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

In re:	Lead Case No. 24-10545 (CN)
LEFEVER MATTSON, a California corporation, et al., 1	(Jointly Administered)
	Chapter 11
Debtors.	Judge: Hon. Charles Novack

# AMENDED STATEMENT OF FINANCIAL AFFAIRS FOR TRADEWINDS APARTMENTS, LP CASE NO. 24-10533 (CN)

# Amended Herein:

- SOFA Question 1 Gross revenue from business
- SOFA Question 2 Non-business revenue
- SOFA Question 3 Certain payments or transfers to creditors within 90 days before filing this case
- SOFA Question 4 Payments or other transfers of property made within 1 year before filing this case that benefited any insider
- SOFA Question 16 Does the debtor collect and retain personally identifiable information of customers?
- SOFA Question 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.

The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such i of the Debtors' claims and noticing agent at https://veritaglobal.net/Ll

Fill in this information to identify the case:
Debtor Name: In re: Tradewinds Apartments, LP
United States Bankruptcy Court for the: Northern District Of California
Case number (if known): 24-10533 (CN)

☑ Check if this is an amended filing

# Official Form 207

# Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy 04/22

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								
	ross revenue from busine	ss							
	None								
	Identify the beginning and may be a calendar year	l ending	dates of the debtor	's fiscal y	ear, which		Sources of revenue Check all that apply	Gross revenue (before deductions and exclusions)	
	From the beginning of the fiscal year to filing date:	From	1/1/2024	to	Filing date	☑	Operating a business		
			MM / DD / YYYY	_			Other	<b>\$</b>	0.00
	Amended herein: amount	updated							
	For prior year:	From	1/1/2023	to	12/31/2023	☑	Operating a business		
			MM / DD / YYYY		MM / DD / YYYY		Other	\$	0.00
	Amended herein: amount t	ıpdated							
	For the year before that:	From	1/1/2022	to	12/31/2022		Operating a business		
			MM / DD / YYYY		MM / DD / YYYY	$^-$	Other	\$	0.00
	Amondod horoin: amount								

Amended herein: amount updated

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533
	Name		

# 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 revent source (before deduce exclusions)	ue from each
From the beginning of the fiscal year to filing date:	From	1/1/2024 MM / DD / YYYY	to	Filing date	Other	\$	1,668.70
Amended herein - amount u	ıpdated						
For prior year:	From	1/1/2023 MM / DD / YYYY	to	12/31/2023 MM / DD / YYYY	Other	\$	9,922.59
Amended herein - amount u	pdated						
For the year before that:	From	1/1/2022 MM / DD / YYYY	to	12/31/2022 MM / DD / YYYY	Other	\$	12,919.00

	Tradewinds Apartments, LP		Case	number (if known):	24-10533
	Name				
2:	List Certain Transfers Made Before Filin	g for Bankrupto	CV		
	ertain payments or transfers to creditors wit				
		-	-		
fili	st payments or transfers-including expense reir ng this case unless the aggregate value of all p	roperty transferi	ed to that creditor is less than		
ar	nd 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		s for payment or transfer all that apply
	3.1 See Amended SOFA 3 Attachment		\$		Secured debt
	Creditor's Name				Unsecured loan repayments
					Suppliers or vendors
	Street				Services
					Other
	City State ZIP Code	_			
	Country				
	List payments or transfers, including expens guaranteed or cosigned by an insider unless than \$7,575. (This amount may be adjusted adjustment.) Do not include any payments li and their relatives; general partners of a par	s the aggregate volume on 4/01/25 and sted in line 3. Institute 1. Ins	value of all property transferre every 3 years after that with r siders include officers, directo	ed to or for the lespect to cases ors, and anyone	penefit of the insider is less is filed on or after the date of in control of a corporate debto
	any managing agent of the debtor. 11 U.S.C  ☐ None	S. § 101(31).			
	Insider's Name and Address	Dates	Total amount an only	D	
		Dates	Total amount or value	Reason for p	payment or transfer
4	.1 See Amended SOFA 4 Attachment Insider's Name		<b>\$</b>	_	
	Street	-			
		-			
	City State ZIP Code	-			
	Country	-			
	Relationship to Debtor				
		=			

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533	
	Name			

# 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

ditor's Name and	Address		<b>Description of the Property</b>	Date	Value of property
Creditor's Name					<b>\$</b>
Street			_		
City	State	ZIP Code	_		
Country			_		

# 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.

	Creditor's Nan	ne and Add	ress	Description of the action creditor took	Date action was taken	Amount
6.1	Creditor's Name					\$
	Street					
				Last 4 digits of account number: XXXX-		
	City	State	ZIP Code			
	Country					

tor:	Tradewinds Apartments, LP		Case number (if known): 24-10533		
1	Name				
rt 3:	Legal Actions or Assign	ments			
Le	egal actions, administrative	proceedings, court actions, exe	cutions, attachments, or governmental audits		
		gs, investigations, arbitrations, me 1 year before filing this case.	ediations, and audits by federal or state agencies in whi	ch the c	debtor was
$\checkmark$	None				
	Case title	Nature of case	Court or agency's name and address	Sta	tus of case
	7.1				Pending
			Name		On appeal
				_ 🗆	Concluded
			Street		
	Case number			_	
			City State ZIP Code	_	
			Country		
As	signments and receivership				
		an assignee for the benefit of cree court-appointed officer within 1 years	ditors during the 120 days before filing this case and an ear before filing this case.	y prope	erty in the ha
	None				

None						
Custodian's name and address		lian's name and address Description of the Property		Value		
I				\$		
Custodian's na	ime			Court name and address		
			Case title			
Street				Name		
			Case number	Street		
City	State	ZIP Code				
Country			Date of order or assignment	City	State	ZIP Code
				Country		

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533
	Name		

Part 4:	Certain	<b>Gifts</b>	and	Charitable	Contributions

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

	Recipient's name	and address		Description of the gifts or contributions	Dates given	Value
9.1						\$
	Creditor's Name					
	Street					
	City	State	ZIP Code			
	Country					
	Recipient's relation	nship to debto	or			

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533	
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Name

Part 5:	Certain	Losses

10. All losses from fire, theft, or other casualty within 1 year before filing this case.

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
0.1			\$

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533
	Name		

Payments	or Transfers
•	n Payments

# 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 transfe	If not money, describe any property transferred	Dates	Total amount or value
1.1				\$
	Address			
	Street	<u> </u>		
	City State ZIP Coc	_		
	Country	_		
	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.

 $\ensuremath{\,\overline{\!\!\mathcal M\!}}$  None

	Name of trust or device	Describe any property transferred	Dates transfers were made	Total amount or value
12.1		-		\$
	Trustee			
		-		

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533	

Name

#### 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 o	r value
13.1	Windscape Apartments, LLC (Buyer)	430 W Napa St, Sonoma, CA 95476	11/8/2022	\$	4,000,000.00

Address		
6359 Auburn Blvo	i.	
Street		
Citrus Heights	CA	95621
City	State	ZIP Code
Country		
Relationship to	Debtor	
Related party		

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Debtor:	Tradewinds Apartmen	nts, LP		Case num	nber (if known):	24-10533
	Name					
Part 7	Previous Loca	tions				
14.	Previous addresse	es				
	List all previous add	Iresses used by the de	ebtor within 3 years befor	e filing this case and the date	s the addres	sses were used.
[	□ Does not apply					
	Address			Dates of occupancy		
1	4.1 P.O. Box 5490			From		To through Sep 12, 2024
	Street					
				_		
	Vacaville	CA	95696			
	City	State	ZIP Code	_		

