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*Attorneys for the Debtors and  
 Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
 corporation, *et al.*,<sup>1</sup>

Debtors.

In re:

KS MATTSON PARTNERS, LP,

Debtor.

Case No. 24-10545 (CN) (Lead Case)  
 (Jointly Administered)  
 Chapter 11

**DECLARATION OF THOMAS P.  
 JEREMIASSEN IN SUPPORT OF  
 MOTION OF THE OFFICIAL  
 COMMITTEE OF UNSECURED  
 CREDITORS FOR SUBSTANTIVE  
 CONSOLIDATION OF DEBTOR  
 LEFEVER MATTSON AND  
 KS MATTSON PARTNERS, LP AND  
 FOR RELATED RELIEF**

**Date:** July 25, 2025

**Time:** 11:00 a.m.

**Place:** United States Bankruptcy Court  
 1300 Clay Street, Courtroom 215  
 Oakland, CA 94612

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.



1 I, Thomas P. Jeremiassen, hereby declare as follows:

2 1. I am a Senior Managing Director at Development Specialists, Inc. (“DSI”), a  
3 leading provider of management consulting and financial advisory services, including turnaround  
4 consulting, fiduciary roles, and financial restructuring services, with numerous offices throughout  
5 the country.

6 2. I have over 25 years of experience in bankruptcy, forensic and investigative  
7 accounting, and litigation support. I have been involved in numerous engagements providing  
8 investigative accounting services related to fraud, including Ponzi and other investment schemes,  
9 as well as matters involving intercompany claims and substantive consolidation. Among my  
10 relevant previous engagements are Adelphia Communications Corporation (accountant for  
11 creditors’ committee), EPD Investment Co. (accountant for chapter 7 trustee), Estate Financial,  
12 Inc. (chapter 11 trustee), Reed Slatkin (accountant for chapter 11 trustee), and Woodbridge Group  
13 of Companies (restructuring advisor for debtor). I am a Certified Public Accountant in California,  
14 have been Certified in Financial Forensics by the American Institute of Certified Public  
15 Accountants, and am a Certified Insolvency and Restructuring Advisor. A copy of my curriculum  
16 vitae is attached hereto as Exhibit A.

17 3. I submit this declaration (the “Declaration”) pursuant to 28 U.S.C. § 1746 in  
18 support of the *Motion of the Official Committee of Unsecured Creditors for Substantive*  
19 *Consolidation of Debtor Lefever Mattson and KS Mattson Partners, LP and for Related Relief*  
20 [Dkt. No. 1585] (the “Motion”),<sup>2</sup> filed on June 20, 2025.<sup>3</sup>

21 4. I am authorized by the LFM Debtors to submit this Declaration.

22 **DSI’s Retention and Scope of Work**

23 5. By order dated October 17, 2024 [Dkt. No. 160], the Court authorized the  
24 LFM Debtors to employ DSI to perform the following services: (a) assisting the LFM Debtors in  
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26 <sup>2</sup> Capitalized terms used but not defined herein have the meanings given to them in the  
27 Motion.

28 <sup>3</sup> An identical copy of the Motion was filed in Case No. 24-10715 (Bankr. N.D. Cal.) as  
Docket No. 157.

1 the preparation of financial disclosures required by the Bankruptcy Code; (b) assisting the  
2 LFM Debtors in the development of cash flow forecasts and other financial analysis as required;  
3 (c) advising and assisting the LFM Debtors, their counsel, and other professionals in responding  
4 to third-party requests; (d) attending meetings and assisting in communications with parties in  
5 interest and their professionals, including the Committee; (e) providing litigation advisory services  
6 with respect to accounting matters, along with expert witness testimony on case-related issues; and  
7 (f) rendering such other general business consulting services or other assistance as the  
8 LFM Debtors deem necessary and that are consistent with the role of a financial advisor and not  
9 duplicative of services provided by other professionals.

#### 10 Sources of Data

11 6. I have worked with other professionals at DSI to assist me in conducting my  
12 analyses and in preparing the information underlying this Declaration. As more fully set forth  
13 below, the information set forth in this Declaration is based upon my personal knowledge formed  
14 from DSI's work to date, information supplied to me by members of the LFM Debtors'  
15 management, employees, and professionals, or learned from my review of relevant documents or  
16 upon my opinion based upon my experience and knowledge of the LFM Debtors' operations and  
17 financial condition. If called upon to testify, I could and would testify competently to the facts set  
18 forth herein.

19 7. LFM's Books and Records. Upon its retention, DSI obtained access to the  
20 LFM Debtors' physical records, stored at LFM's office in Citrus Heights, California, and  
21 electronic records. These records include real property records, partnership records, tax records,  
22 bank records, and the accounting system (described more fully below).

23 8. Yardi. LFM used Yardi, a real estate asset management and accounting software,  
24 as its accounting system of record. DSI obtained extracts of the general ledger from LFM  
25 employees, who also have provided other requested reports and information from Yardi. Based  
26 on DSI's review of information from Yardi and other books and records to which DSI has access,  
27 I believe the LFM Debtors' Yardi system accurately reflects the activities that were known to the  
28 LFM accounting staff (these do not include activity within the 1059 Account). DSI has verified

1 that the Yardi system reconciles with all known bank accounts held by the LFM Debtors, with the  
2 exception of the 1059 Account.

