

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

In re

LEFEVER MATTSON, a California
corporation, et al.

Debtors.¹

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,

Debtor.

Judge: Hon Charles Novack

**STATEMENT OF FINANCIAL AFFAIRS FOR
KS MATTSON PARTNERS, LP, CASE NO. 24-10715 (CN)**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. 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>.

IN RE KS MATTSON PARTNERS, LP

CASE NO. 24-10715 (CN)

**GENERAL NOTES AND STATEMENT OF LIMITATIONS, METHODOLOGY, AND
DISCLAIMERS REGARDING DEBTOR'S SCHEDULES OF ASSETS AND
LIABILITIES; STATEMENTS OF FINANCIAL AFFAIRS; AND LIST OF EQUITY
SECURITY HOLDERS**

On November 22, 2024 (the "Petition Date"), an involuntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") was filed against KS Mattson Partners, LP (the "Debtor") with the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court"). On June 9, 2025 (the "Relief Date"), the Bankruptcy Court entered the *Stipulated Order for Relief in an Involuntary Case* [Docket No. 131]. On June 24, 2025, the Bankruptcy Court entered the *Final Order Authorizing Designation of Robbin L Itkin as Responsible Individual Pursuant to B.L.R. 4002-1* [Docket No. 172] (the "Responsible Individual Order"). The Responsible Individual Order appointed Robbin L. Itkin as the Debtor's Responsible Individual (in such capacity, the "Responsible Individual") effective as of June 16, 2025. On July 29, 2025, the Bankruptcy Court entered the *Stipulated Bridge Order in Connection with the Motion to Substantively Consolidate the Bankruptcy Estates of LeFever Mattson and KS Mattson Partners, LP* [Case No. 24-10545, Docket No. 1887], pursuant to which, among other things, for procedural purposes only pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), the Bankruptcy Court ordered administrative consolidation of the Debtor's chapter 11 case with the jointly administered chapter 11 cases captioned *In re LeFever Mattson, a California corporation, et al.*, Lead Case No. 24-10545 (CN) (collectively, the "Chapter 11 Cases"). The Debtor is authorized to operate its business and manage its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

The Debtor's former principal, Kenneth Mattson, was indicted in May 2025 and has no authority on behalf of the Debtor. Ms. Itkin was appointed the Responsible Individual is serving the Debtor's bankruptcy estate in a fiduciary capacity to protect the rights of creditors and victims and maximize value for the benefit of all stakeholders.

OVERVIEW OF GENERAL NOTES

The Debtor has herewith filed its Schedules of Assets and Liabilities ("Schedules"), Statement of Financial Affairs ("Statements"), and List of Equity Security Holders ("Lists"). These *General Notes and Statement of Limitations, Methodology, and Disclaimers Regarding Debtor's Schedules of Assets and Liabilities, Statements of Financial Affairs, and List of Equity Security Holders* (the "General Notes") relate to the Debtor's Schedules, Statements, and Lists and set forth the basis upon which the Schedules, Statements, and Lists are presented. **These General Notes pertain to, are incorporated by reference in, and comprise an integral part of the Schedules, Statements, and Lists and should be referred to and considered in connection with any review of the Schedules, Statements, and Lists.** The General Notes are in addition to any specific notes contained in any Debtor's Schedules, Statements, and Lists. Disclosure of information in one Schedule, Statement, or List, exhibit, or continuation sheet, even if incorrectly placed, shall be

deemed to be disclosed in the correct Schedule, Statement, or List, exhibit, or continuation sheet. Nothing contained in the Schedules, Statements, and Lists shall constitute a waiver of any rights or claims of the Debtor against any third party, or in or with respect to any aspect of these Chapter 11 Cases.

The Schedules, Statements, Lists, and General Notes should not be relied upon by any person for information relating to the current or future financial conditions, events, or performance of the Debtor.

The Schedules, Statements, and Lists have been prepared, pursuant to section 521 of the Bankruptcy Code and Bankruptcy Rule 1007, by the Debtor's proposed Operations and Assets Manager, Stapleton Group, a part of JS Held, LLC ("Stapleton") with the assistance of the Debtor's counsel. The Debtor has no management or employees and no traditional books and records. The Debtor's books and records were seized by the United States Government in May 2024. The Schedules, Statements and Lists were prepared from financial data derived from public records, information obtained in discovery, due diligence and other limited information (such as bank records, from known documents, and vendor account statements) that has been obtained by the Responsible Individual, Stapleton and the Debtor's other advisors. Neither the Responsible Individual nor Stapleton is aware of the system previously used for the financial management of the Debtor. The information contained within these Schedules, Statements and Lists is subject to significant change if additional information becomes available.

The Schedules, Statements, and Lists contain unaudited information, which is subject to further review and, quite likely, adjustment. While the Debtor has made reasonable efforts to ensure that the Schedules, Statements and Lists are as accurate and comprehensive as possible under the circumstances, based on the limited information that was available at the time of preparation, subsequent information or discovery thereof may result in material changes to the Schedules, Statements, and Lists, and inadvertent errors or omissions may exist. Because the Debtor continues to receive new information regarding the information contained in these Schedules, Statements and Lists on a nearly daily basis, the Debtor cautions that the information contained therein is likely to be incomplete and to change.

Nothing contained in the Schedules, Statements, and Lists shall constitute a waiver of any of the Debtor's rights with respect to the Chapter 11 Cases, including with respect to any issues involving substantive consolidation, recharacterization, equitable subordination, and/or causes of action arising under the provisions of chapter 5 of the Bankruptcy Code and other relevant non-bankruptcy laws to recover assets or avoid transfers.

The Debtor and its agents, attorneys, and financial advisors expressly do not undertake any obligation to update, modify, revise, or re-categorize the information provided herein, or to notify any third party for any direct, indirect, incidental, consequential, or special damages (including, but not limited to, damages arising from the disallowance of a potential claim against the Debtor or damages to business reputation, lost business, or lost profits), whether foreseeable or not and however caused, even if the Debtor or its agents, attorneys, and financial advisors are advised of the possibility of such damages.

The Debtor reserves all rights to amend, modify, or supplement the Schedules, Statements, and Lists from time to time, in all respects, as may be necessary or appropriate, including, but not limited to, the right to dispute or otherwise assert offsets or defenses to any claim or interest reflected on the Schedules, Statements, and Lists as to amount, liability or classification, or to otherwise subsequently designate any claim as “disputed,” “contingent,” or “unliquidated.” Furthermore, nothing contained in the Schedules, Statements, and Lists shall constitute an admission of any claims or a waiver of any of the Debtor’s rights with respect to the Chapter 11 Cases, including with respect to any issues involving causes of action arising under the provisions of chapter 5 of the Bankruptcy Code and other relevant non-bankruptcy laws to recover assets or avoid transfers.

The Schedules, Statements, and Lists have been signed by the Responsible Individual. In reviewing and signing the Schedules, Statements, and Lists, the Responsible Individual necessarily relied upon the efforts, statements, and representations of Stapleton and the Debtor’s counsel. The Responsible Individual has not (and could not have) personally verified the accuracy of each such statement and representation, including, without limitation, statements and representations concerning amounts owed to creditors, classification of such amounts, and their addresses. In addition, the Responsible Individual has no personal knowledge of any matters arising prior to her appointment on June 16, 2025.

Schedules, Statements, and Lists General Notes

1. Value of Assets. Given the lack of any traditional books and records, the Debtor does not have “book values” for its assets. The Debtor’s principal assets are real estate assets, which are comprised of residential, retail, office, agricultural and mixed-use properties in which the Debtor has various interests. It would be prohibitively expensive, unduly burdensome, and an inefficient use of estate assets for the Debtor to obtain current market valuations for all its assets and certain estate assets are contemplated to be marketed for sale. For these reasons, the values of certain of the Debtor’s assets are undetermined or unknown. Values reflected are the Debtor’s best estimate of values on or around the Relief Date, using, in the case of the Debtor’s real estate assets, the lesser of available market data and broker opinions of values. The Debtor’s interests are based on analysis of title documents and may be subject to other claims and other documents not yet identified. Certain other assets may be listed as “unknown” amounts. Additionally, amounts ultimately realized may differ materially from net book value (or whatever value was ascribed). Certain depreciable assets with a net book value of zero (\$0) may also be included for completeness. The Debtor has not performed an analysis of impairment of fixed assets, goodwill, or other intangibles. The Debtor does not intend to amend these Schedules and Statements to reflect actual values.

2. “As of” Information Date. To the best of the Responsible Individual’s knowledge, except as expressly noted otherwise, all asset values in Schedule A/B and all claim amounts in Schedule D and Schedule E/F are as of Relief Date. However, due to the limited information available from the Debtor and the varying “as of” dates on source information and data compiled during these Chapter 11 Cases, the “as of” dates on the Schedules and Statements are inconsistent and cover a range of months. Amounts ultimately realized may vary from net book value (or

whatever value was ascribed) and such variance may be material. Accordingly, the Debtor reserves all rights to amend or adjust the value of each asset set forth herein. In addition, the amounts shown for total liabilities exclude items identified as “unknown,” “disputed,” “contingent,” “unliquidated,” or “undetermined,” and, thus, ultimate liabilities may differ materially from those stated in the Schedules and Statements.

3. Basis of Presentation. Information contained in the Schedules and Statements has been derived from the limited information in the Debtor’s possession as the Debtor does not have traditional books and records. The Schedules and Statements do not purport to represent financial statements prepared in accordance with United States Generally Accepted Accounting Principles (“GAAP”) and does not include all the information and footnotes required by GAAP. The financial information disclosed herein was not prepared in accordance with federal or state securities laws or other applicable non-bankruptcy laws. The financial information included in the Schedules and Statements has not been subjected to procedures that would typically be applied to financial information presented in accordance with GAAP or any other recognized financial reporting framework, and, upon application of such procedures, the Debtor believes that the financial information could be subject to changes, and these changes could be material.

4. Amendment. Reasonable efforts have been made to prepare and file Schedules, Statements, and Lists that are as complete and accurate as possible given the limited information in the Debtor’s possession. Despite these efforts, inadvertent errors or omissions may (and, given the lack of information, are likely to) exist. The Debtor reserves all rights to, but is not required to, amend and/or supplement the Schedules, Statements, and Lists from time to time as is necessary and appropriate.

5. Incomplete Answers. As set forth in more detail in the specific disclosures with respect to the Debtor’s schedules, there are several “yes” / “no” questions that the Debtor is unable to answer as the Responsible Individual and the Debtor’s professionals lack the information to enable the Debtor to answer these questions.

6. Recharacterization. The Debtor has made reasonable efforts to correctly characterize, classify, categorize, and designate assets, liabilities, executory contracts, unexpired leases, and other items reported in the Schedules and Statements. However, due to the complexity and size of the Debtor’s business and operations, the lack of traditional books and records, and limited information available to the Responsible Individual, the Debtor may have improperly characterized, classified, categorized, or designated certain items. The Debtor reserves all rights to recharacterize, reclassify, recategorize, or redesignate items reported in the Schedules and Statements as necessary or appropriate as additional information becomes available, including, without limitation, whether contracts or leases listed herein were deemed executory or unexpired as of the Petition Date and remain executory and unexpired postpetition.

7. Confidentiality. There may be instances in the Schedules, Statements, and Lists where the Debtor has deemed it necessary and appropriate to redact or withhold from the public record information such as names, addresses, or amounts. Typically, the Debtor has used this approach because of an agreement between the Debtor and a third party, concerns of confidentiality, or concerns for the privacy of an individual.

