

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	
	§	<b>Chapter 11</b>
<b>CONSOLIDATED WEALTH</b>	§	
<b>HOLDINGS, INC., et al.<sup>1</sup></b>	§	<b>CASE NO. 22-90013 (DRJ)</b>
	§	
<b>Debtors.</b>	§	<b>(Joint Administration Requested)</b>
	§	

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**SUPPLEMENT TO DEBTORS' EMERGENCY APPLICATION FOR ENTRY OF  
AN ORDER APPOINTING EPIQ CORPORATE RESTRUCTURING, LLC  
AS CLAIMS, NOTICING, SOLICIATION, AND ADMINISTRATIVE AGENT**

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**Emergency relief has been requested. Relief is requested not later than 12:30 p.m. (prevailing Central Time) on April 8, 2022.**

**If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

**A hearing will be conducted on this matter on April 8, 2022 at 12:30 p.m. (prevailing Central Time) in Courtroom 400, 4th Floor, 515 Rusk, Houston, Texas 77002. You may participate in the hearing either in person or by audio/video connection.**

**Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917 1510. Once connected, you will be asked to enter the conference room number. Judge Jones's conference room number is 205691. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Jones's home page. The meeting code is "judgejones". Click the settings icon in the upper right corner and enter your name under the personal information setting.**

**Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Jones's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.**

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<sup>1</sup> The debtors and debtors in possession these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Consolidated Wealth Management, LTD (2913), Consolidated Wealth Holdings, Inc. (8786), Coordinated Wealth Management, LLC (0518), and Granite Financial, Inc. (9135). The Debtors' mailing address is: 11200 Broadway, Suite 2705, Pearland, Texas 77584.

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) file the following Supplement (the “**Supplement**”) to the *Debtors’ Emergency Application for Entry of an Order Appointing Epiq Corporate Restructuring, LLC as Claims, Noticing, Solicitation, and Administrative Agent* [Docket No. 7] (the “**Epiq Retention Application**”) and state as follows:

1. Paragraph 1 of the Epiq Retention Application references a *Declaration of Deanna Osborne in Support of Chapter 11 Petitions and Requests for First Day Relief* under the defined term “First Day Declaration.”<sup>2</sup> The First Day Declaration is intended to be the *Declaration of W. Marc Schwartz in Support of Voluntary Petitions and First Day Motions* [Docket No. 9] (the “**Schwartz Declaration**”).

2. Any reference to the First Day Declaration in the Epiq Retention Application and any documents attached thereto shall mean the Schwartz Declaration.

3. Additionally, the *Declaration of Kate Mailloux in Support of Debtors’ Emergency Application for Entry of an Order Appointing Epiq Corporate Restructuring, LLC as Claims, Noticing, Solicitation, and Administrative Agent* (the “**Mailloux Declaration**”) filed with the Epiq Retention Application makes reference to a list of all known potential parties in interest (“**Schedule 1**”) and a list of all potential parties in interest connected to Epiq (“**Schedule 2**”). Schedule 1 and Schedule 2 are attached to this Supplement.

#### **Notice**

4. The Debtors will provide notice of this Supplement, whether by facsimile, electronic mail, overnight courier or hand delivery, to certain parties in interest, including by serving a copy of the Supplement on: (a) the Office of the U.S. Trustee for the Southern District of Texas; (b) the holders of the 30 largest non-contingent, liquidated, undisputed unsecured claims

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Epiq Retention Application.

against the Debtors (on a consolidated basis); (c) the DIP Lender and counsel thereto; (d) the United States Attorney's Office for the Southern District of Texas; (e) the Internal Revenue Service; (f) the United States Securities and Exchange Commission; (g) the Texas Attorney General, (h) the Texas State Securities Board, (i) the Delaware Attorney General; and (j) any party that has requested notice pursuant to Bankruptcy Rule 2002. A copy of the Supplement will also be made available on the Debtor's case information website located at <https://dm.epiq11.com/ConsolidatedWealth>. A separate one-page Notice of the filing of this Supplement shall be posted on the Epiq website and make reference to the existence of the Supplement for all other parties in interest, including any investors. The Debtors submit that, considering the nature of the relief requested, no other or further notice need be given.