3 9. 1059 Account Records. I have reviewed records from the 1059 Account for the  
4 period from May 2017 through the closing of the account in July 2024. An accounting firm  
5 employed by LFM prior to the Petition Date had already received many of the 1059 Account  
6 records, which were turned over to DSI. Also, as set forth in the Second Declaration of Steven W.  
7 Golden in support of the Motion, filed concurrently herewith, the Committee subpoenaed all  
8 records of the 1059 Account, but BMO only has records since approximately May 2017. DSI was  
9 provided copies of those records.

#### 10 The 1059 Account

11 10. The 1059 Account was in LFM's name. I understand from my review of LFM's  
12 books and records and my conversations with employees of the LFM Debtors, however, that  
13 Mattson did not permit the 1059 Account to be integrated into LFM's accounting system. LFM  
14 employees did not reconcile or otherwise account for the 1059 Account transactions—only  
15 Mattson himself had control over it. Unlike all other LFM bank account statements, which were  
16 sent to LFM's offices in Citrus Heights, statements for the 1059 Account were sent to a P.O. box  
17 to which only Mattson had access.

18 11. From the records turned over by the accounting firm previously employed by LFM  
19 and the records produced by BMO pursuant to the Committee's subpoena, DSI prepared an  
20 analysis of all receipts to and disbursements from the 1059 Account for the period May 2017  
21 through July 2024. During that period, more than 50,000 transactions for amounts aggregating  
22 over \$250 million passed through the 1059 Account.

23 12. Among the funds deposited into the 1059 Account were approximately \$105  
24 million from Investors. Those same funds were used to, among other things, pay old Investors.

25 13. The 1059 Account was also used to pay the financial obligations of KSMP. Over  
26 the last seven years, more than \$80 million was transferred to KSMP or third parties for KSMP's  
27 benefit. This included transfers totaling more than \$20 million to Socotra on account of loans for  
28 which KSMP, not the LFM Debtors, was the borrower and primary obligor.

**Entanglement of LFM and KSMP**

14. I understand from conversations with the LFM Debtors' personnel that KSMP did not have any employees of its own. Instead, it utilized the LFM Debtors' employees, frequently without any payment (or even allocation) of costs between the LFM Debtors and KSMP.

15. Many of the LFM Debtors' and KSMP's records were stored together. For example, based upon my conversations with the LFM Debtors' personnel and my own review of the records, I understand that certain of the LFM Debtors' physical records (including many critical books and records related to Investors and Properties) were stored in boxes at Mattson's assistant's home office along with KSMP's records.

16. To the extent that Mattson maintained records (including, for example, as to the 1059 Account), many of LFM's and KSMP's critical books and records were not stored at LFM's offices or otherwise accessible to LFM.

17. The tens of millions of dollars that were moved between LFM and KSMP were frequently not supported by any formal documentation, such as an intercompany note. In the absence of formal documentation, and based upon my conversations with the LFM Debtors' personnel and my own review of the books and records, I have not been able to ascertain the purposes of such transfers.

18. Over the past seven years, more than \$250 million moved in and out of 1059 Account over approximately 50,000 transactions. Specifically:

- a. LFM transferred more than \$60 million to KSMP or entities controlled by KSMP or Mattson (other than the LFM Debtors).
- b. LFM transferred more than \$30 million to lenders, including over \$20 million to Socotra.
- c. LFM paid more than \$7 million of credit card charges.
- d. Over the course of 3,700 separate transactions, LFM paid more than \$20 million on account of various Property-related expenses on account of LFM or KSMP, all without a written agreement between LFM and KSMP or any discernible accounting.

1           19.     The LFM Debtors frequently paid a deposit or multiple deposits toward KSMP's  
2 purchase of real property. Attached hereto as Exhibit B is a summary of the properties purchased  
3 by KSMP and the funds transferred from the 1059 Account and other LFM Debtor bank accounts  
4 to the escrow company for each purchase. To assist in the preparation of this document, I reviewed  
5 the escrow closing statements, and for the cash deposits, I searched the database of 1059 Account  
6 transactions and Yardi to confirm those that came from LFM Debtors.

7           20.     At least 90 Properties owned by the LFM Debtors (including at least 80 owned as  
8 of the LFM Petition Date) were previously owned by KSMP. KSMP encumbered many—if not  
9 most—of these Properties with Third-Party Loans. Attached hereto as Exhibit C is a summary of  
10 the properties transferred between KSMP and the LFM Debtors. To assist in the preparation of  
11 this document, I reviewed, among things, title reports, sale closing statements, and various  
12 documents recorded with County Records' offices.

13           I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct. Executed on July 11, 2025.



Thomas P. Jeremiassen

**EXHIBIT A**

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## **Thomas P. Jeremiassen, Senior Managing Director**

### **Summary**

Tom Jeremiassen is a Senior Managing Director in DSI's Los Angeles office with over 25 years of experience providing services in bankruptcy, forensic/investigative accounting, and litigation support.

Mr. Jeremiassen has served as a fiduciary in bankruptcy and other matters, including roles as chapter 11 trustee, chapter 7 trustee, liquidating trustee, plan administrator, disbursing agent and receiver. He has served as an accountant and financial advisor for chapter 11 trustees, chapter 7 trustees, debtors, creditor committees, examiners, liquidating trustees and receivers in dozens of insolvency matters. He has also been involved in numerous engagements in which he provided expert witness, litigation support, consulting and investigative accounting services related to fraud, embezzlement, mismanagement, breach of contract, and other disputes.