8. Currency. Unless otherwise indicated, all amounts are reflected in U.S. dollars.

9. Liabilities. The Debtor has sought to allocate liabilities between the prepetition and postpetition periods based on information and research that was conducted or available in connection with the preparation of the Schedules and Statements. As additional information becomes available and further research is conducted, the allocation of liabilities between prepetition and postpetition periods may change. The Debtor reserves rights to amend, supplement, or otherwise modify the Schedules and Statements as they deem necessary or appropriate. The liabilities listed on the Schedules and Statements do not reflect any analysis of claims under section 503(b)(9) of the Bankruptcy Code. Accordingly, the Debtor reserves all rights to dispute or challenge the validity of any asserted claims under section 503(b)(9) of the Bankruptcy Code or the characterization of the structure of any such transaction or any document or instrument related to any creditor's claim.

10. Property and Equipment. Unless otherwise indicated, owned property and equipment are presented at net book value. However, as noted above, given the lack of any traditional books and records, the Debtor has limited information on assets other than real estate assets (see General Note 1).

11. Executory Contracts and Unexpired Leases. The listing of a contract or lease in the Schedules shall not be deemed an admission that such contract is an executory contract or unexpired lease, or that it is necessarily a binding, valid, and enforceable agreement. The Debtor hereby expressly reserves the right to assert that any contract or lease listed on the Debtor's Schedules does not constitute an executory contract or unexpired lease within the meaning of section 365 of the Bankruptcy Code.

12. Leases. The Responsible Individual does not know whether the Debtor may lease real property, furniture, fixtures, and equipment from certain third-party lessors. The Responsible Individual is not currently aware of any such leases.

13. Causes of Action. Despite her reasonable efforts to identify all known assets, the Responsible Individual may not have listed all of the Debtor's causes of action or potential causes of action against third parties as assets in its Schedules and Statements, including, without limitation, avoidance actions arising under chapter 5 of the Bankruptcy Code and actions under other relevant non-bankruptcy laws to recover assets. The Debtor is engaged in fact gathering and analyzing potential claims and causes of action. The Debtor reserves all its rights with respect to any claims, causes of action or avoidance actions it may have, and neither these General Notes nor the Schedules and Statements shall be deemed a waiver of any such claims, causes of action, or avoidance actions or in any way prejudice or impair the assertion of such claims.

14. Taxes. Claims listed on the Debtor's Schedule E/F include claims owing to various taxing authorities to which the Debtor may potentially be liable. However, certain of such claims may be subject to ongoing audits and the Debtor is otherwise unable to determine with certainty the amount of many, if not all, of the claims listed on Schedule E/F. Therefore, the Debtor has listed estimated claim amounts, where possible, or alternatively listed such claims as unknown in

amount and marked the claims as unliquidated and disputed, pending final resolution of ongoing audits or other outstanding issues. The Debtor reserves its rights to dispute or challenge whether such claims are entitled to priority.

15. Unknown Amounts. Claim amounts that could not readily be quantified by the Debtor are scheduled as “unknown.” These may include claims for prepetition services for which the Debtor has not yet received invoices or for which the Debtor has limited or no accounting information. The description of an amount as “unknown” is not intended to reflect upon the materiality of the amount.

16. Excluded Assets and Liabilities. Other non-material assets and liabilities may have been excluded from the Schedules.

17. Claim Description. Any failure to designate a claim in the Schedules and Statements as “contingent,” “unliquidated,” or “disputed” does not constitute an admission that such claim or amount is not “contingent,” “unliquidated,” or “disputed.” The Debtor reserves all of its rights to dispute, or to assert offsets or defenses to, any claim reflected on these Schedules and Statements on any grounds, including, without limitation, amount, liability, priority, status, or classification, or to otherwise subsequently designate any claim as “contingent,” “unliquidated,” or “disputed.” Moreover, although the Debtor may have scheduled claims of various creditors as secured claims for informational purposes, no current valuation of the Debtor’s assets in which such creditors may have a lien has been undertaken. Moreover, the Debtor reserves all rights to, but is not required to, amend, supplement, or otherwise modify the Schedules and Statements as necessary and appropriate, including modifying claims descriptions and designations.

18. Debt Representatives. Claims relating to the repayment of principal, interest and other fees and expenses under agreements governing any syndicated credit facility where the identities of the lenders or other parties in interest are not known with certainty are scheduled listing the administrative agent under the applicable credit facility.

19. Unliquidated Claim Amounts. Claim amounts that could not be readily quantified by the Debtor are scheduled as “unliquidated.” To the extent the Debtor is able to ascertain or estimate all or a portion of the claim amounts, it may have listed the known or estimated claim amount and marked the claims as unliquidated, pending final resolution of outstanding issues necessary to determine the total claim amount with certainty.

20. Liabilities. The Debtor has sought to allocate liabilities between prepetition and postpetition periods based on the information and research that was conducted in connection with the preparation of the Schedules and Statements. As additional information becomes available and further research is conducted, the allocation of liabilities between prepetition and postpetition periods may change. The Debtor reserves its right to, but is not required to, amend the Schedules and Statements as it deems appropriate to reflect this.

21. Guarantees and Other Secondary Liability Claims. The Debtor has used commercially reasonable efforts to locate and identify guarantees and other secondary liability claims (collectively, the “Guarantees”) in its executory contracts, unexpired leases, secured

financings, debt instruments, and other such agreements. Where Guarantees have been identified, they have been included in the relevant Schedules D, E/F, G and H for the Debtor. Guarantees have generally been included in Schedules of the Debtor as “contingent” unless otherwise specified. While the Debtor has used commercially reasonable efforts to locate and identify Guarantees, it is possible that Guarantees embedded in the Debtor’s executory contracts, unexpired leases, secured financings, debt instruments, and other such agreements may have been inadvertently omitted. The Debtor reserves its rights to, but is not required to, amend, supplement, or modify the Schedules if additional Guarantees are identified.

22. Intellectual Property Rights. Exclusion of certain intellectual property shall not be construed to be an admission that those intellectual property rights have been sold, abandoned, or terminated, or otherwise have expired by their terms, or have been assigned or otherwise transferred pursuant to a sale, acquisition, or other transaction. Conversely, inclusion of certain intellectual property shall not be construed to be an admission that those intellectual property rights have not been abandoned, have not been terminated, or otherwise have not expired by their terms, or have not been assigned or otherwise transferred pursuant to a sale, acquisition, or other transaction. Accordingly, the Debtor reserves all rights as to the legal status of all intellectual property rights.

23. Totals. All totals that are included in the Schedules and Statements represent totals of all the known amounts included in the Schedules and Statements and exclude items identified as “unknown.” In addition, the Debtor has, in many cases, listed claim amounts as “unliquidated.” If there are unknown amounts, the actual totals may be materially different from the listed totals.

24. Joint Ownership of Debtor’s Properties. The Debtor co-owns and operates certain investment properties. Where applicable, amounts in the Schedules and Statements have been apportioned based on this co-ownership. Attached to these General Notes as Annex A is a table of properties co-owned by the Debtor and the percentage interests reflected on record title. The Debtor has been made aware of several individuals and entities that allege to hold co-ownership interests in one or more of the Debtor’s properties that are not reflected on title records.

25. Global Notes Control. If the Schedules, Statements and Lists differ from the Global Notes, the Global Notes shall control.

Specific Disclosures with Respect to the Debtor’s Schedules

26. Schedule A/B – Assets: Real and Personal Property. Real property is reported using the lesser of available market data and broker opinions of values. The Debtor’s interests are based on analysis of title documents and may be subject to other claims and other documents not yet identified. The Debtor may have listed certain assets as real property when such assets are in fact personal property, or the Debtor may have listed certain assets as personal property when such assets are in fact real property. The Debtor reserves all rights to re-categorize or re-characterize such asset holdings to the extent the Debtor determines that such holdings were listed incorrectly. The Debtor’s failure to list any rights in real property on Schedule A/B should not be construed as a waiver of any such rights that may exist, whether known or unknown at this time. Despite the Debtor’s reasonable efforts to identify all known assets, the Debtor may not have listed all the

estate's Causes of Action or potential Causes of Action against third parties as assets in the Schedules and Statements. The Debtor reserves all the estate's rights with respect to any Causes of Action that the estate may have, and neither these Global Notes nor the Schedules and Statements shall be deemed a waiver of any such claims, causes of action, or avoidance actions or in any way prejudice or impair the assertion of such claims. The current value of the Debtor's interest in checking, savings, money market, or financial brokerage accounts listed on Schedule A/B is as of the Relief Date.

Given the lack of traditional books and records, the Debtor has listed the current value of its interest in non-publicly traded stock and interests in partnerships, etc. as "unknown."

The Debtor holds potential causes of action against Kenneth Mattson, Stacy Mattson, KS Mattson Company LLC and other individuals and entities related to certain transactions effected by Mr. Mattson prior to the Petition Date.

27. Schedule A/B: Part 3, Q.11 (Accounts Receivable): The Responsible Individual believes that the Debtor likely has accounts receivable relating to rents that were not collected prior to the Relief Date or are otherwise overdue. However, the amount and age of such receivables is not known.

28. Schedule A/B; Property Purchased Within the Last 20 Days: Multiple questions in Schedule A/B (e.g., Part 5; Q.25; Part 6, Q.35 ask whether any property in the applicable Part was purchased within 20 days before the bankruptcy was filed. The Debtor is unable to answer these questions either "yes" or "no." The Responsible Individual has no information on the date of any such purchase.

29. Schedule A/B; Appraisals: Multiple questions in Schedule A/B (e.g., Part 5; Q.26; Part 6, Q.37; Part 7, Q.45; Part 8, Q. 53; Part 9, Q. 58; Part 10, Q. 69; Part 11, Q. 79) ask whether property has been appraised by a professional within the last year. The Debtor is unable to answer these questions either "yes" or "no." While the Responsible Individual is not aware of any such appraisals, the Responsible Individual does not know what appraisals Kenneth Mattson or another individual may have obtained.

30. Schedule A/B, Part 6 (Farming and fishing-related assets):

Q.28: The Debtor owns a vineyard at 2500 Castle Road, Sonoma. The value of the grapes in that vineyard is to be determined.

Q.30: The Debtor understands that Kenneth Mattson mowed the vineyard at 2500 Castle Road, Sonoma. The Debtor is investigating whether any equipment used to mow the vineyard belongs to the Debtor.

31. Schedule A/B, Part 7, Questions 38 through 44 (Office furniture, fixtures, and equipment; and collectibles): The Responsible Individual does not know what office furniture, fixtures, equipment or collectibles may be owned by the Debtor.

32. Schedule A/B, Part 8 (Machinery, equipment, and vehicles): The Responsible Individual does not know what machinery, equipment or vehicles the Debtor may own or lease. The Responsible Individual understands that Kenneth Mattson ran a business called Specialty Sales Classics, Inc., which consigned and/or purchased classic cars. The Debtor understands that business is now closed. The Debtor reserves all rights regarding ownership of any vehicles that may be titled in the name of Kenneth Mattson or another entity affiliated by him.

33. Schedule A/B, Part 10 (Intellectual Property), Q.59: While the Responsible Individual is not aware of the Debtor having interests in intangibles or intellectual property, the Debtor lacks sufficient information to answer this question “yes” or “no.”

