

MCDERMOTT WILL & SCHULTE LLP

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Telephone: (214) 295-8000
E-mail: cr gibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
E-mail: dazman@mcdermottlaw.com

Julia M. Beskin (admitted *pro hac vice*)
919 Third Avenue
New York, New York 10022
Tel: (212) 547-5400
Fax: (212) 547-5444
Email: jbeskin@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

**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 (MVL)
))
Debtors.))
_____)

**AMENDED WITNESS AND EXHIBIT LIST OF THE CHAPTER 7 TRUSTEE
FOR HEARING SCHEDULED ON APRIL 9, 2026**

Anne Elizabeth Burns, solely in her capacity as the duly appointed Chapter 7 bankruptcy trustee (the “Trustee”) for Tricolor Holdings, LLC and its various debtor affiliates, hereby files this *Amended Witness and Exhibit List of the Chapter 7 Trustee for Hearing Scheduled on April*

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, TAG Asset Funding, LLC, and Apoyo Financial, LLC.



9, 2026 (the “Amended Witness and Exhibit List”) in connection with the matters scheduled for hearing on April 9, 2026, at 1:30 p.m. (prevailing Central Time) (the “Hearing”):

WITNESSES

1. Anne Elizabeth Burns, Chapter 7 Trustee
2. Any witness listed, offered, or called by Clay Cooley Motor Company or any other party or party in interest;
3. Any witness necessary to authenticate a document; and
4. Any witness required for rebuttal or impeachment.

EXHIBITS

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	December 2025 Payoff Package [VIN Ending 3530]				
2.	Deposit Information for February 2026 Payoff [VIN Ending 4355]				
3.	Stop Payment for February 2026 Payoff [Vin Ending 4355]				
4.	Any paper or pleading on file in these cases				
5.	Any exhibits listed, designated, or offered by Clay Cooley Motor Company or any other party or party in interest				
6.	Any exhibits necessary for rebuttal				

RESERVATION OF RIGHTS

The Trustee reserves the right to amend or supplement this Amended Witness and Exhibit List at any time prior to the Hearing and/or in compliance with the Local Bankruptcy Rules and the Orders of this Court. The Trustee reserves the right to offer into evidence any other exhibit designated by any other party in connection with the hearing on these matters. The Trustee also

reserves the right to offer into evidence such additional testimony and documents as may be appropriate for rebuttal or impeachment purposes.

Dated: Dallas, Texas
April 7, 2026

MCDERMOTT WILL & SCHULTE LLP

/s/ Charles R. Gibbs

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201-1664
Tel: (214) 295-8000
Fax: (972) 232-3098
E-mail: crgibbs@mcdermottlaw.com
mhelt@mcdermottlaw.com
gwilliams@mcdermottlaw.com

-and-

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: (212) 547-5400
Fax: (212) 547-5444
E-mail: dazman@mcdermottlaw.com

Julia M. Beskin (admitted *pro hac vice*)
919 Third Avenue
New York, New York 10022
Tel: (212) 547-5400
Fax: (212) 547-5444
Email: jbeskin@mcdermottlaw.com

Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I do hereby certify that on April 7, 2026, a true and correct copy of the foregoing document was served via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in this case.

/s/ Charles R. Gibbs
Charles R. Gibbs

Case 25-33487-mvl7 Doc 1033-1 Filed 04/07/26 Entered 04/07/26 16:51:52 Desc



CLAY COOLEY AUTO GROUP

698 E Airport Fwy
Irving, TX 75062

Exhibit 1 Page 1 of 6

NC Bank
249 Fith Avenue
Pittsburgh, PA 15222

157374

DATE
03DEC25

PAY THIS AMOUNT			
*****5,784	DOLLARS	06	CENTS

AMOUNT OF CHECK
*****5,784.06

TO
THE
ORDER
OF

GANAS YA
6021 CONNECTION DR 4TH FLOOR
IRVING, TX 75039

VOID AFTER 120 DAYS

BY

BY

AUTHORIZED SIGNATURE



ENDORSE HERE

Doc 1033-1 Filed 04/07/26 Entered 04/07/26

Exhibit 1 Page 2 of 6

PAY TO THE ORDER OF

FLAGSTAR BANK, N.A.