Country

Official Formation 23년: 24-1054**Statement #f ᢓiŋensial 本ffreigion by ተመታ**ሟ duals ក្រុម្បាស់ 16:59:09 Page 1 ይገል 10

Debtor:	Trade	ewinds Apartments, LP		Case number (if known):	24-10533
	Name				
Part 8	3:	Health Care Bankruptcies			
15. H	lealth	Care bankruptcies			
_	<ul><li>diag</li></ul>	lebtor primarily engaged in offering ser nosing or treating injury, deformity, or o iding any surgical, psychiatric, drug tre	disease, or		
5	☑ No.	Go to Part 9.			
	□ Yes	. Fill in the information below.			
		Facility Name and Address	Nature of the business operation the debtor provides	, including type of services	If debtor provides meals and housing, number of patients in debtor's care
	15.1				
		Facility Name			
			Location where patient records are facility address). If electronic, identify		How are records kept?
		Street			Check all that apply:
			_		☐ Electronically
		City State 7IP Code	_		☐ Paper

Country

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Debtor:	Tradewinds A	partments, LP		Case number (if known):	24-10533
	Name			-	
Part 9	Persona	lly Identifiable Information			
16.	Does the de	otor collect and retain personally i	dentifiable information of c	ustomers?	
	☑ No.				
	☐ Yes. State	e the nature of the information collect	ed and retained.		
	Doe	es the debtor have a privacy policy al	oout that information?		
		No			
		Yes			
	Amended he	erein - updated			
		s before filing this case, have any ofit-sharing plan made available b			A, 401(k), 403(b), or other
<u> </u>	☑ No. Go to	Part 10.			
	Yes. Does	the debtor serve as plan administra	tor?		
	□ <b>N</b>	lo. Go to Part 10.			
	□ Y	es. Fill in below:			
		Name of plan	E	imployer identification number o	f the plan
	17	.1	E	:IN:	
		Has the plan been terminated?			
		□ No			
		□ Yes			

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533	
	Name			

# 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	on name and addre	ess	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				XXXX-	Checking		\$
	Name				Savings		
					Money market		
	Street			-	Brokerage		
					Other		
				-			
	City	State	ZIP Code	-			
	Country						

# 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.

	Depository institution name and add	dress	Names of anyone with access to it	Description of the contents	Does debtor still have it?
19.1					□ No
	Name				□Vee
	Street				□ Yes
	City State	ZIP Code	Address		
	,				
	Country				

Debtor:	Tradewinds Apartments, LP	Case number (if known):	24-10533
	Name		

# 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.

	Facility name and addre	SS	Names of anyone with access to it	Description of the contents	Does debtor still have it?
20.1					□ No
	Name				
	Street				□ Yes
			-		
			Address		
	City State	ZIP Code			
	Country				

Debtor: Tradewinds Apartments, LP Case number (if known): 24-10533	Debtor:
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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

Name

	Owner's nam	ne and addre	ess	Location of the property	Description of the property	,	Value
21.1	Name			-		\$_	
	Street			-			
				- -			
	City	State	ZIP Code				
	Country			-			

ebtor:	Trad	dewinds Apartments, LP				Case number (if known):	24-10533	
	Name	Э						
art 1	2:	Details About Environment	al Informatio	n				
or th	e pur	pose of Part 12, the following	definitions app	oly:				
<i>I</i>	<i>Envir</i> o	onmental law means any state dless of the medium affected	ute or governm (air, land, wate	nental regulation ther, or any other me	at concerns po	ollution, contamination, or h	azardous mate	rial,
		neans any location, facility, or erly owned, operated, or utilize		s, that the debt	or now owns, operates, or u	utilizes or that t	he debtor	
		rdous material means anythin similarly harmful substance.	g that an envir	onmental law defir	nes as hazardo	us or toxic, or describes as	a pollutant, co	ntaminant,
epoi	rt all	notices, releases, and proce	eedings know	n, regardless of	when they occ	curred.		
2. H	as th	ne debtor been a party in an	v iudicial or a	dministrative pro	ceedina unde	r anv environmental law?	? Include settle	ments and orde
	☑ No			·	J	•		
	□ Ye	es. Provide details below.						
		Case title	Court or	agency name and	address	Nature of the case		Status of case
	22.1						1	Pending
			Name					☐ On appeal
							I	Concluded
			Street					
		Case Number						
			City	State	ZIP Code			
			Country					
a	an en	any governmental unit other avironmental law?	wise notified	the debtor that th	ne debtor may	be liable or potentially lia	able under or i	n violation of
	☑ No	0						
	□ Ye	es. Provide details below.						
		Site name and address		Governmental u	ınit name and	Environmental I	aw, if known	Date of notic
	23.1							
		Name		Name				
		Chroat		Chroat				
		Street		Street				
		City State	ZIP Code	City St	ate ZII	Code		
				-				
		Country		Country				

4.	ทสร แ	ne debtor notined any go	remmeman t	init of any ren	ease oi iiazai	uous materiai	ıf	
	☑ No	0						
	□ Ye	es. Provide details below.						
		Site name and address		Government	tal unit name	and address	Environmental law, if known	Date of notice
	24.1							
		Name		Name				
		Street		Street				
				-				
		City	ZID Code	City	Ctata	ZID Codo		
		City State	ZIP Code	City	State	ZIP Code		

Country

Case number (if known):

24-10533

Debtor: Tradewinds Apartments, LP

Country

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Tra —— Nam	adewinds Apartments, LF				Case number (if )	, <u> </u>	10533
. 1011	· <del>·</del>						
13:	Details About the I	Debtor's Business	or Connections to Any Bu	siness			
Othe	er businesses in whi	ch the debtor has	or has had an interest				
			n owner, partner, member, or listed in the Schedules.	otherwise a p	erson in control	within 6 ye	ears before filing this
☑ N	lone						
	Business name and	l address	Describe the nature o	f the business	Employer In Do not inclu	<b>dentificatio</b> de Social Se	n number ecurity number or ITIN
25.1					EIN:		
	Name				Dates busi	ness existe	d
					From		То
	Street						
			<del></del>				
		7100	<del> </del>				
	City	State ZIP Cod	e				
	Country						
	ks, records, and fina		no maintained the debtor's bo	ooks and reco	rds within 2 year	rs before fili	ing this case.
	List all accountants a		no maintained the debtor's bo	ooks and reco	rds within 2 year	rs before fili	ing this case.
26a. I	List all accountants a	nd bookkeepers wh	no maintained the debtor's bo	ooks and recor		rs before fili	ng this case.
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad	nd bookkeepers wh	no maintained the debtor's bo	Dates of se			ing this case.
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name	nd bookkeepers wh		Dates of se	rvice		
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name  6359 Auburn Blvd.	nd bookkeepers wh		Dates of se	rvice		
26a. □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name	nd bookkeepers wh		Dates of se	rvice		
26a. □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name  6359 Auburn Blvd.	nd bookkeepers wh		Dates of se	rvice		
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name  6359 Auburn Blvd.	nd bookkeepers wh		Dates of se	rvice		
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name  6359 Auburn Blvd.  Street	nd bookkeepers wh	x Service of America, Inc.)	Dates of se	rvice		
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd. Street  Citrus Heights	nd bookkeepers wheecountant (Home Tax	x Service of America, Inc.)  95621	Dates of se	rvice		
26a. ∣ □ N	List all accountants a  lone  Name and Address  Ali Raisdana - Sr. Ad  Name  6359 Auburn Blvd.  Street  Citrus Heights	nd bookkeepers wheecountant (Home Tax	x Service of America, Inc.)  95621	Dates of se	rvice		
26a. ∣ □ N	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd. Street  Citrus Heights City  Country	ccountant (Home Tax	x Service of America, Inc.)  95621  ZIP Code	Dates of se	rvice		
26a. l □ N 26a.	List all accountants a lone  Name and Address  Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd. Street  Citrus Heights City  Country	ccountant (Home Tax	x Service of America, Inc.)  95621	Dates of se	rvice	То	
26a.   N	List all accountants a  lone  Name and Address  Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd. Street  Citrus Heights City  Country  Mark Bennett - Asse	ccountant (Home Tax	x Service of America, Inc.)  95621  ZIP Code	Dates of se	rvice 0/2018	То	present
26a.   N	List all accountants a  lone  Name and Address  Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd. Street  Citrus Heights City  Country  Mark Bennett - Asset 2 Inc.)	ccountant (Home Tax	x Service of America, Inc.)  95621  ZIP Code	Dates of se	rvice 0/2018	То	present
26a.   N	List all accountants a lone  Name and Address  1 Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd. Street  Citrus Heights City  Country  Mark Bennett - Asset Inc.) Name	ccountant (Home Tax	x Service of America, Inc.)  95621  ZIP Code	Dates of se	rvice 0/2018	То	present
26a. I	List all accountants a lone  Name and Address  1 Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd.  Street  Citrus Heights City  Country  Mark Bennett - Asset Inc.) Name 6359 Auburn Blvd.	ccountant (Home Tax	x Service of America, Inc.)  95621  ZIP Code	Dates of se	rvice 0/2018	То	present
26a. I	List all accountants a lone  Name and Address  1 Ali Raisdana - Sr. Ad Name 6359 Auburn Blvd.  Street  Citrus Heights City  Country  Mark Bennett - Asset Inc.) Name 6359 Auburn Blvd.	ccountant (Home Tax	x Service of America, Inc.)  95621  ZIP Code	Dates of se	rvice 0/2018	То	present