34. Schedule D: Creditors Holding Secured Claims. Except as otherwise agreed pursuant to a stipulation or agreed order or general order entered by the Bankruptcy Court, the Debtor reserves its rights to dispute or challenge the validity, perfection or immunity from avoidance of any lien purported to be granted or perfected in any specific asset to a secured creditor listed on Schedule D of the Debtor. Certain claims may be listed on Schedule D as “unliquidated” because the value of the collateral securing such claims is unknown. Moreover, although the Debtor may have scheduled claims of various creditors as secured claims, the Debtor reserves all rights to dispute or challenge the secured nature of any such creditor’s claim or the characterization of the structure of any such transaction or any document or instrument (including without limitation, any intercompany agreement) related to such creditor’s claim. In certain instances, the Debtor may be a co-obligor, co-mortgagor or guarantor with respect to scheduled claims of other debtors in the Chapter 11 Cases, and no claim set forth on Schedule D of the Debtor is intended to acknowledge claims of creditors that are otherwise satisfied or discharged by other entities. The descriptions provided in Schedule D are intended only to be a summary. Reference to the applicable loan agreements and related documents is necessary for a complete description of the collateral and the nature, extent and priority of any liens. Nothing in the General Notes or the Schedules and Statements shall be deemed a modification or interpretation of the terms of such agreements.

In addition, there are instances where one debt is secured by two or more pieces of property owned by the Debtor. Out of an abundance of caution, the Debtor has scheduled the applicable debt separately for each piece of collateral.

In addition, certain parties have asserted claims against the Debtor allegedly secured by property of the estate where the Debtor may have sold or may no longer have an interest in the property. The Debtor reserves all rights as to such claims and as to its rights to the property allegedly securing such claims.

35. Schedule E/F, Part 1: Creditors Holding Priority Unsecured Claims. The listing of any claim on Schedule E/F does not constitute an admission by the Debtor that such claim is entitled to priority treatment under section 507 of the Bankruptcy Code or a waiver of the Debtor’s right to recharacterize or reclassify the claim or contract. The Debtor reserves all of its rights to dispute the amount and the priority status of any claim on any basis at any time. All claims listed on the Debtor’s Schedule E/F, Part 1 are claims arising in the ordinary course between the Petition Date and the Relief Date, or from tax, wage, or wage-related obligations to which the Debtor may

potentially be liable. Certain of such claims, however, may be subject to ongoing audits and the Debtor otherwise unable to determine with certainty the amount of many, if not all, of the remaining claims listed on Schedule E/F. Accordingly all such amounts have been flagged as disputed and unliquidated. Amounts owed to taxing authorities related to property tax reassessments have been flagged as disputed to preserve the Debtor's option to review and dispute. The Debtor reserves its rights to object to any listed claims on the ground that, among other things, they have already been satisfied. With respect to tenants of the Debtor that have vacated their leased premises after the Petition Date, their security deposit may have been returned in the ordinary course of business.

36. Schedule E/F, Part 2: Creditors Holding Non-Priority Unsecured Claims. The Debtor has used reasonable efforts to list all general unsecured claims against the Debtor on Schedule E/F based upon the limited information available to the Debtor. Part 2 of Schedule E/F does not include certain deferred charges, deferred liabilities or general reserves. Such amounts are general estimates of liabilities and do not represent specific claims as of the Petition Date. The claims listed in Part 2 of Schedule E/F arose or were incurred on various dates. In certain instances, the date on which a claim arose is an open issue of fact. While commercially reasonable efforts have been made, determining the date upon which each claim in Part 2 of Schedule E/F was incurred or arose would be, in certain cases, unduly burdensome and cost prohibitive and, therefore, the Debtor has not listed a date for each claim listed on Part 2 of Schedule E/F. In addition, certain litigation or claims covered by insurance policies maintained by the Debtor may be excluded from Part 2 of Schedule E/F. The claims of individual creditors are generally listed at the amounts the Debtor believes to be correct based on the limited information in the Debtor's possession and may not reflect credits or allowances due from the creditor. The Debtor reserves all its rights concerning credits or allowances. The Debtor reserves its rights to object to any listed claims on the grounds that, among other things, they have already been satisfied. Additionally, Part 2 of Schedule E/F does not include potential rejection damage claims, if any, of the counterparties to executory contracts and unexpired leases that may be rejected. The Debtor has also listed as disputed, contingent and unliquidated all interests and claims filed by investors against the Debtor in the LeFever Mattson chapter 11 cases.

The Responsible Individual has also been made aware that the Debtor may have liabilities for loans that were made to the Debtor and secured by assets that the Debtor may subsequently have transferred to another party. The Debtor has generally not included these loans in its Schedules due to lack of information regarding the loans.

37. Schedule E/F, Part 3: Additional Page for Others to be Notified About Unsecured Claims. The Debtor has for notice purposes included all investors who filed investor claims or interests (other than claims against the Debtor) in the LeFever Mattson chapter 11 cases.

38. Schedule G: Executory Contracts and Unexpired Leases. While commercially reasonable efforts have been made to ensure the accuracy of Schedule G, inadvertent errors, omissions or over-inclusions may have occurred. The Debtor hereby reserves all rights to dispute the validity, status, or enforceability of any contracts, agreements or leases set forth in Schedule G and to amend or supplement such Schedule as necessary. The contracts, agreements and leases listed on Schedule G may not have taken effect or be binding on any party and may have expired

or been modified, amended, or supplemented from time to time by various amendments, restatements, waivers, estoppel certificates, letter and other documents, instruments and agreements which may not be listed therein. Certain of the real property leases and contracts listed on Schedule G may contain renewal options, guarantees of payments, options to purchase, rights of first refusal, rights to lease additional space and other miscellaneous rights. Such rights, powers, duties and obligations are not set forth on Schedule G. Nothing herein shall be construed as a concession or evidence that any of the contracts, agreements or leases identified on Schedule G: (i) constitute an executory contract within the meaning of section 365 of the Bankruptcy Code or other applicable law; or (ii) have not expired or been terminated or otherwise are not current in full force and effect. The Debtor reserves all rights, claims and causes of action with respect to the contracts and agreements listed on the Schedule, including the right to dispute or challenge the characterization or the structure of any transaction, document, or instrument. Certain of these contracts or leases may have been modified, amended or supplemented by various documents, instruments or agreements that may not be listed, but are nonetheless incorporated by this reference. Certain executory agreements may not have been memorialized in writing and could be subject to dispute.

39. Schedule H: Co-Debtors. In the ordinary course of its business, the Debtor is involved in pending or threatened litigation and claims arising out of the conduct of its businesses. These matters may involve multiple plaintiffs and defendants, some or all of whom may assert crossclaims and counterclaims against other parties. Because such claims are listed elsewhere in the Schedules and Statements, they have not been set forth individually on Schedule H. Schedule H is furnished for informational purposes only to apprise parties in interest of co-debtor relationships of the Debtor as of the Relief Date and is derived from documents in the possession of the Debtor. It is not an admission or recognition that any co-debtor liability exists or existed.

Specific Disclosures with Respect to the Debtor's Statements

40. Statement 1: Income. The Debtor has provided an estimate of business revenue for 2022 based on an analysis of a 2022 tax return. The Responsible Individual did not prepare the 2022 tax return, which was prepared by Kenneth Mattson, so does not and cannot vouch for the accuracy of the information contained therein. As to 2023 and 2024, the Debtor has not seen any tax filings and is unable to establish business revenues for 2023 and 2024 with any degree of accuracy based on the limited information available to it. All information in Statement 1 is subject to material change.

41. Statement 3: Payments or Transfers within 90 Days of the Petition Date. Given the lack of information and books and records available to the Debtor, and the poor quality of the records to which the Debtor does have access,¹ the Debtor has not listed any "90 day" transfers.

¹ For example, the limited bank records to which the Responsible Individual has recently gained access consist only of PDF bank statements / check images. A thorough analysis would require significant time to transfer the information into excel or another format allowing for quicker data searches and manipulation as there were hundreds of transactions per month per bank account. Monthly disbursements occurred in the form of hundreds of checks per month. This production from BMO did not contain a significant portion of the supporting check images and many of the checks images that were provided are illegible. The electronic transactions on the bank statements do not provide

However, the Debtor anticipates that, after reviewing and obtaining additional documentation, there will be significant information to add to Statement 3. The Debtor does not waive any Cause of Action against any third-party based on the lack of inclusion of such transfer in these Statements.

42. Statement 4: Payments or Transfers within One Year of the Petition Date. Statement 4 currently lists sales or transfers of property by the Debtor based on publicly available title records. Given the lack of information and books and records available to the Debtor, and the poor quality of the records to which the Debtor does have access, the Debtor has not listed any other transfers. Given the very limited records available to the Debtor, the Debtor anticipates that Statement 4 likely contains only a fraction of the applicable prepetition transfers (which may include, without limitation, entry into loans and granting of security and other transfers of property to or for the benefit of insiders) and that, after reviewing and obtaining additional documentation, there will be significant information to add to Statement 4. The “value” listed in statement 4 is an estimate of the purchase price paid based on title records assuming the base California transfer tax is 1.10% of purchase price. The actual amounts may vary from those estimated. In addition, where the grant deed listed an exception or exemption from a documentary transfer tax, this has been listed. The Debtor reserves all rights to challenge the characterizations of any such transfers or whether the purchase price paid was reasonably equivalent value or otherwise. The Debtor will seek to amend Statement 4 as it obtains additional information. The Debtor does not waive any Cause of Action against any third-party based on the lack of inclusion of such transfer in these Statements. An individual or entity is designated as an “insider” if such individual or entity, based on the totality of the circumstances, (i) has at least a controlling interest in, or exercises sufficient authority over, the Debtor so as to unqualifiedly dictate corporate policy and the disposition of corporate assets, and/or (2) is considered an affiliate or an insider of the affiliate as defined by section 101(31)(E) of the Bankruptcy Code. The Debtor also reserves all rights with respect to postpetition “gap period” transfers.

43. Statement 6: Setoffs. The Debtor routinely incurs setoffs and net payments in the ordinary course of business. Such setoffs and nettings may occur in connection with a variety of ordinary and customary transactions or settlements and are done in accordance with the contractual arrangement or an agreed upon settlement, including, but not limited to, intercompany transactions, pricing discrepancies, refunds, negotiations, and/or other ordinary and customary billing disputes between the Debtor and its customers and/or suppliers. These normal setoffs and net payments are consistent with the ordinary course of business in the Debtor’s industry and can be voluminous, making it unduly burdensome and costly for the Debtor to list such ordinary course setoffs. This list is incomplete and subject to material change given the lack of information and books and records available to the Debtor. The Debtor does not waive any Cause of Action against any third-party based on the lack of inclusion of such transfer in these Statements.

44. Statement 7: Legal Actions, Administrative Proceedings, Court Actions, Executions, Attachments or Governmental Audits. The Debtor has used reasonable efforts to report all legal actions, proceedings, investigations, arbitrations, mediations, and audits by federal

descriptions that allow determination of who was paid and/or for what reason, while some bank statements appear to be incomplete.

or state agencies in which the Debtor was involved in any capacity within one year prior to the Petition Date.

As of the Petition Date, several matters were in the litigation and dispute resolution process. The Debtor reserves all its rights and defenses with respect to all listed lawsuits and administrative proceedings. The listing of any such suits and proceedings shall not constitute an admission by the Debtor of any liabilities or that the actions or proceedings were correctly filed against the Debtor or any affiliates of the Debtor. The Debtor also reserves its rights to assert that neither the Debtor nor any affiliate of the Debtor is an appropriate party to such actions or proceedings. For completeness, the Debtor has also listed litigations that arose following the Petition Date.

The Debtor is regularly involved in the ordinary course of its business in a number of eviction and collection actions against individual tenants. These actions have not been included in Statement 7.

45. Statement 9: Certain Gifts and Charitable Contributions: The Debtor is unable to answer as the Responsible Individual and the Debtor's professionals currently lack the information to enable the Debtor to answer this question.