Dated: April 7, 2022

**PARKINS LEE & RUBIO LLP**

/s/ R. Hale Neilson

Lenard M. Parkins

TX Bar No. 15518200

R. Hale Neilson

TX Bar No 24116820

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***Proposed Counsel to the Debtors***

**Certificate of Accuracy**

I hereby certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Local Rule 9013-1(i)

/s/ R. Hale Neilson

R. Hale Neilson

**SCHEDULE 1****Potential Parties in Interest**

<b>Interested Parties</b>	<b>Type</b>
Citizens Bank	Bank
TVPX ARS, Inc.	Bank
Wells Fargo	Bank
Deanna Osborne	D&O
John Spalding	D&O
Consolidated Wealth Holdings, Inc.	Debtor
Consolidated Wealth Management, Ltd.	Debtor
Coordinated Wealth Management, LLC, previously known as Consolidated Wealth Management, LLC	Debtor
Granite Financial, Inc.	Debtor
INTERNAL REVENUE SERVICES	Government
SEC HEADQUARTERS	Government
SECURITIES AND EXCHANGE COMMISSION	Government
STATE OF DELAWARE ATTORNEY GENERAL	Government
STATE OF TEXAS ATTORNEY GENERAL	Government
Texas State Securities Board	Government
U.S. Attorney's Office Southern District of Texas	Government
ITM/21st Services	Insurance
American Arbitration Association	TOP30
Lain Gate	Professionals
Locke Lord;	Professionals
Orrick, Herrington & Sutcliffe LLP	Top 30
Parkins Lee & Rubio LLP	Professionals

Schwartz Associates	Professionals
TVPX ARS, Inc.	Securities Intermediary
Office of the United States Trustee	UST
NWQ Advisors, LLC	TOP30
John C. Leininger	Interested Party
Aaron & Mya Linderbaum	Investor
Aaron IV Trust	Investor
Aaron Linderbaum	Investor
Adrian V. Cordova	Investor
Agnes Ondrey	Investor
AH & Dorothy Brorman	Investor
Alan L. Lang	Investor
Alan Wakim	Investor
Aleana M. Crow	Investor
Alice B Billhimer Living Trust Dated 05/09/2006	Investor
Alice I Biggs	Investor
Alice Midkiff	Investor
Amy E. Schoening	Investor
Andrew L. Jackson	Investor
Annamaria Pinon	Investor
April Elizabeth Holtzman	Investor
Arita Brindle	Investor
Arlene Mele	Investor
Audrey E. Rumzek	Investor
Baron J. Honea	Investor
Bettina Child	Investor
Betty H. Graef	Investor
Betty Hunt	Investor
Betty Ingram	Investor
Betty J. Lawson	Investor
Beverly A. Scott	Investor
Bill W. Enlow	Investor
Blake A. Cmajdalka	Investor
Brenda J. Taylor	Investor

Brett Holst	Investor
Brian Collins	Investor
Bryan Dunlap	Investor
Bryan Russman	Investor
C. Dale Sullins	Investor
Carmen D. Ibarra	Investor
Carol Ann Meredith	Investor
Caroll Cavazos	Investor
Chadi S. Saade	Investor
Charlene Lee Shipp	Investor
Charles C. Criswell	Investor
Charles H. Overstreet	Investor
Charles Krostag	Investor
Charles W. Crim	Investor
Cheryl Styers	Investor
Christopher R. Anthony	Investor
Clair F. Orth	Investor
Clarence N. and Mittie Corene Schwab	Investor
Clay Bates	Investor
Cox, Justin MESA Irrevocable Trust	Investor
Coy Lynn Crow	Investor
Curtis R. Opdahl	Investor
Cynthia Timmerman	Investor
Cynthia & Nathan Timmerman	Investor
Cynthia L. Cordeiro	Investor
Cynthia Swanson	Investor
Dale R. Schipper	Investor
Daniel A. Lynch	Investor
Danny Keith Boles	Investor
Darrin M. Hoenig	Investor
David B. Burton	Investor
David E. Hatfield	Investor
David M. Long	Investor
David Pitcher	Investor
David R. Marshall	Investor
David R. Westermann	Investor
David Rhodes	Investor
David Riley Thompson	Investor
David Scarbrough	Investor