### **Notable Assignments at DSI and Predecessor Firms**

Adelphia Communications, EPD Investment Co., Estate Financial, Inc., Fuhu, Inc., Girardi Keese, Girls Gone Wild, Le-Nature's, Inc., Mike Tyson, Rampage Retailing, Inc., Reed Slatkin, and Woodbridge Group of Companies, LLC.

### **Employment History**

Prior to joining DSI in 2018, Mr. Jeremiassen was a Managing Director at Berkeley Research Group, LLC. Previously, he was a Director at LECG, LLC; and a Partner with Neilson Elggren LLP, following his prior employment at Arthur Andersen LLP and Neilson, Elggren, Durkin & Co.

### **Education**

Mr. Jeremiassen received a Bachelor of Science in Accounting from Pepperdine University.

### **Professional Licenses, Certifications and Affiliations**

Mr. Jeremiassen is a Certified Public Accountant, Certified in Financial Forensics, and a Certified Insolvency and Restructuring Advisor. His professional memberships include the American Institute of CPAs (AICPA), the American Bankruptcy Institute (ABI), the Association of Insolvency and Restructuring Advisors (AIRA), and the Los Angeles Bankruptcy Forum (LABF). He is a member of the board of directors of the AIRA. He has presented on bankruptcy and fraud topics at conferences and meetings sponsored by the ABI, AIRA, the California CPA Education Foundation, the Credit Managers Association, and Golden Gate University.

#### **LOS ANGELES**

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Case: 24-10715 Doc# 188-1 Filed: 07/11/25 Entered: 07/11/25 17:04:59 Page 2  
of 2

**EXHIBIT B**

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## LeFever Mattson

## Summary of KSMP Property Acquisitions Funded Partially by LeFever Mattson Debtors

| Property Acquired by KSMP  | Confirmed Deposits from LFM Debtors |                         |              | Other Potential Deposits from LFM Debtors | Applicable Document |     |
|--|-------------------------------------|-------------------------|--------------|---|---------------------|-----|
|  | From 1059 Account                   | From Other LFM Accounts | Total        |   |                     |     |
| 101 Meadowlark Drive<br>24101 Arnold Drive<br>24151 Arnold Drive<br>310 Meadowlark Drive | \$500,000.00                        |                         | \$500,000.00 |   | LFM-S_00831836      |     |
| 1025 Napa Road<br>20470 Eighth Street East   | 165,000.00                          |                         | 165,000.00   |   | SOC00060043         |     |
| 1200 Apple Tree Court  |                                     |                         |              | \$477,833.77                              | LFM-S_00243882      | [1] |
| 1220 E. Napa Street  | 505,500.00                          | \$600,000.00            | 1,105,500.00 |   | LFM-S_00832307      |     |
| 1230 E. Napa Street  | 48,000.00                           |                         | 48,000.00    | 760,241.80                                | LFM-S_00831528      | [1] |
| 151 E. Napa Street   |                                     |                         | -            | 100,000.00                                | LFM-S_00245345      | [1] |
| 170 - 182 E. First Street  | 422,163.00                          |                         | 422,163.00   |   | LFM-S_00831561      | [2] |
| 171 W. Spain Street  | 50,000.00                           |                         | 50,000.00    |   | LFM-S_00831562      |     |
| 1870 Thornsberry Road  | 50,000.00                           |                         | 50,000.00    |   | LFM-S_00831640      |     |
| 19340 Seventh Street E   | 3,297,917.48                        |                         | 3,297,917.48 |   | KSM_OCC_0331739     |     |
| 222/226 W. Spain Street  | 5,000.00                            | 2,600,000.00            | 2,605,000.00 |   | LM_00022101         |     |
| 24120 Arnold Drive   | 100,000.00                          |                         | 100,000.00   |   | KSM_OCC_0338843     |     |
| 24265 Arnold Drive   | 37,500.00                           | 816,729.50              | 854,229.50   |   | FAMEXCO00002201     |     |
| 2500 Castle Road<br>3200 Castle Road   | 100,000.00                          | 1,250,000.00            | 1,350,000.00 |   | LM_00593309         |     |
| 282 Patten Street  | 39,750.00                           |                         | 39,750.00    |   | LFM-S_00246132      |     |
| 3003 Castle Road   | 100,000.00                          |                         | 100,000.00   |   | LFM-S_00831857      |     |
| 302/310 First Street East  | 1,629,595.38                        |                         | 1,629,595.38 |   | LFM-S_00245412      | [3] |
| 304 First Street East  | 815,000.00                          |                         | 815,000.00   |   | LFM-S_00245414      |     |