46. Statement 10: Certain Losses: The Debtor is unable to answer as the Responsible Individual and the Debtor's professionals lack the information to enable the Debtor to answer this question. To the extent the Debtor becomes able to answer this question, any losses listed in response to Statement 10 may exclude those incurred in the ordinary course of business, those where the amount is *de minimis*, or where the loss is less than the amount of the insurance deductible. The property values reported in response to Statement 10 are based on the actual or estimated costs, including labor costs, to repair the property.

47. Statement 11: Payments Related to Bankruptcy. The Debtor's counsel prior to the Relief Date was Fennemore Craig ("Fennemore"), which also represented, and continues to represent, Kenneth Mattson. Although the Debtor has obtained information from Fennemore relating to amounts paid by the Debtor for the "gap period" between the Petition Date and the Relief Date, and any unpaid amounts that may be owed to Fennemore for such period, the Debtor does not yet have information from Fennemore on amounts paid to Fennemore for the period prior to the Petition Date that are related to bankruptcy. The Debtor has requested such information from Fennemore. The Debtor cautions that, while it will seek to update the Statements after receiving the prepetition payment information from Fennemore, any payments initiated by the Debtor may have been for the benefit of both the Debtor and Mr. Mattson. To the extent Fennemore performed prepetition work for the Debtor that is both bankruptcy and non-bankruptcy related, it may not be possible for the Debtor to distinguish payments for bankruptcy and non-bankruptcy services.

48. Statement 12: Self-settled trusts of which the debtor is a beneficiary: The Debtor is unable to answer as the Responsible Individual and the Debtor's professionals currently lack the information to enable the Debtor to answer this question.

49. Statement 13: Transfers Not Already Listed. These transfers currently list sales or transfers of property by the Debtor based on publicly available title records. Given the very limited

records available to the Debtor, the Debtor anticipates that Statement 13 likely contains only a fraction of the applicable prepetition transfers (which may include, without limitation, entry into loans and granting of security) and will likely be subject to material updates. The “value” listed in statement 4 is an estimate of the purchase price paid based on title records assuming the base California transfer tax is 1.10% of purchase price. The actual amounts may vary from those estimated. In addition, where the grant deed listed an exception or exemption from a documentary transfer tax, this has been listed. The Debtor reserves all rights to challenge the characterizations of any such transfers or whether the purchase price paid was reasonably equivalent value or otherwise. The Debtor will seek to amend Statement 13 as it obtains additional information. The Debtor does not waive any Cause of Action against any third-party based on the lack of inclusion of such transfer in these Statements.

50. Statement 14: Previous Addresses. The Debtor understands that Kenneth Mattson used the Vacaville P.O. Box address for years, and it has been included as a previous address used by the Debtor. The Debtor has also seen a K-1 purportedly issued on behalf of the Debtor that lists 6359 Auburn Blvd, Citrus Heights as a prior address. All address dates are unknown.

51. Statement 18: Closed Financial Accounts: The Responsible Individual has been informed that Debtor accounts with BMO ending in -1380, -5410 and -9987 were closed in late 2024. While the Debtor has recently received production of documents from BMO, those documents are incomplete, and do not appear to provide closing date information.

52. Statement 19: Safe Deposit Boxes: The Debtor is unable to answer as the Responsible Individual and the Debtor’s professionals currently lack the information to enable the Debtor to answer this question.

53. Statement 20: Off-premises storage: The Debtor is unable to answer as the Responsible Individual and the Debtor’s professionals currently lack the information to enable the Debtor to answer this question.

54. Statement 21: Property held for another: The Responsible Individual is not aware of property held for another. However, parties in interest may assert that the Debtor is holding property that belongs to someone else.

55. Statements 22 and 23: Environmental Liabilities. The environmental issues regarding potential discharge came to the Responsible Individual’s awareness following her appointment on June 16, 2025.

56. Statement 26: Books, records, and financial statements:

Statement 26a: The Debtor does not have access to any traditional books and records, but believes that Home Tax Service of America, Inc. (dba LeFever Mattson Property Management) and Kenneth Mattson may have maintained certain records with respect to assets owned by the Debtor. The FBI seized Mr. Mattson’s files in May 2024.

Statement 26b. The Debtor is not aware of any audit, compilation or review of the Debtor's books and records, but does not know what audit, compilation or review Mr. Mattson may have sought on behalf of the Debtor.

Statement 26c. The Debtor is not aware of any firms or individuals who may have been in possession of books of account and records when the case was filed. Documents were seized by the FBI in May 2024, but lacks information on this issue.

Statement 26d. The Debtor does not know what financial statements Kenneth Mattson may have issued on behalf of the Debtor.

Statements 28 and 29: Mr. Mattson, Stacy Mattson and KS Mattson Company, LLC no longer control the Debtor. The Bankruptcy Court's order appointing Ms. Itkin as Responsible Individual provides that:

Ms. Itkin (a) shall solely be responsible for the duties and obligations of the Debtor as a debtor in possession; (b) shall be vested with the sole and exclusive right and full authority to manage, conduct, and operate the Debtor's business, including, without limitation, opening, closing, and otherwise controlling the Debtor's bank accounts; and (c) shall not be removed as Responsible Individual without further order of this Court. Notwithstanding anything to the contrary contained herein or in the Limited Partnership Agreement of KS Mattson Partners, LP (as amended from time to time), all decisions respecting any matter affecting or arising out of the conduct of the business of the Debtor shall be made by the Responsible Individual. Docket No. 172 ¶ 4.

It further provides that "[n]one of Kenneth Mattson, Stacy Mattson or K.S. Mattson Company, LLC shall have any authority, express or implied, to act on behalf of the Debtor, bind the Debtor, operate the Debtor's business, access any of the Debtor's assets or any property of the estate. Any such actions shall be void ab initio and a violation of this Order." *Id.* ¶ 5.

Specific Disclosures with Respect to the Debtor's Lists

57. The Debtor's partnership agreement indicates that the partnership interests in the Debtor are held 49% each by Kenneth Mattson and Stacy Mattson and 2% by KS Mattson Partners LLC, a company controlled by Kenneth Mattson. The Debtor has been made aware of several individuals and entities that allege (i) to hold co-ownership interests in one or more of the Debtor's properties that are not reflected on title records and/or (ii) that the Debtor sold them interests in other entities that may or may not have been recorded. The Responsible Individual is not currently aware of individuals or entities alleging that they hold interests in the Debtor itself.

ANNEX A

(Joint Ownership of Debtor's Properties)

Address	Ownership ²
18010 Hwy 12, Boyes Hot Springs, CA 95476	KS Mattson Partners, LP, a California Limited Partnership, as to an undivided 55% interest Charles Edgar, Trustee, and Cathleen Edgar, Trustee, of the C and C Edgar Revocable Trust Established June 18, 2008, as to an undivided 45% interest
18590 Hwy 12, Boyles Hot Springs, CA 95476	KS Mattson Partners LP as to an undivided 40% Gary R. Fox and Katherine E. Fox, Trustees of The Fox Family Trust dated May 24, 2002, as to an undivided 20.0% John Dale Horton, Trustee of The John Dale Horton Revocable Living Trust dated January 6, 2015, and any amendments thereto, as to an undivided 40.0%
19357 Hwy 12, Sonoma, CA 94559	KS Mattson Partners LP as to an undivided 40% John Dale Horton, Trustee of The John Dale Horton Revocable Living Trust dated January 6, 2015, and any amendments thereto, as to an undivided 40.0% Keith A. Holmlund and Phyllis I. Holmlund, as to an undivided 20.0%
22666 Broadway, Sonoma, CA 95746	KS Mattson Partners, LP, as to an undivided 42% interest Charles Richard Davis, as to an undivided 22.0% interest Sheridan K Haley and Samuel R. Haley, wife and husband as joint tenants as to an undivided 7% interest Charles Richard Davis, an unmarried man as to an undivided 11% interest Fazale Rahman Rana and Amy Donna Pinnow Rana, Trustees of The Fazale Rahman Rana and Amy Donna Pinnow rana Family Living Trust DTD 6/3/2014 as to an undivided 18% interest

² Reflects tenants in common listed on title. Other individuals and entities may assert that they have unrecorded interests in these properties. The Debtor additionally had interests in 452C First Street East, Sonoma. It is unclear if the Debtor retains any interest in this property.