DEPOSIT ONLY

Anne Elizabeth Burns, as Trustee

CASE NAME *Trustee Holdings LLC*

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE*

MP

ORIGINAL
DOCUMENT

The security features listed below, as well as those not listed, exceed industry guidelines. Absence of these features may indicate alteration.

SecurityFeatures:

SecurityScreen:

Micro-Printing - "MP"

Chemically Sensitive Paper:

Fluorescent Fibers:

Contains A Watermark:

Results of document alteration:

Absence of "Original Document" Verbiage on back of check

Small type under endorsement area and surrounding

Padlock Security box appears blurred if copied or scanned.

Appearance of brown and/or blue stains may indicate alterations.

Invisible unless exposed to ultraviolet light.

Hold to light to view, absence indicates alteration.



Trustee's Exhibit 001



Clay Cooley Auto Group
698 E Airport Fwy
Irving, TX 75062

Payment Advice
\$5,784.06

Check #: 157374
Created by: Alexandria Christian
12/03/25 | 11:57 AM

Customer: GANAS YA

Invoice Number	Amount	Comments
JN8AS5MT1EW613530		
Vehicle: 2014 Nissan Rogue Select	\$5,784.06	LPO EW613530

Posting Lines

GL Account	Amount	Control	Control Description	Control2	Posting Description
110100	-\$5,784.06	157374	-	GANAS YA	-
999	\$5,000.00	6004	Clay Cooley Nissan Irving	GL: 122700 , Journal: 601	ew613530,lpo ew613530,ganas ya
999	\$784.06	6004	Clay Cooley Nissan Irving	GL: 143610 , Journal: 601	ew613530,lpo ew613530,ganas ya

**PLEASE SEND TITLE TO:
698 E. AIRPORT FWY
IRVING, TX 75062**

If the payoff is short please call Clay Cooley AG
at (972) 721-4322

888-448-7426

LIEN PAYOFF AUTHORIZATION

DEAL# 95501

EW613530

CUST# 257835C

Dealer Name	IRVING N MOTOR COMPANY, LLC DBA CLAY COOLEY NISSAN IRVING			Phone Number	(972)554-2200
Address	1000 E AIRPORT FWY	City	IRVING	State	TX
				Zip	75062
				County	

Customer Name	BAYRON RONEN RUIZ GARCIA			Phone Number	(469) 761-0574
Address	2020 ESTRADA PKWY APT 104	City	IRVING	State	TX
				Zip	75061
				County	DALLAS

Customer Name	N/A			Phone Number	N/A
Address	N/A	City	N/A	State	N/A
				Zip	N/A
				County	N/A

Year	Make	Model	Vehicle Identification Number
2014	NISSAN	ROGUE SELECT	JN8AS5MT1EW613530

To Vehicle Lienholder: FLEXI COMPRAS AUTOS *overnight address* DBA: GANAS YA *Irving to* 6021 Connection Dr *75039*

You are authorized to accept payment in full ("Payoff") from the dealer identified above ("Dealer") for the satisfaction of the security interest in the vehicle described above ("Vehicle"). You are instructed to cancel any insurance, maintenance, service, or other contract for which a refund is available and apply such proceeds to reduce the Payoff amount due.

You are further instructed to release your security interest in the Vehicle and within 15 days of receipt of the Payoff and this LIEN PAYOFF AUTHORIZATION, to mail, transmit, or deliver the Vehicle's certificate of ownership to the Dealer or take any other action required to release your interest in the Vehicle and mail, transmit, or deliver written notice of your taking such action to the Dealer.

per item: 3.04

good until: 08/08/2025

payoff: 6281.63

acct: 257328

5784.06
PD- \$3.03

Customer Printed Name BAYRON RONEN RUIZ GARCIA

Customer Signature 

Date 07/21/2025

Customer Printed Name N/A

Customer Signature N/A

Date N/A

Ganas Ya
6021 Connection Dr 4th floor
Irving tx 75039

EW613530
DEAL# 95501

ODOMETER DISCLOSURE STATEMENT

CUST# 257835C

Federal law (and State law, if applicable) requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

I, BAYRON RONEN RUIZ GARCIA state that the odometer now
TRANSFEROR'S NAME - PRINT

reads 128665 (no tenths) miles and to the best of my knowledge that it reflects the actual mileage of the vehicle described below, unless one of the following statements is checked.