Country

Tradev	winds Apartments, LP				Case number (if known):	24-10533
Name						
List all statem	firms or individuals went within 2 years be	ho have audited fore filing this ca	d, compiled, or review ase.	ed debtor's books of a	account and records or	prepared a financial
☑ No	ne					
	Name and Address			Dates of servi	ice	
26b.1				From	Т	0
	Name			<del></del>		
	Street			<del></del>		
	City	State	7IP Codo			
	City	State	ZIF Code			
	Country					
ist all t	firms or individuals w	ho were in poss	ession of the debtor's	books of account and	d records when this ca	se is filed.
□ Nor	ne					
	Name and address				If any books of a unavailable, exp	ccount and records are
26c.1 <i>A</i>	Ali Raisdana (Home Ta	ax Service of Ame	erica, Inc.)			
_			, , , , , , , , , , , , , , , , , , ,			
6	3359 Auburn Blvd.					
5	Street					
_						
,	Citrus Hoights		CA	05621		
_						
	•					
-	Country					
					If any books of a	ccount and records are
	Name and address				unavailable, exp	lain why
26c.2 E	ВРМ					
1	Name					
2	2001 North Main Stree	t				
5	Street					
5	Suite 360					
				0.4500		
1.	Nalnut Creek		$\cap$	94596		
_	Walnut Creek		CA State	94596 ZIP Code		
_	Valnut Creek City		CA State	ZIP Code		
	Name List all statem  ✓ No  26b.1  List all f	List all firms or individuals we statement within 2 years be  None  Name and Address  26b.1  Name  Street  City  Country  List all firms or individuals we made and address  26c.1 Ali Raisdana (Home Tank) Name 6359 Auburn Blvd. Street  Citrus Heights City  Country  Name and address  26c.2 BPM Name Name	List all firms or individuals who have audited statement within 2 years before filing this case.  None  Name and Address  26b.1  Name  Street  City State  Country  List all firms or individuals who were in posses.  None  Name and address  26c.1 Ali Raisdana (Home Tax Service of American Name 6359 Auburn Blvd.  Street  Citrus Heights  City  Country  Name and address  26c.2 BPM  Name 2001 North Main Street  Street	Name List all firms or individuals who have audited, compiled, or review statement within 2 years before filling this case.  ✓ None  Name and Address  26b.1  Name  Street  City State ZIP Code  Country  List all firms or individuals who were in possession of the debtor's None  Name and address  26c.1 Ali Raisdana (Home Tax Service of America, Inc.)  Name 6359 Auburn Blvd.  Street  Citrus Heights CA  City State  Country  Name and address  26c.2 BPM  Name 2001 North Main Street  Street	Name List all firms or individuals who have audited, compiled, or reviewed debtor's books of statement within 2 years before filing this case.  None    Name and Address	Name List all firms or individuals who have audited, compiled, or reviewed debtor's books of account and records or statement within 2 years before filing this case.  None  Name and Address  Dates of service From

r: Trade	ewinds Apartments, LP		Case	number (if known):	24-10533
Name					
List a stater	all financial institutions, creditors, ment within 2 years before filing	and other parties, including mercan this case.	tile and trade ager	ncies, to whom th	ne debtor issued a financia
☑N	lone				
	Name and address				
26d	.1 NexBank				
	Name				
	2515 McKinney Ave Ste 1100				
	Street				
	Dallas	ŦX	<del>75201</del>		
	City	State	ZIP Code		
	Country				
	Country				
	Country  Amended herein - removed				
	Amended herein - removed				
Invento	Amended herein - removed				
	Amended herein - removed	perty been taken within 2 years befo	re filing this case?	,	
Have ar	Amended herein - removed	perty been taken within 2 years befo	re filing this case?		
Have ar ☑ No	Amended herein - removed pries  ny inventories of the debtor's pro		re filing this case?	,	
Have ar ☑ No	Amended herein - removed		re filing this case?		
Have an  ☑ No □ Yes.	Amended herein - removed pries  ny inventories of the debtor's pro	most recent inventories.	Date of		unt and basis (cost, marke each inventory
Have an  ☑ No □ Yes.	Amended herein - removed ories  ny inventories of the debtor's pro	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory
Have an  ☑ No ☐ Yes.	Amended herein - removed ories  ny inventories of the debtor's pro	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory
Have an  ☑ No ☐ Yes.	Amended herein - removed ories  ny inventories of the debtor's pro  . Give the details about the two in the person who supervious and address of the person.	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory
Have ar  ☑ No □ Yes. □	Amended herein - removed ories  ny inventories of the debtor's pro  . Give the details about the two in the person who supervious and address of the person.	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory
Have ar	Amended herein - removed ories  ny inventories of the debtor's pro  . Give the details about the two in the person who superviolated	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory
Have ar	Amended herein - removed ories  The property of the debtor's property inventories of the person who supervised inventories of the person records.	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory
Have an  ✓ No  ☐ Yes.  27.1  S	Amended herein - removed ories  The property of the debtor's property inventories of the person who supervised inventories of the person records.	most recent inventories.	Date of	The dollar amou	unt and basis (cost, marke each inventory

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
28.1	LeFever Mattson, a California corporation	6359 Auburn Blvd., Citrus Heights, CA 95621	General Partner	15.02%

Official Formasse: 24-10545tatement of zinemial Affein for by dividuals filling of the filling of the statement of the statem