Address	Ownership ²														
414 W Napa St, Sonoma, CA 95476	KS Mattson Partners, LP, as to an undivided 31.813% interest David Figueiredo and Valerie Figueiredo, husband and wife as Joint Tenants, as to an undivided 12.5% interest Jeffrey Lee Barnes and Rhonda Michelle Barnes, Trustees of the Barnes Family Living Trust dates May 30, 2018, as to an undivided 4.687% interest John L. Chase and Susan Goodwin Chase, Trustees of the Chase 1992 Family Trust, as to an undivided 25.5% interest Cheryl Anne Reese, a married woman, as her sole and separate property, as to an undivided 6.5% interest Stanford Captital LLC, a Missouri Limited Liability Company, as to an undivided 19.0% interest														
450G 1st Street East, Sonoma, CA 95476	KS Mattson Partners, LP, as to an undivided 50% interest Scott A. Walker and Elizabeth Lull Walker, Trustees of The Walker Family Living Trust, dated December 15, 2006 as to an undivided 50% interest														
450J 1st Street East, Sonoma, CA 95476	KS Mattson Partners, LP, as to an undivided 60% interest Brad D. Driver, as to an undivided 40% interest														
450 1st St E #A,B, K, Sonoma, CA 95476	KS Mattson Partners LP, a California limited partnership, as to an undivided 44% Luis U. Martinez and Elizabeth N. Martinez, Trustee of the Luis Urbano Martinez and Elizabeth Naomi Martinez Revocable Intervivos Trust dated July 6, 1998, as to an undivided 31% ownership interest, William H. Weber and Pamela A. Weber, as to an undivided 25% ownership interest														
47 and 49 Natoma Street, Folsom, CA	<table> <tr> <th><u>% Interest Owned</u></th><th><u>Holding Entity</u></th></tr> <tr> <td>3.328%</td><td>K S Mattson Partners LP</td></tr> <tr> <td>7.727%</td><td>Tretiakoff, Dimitri</td></tr> <tr> <td>6.761%</td><td>Hanson, Richard Victor; Hanson, Karen Denise; Hanson Family 2002 Trust</td></tr> <tr> <td>24.084%</td><td>Driver, Brad D</td></tr> <tr> <td>7.526%</td><td>Anderson, Graham Michael; Anderson, Trisha Susan; The Anderson 2001 Revocable Trust Dated</td></tr> <tr> <td>4.326%</td><td>Haley Jr, Samuel R; Haley, Sheridan K; Haley, Samuel R</td></tr> </table>	<u>% Interest Owned</u>	<u>Holding Entity</u>	3.328%	K S Mattson Partners LP	7.727%	Tretiakoff, Dimitri	6.761%	Hanson, Richard Victor; Hanson, Karen Denise; Hanson Family 2002 Trust	24.084%	Driver, Brad D	7.526%	Anderson, Graham Michael; Anderson, Trisha Susan; The Anderson 2001 Revocable Trust Dated	4.326%	Haley Jr, Samuel R; Haley, Sheridan K; Haley, Samuel R
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Address	Ownership ²																																						
	11.668% Hayes, Darryl E; Hayes, Jill D; The Hayes Family Trust Established Augus 16.448% Eandi Family Properties Llc 6.648% Acacio, Nicole A 6.939% Pollock, Gerald C; Gerald C Pollock Revocable Living Trust 4.545% Davis, Charles Richard																																						
8340/8350 Auburn Blvd. Citrus Heights	<table> <tr> <th><u>% Interest Owned</u></th><th><u>Holding Entity</u></th></tr> <tr> <td>0.479%</td><td>KS Mattson Partners, LP</td></tr> <tr> <td>1.912%</td><td>Dow, Kenneth G; Dow, Pauline Louise Afrakhteh, Farideh</td></tr> <tr> <td>4.251%</td><td>Afrakhteh, Farideh; The Farideh Afrakhteh Living Trust</td></tr> <tr> <td>4.055%</td><td>Krive, Christopher A; Krive, Aimay Chang</td></tr> <tr> <td>4.690%</td><td>Niezelski, Michael; Niezelski, Susan</td></tr> <tr> <td>5.710%</td><td>Reese, William J</td></tr> <tr> <td>5.703%</td><td>Mattson, James; Mattson, Rachel</td></tr> <tr> <td>4.788%</td><td>Hayes, Darryl E; Hayes, Jill D; Tyhe Hayes Family Trust</td></tr> <tr> <td>4.878%</td><td>Martinez, Luis U; Martinez, Elizabeth N; Luis Urbano Martinez & Elizabeth Naomi M</td></tr> <tr> <td>5.327%</td><td>Dow, Kenneth George; Dow, Pauline Louise; Kenneth George Dow & Pauline Louise Dow</td></tr> <tr> <td>7.612%</td><td>Anderson, Graham Michael; Anderson, Trisha Susan; The Anderson 2001 Revocable Trust</td></tr> <tr> <td>7.964%</td><td>Mack, Thomas J; Mack, Edyth Hayashi; Thomas J Mack & Edyth Hayashi Mack Liv T</td></tr> <tr> <td>3.853%</td><td>Pollock, Dale Everett; Pollock, Joanna Elizabeth; Everett Pollock & Joanna Elizabeth Pollo</td></tr> <tr> <td>8.997%</td><td>Dennison, Ronald W; Dennison, Deborah A; Dennison Living Trust</td></tr> <tr> <td>3.650%</td><td>Goodwin, Howard I; The Howard I Goodwin Living Trust</td></tr> <tr> <td>8.554%</td><td>Mcmullen, Patrick; The Patrick McMullen Living Trust</td></tr> <tr> <td>4.847%</td><td>Giacinto Jr, Joseph A; Giacinto, Rebecca A; Joseph A Giacinto Jr & Rebecca A Giacinto</td></tr> <tr> <td>12.730%</td><td>Mueller, M C; The M C Mueller Living Trust</td></tr> </table>	<u>% Interest Owned</u>	<u>Holding Entity</u>	0.479%	KS Mattson Partners, LP	1.912%	Dow, Kenneth G; Dow, Pauline Louise Afrakhteh, Farideh	4.251%	Afrakhteh, Farideh; The Farideh Afrakhteh Living Trust	4.055%	Krive, Christopher A; Krive, Aimay Chang	4.690%	Niezelski, Michael; Niezelski, Susan	5.710%	Reese, William J	5.703%	Mattson, James; Mattson, Rachel	4.788%	Hayes, Darryl E; Hayes, Jill D; Tyhe Hayes Family Trust	4.878%	Martinez, Luis U; Martinez, Elizabeth N; Luis Urbano Martinez & Elizabeth Naomi M	5.327%	Dow, Kenneth George; Dow, Pauline Louise; Kenneth George Dow & Pauline Louise Dow	7.612%	Anderson, Graham Michael; Anderson, Trisha Susan; The Anderson 2001 Revocable Trust	7.964%	Mack, Thomas J; Mack, Edyth Hayashi; Thomas J Mack & Edyth Hayashi Mack Liv T	3.853%	Pollock, Dale Everett; Pollock, Joanna Elizabeth; Everett Pollock & Joanna Elizabeth Pollo	8.997%	Dennison, Ronald W; Dennison, Deborah A; Dennison Living Trust	3.650%	Goodwin, Howard I; The Howard I Goodwin Living Trust	8.554%	Mcmullen, Patrick; The Patrick McMullen Living Trust	4.847%	Giacinto Jr, Joseph A; Giacinto, Rebecca A; Joseph A Giacinto Jr & Rebecca A Giacinto	12.730%	Mueller, M C; The M C Mueller Living Trust
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Fill in this information to identify the case:

Debtor name KS MATTSON PARTNERS, LP

United States Bankruptcy Court for the: Northern District of California (State)

Case number (if known): 1:24-bk-10715

☐ Check if this is an amended filing

Official Form 207**Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy**

04/25

The debtor must answer every question. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known).

Part 1: Income**1. Gross revenue from business**

☐ None

Identify the beginning and ending dates of the debtor's fiscal year, which may be a calendar year			Sources of revenue Check all that apply	Gross revenue (before deductions and exclusions)
From the beginning of the fiscal year to filing date:	From <u>01/01/2024</u> MM / DD / YYYY	to Filing date	<input checked="" type="checkbox"/> Operating a business <input type="checkbox"/> Other _____	\$ _____
For prior year:	From <u>01/01/2023</u> MM / DD / YYYY	to <u>12/31/2023</u> MM / DD / YYYY	<input checked="" type="checkbox"/> Operating a business <input type="checkbox"/> Other _____	\$ _____
For the year before that:	From <u>01/01/2022</u> MM / DD / YYYY	to <u>12/31/2022</u> MM / DD / YYYY	<input checked="" type="checkbox"/> Operating a business <input type="checkbox"/> Other _____	\$ <u>5,644,419.00</u>

2. Non-business revenue

Include revenue regardless of whether that revenue is taxable. *Non-business income* may include interest, dividends, money collected from lawsuits, and royalties. List each source and the gross revenue for each separately. Do not include revenue listed in line 1.

☒ None

			Description of sources of revenue	Gross revenue from each source (before deductions and exclusions)
From the beginning of the fiscal year to filing date:	From _____ MM / DD / YYYY	to Filing date	_____	\$ _____
For prior year:	From _____ MM / DD / YYYY	to _____ MM / DD / YYYY	_____	\$ _____
For the year before that:	From _____ MM / DD / YYYY	to _____ MM / DD / YYYY	_____	\$ _____

Part 2: List Certain Transfers Made Before Filing for Bankruptcy**3. Certain payments or transfers to creditors within 90 days before filing this case**

List payments or transfers—including expense reimbursements—to any creditor, other than regular employee compensation, within 90 days before filing this case unless the aggregate value of all property transferred to that creditor is less than \$8,575. (This amount may be adjusted on 4/01/28 and every 3 years after that with respect to cases filed on or after the date of adjustment.)

☐ None

Creditor's name and address	Dates	Total amount or value	Reasons for payment or transfer <i>Check all that apply</i>
3.1. See global notes Creditor's name _____ Street _____ City _____ State _____ ZIP Code _____	_____	\$ _____	<input type="checkbox"/> Secured debt <input type="checkbox"/> Unsecured loan repayments <input type="checkbox"/> Suppliers or vendors <input type="checkbox"/> Services <input type="checkbox"/> Other _____
3.2. _____ Creditor's name _____ Street _____ City _____ State _____ ZIP Code _____	_____	\$ _____	<input type="checkbox"/> Secured debt <input type="checkbox"/> Unsecured loan repayments <input type="checkbox"/> Suppliers or vendors <input type="checkbox"/> Services <input type="checkbox"/> Other _____

4. Payments or other transfers of property made within 1 year before filing this case that benefited any insider

List payments or transfers, including expense reimbursements, made within 1 year before filing this case on debts owed to an insider or guaranteed or cosigned by an insider unless the aggregate value of all property transferred to or for the benefit of the insider is less than \$8,575. (This amount may be adjusted on 4/01/28 and every 3 years after that with respect to cases filed on or after the date of adjustment.) Do not include any payments listed in line 3. *Insiders* include officers, directors, and anyone in control of a corporate debtor and their relatives; general partners of a partnership debtor and their relatives; affiliates of the debtor and insiders of such affiliates; and any managing agent of the debtor. 11 U.S.C. § 101(31).

☐ None

Insider's name and address	Dates	Total amount or value	Reasons for payment or transfer
4.1. See attached Insider's name _____ Street _____ City _____ State _____ ZIP Code _____ Relationship to debtor _____	_____	\$ _____	_____
4.2. _____ Insider's name _____ Street _____ City _____ State _____ ZIP Code _____ Relationship to debtor _____	_____	\$ _____	_____

5. Repossessions, foreclosures, and returns

List all property of the debtor that was obtained by a creditor within 1 year before filing this case, including property repossessed by a creditor, sold at a foreclosure sale, transferred by a deed in lieu of foreclosure, or returned to the seller. Do not include property listed in line 6.

☐ None

	Creditor's name and address	Description of the property	Date	Value of property
5.1.	Visio Int. Employee Pension Trust <small>Creditor's name</small> PO Box 200 <small>Street</small> Vineburg CA 95487 <small>City State ZIP Code</small>	8th Street East Sonoma CA 95476	11/06/2024	\$ 1,500,000
5.2.	<small>Creditor's name</small> <small>Street</small> <small>City State ZIP Code</small>			\$

6. Setoffs

List any creditor, including a bank or financial institution, that within 90 days before filing this case set off or otherwise took anything from an account of the debtor without permission or refused to make a payment at the debtor's direction from an account of the debtor because the debtor owed a debt.

☐ None

Creditor's name and address	Description of the action creditor took	Date action was taken	Amount
See attached <small>Creditor's name</small> <small>Street</small> <small>City State ZIP Code</small>			\$
Last 4 digits of account number: XXXX- _ _ _ _			

Part 3: Legal Actions or Assignments

7. Legal actions, administrative proceedings, court actions, executions, attachments, or governmental audits

List the legal actions, proceedings, investigations, arbitrations, mediations, and audits by federal or state agencies in which the debtor was involved in any capacity—within 1 year before filing this case.

☐ None

	Case title	Nature of case	Court or agency's name and address	Status of case
7.1.	See Attached		<small>Name</small> <small>Street</small> <small>City State ZIP Code</small>	<input type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
	Case number			
7.2.			Court or agency's name and address <small>Name</small> <small>Street</small> <small>City State ZIP Code</small>	<input type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
	Case title			
	Case number			

8. Assignments and receivership

List any property in the hands of an assignee for the benefit of creditors during the 120 days before filing this case and any property in the hands of a receiver, custodian, or other court-appointed officer within 1 year before filing this case.

☒ None

Custodian's name and address	Description of the property	Value
<div>Custodian's name</div> <div>Street</div> <div>City State ZIP Code</div>	<div></div> <div>Case title</div> <div>Case number</div> <div>Date of order or assignment</div>	<div>\$</div> <div>Court name and address</div> <div>Name</div> <div>Street</div> <div>City State ZIP Code</div>

Part 4: Certain Gifts and Charitable Contributions**9. List all gifts or charitable contributions the debtor gave to a recipient within 2 years before filing this case unless the aggregate value of the gifts to that recipient is less than \$1,000**

☐ None

Recipient's name and address	Description of the gifts or contributions	Dates given	Value
<div>9.1. Unknown</div> <div>Recipient's name</div> <div>Street</div> <div>City State ZIP Code</div> <div>Recipient's relationship to debtor</div>			\$
<div>9.2. Recipient's name</div> <div>Street</div> <div>City State ZIP Code</div> <div>Recipient's relationship to debtor</div>			\$

Part 5: Certain Losses**10. All losses from fire, theft, or other casualty within 1 year before filing this case.**

☐ None

Description of the property lost and how the loss occurred	Amount of payments received for the loss If you have received payments to cover the loss, for example, from insurance, government compensation, or tort liability, list the total received. List unpaid claims on Official Form 106A/B (Schedule A/B: Assets – Real and Personal Property).	Date of loss	Value of property lost
Unknown			\$

Part 6: Certain Payments or Transfers**11. Payments related to bankruptcy**

List any payments of money or other transfers of property made by the debtor or person acting on behalf of the debtor within 1 year before the filing of this case to another person or entity, including attorneys, that the debtor consulted about debt consolidation or restructuring, seeking bankruptcy relief, or filing a bankruptcy case.

