K&S identified in the Motion, the Debtors' physical abandonment of the Premises, combined with the Trustee's refusal to pay post-petition rent, and/or properly secure the Premises creates undue risk to the Landlord. On October 23, 2025, property adjacent to the Premises (also a TriColor dealership) was vandalized, the electrical panels were stripped, and all copper (and other metals) stolen from the Premises. Undeniably, the same will likely happen to the Premises and the guilty parties will be back to vandalize and strip the copper and other metals from the Premises.

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.



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



HOUSTON POLICE DEPARTMENT

Incident No: 1390604-25

Title: THEFT

Address: 9326 NORTH FREEDAY

Date: 10-23-25

Officer's Name: STANUCL

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 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 this case for the benefit of the purported secured lenders.

WHEREFORE, the Movant 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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