Debtor:	: Trade	ewinds Apartments, LP			Case number (if kno	wn): 24-10533	
	Name				•	<del></del>	
		1 year before the filing of trol of the debtor, or share					rtners, members
	□ No						
	☑ Yes	s. Identify below.					
	N	lame	Address		Position and Nature of any interest	Period during vinterest was he	which position or eld
	29.1 K	en Mattson	PO Box 5490, Vacaville	e, CA 95696	President	From	To through 9/12/2024
30.	Payme	ents, distributions, or with	ndrawals credited or gi	ven to insiders			
	bonuse	1 year before filing this cases, loans,credits on loans, s			in any form, including sal	ary, other compe	nsation, draws,
	□ No						
	⊻ Ye	s. Identify below.		A			
		Name and address of reci	pient	Amount of money or description and value of property	Dates	Reason for p	roviding the value
	30.1	See SOFA Question 4					
		Name					
		Street		-			
				-			
		City State	ZIP Code	-			
		Country		-			
		Relationship to debtor					
31.	Within	n 6 years before filing this	case has the debtor l	heen a member of an	v consolidated group fo	or tax nurnoses	7
	☑ No		o daos, não the dobtor .		y concomunica group is	n tax parpecce	
	□ Yes	s. Identify below.					
	l	Name of the parent corpora	ation		er Identification number of	f the parent corp	oration
	31.1			EIN:			
32.	Withi	n 6 years before filing thi	s case, has the debtor	as an employer beer	n responsible for contrib	outing to a pens	ion fund?
	☑ No						
	□ Ye	es. Identify below.					
		Name of the pension fund	d	Employer lo	dentification number of th	e pension fund	
	32.1	•		EIN:		-	
	02.1	•					

# Part 14: Signature and Declaration

WA	RNING Ba	ankruptcy fraud is a seri	ous crime. Making a false statement, c	oncealing property, or	obtaining money or property by fraud in
coni	nection with	a bankruptcy case can	result in fines up to \$500,000 or impris	onment for up to 20 ye	ears, or both.
18 L	J.S.C.§§ 152	2, 1341, 1519, and 3571			
l ha	ve examined	d the information in this	Statement of Financial Affairs and any	attachments and have	e a reasonable belief that the information is true and correct.
I de	clare under	penalty of perjury that th	ne foregoing is true and correct.		
Exe	cuted on	09/09/2025			
		MM / DD / YYYY			
×	/s/Brad	ley D. Sharp		Printed name	Bradley D. Sharp
	Signature	of individual signing on	behalf of the debtor		
	Position or	relationship to debtor	Chief Restructuring Officer		
Are	additiona	l pages to <i>Statemen</i>	t of Financial Affairs for Non-Ind	lividuals Filing for I	Bankruptcy (Official Form 207) attached?
	No				
	Yes				

# In re: Tradewinds Apartments, LP Case No. 24-10533

# Amended Attachment 3

Certain payments or transfers to creditors within 90 days before filing this case

Payee's name	Address 1	City	State	Zin	Date	Total amount or value	Reason for payment or transfer	Amendment
•			1					
Capital Premium Financing, Inc.	PO Box 667180	<del>Dallas</del>	ŦX	<del>75266-7180</del>	6/28/2024			Amended herein - removed
Capital Premium Financing, Inc.	PO Box 667180	Dallas	ŦX	<del>75266-7180</del>	7/9/2024	<del>-\$2,102.77</del>	Services	Amended herein - removed
Capital Premium Financing, Inc.	PO Box 667180	<del>Dallas</del>	ŦX	75266-7180	7/9/2024	<del>\$155.14</del>	Services	Amended herein - removed
Capital Premium Financing, Inc.	PO Box 667180	<del>Dallas</del>	TX	<del>75266-7180</del>	7/9/2024	<del>\$2,102.77</del>	Services	Amended herein - removed
Capital Premium Financing, Inc.	PO Box 667180	<del>Dallas</del>	ŦX	75266-7180	7/15/2024	<del>\$2,117.77</del>	Services	Amended herein - removed
Capital Premium Financing, Inc.	PO Box 667180	Dallas	ŦX	75266-7180	7/19/2024	\$4,310.68	Services	Amended herein - removed
Capital Premium Financing, Inc.	PO Box 667180	<del>Dallas</del>	ŦX	75266-7180	8/12/2024	<del>\$2,102.77</del>	Services	Amended herein - removed
<del>NexBank</del>	2515 McKinney Ave Ste 1100	<del>Dallas</del>	ŦX	<del>75201</del>	7/9/2024	<del>\$3,787.17</del>	Secured Debt	Amended herein - removed
<del>NexBank</del>	2515 McKinney Ave Ste 1100	<del>Dallas</del>	ŦX	<del>75201</del>	7/9/2024	<del>\$6,185.19</del>	Secured Debt	Amended herein - removed
<del>NexBank</del>	2515 McKinney Ave Ste 1100	<del>Dallas</del>	ŦX	<del>75201</del>	8/20/2024	<del>\$3,593.46</del>	Secured Debt	Amended herein - removed
NexBank	2515 McKinney Ave Ste 1100	Dallas	ŦX	<del>75201</del>	8/20/2024	\$6,378.90	Secured Debt	Amended herein - removed
<del>NexBank</del>	2515 McKinney Ave Ste 1100	<del>Dallas</del>	ŦX	<del>75201</del>	9/9/2024	<del>\$3,605.94</del>	Secured Debt	Amended herein - removed
<del>NexBank</del>	2515 McKinney Ave Ste 1100	<del>Dallas</del>	ŦX	<del>75201</del>	9/9/2024	<del>\$6,366.42</del>	Secured Debt	Amended herein - removed
PDF Designs Inc	34522 N Scottsdale Rd Ste 12-510	Scottsdale	AZ	<del>85266</del>	9/6/2024	<del>\$8,250.00</del>	Services	Amended herein - removed

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#### In re: Tradewinds Apartments, LP Case No. 24-10533