☐ None

	Who was paid or who received the transfer?	If not money, describe any property transferred	Dates	Total amount or value
11.1.	See global notes			\$
	Address			
	Street			
	City State ZIP Code			
	Email or website address			
	Who made the payment, if not debtor?			
11.2.				\$
	Address			
	Street			
	City State ZIP Code			
	Email or website address			
	Who made the payment, if not debtor?			

12. Self-settled trusts of which the debtor is a beneficiary

List any payments or transfers of property made by the debtor or a person acting on behalf of the debtor within 10 years before the filing of this case to a self-settled trust or similar device.

Do not include transfers already listed on this statement.

☐ None

	Name of trust or device	Describe any property transferred	Dates transfers were made	Total amount or value
	Unknown			\$
	Trustee			

13. Transfers not already listed on this statement

List any transfers of money or other property—by sale, trade, or any other means—made by the debtor or a person acting on behalf of the debtor within 2 years before the filing of this case to another person, other than property transferred in the ordinary course of business or financial affairs. Include both outright transfers and transfers made as security. Do not include gifts or transfers previously listed on this statement.

☐ None

Who received transfer?	Description of property transferred or payments received or debts paid in exchange	Date transfer was made	Total amount or value
13.1. See attached			\$
Address			
Street			
City State ZIP Code			
Relationship to debtor			
Who received transfer?			
13.2.			\$
Address			
Street			
City State ZIP Code			
Relationship to debtor			

Part 7: Previous Locations**14. Previous addresses**

List all previous addresses used by the debtor within 3 years before filing this case and the dates the addresses were used.

☐ Does not apply

Address	Dates of occupancy
14.1. PO Box 5490	From To
Street	
VACAVILLE CA 95696	
City State ZIP Code	
14.2. 3003 CASTLE ROAD	From To
Street	
SONOMA CA 95476	
City State ZIP Code	

Part 8: Health Care Bankruptcies**15. Health Care bankruptcies**

Is the debtor primarily engaged in offering services and facilities for:

- diagnosing or treating injury, deformity, or disease, or
- providing any surgical, psychiatric, drug treatment, or obstetric care?

- ☒ No. Go to Part 9.
☐ Yes. Fill in the information below.

Facility name and address	Nature of the business operation, including type of services the debtor provides	If debtor provides meals and housing, number of patients in debtor's care
---------------------------	--	---

15.1.

Facility name

Street

City

State

ZIP Code

Location where patient records are maintained (if different from facility address). If electronic, identify any service provider.

How are records kept?

Check all that apply:

- ☐ Electronically
☐ Paper

Facility name and address

Nature of the business operation, including type of services the debtor provides

If debtor provides meals and housing, number of patients in debtor's care

15.2.

Facility name

Street

City

State

ZIP Code

Location where patient records are maintained (if different from facility address). If electronic, identify any service provider.

How are records kept?

Check all that apply:

- ☐ Electronically
☐ Paper

Part 9: Personally Identifiable Information**16. Does the debtor collect and retain personally identifiable information of customers?**

- ☐ No.
☒ Yes. State the nature of the information collected and retained. Name, address and SSN

Does the debtor have a privacy policy about that information?

- ☒ No
☐ Yes

17. Within 6 years before filing this case, have any employees of the debtor been participants in any ERISA, 401(k), 403(b), or other pension or profit-sharing plan made available by the debtor as an employee benefit?

- ☒ No. Go to Part 10.
Yes. Does the debtor serve as plan administrator?

- ☐ No. Go to Part 10.
☐ Yes. Fill in below:

Name of plan

Employer identification number of the plan

EIN: _ _ - _ _ _ _ _

Has the plan been terminated?

- ☐ No
☐ Yes

Part 10: Certain Financial Accounts, Safe Deposit Boxes, and Storage Units**18. Closed financial accounts**

Within 1 year before filing this case, were any financial accounts or instruments held in the debtor's name, or for the debtor's benefit, closed, sold, moved, or transferred?

Include checking, savings, money market, or other financial accounts; certificates of deposit; and shares in banks, credit unions, brokerage houses, cooperatives, associations, and other financial institutions.

☐ None

	Financial institution name and address	Last 4 digits of account number	Type of account	Date account was closed, sold, moved, or transferred	Last balance before closing or transfer
18.1.	Unknown Name _____ Street _____ City _____ State _____ ZIP Code _____	XXXX-____-____-____	<input type="checkbox"/> Checking <input type="checkbox"/> Savings <input type="checkbox"/> Money market <input type="checkbox"/> Brokerage <input type="checkbox"/> Other _____	_____	\$ _____
18.2.	_____ Name _____ Street _____ City _____ State _____ ZIP Code _____	XXXX-____-____-____	<input type="checkbox"/> Checking <input type="checkbox"/> Savings <input type="checkbox"/> Money market <input type="checkbox"/> Brokerage <input type="checkbox"/> Other _____	_____	\$ _____

19. Safe deposit boxes

List any safe deposit box or other depository for securities, cash, or other valuables the debtor now has or did have within 1 year before filing this case.

☐ None

Depository institution name and address	Names of anyone with access to it	Description of the contents	Does debtor still have it?
Unknown Name _____ Street _____ City _____ State _____ ZIP Code _____	_____ _____ _____ Address _____ _____ _____	_____ _____ _____ _____ _____ _____	<input type="checkbox"/> No <input type="checkbox"/> Yes

20. Off-premises storage

List any property kept in storage units or warehouses within 1 year before filing this case. Do not include facilities that are in a part of a building in which the debtor does business.

☐ None

Facility name and address	Names of anyone with access to it	Description of the contents	Does debtor still have it?
Unknown Name _____ Street _____ City _____ State _____ ZIP Code _____	_____ _____ _____ Address _____ _____ _____	_____ _____ _____ _____ _____ _____	<input type="checkbox"/> No <input type="checkbox"/> Yes

Part 11: Property the Debtor Holds or Controls That the Debtor Does Not Own**21. Property held for another**

List any property that the debtor holds or controls that another entity owns. Include any property borrowed from, being stored for, or held in trust. Do not list leased or rented property.

☒ None

Owner's name and address	Location of the property	Description of the property	Value
Name			\$ _____
Street			
City	State	ZIP Code	

Part 12: Details About Environmental Information

For the purpose of Part 12, the following definitions apply:

- *Environmental law* means any statute or governmental regulation that concerns pollution, contamination, or hazardous material, regardless of the medium affected (air, land, water, or any other medium).
- *Site* means any location, facility, or property, including disposal sites, that the debtor now owns, operates, or utilizes or that the debtor formerly owned, operated, or utilized.
- *Hazardous material* means anything that an environmental law defines as hazardous or toxic, or describes as a pollutant, contaminant, or a similarly harmful substance.

Report all notices, releases, and proceedings known, regardless of when they occurred.

22. Has the debtor been a party in any judicial or administrative proceeding under any environmental law? Include settlements and orders.

- ☐ No
- ☒ Yes. Provide details below.

Case title	Court or agency name and address	Nature of the case	Status of case
Central Valley Water Board	Central Valley Regional Water	Remediation order re: Village	<input checked="" type="checkbox"/> Pending
Case number	Name	Cleaners, 49 Natoma Street,	<input type="checkbox"/> On appeal
Unknown	Street	Folsom	<input type="checkbox"/> Concluded
	11020 Sun Center Drive, #200		
	Rancho Cordova CA 95670		
	City	State	ZIP Code

23. Has any governmental unit otherwise notified the debtor that the debtor may be liable or potentially liable under or in violation of an environmental law?

- ☐ No
- ☒ Yes. Provide details below.

Site name and address	Governmental unit name and address	Environmental law, if known	Date of notice
KS Mattson Partners, LP	Sonoma County	17920 3(b) 17920 3(g)	06/14/2024
Name	Name	17920 3(k)	
18285 Highway 12	2550 Ventura Avenue		
Street	Street		
Sonoma	Santa Rosa	CA	95403
City	State	ZIP Code	

24. Has the debtor notified any governmental unit of any release of hazardous material?

☒ No☐ Yes. Provide details below.

Site name and address	Governmental unit name and address	Environmental law, if known	Date of notice
Name _____	Name _____	_____	_____
Street _____	Street _____	_____	
_____	_____	_____	
City _____ State _____ ZIP Code _____	City _____ State _____ ZIP Code _____		

Part 13: Details About the Debtor's Business or Connections to Any Business

25. Other businesses in which the debtor has or has had an interest

List any business for which the debtor was an owner, partner, member, or otherwise a person in control within 6 years before filing this case. Include this information even if already listed in the Schedules.

☐ None

Business name and address	Describe the nature of the business	Employer Identification number Do not include Social Security number or ITIN.
25.1. See attached Name _____ Street _____ City _____ State _____ ZIP Code _____	_____ _____ _____	EIN: ____ - ____ - ____ Dates business existed From _____ To _____
25.2. Business name and address Name _____ Street _____ City _____ State _____ ZIP Code _____	_____ _____ _____	EIN: ____ - ____ - ____ Dates business existed From _____ To _____
25.3. Business name and address Name _____ Street _____ City _____ State _____ ZIP Code _____	_____ _____ _____	EIN: ____ - ____ - ____ Dates business existed From _____ To _____

26. Books, records, and financial statements

26a. List all accountants and bookkeepers who maintained the debtor's books and records within 2 years before filing this case.

☐ None

Name and address

Dates of service

26a.1. Home Tax Service of America, Inc.

Name

6359 Auburn Blvd, Ste B

Street

Citrus Heights CA 95621

City

State

ZIP Code

From _____ To _____

Name and address

Dates of service

26a.2. Kenneth Mattson

Name

3200 Castle Road

Street

Sonoma, CA 95476

City

State

ZIP Code

From _____ To _____

26b. List all firms or individuals who have audited, compiled, or reviewed debtor's books of account and records or prepared a financial statement within 2 years before filing this case.

☒ None

Name and address

Dates of service

26b.1.

Name

Street

City

State

ZIP Code

From _____ To _____

Name and address

Dates of service

26b.2.

Name

Street

City

State

ZIP Code

From _____ To _____

26c. List all firms or individuals who were in possession of the debtor's books of account and records when this case is filed.

☒ None

Name and address

If any books of account and records are unavailable, explain why

26c.1.

Name

Street

City

State

ZIP Code

Unaware of what books and records
were maintained; documents were
seized by FBI in May 2024

Name and address

If any books of account and records are unavailable, explain why

26c.2.

Name

Street

City

State

ZIP Code

26d. List all financial institutions, creditors, and other parties, including mercantile and trade agencies, to whom the debtor issued a financial statement within 2 years before filing this case.

☒ None

Name and address

26d.1.

Name

Street

City

State

ZIP Code

Name and address

26d.2.

Name

Street

City

State

ZIP Code

27. Inventories

Have any inventories of the debtor's property been taken within 2 years before filing this case?

☒ No☐ Yes. Give the details about the two most recent inventories.