- (1) I hereby certify that to the best of my knowledge the odometer reading reflects the amount of mileage in excess of its mechanical limits.
- (2) I hereby certify that the odometer reading is **NOT** the actual mileage.
WARNING — ODOMETER DISCREPANCY.

MAKE NISSAN

MODEL ROGUE SELECT BODY TYPE SPORT UTILITY

VEHICLE IDENTIFICATION NUMBER JN8AS5MT1EW613530

YEAR 2014

TRANSFEROR'S NAME BAYRON RONEN RUIZ GARCIA
(PRINTED NAME)

TRANSFEROR'S ADDRESS [REDACTED]
(STREET)
[REDACTED] [REDACTED] [REDACTED]
(CITY) (STATE) (ZIP CODE)

TRANSFEROR'S NAME *Bayron R.*
(SIGNATURE)

DATE OF STATEMENT 07/21/2025

TRANSFEEE'S NAME IRVING N MOTOR COMPANY, LLC DBA CLAY COOLEY NISSAN IRVING

TRANSFEEE'S ADDRESS 1000 E AIRPORT FWY
(STREET)
IRVING TX 75062
(CITY) (STATE) (ZIP CODE)

TRANSFEEE'S NAME *[Signature]*
(SIGNATURE)
EDWIN ZUNIGA
(PRINTED NAME)

07/21/2025

TEXAS DEPARTMENT OF MOTOR VEHICLES
VEHICLE TITLES AND REGISTRATION DIVISION

LIC RJX2546 AUG/2025 OLD # RJX2546 AUG/2024 EWT 3300 GWT 3300
PASSENGER-TRUCK PLT, STKR REG CLASS 25 \$ 75.25 DALLAS CNTY
TITLE 05731544640250396 ISSUED 03/30/2022 ODOMETER 87001 REG DT 09/10/2024
YR:2014 MAK:NISS MODL:ROG BDY STYL:LL VEH CLS:PASS-TRK SALE PRC: \$13199.00
VIN: JN8AS5MT1EW613530 BODY VIN: COLOR: BLUE
PREV TTL: JUR FL TTL # 115482161 ISSUE 07/17/2014
PREV OWN GANAS YA, FORT WORTH, TX
OWNER BAYRON RONEN RUIZ-GARCIA, [REDACTED]
RNWL RCP BAYRON RONEN RUIZ SR, [REDACTED]
LIEN 02/12/2022, GANAS YA, , 6021 CONNECTION DR, FLOOR 4, IRVING, TX, 75039
PLATE AGE: 3 LAST ACTIVITY 01/06/2025 IADDRE OFC: 290
REMARKS ACTUAL MILEAGE.DATE OF ASSIGNMENT:2022/02/12.E-REMINDER.E-TITLE.FUEL
TYPE: GAS.

TITLE AND REGISTRATION VERIFICATION

USER NAME: W299S04

Printed: 02/05/26

Deposit Confirmation

Anne Elizabeth Burns
 900 Jackson Street
 Suite 570
 Dallas, TX 75202

Received	Payer	Payment Method	Check #	Amount
02/05/26	Clay Cooley Auto Group	Check	0000147322	\$12,911.33