#### Amended Attachment 4

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

							Total amount			
Insider's name	Address 1	Address 2	City	State	Zip	Date	or value	Reasons for payment or transfer	Relationship to debtor	Amended
Bishop Pine, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	9/19/2023	\$20,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Cambria Pine, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	10/13/2023	\$16,500.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Cambria Pine, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	10/25/2023	\$1,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Cambria Pine, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	1/26/2024	\$4,500.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Country Oaks I LP	6359 Auburn Blvd	Suite B	Citrus Heights	CA	95621	9/26/2023	\$45,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Foxtail Pine. LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	11/28/2023	\$9,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Gold Oak Apartments	6359 Auburn Blvd	Suite B	Citrus Heights	CA	95621	9/26/2023	\$4.000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Gold Oak Apartments	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	10/10/2023	\$15,000.00	1 /	Common Ownership	Amended Herein - removed
Home Tax Service of America,	0000 Aubum Bivu.	Ounc D	Ollius Ficigrits	<del>0</del> A	330ZT	10/10/2020	Ψ10,000.00	microompany Loan	Common Ownership	Amended Herein - Temoved
Inc., dba LeFever Mattson										
The state of the s	COEO Automo Dhad	0 11 0	0.1	0.4	05004	40/40/0000	004 000 00	International Con-	0	
Property Management	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	12/13/2023	<del>\$31,000.00</del>	Intercompany Loan	Common Ownership	Amended Herein - removed
Home Tax Service of America,										
Inc., dba LeFever Mattson	l								l	
Property Management	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	4/10/2024	-\$755.00	Other	Common Ownership	
Home Tax Service of America,										
Inc., dba LeFever Mattson										
Property Management	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	4/10/2024	\$755.00	Other	Common Ownership	
Kathleen Hamlin Living Trust, dtd										
July 2, 2008	Address on file					9/22/2023	\$1,611.47	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd										
July 2, 2008	Address on file					10/20/2023	\$1.611.47	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd							<del>+</del> 1,+1111			
July 2, 2008	Address on file					11/22/2023	\$1 611 47	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd	/ tadrees on me					TITELIEUEU	Ψ1,011.41	CWITCH DISTINGUISTIC	Indiadi redativo	
July 2, 2008	Address on file					12/26/2023	¢1 611 17	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd	Address on the					12/20/2023	φ1,011.47	OWNER DISTRIBUTIONS	Insider relative	
July 2. 2008	Address on file					1/28/2024	¢1 611 17	Owner Distributions	Insider Relative	
	Address on file		-			1/20/2024	\$1,011.47	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd	A -l-l					0/00/0004	04 044 47	O Distributions	Institute Deletion	
July 2, 2008	Address on file					2/23/2024	\$1,611.47	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd									l	
July 2, 2008	Address on file					3/22/2024	-\$1,611.47	Owner Distributions	Insider Relative	
Kathleen Hamlin Living Trust, dtd										
July 2, 2008	Address on file					3/22/2024	\$1,611.47	Owner Distributions	Insider Relative	
LeFever Mattson, a California								Expense Reimbursements /-		
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	10/2/2023	<del>\$8,753.31</del>	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California								Expense Reimbursements /-		
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	11/1/2023	\$2,915.00	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California								Expense Reimbursements /	1	
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	12/1/2023	\$1.457.50	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California							<b>\$1,121.00</b>	, and the second	1 7	
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	12/19/2023	\$34,000,00	Intercompany Loan	Parent Company	Amended Herein - removed
LeFever Mattson, a California	COCC / tabarri Biva:	Outc D	Olli da Ficigrita	OA	30021	12/13/2023	ψ04,000.00	Expense Reimbursements /	T dronk Company	Ameriaca mercim - removea
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	1/1/2024	¢1 /57 50	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California	<del>0000 Aubum bivu.</del>	<del>ouite b</del>	<del>Oitrus Heights</del>	<del>OA</del>	30021	1/1/2024	<del>φ1,401.30</del>	Expense Reimbursements /-	r arent Company	Amended Herein - Teilloved
the state of the s	GOEO Auburn Dhiel	Cuite D	O:t	C 4	05004	0/4/0004	¢4 457 50	The state of the s	Derent Company	A
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	2/1/2024	<del>\$1,457.50</del>	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California				L.	1		4.4.	Expense Reimbursements /		l
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	3/1/2024	<del>\$1,457.50</del>		Parent Company	Amended Herein - removed
LeFever Mattson, a California			1	1	1			Expense Reimbursements /		
<del>corporation</del>	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	4/1/2024	<del>\$1,457.50</del>		Parent Company	Amended Herein - removed
LeFever Mattson, a California								Expense Reimbursements /-		
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	5/2/2024	<del>\$1,457.50</del>	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California								Expense Reimbursements /		
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	6/4/2024	\$1,457.50	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California			Ĭ	1				Expense Reimbursements /	, ,	
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	6/13/2024	<del>\$954.03</del>	Management Fee	Parent Company	Amended Herein - removed
	TITLE FLOORING BITTE	Cano D	Cardo Froigitto	5/1	30021	3/10/2024	Ψ004.00		I'm Company	, and add riotolii Tollloved

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# In re: Tradewinds Apartments, LP

#### Case No. 24-10533

Amended Attachment 4

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

							Total amount			
Insider's name	Address 1	Address 2	City	State	Zip	Date	or value	Reasons for payment or transfer	Relationship to debtor	Amended
LeFever Mattson, a California								Expense Reimbursements /-		
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	8/1/2024	\$1,457.50	Management Fee	Parent Company	Amended Herein - removed
LeFever Mattson, a California										
<del>corporation</del>	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	8/12/2024	<del>\$929.75</del>	Intercompany Loan	Parent Company	Amended Herein - removed
LeFever Mattson, a California										
<del>corporation</del>	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	8/12/2024	<del>\$23,500.00</del>	Intercompany Loan	Parent Company	Amended Herein - removed
LeFever Mattson, a California								Expense Reimbursements /-		
corporation	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	9/3/2024	<del>\$1,603.25</del>	Management Fee	Parent Company	Amended Herein - removed
Salvio Pacheco Square	2151 Salvio St		Concord	CA	94520	2/8/2024	\$40,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Scotch Pine, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	2/8/2024	\$20,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Sienna Pointe, LLC	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	10/25/2023	\$4,500.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Sienna Pointe, LLC	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	10/26/2023	\$23,500.00	Intercompany Loan	Common Ownership	Amended Herein - removed
Sienna Pointe, LLC	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	11/28/2023	<del>\$11,500.00</del>	Intercompany Loan	Common Ownership	Amended Herein - removed
Valley Oak Investments, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	1/26/2024	<del>\$3,500.00</del>	Intercompany Loan	Common Ownership	Amended Herein - removed
Valley Oak Investments, LP	6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621	1/31/2024	\$5,000.00	Intercompany Loan	Common Ownership	Amended Herein - removed

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# IN RE LEFEVER MATTSON, A CALIFORNIA CORPORATION, ET AL.

**LEAD CASE NO. 24-10545 (CN)** 

# GENERAL NOTES AND STATEMENT OF LIMITATIONS, METHODOLOGY, AND DISCLAIMERS REGARDING DEBTORS' SCHEDULES OF ASSETS AND LIABILITIES; STATEMENTS OF FINANCIAL AFFAIRS; AND LISTS OF EQUITY SECURITY HOLDERS

On September 12, 2024, LeFever Mattson, a California corporation, ("LeFever Mattson") and certain of its affiliates (collectively, the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court"), commencing the chapter 11 cases now jointly administered, for procedural purposes only pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), under Lead Case No. 24-10545 (CN) (the "Chapter 11 Cases"). One of the Debtors, Windscape Apartments, LLC, filed its chapter 11 petition on August 6, 2024. Two of the Debtors, Pinewood Condominiums, LP, and Ponderosa Pines, LP, filed their chapter 11 petitions on October 2, 2024. A related entity, K S Mattson Partners, LP, ("KSMP") was the debtor in an involuntary petition filed on November 22, 2024. The order for relief for KSMP was entered by the Bankruptcy Court on June 9, 2025, and the chapter 11 case of KSMP is now jointly administered with the Debtors. Unless otherwise indicated, "Debtors" as used herein excludes KSMP. The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

# **OVERVIEW OF GENERAL NOTES**

Each of the Debtors filed separate Schedules of Assets and Liabilities ("Schedules"), Statements of Financial Affairs ("Statements"), and Lists of Equity Security Holders ("Lists") on November 15, 2024 [Dkt. Nos. 292-353]. Certain Debtors have filed herewith separate amended Schedules These General Notes and Statement of Limitations, Methodology, and Disclaimers Regarding Debtors' Schedules of Assets and Liabilities, Statements of Financial Affairs, and Lists of Equity Security Holders (the "General Notes") relate to each of the Debtors' 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. The General Notes are presented for each individual Debtor; however, each provision contained in the General Notes may not apply to all Debtors. 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 Debtors against any third party, or in or with respect to any aspect of these Chapter 11 Cases.

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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 any of the Debtors.

The Schedules, Statements, and Lists have been prepared, pursuant to section 521 of the Bankruptcy Code and Bankruptcy Rule 1007, by the Debtors' management with the assistance of their advisors and other professionals. The Schedules, Statements, and Lists contain unaudited information, which is subject to further review and potential adjustment. Reasonable efforts have been made to provide accurate and complete information herein based upon information that was available at the time of preparation; however, subsequent information or discovery thereof may result in material changes to the Schedules, Statements, and Lists, and inadvertent errors or omissions may exist. Nothing contained in the Schedules, Statements, and Lists shall constitute a waiver of any of the Debtors' 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 Debtors and their 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 Debtors or damages to business reputation, lost business, or lost profits), whether foreseeable or not and however caused, even if the Debtors or their agents, attorneys, and financial advisors are advised of the possibility of such damages.