Name of the person who supervised the taking of the inventory

Date of
inventoryThe dollar amount and basis (cost, market, or
other basis) of each inventory

\$

Name and address of the person who has possession of inventory records

27.1.

Name

Street

City

State

ZIP Code

Name of the person who supervised the taking of the inventory

Date of inventory

The dollar amount and basis (cost, market, or other basis) of each inventory

\$

Name and address of the person who has possession of inventory records

27.2.

Name

Street

CityStateZIP Code

28. List the debtor's officers, directors, managing members, general partners, members in control, controlling shareholders, or other people in control of the debtor at the time of the filing of this case.

Name	Address	Position and nature of any interest	% of interest, if any
Ken Mattson		Limited Partner	49%
Stacy Mattson		Limited Partner	49%
KS Mattson Company		General Partner	2%

29. Within 1 year before the filing of this case, did the debtor have officers, directors, managing members, general partners, members in control of the debtor, or shareholders in control of the debtor who no longer hold these positions?

- ☒ No
- ☐ Yes. Identify below.

Name	Address	Position and nature of any interest	Period during which position or interest was held
			From To
			From To
			From To
			From To

30. Payments, distributions, or withdrawals credited or given to insiders

Within 1 year before filing this case, did the debtor provide an insider with value in any form, including salary, other compensation, draws, bonuses, loans, credits on loans, stock redemptions, and options exercised?

- ☐ No
- ☐ Yes. Identify below.

Name and address of recipient

Amount of money or description and value of property

Dates

Reason for providing the value

30.1.

Name

Street

CityStateZIP Code

Relationship to debtor

Name and address of recipient

30.2

Name

Street

City

State

ZIP Code

Relationship to debtor

31. Within 6 years before filing this case, has the debtor been a member of any consolidated group for tax purposes?

☒ No

☐ Yes. Identify below.

Name of the parent corporation

Employer Identification number of the parent corporation

EIN: _____

32. Within 6 years before filing this case, has the debtor as an employer been responsible for contributing to a pension fund?

☒ No

☐ Yes. Identify below.

Name of the pension fund

Employer Identification number of the pension fund

EIN: _____

Part 14: Signature and Declaration

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

I have examined the information in this *Statement of Financial Affairs* and any attachments and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 08/08/2025
MM / DD / YYYY

x

/s/ Robbin L. Itkin

Printed name Robbin L. Itkin

Signature of individual signing on behalf of the debtor

Position or relationship to debtor Responsible Individual

Are additional pages to *Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy* (Official Form 207) attached?

☐ No

☒ Yes

In re: KS Mattson Partners, LP

Case No. 24-10715

Part 2 Question 4

Payments or other transfers of property made within 1 year before filing this case that benefited any insider

Who Received the Transfer	Address	City	State	Zip	Date	Total amount or value	Property Transferred
Dylan Lair Trustee of the MCDAB Family Trust					3/21/2024	\$3,500,000	1817-1819 Coast Boulevard
Equitable Ocean Front LLC					7/22/24	Loan purpose	1716 Ocean Avenue, Del Mar
LeFever Mattson					2/21/2024	Equal transfer	1870 Thornsberry Road, Sonoma
RT Capitol Mall, LP					7/17/2024	TT Exempt	921 Broadway, Sonoma
RT Capitol Mall, LP					7/17/2024	TT Exempt	222-226 West Spain, Sonoma
Sienna Pointe LLC					7/17/2024	TT Exempt	925-927 Broadway, Sonoma
Sienna Pointe LLC					7/17/2024	TT Exempt	141-145 E Napa St, Sonoma

In re: KS Mattson Partners, LP
Case No. 24-10715
Part 2 Question 6
Setoffs made within 90 days before filing this case

Creditor's name	Address 1	Address 2	City	State	Zip	Date	Amount	Action Taken	Last 4-digits of Account
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	08/28/24	\$1,000.00	Credited check returned unpaid	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$580.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$600.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$625.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$625.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$900.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$900.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$900.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$1,000.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$1,392.50	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$1,650.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$1,778.00	Unpaid check - Insufficient Funds	1380
BMO BANK	P.O. BOX 94033		PALATINE	IL	60094	10/21/24	\$2,275.00	Unpaid check - Insufficient Funds	1380

In re: KS Mattson Partners, LP
Case No. 24-10715
Part 3 Question 7

Legal actions, administrative proceedings, court actions, executions, attachments, or governmental audits

Case Title	Case Number	Nature of Case	Court Name	Court Address	Status of Case
ANDREW TUBLEY and MAE UMBRIAC, husband and wife; ANDREW TUBLEY and MAE UMBRIAC, as Trustees of the MAE UMBRIAC AND ANDREW DAVID TUBLEY FAMILY TRUST U/A/D APRIL 27, 2015 v. KENNETH W. MATTSON, an individual; TIMOTHY LEFEVER, an individual; KS MATTSON PARTNERS, LP, a California limited partnership; LEFEVER MATTSON, a California corporation; AUTUMN WOOD I, LP, a California limited partnership; BAY TREE, LP, a California limited partnership; COUNTRY OAKS I, LP, a California limited partnership formerly known as Country Oaks, LLC; DIVI DIVI TREE, LP, a California limited partnership; FIRETREE I, LP, a California limited partnership; FIRETREE II, LP, a California limited partnership; FIRETREE III, LP, a California limited partnership; GOLDEN TREE, LP, a California limited partnership; RIVER BIRCH, LP, a California limited partnership; VALLEY OAK INVESTMENTS, LP, a California limited partnership; WATERTREE I, LP, a California limited partnership; and DOES 1-500, inclusive	24CV04329	COMPLAINT FOR: (1) SECURITIES FRAUD (2) FRAUD (3) CONSTRUCTIVE FRAUD (4) NEGLIGENCE (5) MISREPRESENTATION (6) BREACH OF FIDUCIARY DUTY (7) AIDING AND ABETTING (8) BREACH OF FIDUCIARY DUTY (9) CIVIL THEFT (10) BREACH OF CONTRACT (11) MONEY HAD AND RECEIVED (12) ACCOUNTING (13) INJUNCTIVE RELIEF (14) DECLARATORY RELIEF	Sonoma County Superior Court	3055 Cleveland Avenue Santa Rosa, CA 95403	Pending
Brad Driver, by and through the personal representative and administrator of his estate, Mariah Driver v. KS Mattson Company LLC, KS Matison Partners LP, Timothy D. Thomas, et al.	24CV06439	Real property (partition)	Sonoma County Superior Court	3035 Cleveland Avenue Suite 200 Santa Rosa, CA 95403	Pending
Charlene Hultman v. KENNETH W. MATTSON, an individual; KS MATTSON PARTNERS, LP, a limited partnership; LEFEVER MATTSON, INC., a corporation; DIVI DIVI TREE, LP, a limited partnership; and SPECIALTY PROPERTIES PARTNERS, LP, a limited partnership	4:24-cv-03381-JST	Complaint: Demand for Trial by Jury	California Northern District	280 S 1st St Ste 2112 San Jose, CA 95113	Concluded (as to Debtor)
Estate of Brad Driver, by and through the personal representative and administrator of his Estate, Mariah Driver v. KS Mattson Company LLC, KS Matison Partners LP, Charles Richard Davis, et al.	24CV021784	Real property (partition)	Sacramento County Superior Court	813 6th Street, Room 212, 2nd Floor Sacramento, CA 95814	Pending
JEANNE WONDRA, as trustee for the JAMES HURLEY TRUST; JEANNE WONDRA, as trustee for the IRENE B HURLEY SURVIVORS TRUST; PATRICIA HURLEY, as trustee for the DAVID AARON TANNENBAUM AND PATRICIA MARIE HURLEY LIVING TRUST; MARYANNE KELLY, an individual; MARYANNE KELLY, as trustee for the MARYANNE KELLY LIVING	24CV011902	AMENDED COMPLAINT FOR: 1. BREACH OF CONTRACT 2. FRAUDULENT INDUCEMENT 3. NEGLIGENCE 4. MISREPRESENTATION 5. NEGLIGENCE 6. BREACH OF FIDUCIARY DUTY	Sacramento County Superior Court	813 6th Street, Room 212, 2nd Floor Sacramento, CA 95814	Pending

In re: KS Mattson Partners, LP
Case No. 24-10715
Part 3 Question 7

Legal actions, administrative proceedings, court actions, executions, attachments, or governmental audits

Case Title	Case Number	Nature of Case	Court Name	Court Address	Status of Case
TRUST v. LEFVER MATTSON, INC, a California corporation; K S MATTSON PARTNERS, LP, a California Limited Liability Partnership; KENNETH MATTSON, an individual; DIVI DIVI TREE, LP, a California Limited Partnership; FULTON VILLAGE PARTNERS, LLC, a California Limited Company; BUTCHER RD. PARTNERS, LLC, a California Limited Liability Company; PERRIS FREEWAY AY PLAYA, LLC, a California Limited Liability Company; FOLSOM VILLAGE PARTNERS, LP, a California Limited Liability Partnership; PONDEROSA PINES, LP, a California Limited Liability Partnership; BAY TREE, LP, a California Limited Liability Partnership; GOLDEN TREE, LP, a California Limited Liability Partnership; AND DOES 1-100		COVENANT OF GOOD FAITH AND FAIR DEALING; 6. BREACH OF FIDUCIARY DUTY 7. AIDING AND ABETTING 8. CONVERSION 9. ALTER EGO 10. DECLARATORY RELIEF			
KS MATTSON PARTNERS, LP vs. BENEDETTI FARMS, INC. ¹	SCV-270023 (on appeal at Docket No. A171038)	Unlimited Civil	Sonoma County Superior Court	3055 Cleveland Avenue Santa Rosa, CA 95403	On appeal to California Court of Appeals
Mark Nielsen v. Kenneth Mattson, KS Mattson Company LLC, KS Mattson Partners LP, et al.	24CV082282	Civil (Real property partition)	Alameda County Superior Court	24405 Amador Street Hayward, CA 94544	Pending
RICHARD ALLEN CLARIDGE, individual and trustee of the Joint Revocable Trust of Richard Allen Claridge Jr. & Capri Lynn Winsor; CAPRI LYNN WINSER; individual and trustee of the Joint Revocable Trust of Richard Allen Claridge Jr. & Capri Lynn Winsor; TODD MICHERO, an individual; LORI MICHERO, an individual; BROOKE SAMPLE, individual and trustee of the First Amendment to the Brooke Sample Separate Property Trust; SCOTT A. WALKER, individual and trustee of The Walker Family Living Trust; and ELIZABETH L. WALKER, individual and trustee of The Walker Family Living Trust, on behalf of themselves and all others similarly situated v. TIMOTHY J. LEFEVER, an individual; KENNETH W. MATTSON, an individual; LEFEVER MATTSON, INC., a corporation; KS MATTSON PARTNERS, LP, a limited partnership; LEFEVER MATTSON I, LLC, a limited liability company; HOME TAX SERVICE OF AMERICA, INC. (d/b/a LEFEVER MATTSON PROPERTY MANAGEMENT), a corporation; DIVI DIVI TREE, LP, a limited partnership; and SPECIALTY PROPERTIES PARTNERS, LP, a limited partnership	4:24-cv-04093-JST	Class Action Complaint - Demand for Jury Trial	California Northern District	280 S 1st St Ste 2112 San Jose, CA 95113	Pending

¹ LeFever Mattson, a California corporation, substituted into this action (in which judgment for \$1,833,663.68 was awarded in favor of the plaintiff) in or around May 2024. The Debtor reserves all rights regarding the propriety of that substitution and entitlement to any judgment.