## LeFever Mattson

## Summary of KSMP Property Acquisitions Funded Partially by LeFever Mattson Debtors

| Property Acquired by KSMP  | Confirmed Deposits from LFM Debtors |                         |                        | Other Potential Deposits from LFM Debtors | Applicable Document |
|--|-------------------------------------|-------------------------|------------------------|---|---------------------|
|  | From 1059 Account                   | From Other LFM Accounts | Total                  |   |                     |
| 333 Wilkerson Avenue<br>371 Wilkerson Avenue<br>411 Wilkerson Avenue | 22,000.00                           |                         | 22,000.00              |   | SOC00061247         |
| 405 London Way   | 204,016.03                          |                         | 204,016.03             |   | LFM-S_00831891      |
| 424 Second Street West   | 530,457.73                          |                         | 530,457.73             |   | LFM-S_00245447      |
| 430 W. Spain Street  | 726,424.08                          |                         | 726,424.08             | 525,000.00                                | LFM-S_00245448 [1]  |
| 443 Casabonne Lane   | 403,815.22                          |                         | 403,815.22             |   | LFM-S_00831900      |
| 4920 Samo Lane   |                                     |                         | -                      | 403,512.42                                | LM_01090477 [1]     |
| 5120 Lovall Valley Road  | 75,000.00                           |                         | 75,000.00              |   | LFM-S_00244578      |
| 528 Third Street West  | 29,970.00                           |                         | 29,970.00              |   | LFM-S_00832000      |
| 821 Lovall Valley Road<br>19355 E. Seventh Street East               | 90,000.00                           | 150,000.00              | 240,000.00             |   | SOC00056499         |
| 834 Donner Avenue  | 2,006,454.54                        |                         | 2,006,454.54           |   | LM_00225673         |
| 870 E. Napa Street   | 862,300.00                          |                         | 862,300.00             |   | LM_00236662 [4]     |
| 921 Broadway   | 75,000.00                           |                         | 75,000.00              |   | LM_00082930         |
| Third Street Lot   | 5,003.25                            |                         | 5,003.25               |   | LFM-S_00831890      |
| <b>Totals</b>  | <b>\$12,895,866.71</b>              | <b>\$5,416,729.50</b>   | <b>\$18,312,596.21</b> | <b>\$2,266,587.99</b>                     |                     |

## Notes:

- [1] The escrow closing statements include certain deposits from LeFever Mattson for which the sources have not yet been confirmed.
- [2] The 1059 Account deposits include \$73,000 that the escrow closing statement indicates was from KS Mattons Partners.
- [3] The 1059 Account deposits include \$50,000 that the escrow closing statement indicates was from KS Mattons Partners.
- [4] The 1059 Account deposits include \$28,800 that the escrow closing statement indicates was from KS Mattons Partners.

**EXHIBIT C**

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## LeFever Mattson

## Summary of Property Transfers from KSMP to LeFever Mattson Debtors

| Address  | KSMP Acquisition          |                        |  | LFM Debtor Acquisition       |           |                        |   | Applicable Document(s)           |
|--|---------------------------|------------------------|--|------------------------------|-----------|------------------------|---|----------------------------------|
|  | Date                      | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                   | Buyer Entity                 | Date      | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)        |                                  |
| 101 Meadowlark Ln<br>310 Meadowlark Ln<br>24101 Arnold Dr<br>24151 Arnold Dr | 8/2/2021                  | \$5,500,000.00         | \$2,372,255.92 Trf/Exch<br>\$500,000 LFM<br>\$2,750,000 Socotra Loan | Sienna Pointe, LLC           | 8/5/2021  | \$5,600,000.00         | \$2,850,715.00 Trf/Exch<br>\$2,750,000 Existing Loan      | LFM-S_00245383<br>LM_00003495    |
| 101 Quail Court  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 102 Quail Court  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 1025 Napa St   | 10/23/2017                | \$875,000.00           | \$295,871.98 Trf/Exch<br>\$165,000 LFM (3)<br>\$437,500 Socotra Loan | Windscape<br>Apartments, LLC | 10/4/2022 | \$3,000,000.00         | \$2,500,000 Trf/Exch<br>\$500,000 Loan Assumption         | LFM-S_00831482<br>LFM-S_00246729 |
| 10298 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 103 Quail Court  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 103/105 Commerce Ct  | Various<br>(May-Sep 2020) |                        |  | Nut Pine, LP                 | 9/1/2020  | \$6,500,000.00         | \$2,500,000 Trf/Exch<br>\$4,480,000 Suncrest Bank<br>Loan | LM_00003129                      |
| 10300 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10306 Badger Lane  | 5/3/2021                  |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10308 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10316 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10318 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10326 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10328 Badger Lane  | 5/3/2021                  |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10333 Badger Lane  | 2/3/2021                  |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10334 Badger Lane  | 2/28/2022                 |                        |  | LeFever Mattson              | 9/26/2023 |                        |   |                                  |
| 10335 Badger Lane  | 3/1/2021                  |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10336 Badger Lane  | 2/28/2022                 |                        |  | LeFever Mattson              | 9/26/2023 |                        |   |                                  |
| 10342 Badger Lane  | 2/28/2022                 |                        |  | LeFever Mattson              | 9/26/2023 |                        |   |                                  |
| 10344 Badger Lane  | 2/28/2022                 |                        |  | LeFever Mattson              | 3/1/2022  |                        |   |                                  |
| 10350 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10352 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10358 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10360 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10366 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10368 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10378 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10379 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10380 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |
| 10381 Badger Lane  | 2/26/2021                 |                        |  | LeFever Mattson              | 7/28/2021 |                        |   |                                  |