The Debtors reserve 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 Debtors' 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 for each Debtor have been signed by an authorized officer or representative for each of the Debtors (the "Signatory"). In reviewing and signing the Schedules, Statements, and Lists, the Signatory necessarily relied upon the efforts, statements, and representations of various personnel employed by the Debtors and their advisors and other professionals. The Signatory 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.

# Schedules, Statements, and Lists General Notes

- 1. Net Book Value of Assets. The Debtors do not have current market valuations for all of their assets as it would be prohibitively expensive, unduly burdensome, and an inefficient use of estate assets and resources for the Debtors to obtain current market valuations of all their assets. Accordingly, unless otherwise indicated herein, assets in the Schedules and Statements reflect net book values as of the end of the day on the applicable petition date for each Debtor. Net book values may vary, sometimes materially, from market values. 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 Debtors have not performed an analysis of impairment of fixed assets, goodwill, or other intangibles. The Debtors do not intend to amend these Schedules and Statements to reflect actual values.
- 2. <u>Basis of Presentation</u>. Information contained in the Schedules and Statements has been derived from the Debtors' books and records and historical financial statements. The Schedules and Statements do not purport to represent financial statements prepared in accordance with United States Generally Accepted Accounting Principles ("<u>GAAP</u>"), nor are they intended to fully reconcile with the financial statements of each Debtor.
- 3. <u>Amendment.</u> Reasonable efforts have been made to prepare and file complete and accurate Schedules, Statements, and Lists. Despite these efforts, inadvertent errors or omissions may exist. The Debtors reserve all rights to, but are not required to, amend and/or supplement the Schedules, Statements, and Lists from time to time as is necessary and appropriate.
- 4. Recharacterization. The Debtors have 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 Debtors' business and operations, the Debtors may have improperly characterized, classified, categorized, or designated certain items. The Debtors reserve all of their 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 applicable petition date and remain executory and unexpired postpetition.
- 5. <u>Confidentiality.</u> There may be instances in the Schedules, Statements, and Lists where the Debtors have deemed it necessary and appropriate to redact or withhold from the public record information such as names, addresses, or amounts. Typically, the Debtors have used this approach because of an agreement between the Debtors and a third party, concerns of confidentiality, or concerns for the privacy of an individual.
- 6. <u>Cash Management System.</u> Certain payments in the Schedules and Statements may have been made prepetition by one entity on behalf of another entity through the operation of the Debtors' cash management system. The Debtors' prepetition cash management system is described in the Motion of Debtors for Interim and Final Orders (I) Approving Continued Use of the Debtors' Cash Management System and Bank Accounts; (II) Authorizing the Debtors to Open and Close Bank

Accounts; and (III) Authorizing Banks to Honor Certain Prepetition Transfers (the "Cash Management Motion") dated September 12, 2024 [Docket No. 13].

- 7. <u>Currency.</u> Unless otherwise indicated, all amounts are reflected in U.S. dollars.
- 8. <u>Liabilities</u>. The Debtors have 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 Debtors reserve all of their 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 Debtors reserve 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.

- 9. <u>Property and Equipment.</u> Unless otherwise indicated, owned property and equipment are presented at net book value.
- 10. 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 Debtors hereby expressly reserve the right to assert that any contract or lease listed on the Debtors' Schedules does not constitute an executory contract or unexpired lease within the meaning of section 365 of the Bankruptcy Code.
- 11. Leases. The Debtors may lease real property, furniture, fixtures, and equipment from certain third-party lessors. Such leases are presented in the Schedules and Statements, subject to the reservation of rights set forth herein. The Debtors have not included in the Schedules and Statements the future obligations of any leases. Nothing herein or in the Schedules or Statements shall be construed as a concession, admission or evidence as to the determination of the legal status of any leases (including whether any lease is a true lease or a financing agreement) identified in the Schedules or Statements, including whether such leases: (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, and the Debtors reserve all of their rights.
- 12. <u>Causes of Action.</u> Despite their reasonable efforts to identify all known assets, the Debtors may not have listed all of their causes of action or potential causes of action against third parties as assets in their 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 Debtors reserve all of their rights with respect to any claims, causes of action or avoidance actions they 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.

- 13. <u>Taxes.</u> Claims listed on the Debtors' Schedule E/F include claims owing to various taxing authorities to which the Debtors may potentially be liable. However, certain of such claims may be subject to ongoing audits and the Debtors are otherwise unable to determine with certainty the amount of many, if not all, of the claims listed on Schedule E/F. Therefore, the Debtors have listed estimated claim amounts, where possible, or alternatively listed such claims as unknown in amount and marked the claims as unliquidated, pending final resolution of ongoing audits or other outstanding issues. The Debtors reserve their rights to dispute or challenge whether such claims are entitled to priority.
- 14. <u>Unknown Amounts</u>. Claim amounts that could not readily be quantified by the Debtors are scheduled as "unknown." These may include claims for prepetition services for which the Debtors have not yet received invoices or for Debtors with limited accounting information available (see General Note 31). The description of an amount as "unknown" is not intended to reflect upon the materiality of the amount.
- 15. Payment of Prepetition Claims Pursuant to First Day Orders. On or about September 25, 2024, the Bankruptcy Court entered interim orders (the "Interim Orders") authorizing, but not directing, the Debtors to, among other things, pay certain prepetition claims relating to (a) employee wages, salaries, and other compensation and benefits; (b) insurance premiums; and (c) the continued use of the Debtors' Cash Management System. Final orders granting such relief were entered on or about October 17-21, 2024 (the "Final Orders," and, collectively with the Interim Orders, the "First Day Orders"). In certain instances, the debtor has continued to make payments on outstanding secured debt. Where the Schedules list creditors and set forth the amounts attributable to such claims, such scheduled amounts reflect balances owed as of the applicable petition date. To the extent any adjustments are necessary to reflect any payments made on account of such claims following the commencement of these Chapter 11 Cases pursuant to the authority granted to the Debtors by the Bankruptcy Court under the First Day Orders, such adjustments have been included in the Schedules unless otherwise noted on the applicable Schedule. The Debtors reserve the right to update the Schedules to reflect payments made pursuant to the First Day Orders.
- 16. <u>Employee Claims</u>. The Bankruptcy Court entered a First Day Order granting the Debtors the authority, but not imposing on them the obligation, to pay certain prepetition employee wages, salaries, benefits, and other obligations in the ordinary course. Employee claims for prepetition amounts that were paid, or were authorized to be paid, pursuant to such orders of the Bankruptcy Court, may not be included in the Schedules and Statements.
- 17. Other Claims Paid Pursuant to Court Orders. Pursuant to certain orders of the Bankruptcy Court entered in the Debtors' Chapter 11 Cases, the Debtors were authorized (but not directed) to pay, among other things, certain prepetition claims. Accordingly, these liabilities may have been or may be satisfied in accordance with those orders, and therefore may not be listed in the Schedules and Statements.

