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July 22, 2026

Re: Effect of Bankruptcies of LeFever Mattson, a California corporation and its debtor affiliates on Individual Retirement Accounts

To Whom It May Concern:

This firm is counsel to the LFM Plan Recovery Trust, successor in interest to LeFever Mattson, a California corporation in its bankruptcy case pending in the United States Bankruptcy Court for the Northern District of California (the "Court") under case no. 24-10545 (HLB).

On March 6, 2026, the Court entered an order[1] substantively consolidating the estates of LeFever Mattson, a California corporation ("LeFever Mattson") and its affiliated debtors[2] (collectively, the "LFM Debtors"), KS Mattson Partners, LP ("KSMP" and, together with the LFM Debtors, the "Debtors"), and three-KSMP affiliated entities (Perris Freeway Plaza, LP, Specialty Properties Partners, LP and Treehouse Investments, LP) (the "KSMP Investment Entities").

On April 23, 2026, Judge Charles Novack entered an order [Docket No. 4225] (the "Confirmation Order") confirming the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Docket No. 4151] (the "Plan"). As set forth in the Confirmation Order, Judge Novack found that the Debtors and KSMP Investment Entities were operated as a Ponzi scheme from at least September 12, 2017.[3]

The Plan became effective on May 14, 2026 [Docket No. 4335]. As a result, all partnership interests in LPs, membership interests in LLCs, and deeds of trust before the bankruptcy were cancelled and discharged (*see* Section 5.6 of the Plan). Holders of these investments received an Investor Claim against the Debtors

[1] *Order Substantively Consolidating Debtors and KSMP Investment Entities and Granting Related Relief* [Docket No. 3914]. Copies of all pleadings and orders entered in this chapter 11 case are available on the Debtors' noticing and claim agent's website at: https://veritaglobal.net/LM.

[2] The Debtors include: Divi Divi Tree, LP and Butcher Road Partners, LLC.

[3] *See* Confirmation Order, ¶ L.

which will yield a pro rata distribution of Class A and Class B Plan Recovery Trust Units on account of their allowed Investor Claim, calculated in accordance with the Plan and set forth in a statement provided to them by the Debtors ("Investor Claims Statement").

If your company charges account holder fees based on the value of the underlying investment, those investments have been revalued at significantly lower amounts than their original book values. Indeed, the estimate included in the Plan and accompanying disclosure statement suggested that the value of each claimant's Class A and B Plan Recovery Trust Units will be somewhere between 19.7 and 35.9 percent of their Investor Claim.

Because (a) no separate LeFever Mattson investments exist for any victim and (b) each holds, at most, a single Investor Claim, we believe you should adjust your records to reflect the effect of the chapter 11 bankruptcy case and the Plan and reflect just one investment in the amount as set forth on the applicable Investor Claims Statement.

I would be happy to answer any questions you may have to facilitate the adjustment of your records.

Very truly yours,

/s/ John D. Fiero
John D. Fiero