In re: KS Mattson Partners, LP
Case No. 24-10715
Part 3 Question 7

Legal actions, administrative proceedings, court actions, executions, attachments, or governmental audits

Case Title	Case Number	Nature of Case	Court Name	Court Address	Status of Case
Securities & Exchange Commission v. Mattson et al	4:25-cv-04387-JST	Securities Fraud	California Northern District	3055 Cleveland Avenue Santa Rosa, CA 95403	Pending
Tamara D. Migliozi v. KENNETH W. MATTSON, an individual;TIMOTHY LeFEVER, an individual; LeFEVER MATTSON, INC., a California corporation; DIVI DIVI TREE, L.P., a California limited partnership; KS MATTSON PARTNERS, LP, a California limited partnership; K S MATTSON PARTNERS, LLC, a California limited liability company; LeFEVER MATTSON I, LLC, a California limited liability company; STACY MATTSON, an individual; SCOTT SMITH, an individual; and DOES 1 through 30, inclusive	24CV03663	Unlimited Civil	Sonoma County Superior Court	3055 Cleveland Avenue Santa Rosa, CA 95403	Pending
Timothy LeFever, LeFever Mattson, Divi Divi Tree, LP., and Windscape Apartments, LLC v. Kenneth W. Mattson and KS Mattson Partners L.P	24CV03485	Unlimited Civil	Sonoma County Superior Court	3055 Cleveland Avenue Santa Rosa, CA 95403	Pending
Tina M. Stott, as an individual and Trustee to the Tina M. Stott Family Trust dated 3/17/2017 v. Kenneth Mattson, KS Mattson Company LLC, KS Mattson Partners LP, et al.	24CV082453	Civil (Contract)	Alameda County Superior Court	1225 Fallon Street Oakland, CA 94612	Pending

In re: KS Mattson Partners, LP
Case No. 24-10715
Part 6 Question 13
Transfers not already listed on this statement

Who Received the Transfer	Address	City	State	Zip	Date	Total amount or value	Property Transferred
Bian Hager and Chia-Hui Hager					7/31/2023	\$3,147,000	721 Camino, Del Mar
Beach Pine LP					6/20/2023	\$720,000.00	282 Patten Street, Sonoma
Beach Pine LP					6/20/2023	\$760,000.00	1200 Apple Tree Ct, Sonoma
Beach Pine LP					6/20/2023	\$600,000.00	377 West Spain Street, Sonoma
Beach Pine LP					6/20/2023	\$640,000.00	1220 East Napa St, Sonoma
Black Walnut, LP					7/12/2023	\$1,050,000.00	789 Cordilleras Dr, Sonoma
Black Walnut, LP					6/20/2023	\$825,000.00	653 3rd Street W, Sonoma
Black Walnut, LP					6/20/2023	\$875,000.00	20564 Broadway, Sonoma
Black Walnut, LP					6/20/2023	\$500,000.00	3917455 Oak St, Sonoma
Buckeye Tree, LP					6/20/2023	\$545,000.00	19173 Railroad Ave, Sonoma
Charles Richard Davis - 11%					5/21/2024	\$495,000	16721 Sonoma Highway, Sonoma
Cheryl Anne Reese - 6.5%					6/20/2023	\$210,000.00	22666 Broadway, Sonoma
Fazale Rahman Rana and Amy Donna Pinnow Rana Trustees of The Fazale Rahman Rana and Amy Donna Pinnow Rana Family Living Trust - 18%					5/21/2024	\$810,000	414 W Napa Street, Sonoma
Gary R. Fox and Katherine E. Fox, Trustees of The Fox Family Trust dated May 24, 2005 - 20%					6/20/2023	\$500,000.00	22666 Broadway, Sonoma
Gerald Garrett and Marcy Garrett					5/17/2023	\$500,000.00	18590 Sonoma Highway, Sonoma
Ginko Tree, LP					6/20/2023	\$350,000.00	2377 Lovall Valley Road, Sonoma
I Heart Sonoma LLC					6/20/2023	\$350,000.00	596 Third Street East, Sonoma
I Heart Sonoma LLC					5/20/2024	\$600,000	528 3rd Street West, Sonoma
I Heart Sonoma LLC					5/16/2024	\$1,850,000	834 Donner Avenue, 0 Third St. E, Sonoma
I Heart Sonoma LLC					5/16/2024	\$1,900,000	19021 7th St, Sonoma
I Heart Sonoma LLC					5/7/2024	\$850,000	456 85th Street W, Sonoma
I Heart Sonoma LLC					5/6/2024	\$1,400,000	1221 Apple Tree Court, Sonoma
I Heart Sonoma LLC					5/6/2024	\$800,000	1230 E Napa Street, Sonoma
I Heart Sonoma LLC					5/6/2024	\$3,000,000	72 and 74 Moon Mountain Road, Sonoma
I Heart Sonoma LLC					5/6/2024	\$1,100,000	1176 Castle Road, Sonoma
I Heart Sonoma LLC					5/3/2024	\$2,250,000	1170 Castle Road, Sonoma
John Dale Horton, Trustee of The John Dale Horton Revocable Living Trust dated January 6, 2015 - 40%					6/20/2023	\$975,000.00	18590 Sonoma Highway, Sonoma
John Dale Horton, Trustee of The John Dale Horton Revocable Living Trust dated January 6, 2015 - 40%					6/20/2023	\$1,085,000.00	19357 Sonoma Highway, Sonoma
John L. Chase and Susan Goddwin Chase Trustees of the Chase 1992 Family Trust - 25.5%					2/2/2023	\$825,000.00	414 W Napa Street, Sonoma
Katherine Lynn Marbry aka Katherine D. Mabry Trustee of the Katherine D. Mabry Revocable Trust					11/17/2023	\$1,000,000.00	731 R 5th St, Sonoma
Keith A. Holmlund and Phyllis I. Holmlund - 20%					6/20/2023	\$390,000.00	19357 Sonoma Highway, Sonoma
Luis U. Martinez and Elizabeth N. Martinez Trustee of the Luis Urbano Martinex and Elizabeth Naomi Martinez Revocable Intervivos trust dated July 6, 1998 - 31%					5/17/2023	\$350,000.00	450 1ST ST E, Sonoma
M.C. Mueller Trustee of The M.C. Mueller Living Trust, dated March 23, 2004 - 12.73%					8/24/2023	\$720,000	8340-8340 Auburn Blvd, Citrus Heights
Paul Shvelkin Trustee of the Flamenca Family Trust - 50% Svetlana P Ivachtchenko Trustee of the ASA Revocable Trust - 50%					7/21/2023	\$2,800,000	1823-25 Coast Boulevard, Del Mar
Scott A. Walker and Elizabeth Lull Walker Trustees of The Walker Family Living Trust dated December 15, 2006 - 50%					6/20/2023	TT Exempt	450 First Street, E, Suite G, , Sonoma
Sheridan K Haley and Samuel R. Haley - 7%					5/21/2024	\$315,000	22666 Broadway, Sonoma
Sienna Pointe LLC					5/16/2023	Same Party/Same	302 1ST ST E, Sonoma
Stanford Capital LLC - 19%					6/20/2023	\$650,000.00	414 W Napa Street, Sonoma

In re: KS Mattson Partners, LP
Case No. 24-10715
Part 6 Question 13
Transfers not already listed on this statement

Who Received the Transfer	Address	City	State	Zip	Date	Total amount or value	Property Transferred
William H. Weber and Pamela A. Weber - 25%					5/17/2023	\$430,000.00	450 1ST ST E, Sonoma
Windscape Apartments, LLC					6/20/2023	\$2,625,000.00	525 West Napa St, Sonoma
Windscape Apartments, LLC					6/20/2023	\$5,600,000.00	520/530/532 Studley St, Sonoma
Windscape Apartments, LLC					6/12/2023	\$900,000.00	21420 Arnold Dr, Sonoma
Windscape Apartments, LLC					6/12/2023	\$2,500,000.00	424 2nd Street West, Sonoma
Windscape Apartments, LLC					2/2/2023	\$1,940,000.00	1025 Napa Rd, Sonoma
Windscape Apartments, LLC					2/2/2023	\$1,700,000.00	20470 8th Street East, Sonoma
Windscape Apartments, LLC					2/2/2023	\$1,700,000.00	900 E Napa St, Sonoma
Windscape Apartments, LLC					2/2/2023	\$1,700,000.00	1045 Bart Road, Sonoma

In re: **KS Mattson Partners, LP**
Case No.24-10715
Part 7, Question 14
Previous addresses

Address	Dates of Occupancy
6359 Auburn Blvd., Citrus Heights, CA 95621	Unknown

In re: KS Mattson Partners, LP

Case No. 24-10715

Part 13 Question 25

Other businesses in which the debtor has or has had an interest

Name of entity ¹	% of ownership	Valuation method used for current value	Current value of debtor's interest	EIN
Beach Pine, LP	9.8994% (per LFM books and records); 9.900% (per Claim No 1524 filed by KSMP).	N/A	Unknown	83-2643272
Country Oaks I, LP	3.1170% (per LFM books and records); 7.949% (per Claim No 1435 filed by KSMP).	N/A	Unknown	26-0860694
Divi Divi Tree, LP	48.4670% (per LFM books and records); 50.280% (per Claim No. 1429 filed by KSMP)	N/A	Unknown	71-0926806
Hagar Properties, LP	19.2450% (per LFM books and records); 19.244% per Claim No 1430 filed by KSMP).	N/A	Unknown	Unknown
Heacock Apartments, LP	6.4340%	N/A	Unknown	46-3737509
LeFever Mattson and related entities	Unknown	Unknown	Unknown	Unknown
Perris Freeway Plaza, LP	Unknown	N/A	Unknown	Unknown
Pinecone, LP	Unknown (per LFM books and records); 10.810% (per Claim No 1544 filed by KSMP).	N/A	Unknown	84-2395880
Ringmaster's Square, LLC	Unknown	N/A	Unknown	Unknown
Sonoma's Best, LP	Unknown	N/A	Unknown	Unknown
Specialty Properties Partners, LP	Unknown	N/A	Unknown	Unknown
Specialty Sales Classics, Inc.	Unknown	N/A	Unknown	Unknown

¹ The Debtor filed multiple proofs of claims and interest in the chapter 11 cases of LeFever Mattson, a California corporation, et al., Lead Case No. 24-10545, asserting ownership interests with respect to certain of those entities. In some instances, the Debtor's asserted interests are not recorded on the LeFever Mattson debtors' books and records. In other instances, the percentage interests asserted by the Debtor differ from those indicated on the LeFever Mattson debtors' books and records. These claims were filed by the Debtor while it was controlled by Kenneth Mattson, and not by Robbin Itkin, the Responsible Individual appointed June 16, 2025. The Responsible Individual has not yet diligenced these claims and expresses no opinion as to the amount, validity, priority or collectability of these claims. Ownership interests are listed as "unknown" where the Debtor does not have current documentation indicating the ownership interest.

In re: KS Mattson Partners, LP

Case No. 24-10715

Part 13 Question 25

Other businesses in which the debtor has or has had an interest

Name of entity ¹	% of ownership	Valuation method used for current value	Current value of debtor's interest	EIN
Specialty Sales Global, Inc.	Unknown	N/A	Unknown	Unknown
Tradewinds Apartments, LP	42.5700% (per LFM books and records); 42.571% per Claim No 1434 filed by KSMP).	N/A	Unknown	54-2090326
Treehouse Investments, LP	Unknown	N/A	Unknown	Unknown
Valley Oak Investments, LP	13.4520% (per LFM books and records); 13.451% per Claim No 1424 filed by KSMP).	N/A	Unknown	47-3383417