## LeFever Mattson

## Summary of Property Transfers from KSMP to LeFever Mattson Debtors

| Address                | KSMP Acquisition |                        |  | LFM Debtor Acquisition    |            |                        |   | Applicable Document(s)            |
|------------------------|------------------|------------------------|--|---------------------------|------------|------------------------|---|-----------------------------------|
|                        | Date             | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                       | Buyer Entity              | Date       | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)        |                                   |
| 10386 Badger Lane      | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 10388 Badger Lane      | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 10393 Badger Lane      | 11/22/2023       |                        |  | LeFever Mattson           | 11/27/2023 |                        |   |                                   |
| 10394 Badger Lane      | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 10395 Badger Lane      | 11/22/2023       |                        |  | LeFever Mattson           | 11/27/2023 |                        |   |                                   |
| 10396 Badger Lane      | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 104 Quail Court        | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 1045 Bart Rd           | 5/26/2022        | \$1,800,000.00         | \$45,000 Earnest Money<br>\$987,397.44 KSMP<br>\$800,000 Socotra Loan    | Windscape Apartments, LLC | 9/1/2022   | \$2,500,000.00         | \$1,700,000 Trf/Exch<br>\$800,000 Seller Financing        | LFM-S_00831494<br>LM_00003737     |
| 107 Quail Court        | 2/28/2022        |                        |  | LeFever Mattson           | 3/1/2022   |                        |   |                                   |
| 108 Quail Court        | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 109 Quail Court        | 2/28/2022        |                        |  | LeFever Mattson           | 3/1/2022   |                        |   |                                   |
| 110 Quail Court        | 2/26/2021        |                        |  | LeFever Mattson           | 7/28/2021  |                        |   |                                   |
| 1200 Apple Tree Ct     | 4/4/2016         | \$1,057,300.00         | \$59,070.99 Trf/Exch<br>\$477,833.77 LFM (2)<br>\$550,000 Socotra Loan   | Beach Pine, LP            | 12/28/2022 | \$1,900,000.00         | \$760,000 Trf/Exch<br>\$1,140,000 Seller Carryback        | SOC00069563<br>LM_00003613        |
| 1220 E. Napa St        | 5/14/2021        | \$1,100,000.00         | \$1,105,500 LFM (3)  | Beach Pine, LP            | 12/28/2022 | \$1,600,000.00         | \$618,605.96 Trf/Exch<br>\$960,000 Seller Carryback       | LFM-S_00832307<br>LM_00003615     |
| 141-145 E. Napa Street | 10/30/2018       |                        |  | Sienna Pointe, LLC        | 9/8/2021   | \$2,500,000.00         | \$1,600,000 Trf/Exch<br>\$900,000 Existing Loan           | LFM-S_00342144<br>KSM_OCC_0175878 |
| 141-145 E. Napa Street | 9/15/2022        |                        |  | Sienna Pointe, LLC        | 9/21/2022  |                        |   |                                   |
| 151 E. Napa St         | 6/7/2021         | \$3,800,000.00         | \$2,101,415.47 Trf/Exch (5)<br>\$100,000 LFM<br>\$1,740,000 Socotra Loan | River Birch LP            | 6/10/2021  | \$3,950,000.00         | \$1,750,000 Trf/Exch<br>\$2,200,000 Seller Financing      | LFM-S_00245345<br>LFM-S_00491571  |
| 1549 E. Napa St        | 2/3/2020         | \$2,450,000.00         | \$73,500 LFM<br>\$586,000 KSMP (2)<br>\$1,800,000 New Loan               | Napa Elm, LP              | 7/15/2020  | \$2,450,000.00         | \$1,125,875 Trf/Exch<br>\$1,324,125 Existing Socotra Loan | KSM_OCC_0272736<br>LM_00003137    |
| 16721 Sonoma Highway   | 11/3/2022        | \$1,300,000.00         | \$39,000 Deposit<br>\$1,266,417.40 Buyer Credit                          | Buckeye Tree LP           | 11/8/2022  | \$1,725,000.00         | \$511,891.97 Trf/Exch<br>\$1,200,000 Seller Financing     | LFM-S_00245346<br>LM_00003638     |