- 18. <u>Insiders.</u> The Debtors have included all payments and distributions made to officers and managers during the twelve months preceding the applicable petition date. Included in the value reflected are cash payments to or for the benefit of the insider (inclusive of payroll, bonus and other employee benefits paid in cash). Persons have been included in the Statements for informational purposes only, and the listing of an individual as an insider is not intended to be and should not be construed as a legal characterization of that person as an insider and does not act as an admission of any fact, claim, right or defense, and all such rights, claims and defenses are reserved. Further, the Debtors do not take any position concerning (a) the person's influence over the control of the Debtors, (b) the person's management responsibilities and functions, (c) the person's decision-making or corporate authority, or (d) whether the person could successfully argue that he or she is not an insider under applicable law, including federal securities law, or any theories of liability or for any other purpose.
- 19. <u>Excluded Assets and Liabilities.</u> Other non-material assets and liabilities may have been excluded from the Schedules.
- 20. <u>Intercompany Claims</u>. Claims between the Debtors, as reflected in the applicable entities' balance sheet accounts, have been reported on Schedule A/B 71 and Schedule E/F. The Debtors take no position in these Schedules and Statements as to whether such accounts would be allowed as claims, interests, or not allowed at all. Such claims between the Debtors as reflected in their books and records do not completely reconcile as to each Debtor. Accordingly, the intercompany claims on Schedule E/F have been flagged as disputed. On February 14, 2025, the Debtors filed the *Debtors' Reservation of Rights Regarding Interdebtor Claims and Interests* [Dkt. No. 836], reserving all rights as to asserting claims between Debtors. The Debtors expressly reserve all rights with respect to intercompany claims and interests, including to assert that one or more Debtors or other entities should be substantively consolidated, and including to amend their Schedules, Statements, and Lists as needed to assert such intercompany claims and interests.
- 21. <u>Litigation</u>. Certain litigation actions reflected as claims against one Debtor may relate to any of the other Debtors. The Debtors have made commercially reasonable efforts to record these actions in the Schedules and Statements of the Debtor that is party to the action.
- 22. <u>Claim Description</u>. 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 Debtors reserve all of their 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 Debtors may have scheduled claims of various creditors as secured claims for informational purposes, no current valuation of the Debtors' assets in which such creditors may have a lien has been undertaken. Moreover, the Debtors reserve all of their rights to, but are not required to, amend, supplement, or otherwise modify their Schedules and Statements as necessary and appropriate, including modifying claims descriptions and designations.
- 23. <u>Debt Representatives</u>. 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.

- 24. <u>Unliquidated Claim Amounts</u>. Claim amounts that could not be readily quantified by the Debtors are scheduled as "unliquidated." To the extent the Debtors are able to ascertain or estimate all or a portion of the claim amounts, they 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.
- 25. <u>Liabilities</u>. The Debtors have 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 Debtors reserve their right to, but are not required to, amend the Schedules and Statements as they deem appropriate to reflect this.
- 26. <u>Guarantees and Other Second Liability Claims</u>. The Debtors have used commercially reasonable efforts to locate and identify guarantees and other secondary liability claims (collectively, the "<u>Guarantees</u>") in their 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 affected Debtor or Debtors. Guarantees have generally been included in Schedules of the guarantor Debtor as "contingent" unless otherwise specified. While the Debtors have used commercially reasonable efforts to locate and identify Guarantees, it is possible that Guarantees embedded in the Debtors' executory contracts, unexpired leases, secured financings, debt instruments, and other such agreements may have been inadvertently omitted. The Debtors reserve all of their rights to, but are not required to, amend, supplement, or modify the Schedules if additional Guarantees are identified.
- 27. 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 Debtors reserve all of their rights as to the legal status of all intellectual property rights.
- 28. <u>Post-petition Agreements</u>. The Debtors have entered into and may continue to enter into certain post-petition agreements with creditors and other counterparties such as secured lenders with respect to the amounts of pre-petition claims. The amounts listed in the Schedules and Statements represent amounts owed as of the applicable petition date and are not intended to be a waiver or repudiation of any such post-petition agreement. The Debtors reserve all of their rights to, but are not required to, amend, supplement, or otherwise modify their Schedules and Statements as necessary and appropriate to reflect such post-petition agreements, including modifying claims descriptions and designations.

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- 29. <u>Totals</u>. 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" or "unliquidated." If there are unknown or unliquidated amounts, the actual totals may be materially different from the listed totals.
- 30. <u>Joint Ownership of Debtors' Properties.</u> Certain Debtors co-own and operate investment properties. Where applicable, amounts in the Schedules and Statements have been apportioned based on this co-ownership. Attached to these General Notes as <u>Annex A</u> is a table of properties co-owned by the debtors.
- 31. 1050 Elm Street: There was conflicting information and uncertainty regarding the ownership of 1050 Elm Street, in Napa, California. The Debtors' books and records reflected the property owner as Tradewinds Apartments, LP and the historical tax returns have been prepared as such. Further investigation has determined that the owner of 1050 Elm Street is Pinecone, LP. 1050 Elm Street is reported as an asset of Pinecone, LP in the amended Schedules and Statements.

# **Specific Disclosures with Respect to the Debtors' Schedules**

32. <u>Schedule A/B – Assets: Real and Personal Property.</u> All values are as the applicable petition date. Bank account balances are as of the end of the day on the applicable petition date. Details with respect to the Debtors' cash management system and bank accounts are provided in the Cash Management Motion. The cash balance as of the applicable petition date for all Debtors is presented on a book basis except for Home Tax Service of America, Inc., which is presented on a bank balance basis.

Net operating losses are listed in the Schedules as unknown, as the ability of the Debtors to utilize any available NOLs has not been evaluated.

The current value of a Debtors' interest in non-publicly traded stock and interests in partnerships, etc., are presented as the original cost of the investment.

In connection with the operation of their businesses, the Debtors maintain numerous property and liability insurance programs through different insurance carriers that provide the Debtors with insurance coverage for claims relating to, among other things, workers' compensation, property, liability, and employee health. The Debtors offer their employees: (i) medical insurance through Kaiser Foundation Health Plan, (ii) dental and vision coverage through Humana Inc. and (iii) life and accidental death and dismemberment through The Guardian Life Insurance Company of America. The Debtors' also maintain a policy of directors' and officers' liability insurance.

The Debtors hold potential causes of action against Kenneth Mattson and other entities related to certain transactions effected by Mr. Mattson prior to the applicable petition dates.

33. <u>Schedule D: Creditors Holding Secured Claims.</u> Except as otherwise agreed pursuant to a stipulation or agreed order or general order entered by the Bankruptcy Court, the Debtors reserve their 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 any 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 Debtors may have scheduled claims of various creditors as secured claims, the Debtors reserve 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, a Debtor may be a co-obligor, co-mortgagor or guarantor with respect to scheduled claims of other Debtors, and no claim set forth on Schedule D of any Debtor is intended to acknowledge claims of creditors that are otherwise satisfied or discharged by other entities. In certain instances, a Debtor may not be the borrower identified on a note or deed of trust secured by such Debtor's property; in such instances the borrower identified on the note or deed of trust may be listed on Schedule H for that Debtor. 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.

34. Schedule E/F: Creditors Who Have Unsecured Claims. Listing a claim on Part 1 of Schedule E/F as priority does not constitute an admission by the Debtors of the claimant's legal rights or a waiver of the Debtors' right to recharacterize or reclassify the claim or contract. The Bankruptcy Court entered a number of First Day Orders granting authority to pay certain prepetition priority claims. Accordingly, only claims against Debtors for prepetition amounts as of the applicable petition date that have not been paid have been included in Part 1 of Schedule E/F. Amounts owed to taxing authorities related to property tax reassessments have been flagged as disputed to preserve the applicable Debtor's option to review and dispute. The Debtors reserve their 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 Debtors that have vacated their leased premises after the applicable petition date, their security deposit may have been returned in the ordinary course of business.

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 applicable petition date; however, they are reflected on the Debtors' books and records. 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 Debtors have 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 Debtors may be excluded from Part 2 of Schedule E/F. The claims of individual creditors are generally listed at the amounts recorded on the Debtors' books and records and may not reflect credits or allowances due from the creditor. The Debtors reserve all of their rights concerning credits or allowances. The Bankruptcy Court entered First Day Orders granting authority to the Debtors to pay certain prepetition obligations in the ordinary course of business. Accordingly, only claims against the Debtors for prepetition amounts that have not been paid as of the applicable petition date have been included in Part 2 of Schedule E/F. The Debtors reserve their rights to object to any listed

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claims on the ground 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 notes payable from related parties or affiliates reflect balances from the books and records as of the applicable petition date and are subject to further review. In most instances, a signed note does not exist, however amounts borrowed or loaned bear interest.