Entered By: Anne Burns

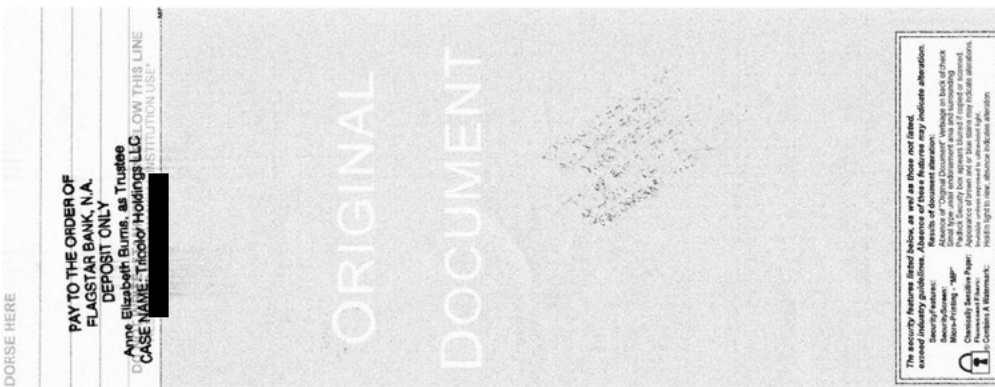
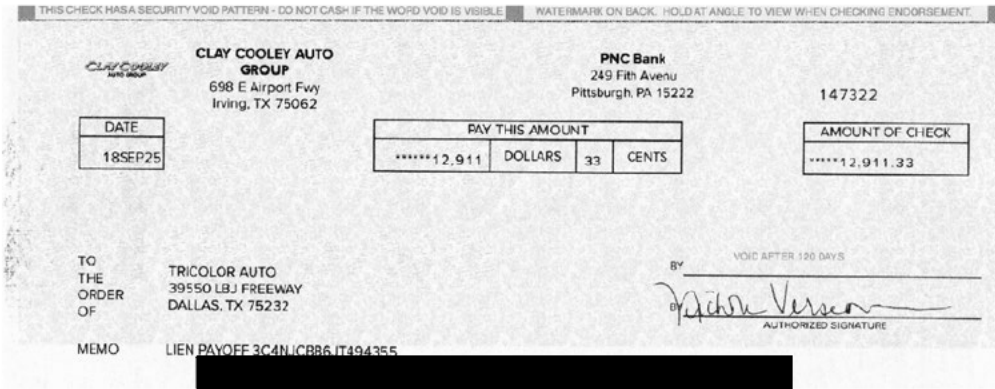
Remarks: Payee: Tricolor Auto
 Payoff: Yurisay Hernandez
 2018 Jeep Compass
 3C4NJCBB6JT494355

Sent	Case	Account Description	Account #
02/05/26	25-33487 Tricolor Holdings LLC	Checking	[REDACTED]

Sent By: Anne Burns

Deposited	Deposit #	Amount
-----------	-----------	--------

PENDING





1400 Broadway, 6th Floor, New York, NY 10018
646-822-1500
Advice D-100112

WE CHARGE YOUR ACCOUNT WITH THE FOLLOWING ITEMS RETURNED UNPAID

MAKER	REASON	AMOUNT
CLAY COOLEY AUTO GROUP	Stop Payment	\$12,911.33

161
TRICOLOR HOLDINGS LLC DEBTOR
CASE 25-33487
ANNE ELIZABETH BURNS AS TRUSTEE
900 JACKSON ST. STE.570
DALLAS TX 75202

Number of Items : 1 Total Debit : \$12,911.33

If you have any questions concerning this notification, please contact your financial center.

[REDACTED]
02/10/2026
[REDACTED]

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

RETURN REASON-C
STOP PAYMENT

STOP PAYMENT

02/06/2026

THIS CHECK HAS A SECURITY VOID PATTERN - DO NOT CASH IF THE WORD VOID IS VISIBLE WATERMARK ON BACK. HOLD AT ANGLE TO VIEW WHEN CHECKING ENDORSEMENT.

CLAY COOLEY AUTO GROUP 698 E Airport Fwy Irving, TX 75062	PNC Bank 249 Fifth Avenue Pittsburgh, PA 15222	147322
--	---	--------

DATE 18SEP25	PAY THIS AMOUNT *****12,911 DOLLARS 33 CENTS	AMOUNT OF CHECK *****12,911.33
-----------------	---	-----------------------------------

TO THE ORDER OF: TRICOLOR AUTO
39550 LBJ FREEWAY
DALLAS, TX 75232

MEMO: LIEN PAYOFF 3C4NJCBB6JT494355

BY: [Signature] AUTHORIZED SIGNATURE
VOID AFTER 120 DAYS