## LeFever Mattson

## Summary of Property Transfers from KSMP to LeFever Mattson Debtors

| Address                   | KSMP Acquisition |                        |  | LFM Debtor Acquisition     |            |                        |   | Applicable Document(s)                               |
|---------------------------|------------------|------------------------|--|----------------------------|------------|------------------------|---|--|
|                           | Date             | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                                       | Buyer Entity               | Date       | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)  |  |
| 170 - 182 1st Street East | 6/30/2021        | \$3,150,000.00         | \$842,449.27 Trf/Exch<br>\$349,163 LFM<br>\$117,500 KSMP (2)<br>\$1,890,000 Socotra Loan | River Birch LP             | 7/1/2021   | \$3,225,000.00         | \$844,361.11 Deposit<br>\$1,890,000 Socotra Loan<br>Assumption<br>\$493,000 Additional Loan | LFM-S_00831561<br>LFM-S_00491573                     |
| 171 W. Spain Street       | 7/21/2021        | \$2,400,000.00         | \$1,075,564.58 Trf/Exch<br>\$50,000 LFM<br>\$1,320,000 Socotra Loan                      | Sienna Pointe, LLC         | 8/6/2021   | \$2,500,000.00         | \$1,184,670.00 Trf/Exch<br>\$1,320,000 Existing Loan  | LFM-S_00831562<br>LFM-S_00491579<br>KSM_OCC_0175989  |
| 17700 Sonoma Highway      | 4/5/2022         | \$1,350,000.00         | \$51,250 Deposit<br>\$778,529 Buyer Credit<br>\$810,000 Socotra Loan                     | Firetree III, LP           | 4/20/2022  | \$3,410,000.00         | \$1,413,080.73 From<br>Firetree III<br>\$2,010,000 Assumption of<br>Existing Loans          | LM_00068762<br>LM_00003658                           |
| 1870 Thornsberry Rd       | 8/11/2020        | \$2,700,000.00         | \$50,000 LFM (2)<br>\$1,014,307.88 Trf/Exch<br>\$1,700,000 FJM Loan                      | LeFever Mattson            | 11/13/2023 |                        |   | LFM-S_00831640                                       |
| 18701 Gehricke Rd         | 12/23/2019       | \$7,500,000.00         | \$3,509,134.73 Trf/Exch<br>\$4,000,000 Secured Loan                                      | Sienna Pointe, LLC         | 12/17/2021 | \$8,000,000.00         | \$4,250,000 Trf/Exch<br>\$3,750,000 Loan<br>Assumption                                      | FAMEXCO00002200<br>LFM-S_00342201<br>KSM_OCC_0177550 |
| 19340 7th St E            | 7/18/2018        | \$3,200,000.00         | \$3,297,917.48 LFM (2)   | Golden Tree, LP            | 8/21/2020  |                        |   | KSM_OCC_0331739                                      |
| 19450 Old Winery Rd       | 1/15/2021        | \$3,500,000.00         | \$1,646,222.15 Trf/Exch (2)<br>\$1,925,000 Socotra Loan                                  | RT Capitol Mall LP         | 5/4/2022   | \$5,000,000.00         | \$3,075,000 Trf/Exch<br>\$1,925,000 Socotra Loan<br>Assumption                              | LFM-S_00245378<br>LM_00003681                        |
| 201 Meadowlark            | 5/13/2022        | \$3,500,000.00         | \$50,000 Deposit<br>\$1,925,000 Socotra Loan<br>\$1,589,921.64 Unaccounted               | Firetree III, LP           | 5/24/2022  | \$3,600,000.00         | \$1,662,610.95 Trf/Exch<br>\$1,925,000 Seller Financing<br>\$12,389.05 Loan<br>Assumption   | SOC00037731<br>LM_00003662                           |
| 2030 E Grayson Rd         | 8/3/2007         |                        |  | Valley Oak Investments, LP | 7/17/2020  | \$3,950,000.00         | \$3,241,055.74 Trf/Exch<br>\$829,961.00 Existing Loan                                       | LM_00003338  |
| 20564 Broadway            | 9/13/2022        | \$1,750,000.00         | \$50,000 Earnest Money<br>\$1,702,025.35 Unaccounted                                     | Black Walnut, LP           | 12/19/2022 | \$1,750,000.00         | \$875,000 Trf/Exch<br>\$875,000 Seller Carryback  | STCA00001835<br>LM_00003625                          |
| 21885 Eighth St E         | 8/4/2021         | \$6,100,000.00         | \$1,600,000 New Loan<br>\$2,200,000 New Loan<br>\$2,286,703.49 Unaccounted               | Yellow Poplar, LP          | 8/6/2021   | \$6,250,000.00         | \$2,122,834.55 Trf/Exch<br>\$2,200,000 Existing Loan<br>\$1,900,000 KSMP Loan               | LFM-S_00245381<br>LM_00003352                        |

## LeFever Mattson

## Summary of Property Transfers from KSMP to LeFever Mattson Debtors

| Address                          | KSMP Acquisition |                        |  | LFM Debtor Acquisition     |            |                        |   | Applicable Document(s)           |
|----------------------------------|------------------|------------------------|--|----------------------------|------------|------------------------|---|----------------------------------|
|                                  | Date             | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                               | Buyer Entity               | Date       | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)  |                                  |
| 222-226 W. Spain St              | 3/16/2020        | \$2,600,000.00         | \$3,064.38 Trf/Exch<br>\$1,605,000 LFM (2)<br>\$1,000,000 HTSA                   | RT Capitol Mall LP         | 6/9/2022   | \$4,500,000.00         | \$3,200,000 Trf/Exch<br>\$1,300,000 Seller Financing  | LM_00022101<br>LM_00003683       |
| 222-226 W. Spain St              | 9/15/2022        |                        |  | RT Capitol Mall LP         | 9/28/2022  |                        |   |                                  |
| 23250 Maffei Road                | 3/26/2021        |                        |  | Sienna Pointe, LLC         | 9/23/2021  | \$2,500,000.00         | \$1,250,000 Trf/Exch<br>\$1,250,000 Existing Loan   | LFM-S_00342364<br>LFM-S_00257231 |
| 24120 Arnold Dr                  | 3/7/2019         | \$4,750,000.00         | \$100,000 LFM (2)<br>\$2,369,614.21 KSMP<br>\$2,375,000 Socotra Loan             | Windscape Apartments, LLC  | 9/21/2022  | \$8,000,000.00         | \$5,600,000 Trf/Exch<br>\$2,400,000 Loan<br>Assumptoin  | LFM-S_00831483<br>LM_00003743    |
| 24160 Turkey Rd/24237 Arnold Rd. | 3/28/2022        | \$2,600,000.00         | \$50,000 Earnest Money<br>\$325,000 Seller Carryback<br>\$1,312,500 Socotra Loan | Windscape Apartments, LLC  | 7/21/2022  | \$3,250,000.00         | \$1,300,000 Trf/Exch<br>\$1,950,000 Loan<br>Assumption  | LFM-S_00851890<br>LM_00003745    |
| 24265 Arnold Dr                  | 12/24/2019       | \$1,250,000.00         | \$400,738.46 Trf/Exch<br>\$37,500 LFM<br>\$816,729.50 HTSA                       | Napa Elm, LP               | 7/15/2020  | \$1,400,000.00         | \$291,876.25 Trf/Exch<br>\$729,625 Socotra Loan<br>Assumption<br>\$378,498.75 Seller<br>Carryback | FAMEXCO00002201<br>LM_00003139   |
| 24321 Arnold Dr                  | 1/7/2020         | \$1,650,000.00         | \$1,655,275.46 LFM (2)   | Napa Elm, LP               | 4/26/2022  | \$1,656,000.00         | \$767,250 Trf/Exch<br>\$888,750 Existing Socotra<br>Loan  | KSM_OCC_0272735<br>LM_00003141   |
| 2787 Woodmont Drive              | Unknown          |                        |  | Valley Oak Investments, LP | 5/21/2021  | \$560,000.00           | \$178,058.25 Trf/Exch<br>\$344,038.27 Loan<br>Assumption<br>\$37,903.48 Additional Loan           | LFM-S_00491590                   |
| 282 Patten St                    | 2/19/2020        | \$1,325,000.00         | \$794,862.21 Trf/Exch<br>\$39,750 LFM<br>\$500,000 New Loan                      | Unknown                    | Unknown    |                        |   | LM_00003144                      |
| 282 Patten St                    | 9/15/2022        |                        |  | Beach Pine, LP             | 12/28/2022 | \$1,800,000.00         | \$720,000 Trf/Exch<br>\$1,080,000 Seller<br>Carryback   | LM_00003617                      |
| 302/310 1st Street East          | 2/26/2019        | \$4,030,000.00         | \$1,579,595.38 LFM (2)<br>\$50,000 KSMP<br>\$2,350,000 Socotra Loan              | LeFever Mattson            | 1/21/2020  |                        |   | LFM-S_00245412                   |
| 302/310 1st Street East          | 5/9/2023         |                        |  | Sienna Pointe, LLC         | 5/9/2023   |                        |   |                                  |