35. 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 Debtors hereby reserve all of their 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 Debtors reserve all of their 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. Certain of the contracts, agreements and leases listed on Schedule G may have been entered into by more than one of the Debtors. Such contracts, agreements and leases are listed on Schedule G of each such Debtor.

36. Schedule H: Co-Debtors. In the ordinary course of their businesses, the Debtors are involved in pending or threatened litigation and claims arising out of the conduct of their businesses. These matters may involve multiple plaintiffs and defendants, some or all of whom may assert crossclaims and counter-claims against other parties. Because such claims are listed elsewhere in the Schedules and Statements, they have not been set forth individually on Schedule H. In certain instances, a Debtor may not be the borrower identified on a note or deed of trust secured by such Debtor's property and set forth on Schedule D; in such instances the borrower identified on the note or deed of trust may be listed on Schedule H for that Debtor. Schedule H also reflects guarantees by various Debtors. The Debtors may not have identified certain guarantees that are embedded in the Debtors' executory contracts, unexpired leases, secured financings, debt instruments and other such agreements. Further, the Debtors believe that certain of the guarantees reflected on Schedule H may have expired or are no longer enforceable. Thus, the Debtors reserve their right to amend the Schedules to the extent that additional guarantees are identified or such

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guarantees are discovered to have expired or are unenforceable. Schedule H is furnished for informational purposes only to apprise parties in interest of co-debtor relationships of the Debtors as of the applicable petition date and is derived from documents in the possession of the Debtors. It is not an admission or recognition that any co-debtor liability exists or existed.

# **Specific Disclosures with Respect to the Debtors' Statements**

- 37. <u>Statement 2: Income.</u> To the extent a Debtor has negative income, that is indicative of a loss from the sale of an asset (i.e., Beach Pine 2024 and Red Spruce Tree 2023).
- 38. Statement 3: Payments or Transfers within 90 Days of the Petition Date. The dates identified in the date of payment column for payments made to creditors for goods or services, and other debts, within 90 days prior to the applicable petition date relate to one of the following: (i) the date of a wire transfer; (ii) the date of an ACH payment; or (iii) the issuance date for a check or money order. Although the Debtors have attempted to remove unfunded and rejected payments, there may be items in process; therefore, certain payments reflected in response to Statement 3 may not have been paid, and those amounts may also appear as unsecured non-priority claims in Schedule E/F as amounts owed to the same entities. Credits taken against balances owed to third parties are included in response to Statement 3. Payments or transfers made within the 90 days prior to the applicable petition date to non-employee directors and/or insiders are included in response to Statement 4, and not listed in response to Statement 3. Payments or transfers on account of payroll for employees are not included in response to Statement 3.
- 39. <u>Statements 3 and 4: Prepetition transfers.</u> Vendor payments reviewed for threshold amount by property. See General Note 30 regarding co-ownership of properties by Debtors. Even though a payment may have fallen below the threshold when allocated to each Debtor-owner, it has been included in this list if the total payment exceeded the threshold amount for an avoidable preference.
- 40. Statement 6: Setoffs. The Debtors routinely incur 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 Debtors and their customers and/or suppliers. These normal setoffs and net payments are consistent with the ordinary course of business in the Debtors' industry and can be voluminous, making it unduly burdensome and costly for the Debtors to list such ordinary course setoffs. Therefore, although such setoffs and nettings may have been accounted for when scheduling certain amounts, these ordinary course setoffs and nettings are not independently accounted for, and as such, have been excluded from the Statements.
- 41. <u>Statement 7: Legal Actions, Administrative Proceedings, Court Actions, Executions, Attachments or Governmental Audits.</u> The Debtors have used reasonable efforts to report all legal actions, proceedings, investigations, arbitrations, mediations, and audits by federal or state agencies in which the Debtors were involved in any capacity within one year prior to the applicable petition date.

As of the applicable petition date, several matters were in the litigation and dispute resolution process. The Debtors reserve all of their rights and defenses with respect to any and all listed lawsuits and administrative proceedings. The listing of any such suits and proceedings shall not constitute an admission by the Debtors of any liabilities or that the actions or proceedings were correctly filed against the Debtors or any affiliates of the Debtors. The Debtors also reserve their rights to assert that neither the Debtors nor any affiliate of the Debtors is an appropriate party to such actions or proceedings.

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

- 42. <u>Statement 10: Certain Losses.</u> The 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.
- 43. <u>Statement 11: Payments Related to Bankruptcy.</u> All disbursements listed in response to Statement 11 were initiated and disbursed by each specific Debtor entity but were for the benefit of all Debtors. To the extent any of the firms listed in response to Statement 11 performed both bankruptcy and non-bankruptcy related work, the Debtors have attempted to identify only the payments related to bankruptcy. However, certain payments listed in response to Statement 11 may be for both bankruptcy and non-bankruptcy services.
- 44. Statement 13: Transfers Not Already Listed. These transfers include both purchases and sales.
- 45. <u>Statement 14: Previous Addresses.</u> The Debtors understand that Kenneth Mattson used the Vacaville P.O. Box address for years, and it has been included as previous address used by all Debtors
- 46. <u>Statement 23: Environmental Liabilities.</u> The environmental issue regarding soil contamination came to the Debtors' attention in March 2023.
- 47. <u>Statement 26d: Financial Statements Issued.</u> The Debtors do not know what financial statements Kenneth Mattson may have issued on behalf of the Debtors.

# **Specific Disclosures with Respect to the Debtors' Lists**

48. "<u>Unrecorded</u>" <u>Investors.</u> The Debtors have been made aware of a number of individuals and entities that allege to hold equity interests in one or more of the Debtors that are not reflected in the Debtors' books and records. The identities and alleged interests that the Debtors are aware of are listed on <u>Annex B</u> attached to these General Notes. <u>Because Annex B</u> is voluminous, it has only been included with the version of the General Notes attached to the Debtors' Omnibus List of Equity Security Holders.

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# ANNEX A

# (Joint Ownership of Debtors' Properties)

Property	Owners
	Autumn Wood I, LP

Troperty	OWINCIS
	Autumn Wood I, LP
2151 Salvio Street	Pinewood Condominiums, LP
Concord, CA 94520	Vaca Villa Apartments, LP
450 West Spain	Fire Tree II, LP
Sonoma, CA 94576	LeFever Mattson
1151 Broadway	Ginko Tree LP
Sonoma, CA 94576	Buckeye Tree LP
1161-1167 Broadway	Ginko Tree LP
Sonoma, CA 94576	Buckeye Tree LP
,	
635 Broadway	Ginko Tree LP
Sonoma, CA 95476	Buckeye Tree LP
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645-651 Broadway/10 Maple St	Ginko Tree LP
Sonoma, CA 94576	Buckeye Tree LP
	•
2280 Bates Ave	Watertree I, LP
Concord, CA 94520	Nut Pine, LP
	Riverview Shopping Center I, LLC
9415-9471 N Fort Washington	Riverview Shopping Center II,
Fresno, CA 93730	LLC
	LeFever Mattson, a California
5701/5703 Orange Ave	corporation
Sacramento, CA 95823	Third party non-debtor
	LeFever Mattson, a California
6359 Auburn Blvd.	corporation
Citrus Heights, CA 95621	Third party non-debtor

# ANNEX B

(Parties Asserting Equity Interests Not Recorded on Debtors' Books and Records)

[See General Notes attached to the Debtors' Omnibus List of Equity Security Holders]

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