## LeFever Mattson

## Summary of Property Transfers from KSMP to LeFever Mattson Debtors

| Address   | KSMP Acquisition |                        |   | LFM Debtor Acquisition       |            |                        |   | Applicable Document(s)                             |
|---|------------------|------------------------|---|------------------------------|------------|------------------------|---|--|
|   | Date             | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                      | Buyer Entity                 | Date       | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                |  |
| 304 First St E  | 12/3/2019        | \$800,000.00           | \$815,000 LFM (4)   | Sienna Pointe LLC            | 10/5/2021  | \$1,000,000.00         | \$1,000,000 Trf/Exch  | LFM-S_00245414<br>LFM-S_00342522<br>LFM-S_00342531 |
| 333 Wilkerson Ave.<br>371 Wilkerson Ave.<br>411 Wilkerson Ave<br>No Address | 1/23/2018        |                        |   | Windtree LP                  | 4/11/2018  | \$8,500,000.00         | \$4,725,747.22 Trf/Exch<br>\$4,000,000 Socotra Loan<br>Assumption | LM_01124188<br>IPX_00004650                        |
| 333 Wilkerson Ave.<br>371 Wilkerson Ave.<br>411 Wilkerson Ave<br>No Address | 3/16/2023        |                        |   | Windtree LP                  | 3/16/2023  |                        |   |  |
| 377 West Spain Street   | 9/10/2021        |                        |   | Beach Pine, LP               | 12/28/2022 | \$1,500,000.00         | \$600,000 Trf/Exch<br>\$900,000 Existing Loan                     | LM_00003619  |
| 391-455 Oak Street<br>19173 Railroad Ave                                    | 10/7/2022        | \$1,000,000.00         | \$30,000 Deposit<br>\$972,189.21 KSMP Buyer<br>Credit (2)               | Black Walnut, LP             | 12/19/2022 | \$1,000,000.00         | \$500,000 Trf/Exch<br>\$500,000 Seller Carryback                  | LFM-S_00245446<br>LM_00003630                      |
| 424 2nd St W  | 1/29/2021        | \$1,100,000.00         | \$3,000 Trf/Exch<br>\$530,457.73 LFM (3)<br>\$600,000 Socotra Loan      | Windscape<br>Apartments, LLC | 10/4/2022  | \$1,500,000.00         | \$900,000 Trf/Exch<br>\$600,000 Loan Assumption                   | LFM-S_00245447<br>LFM-S_00836351                   |
| 430 W. Napa St  | 1/9/2017         |                        |   | Tradewinds<br>Apartments, LP | 3/1/2018   | \$3,250,000.00         | \$2,669,797.94 Trf/Exch<br>\$992,521.10 Existing Loan             | LM_01368575  |
| 430 W. Spain St   | 3/29/2019        | \$2,800,000.00         | \$1,251,424.08 LFM (6)<br>\$1,600,000 Socotra Loan                      | Seinna Pointe, LLC           | 12/16/2021 | \$3,000,000.00         | \$3,000,000 Trf/Exch  | LFM-S_00245448<br>LM_00823014                      |
| 446 W. Napa St  | 7/19/2022        | \$1,600,000.00         | \$48,000 Earnest Money<br>\$636,640.39 KSMP<br>\$960,000 Socotra Loan   | Windscape<br>Apartments, LLC | 8/3/2022   | \$1,666,666.67         | \$712,666.67 Trf/Exch<br>\$954,000 Seller Financing               | LFM-S_00245529<br>LFM-S_00836437                   |
| 453/457/459 2nd St W  | 7/1/2021         | \$1,825,000.00         | \$627,250 KSMP (3)<br>\$1,200,000 Secured Loan                          | Firetree III, LP             | 4/1/2022   |                        |   | LFM-S_00831937                                     |
| 454 W. Napa St  | 7/22/2022        | \$1,500,000.00         | \$50,000 Earnest Money<br>\$565,604.33 KSMP<br>\$900,000 Socotra Loan   | Windscape<br>Apartments, LLC | 8/3/2022   | \$1,666,666.67         | \$712,666.67 Trf/Exch<br>\$954,000 Seller Financing               | LFM-S_00831488<br>LFM-S_00836437                   |
| 462 W Napa St   | 7/22/2022        | \$1,670,000.00         | \$50,000 Earnest Money<br>\$643,594.09 KSMP<br>\$1,002,000 Socotra Loan | Windscape<br>Apartments, LLC | 8/3/2022   | \$1,666,666.67         | \$712,666.67 Trf/Exch<br>\$954,000 Seller Financing               | LFM-S_00831487<br>LFM-S_00836437                   |
| 4920 Samo Lane  | 10/24/2016       | \$685,000.00           | \$286,600.88 Trf/Exch<br>\$403,512.42 LFM (2)                           | LeFever Mattson              | 11/14/2016 |                        |   | LM_01090477  |

## LeFever Mattson

## Summary of Property Transfers from KSMP to LeFever Mattson Debtors

| Address  | KSMP Acquisition |                        |   | LFM Debtor Acquisition       |            |                        |   | Applicable Document(s)        |
|--|------------------|------------------------|---|------------------------------|------------|------------------------|---|-------------------------------|
|  | Date             | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)                              | Buyer Entity                 | Date       | Cost<br>(if available) | Source(s) of Acquisition<br>Cost<br>(if available)  |                               |
| 4950 Allison Parkway<br>4960 Allison Parkway<br>4970 Allison Parkway | 6/30/2020        |                        |   | Beach Pine, LP               | 8/19/2020  | \$6,500,000.00         | \$2,494,195.19 Trf/Exch<br>\$4,000,000 Existing Loan                                      | LM_00003150                   |
| 5120 Lovall Valley Rd  | 10/14/2020       | \$2,800,000.00         | \$75,000 LFM (2)<br>\$1,225,438.33 KSMP<br>\$1,500,000 Seller Carryback<br>Note | Golden Tree, LP              | 11/10/2020 |                        |   | LM_00121222                   |
| 520/530/532 Studley St<br>525 W Napa St                              | 9/19/2022        |                        |   | Windscape<br>Apartments, LLC | 11/1/2022  | \$7,500,000.00         | \$2,625,000 Trf/Exch<br>\$4,875,000 Seller Financing                                      | LFM-S_00836752                |
| 596 3rd St E   | 8/23/2022        |                        |   | Ginko Tree LP                | 11/8/2022  | \$1,650,000.00         | \$338,479.23 Trf/Exch<br>\$1,300,000 Seller Financing                                     | LM_00003666<br>SOC00031690    |
| 653 3rd Street W   | 11/8/2022        | \$1,650,000.00         | \$49,500 Deposit<br>\$1,608,853.16 Unaccounted                                  | Black Walnut, LP             | 12/19/2022 | \$1,650,000.00         | \$825,000 Trf/Exch<br>\$825,000 Seller Carryback  | LFM-S_00245692<br>LM_00003632 |
| 786 Broadway<br>790 Broadway   | 4/18/2022        |                        |   | Firetree I, LP               | 4/26/2022  | \$3,125,000.00         | \$1,305,544.86 Trf/Exch<br>\$1,800,000 Seller Financing<br>\$19,455.14 Loan<br>Assumption | LM_00003654                   |
| 789 Cordilleras  | 9/8/2022         | \$2,100,000.00         | \$50,000 Deposit<br>\$2,052,394.37 KSMP Buyer<br>Credit                         | Black Walnut, LP             | 12/19/2022 | \$2,100,000.00         | \$1,050,000 Trf/Exch<br>\$1,050,000 Existing Loan   | LFM-S_00245693<br>LM_00003634 |
| 900 E Napa St  | 12/26/2018       |                        |   | Windscape<br>Apartments, LLC | 9/12/2022  | \$2,740,000.00         | \$1,940,000 Trf/Exch<br>\$800,000 Seller Financing  | LFM-S_00836981                |
| 921 Broadway   | 4/13/2018        | \$2,500,000.00         | \$2,435,146.14 Trf/Exch<br>\$75,000 LFM   | RT Capitol Mall LP           | 5/20/2022  | \$3,500,000.00         | \$1,900,000 Trf/Exch<br>\$1,600,000 Seller Financing                                      | LM_00082930<br>LM_00003685    |
| 925-927 Broadway   | 11/8/2018        |                        |   | Sienna Pointe, LLC           | 8/17/2021  | \$2,500,000.00         | \$1,754,750 Trf/Exch<br>\$750,000 Existing Loan   | FAMEXCO00007961               |
| 925-927 Broadway   | 9/15/2022        |                        |   | Sienna Pointe, LLC           | 9/28/2022  |                        |   |                               |