David Venus David	Investor
David W. Piekarczyk	Investor
David W. Sonnier	Investor
David William Welp	Investor
Dean POLLY	Investor
Deborah F. and Christopher L. Wheatley	Investor
Deborah F. Wheatley	Investor
Deborah R. Lang	Investor
Dewey E. and Vickie S. Williams	Investor
Dewey E. Williams	Investor
Diane H. Mumford	Investor
Don Garland	Investor
Donald & Tracy Spurlock	Investor
Donald Douglas Colbert	Investor
Donald E and Linda I Martin REV TRUST	Investor
Donald E. and Rosemary C. Pentecost	Investor
Donald Gorski	Investor
Donald Spurlock	Investor
Donald W. Hutchinson	Investor
Donna Perlinger and Mary Perlinger	Investor
Dorothy M. Clevenger	Investor
Dorothy R. Chauvin	Investor
Douglas P. Rives	Investor
Earlene Cooper Trust	Investor
Edgar MacBean	Investor
Edward M. White	Investor
Eijaz G. Haider	Investor
Eldor Eisen c/o James Farmer	Investor
Elise E. Smith	Investor
Elizabeth A. Schoonover	Investor
Eric & Mai Miller	Investor
Eric M. & Mary E. Hartman	Investor
Eric Nelson	Investor
Eric Van	Investor
Erika Watson	Investor
Evelyn Merritt	Investor

Fanny Williams	Investor
Floydean Yeager	Investor
Fortunato Caragan	Investor
Gail M. Newton	Investor
Gailyn & Lavada Parks	Investor
Gailyn Parks	Investor
Gary Hazelwood	Investor
George Puente	Investor
George Warren	Investor
Gerald Dale Churchman Benefits Trust Churchman	Investor
Gerald Heather	Investor
Geraldine Winn Revoc Trust	Investor
Gilbert Pinon	Investor
Gladys M. Palmer	Investor
Glenda Todd	Investor
Glenda Wright	Investor
Gloria Jean Alley	Investor
Gloria Suzanne McDonald	Investor
Grace Joines	Investor
Greg Gossman	Investor
Grover C. Perry	Investor
Gustafson Family Trust	Investor
Guy Herbert Lilly	Investor
Harry L. Graham	Investor
Harry Wadsworth	Investor
Hattie Torrence	Investor
Helen King Rueter	Investor
Helen Mary Hoglund	Investor
Herman W. Dunlap	Investor
Hilda Carranza	Investor
Homer Alston Brown	Investor
Ida Lilly	Investor
Isaac Gian	Investor
Jack Gian	Investor
Jack W. and Jean C. Langford	Investor
James (Jay) Lagrone	Investor
James Edmund	Investor

Churchman Benefits Trust Churchman	
James Lemuel Thompson, Jr.	Investor
James R. Sr. and Mary H. Collins	Investor
James Wynn	Investor
Jane Ann & Leroy Dean Schraceo	Investor
Janet E. Barton	Investor
JC Ingram	Investor
Jeanette N. Espineli	Investor
Jeffrey Cauble	Investor
Jeffrey J. Gilbert	Investor
Jerry D. McKinney	Investor
Jerry K. Reid	Investor
Jerry L Cardwell	Investor
Jerry O. Goode	Investor
Jerry Swann	Investor
Jill Elise Jones	Investor
Jimmy Van Schrib Revocable Living Trust did 11-11-09	Investor
Joel Liebman	Investor
Joel Stuart Liebman	Investor
John Alachnowicz	Investor
John B. Tedor and Lorraine C. Williams Tedor	Investor
John Byrl Holland, Jr.	Investor
John Byrl Holland	Investor
John Chambers	Investor
John Frederick Wiles	Investor
John M. Myers	Investor
John Mark Darville	Investor
John Mouring	Investor
John R. Powers	Investor
John S. Rousey	Investor
Johnny Warren	Investor
Josefina Gilbert	Investor
Joseph E. Burkins	Investor
Joseph Koehler	Investor
Joseph M. Pelle	Investor

Josh Lisle	Investor
Joshua Crow	Investor
Joy N. Baumann	Investor
Judy K. Cherne	Investor
Julie Dunn	Investor
Karen S. Ham	Investor
Karolyn S. Burton	Investor
Karon Estelle Kingsley Gopffarth	Investor
Kathryn Marie O'Connor	Investor
Kathy A. Shearer	Investor
Kathy M. Cramer	Investor
Kay Wesie	Investor
Keith & Christina Johnson	Investor
Keith Johnson	Investor
Keith Reginald Kingsley	Investor
Keli Moore	Investor
Kimberley Jean Brents	Investor
Kyle O'Neal	Investor
Larry Brindle	Investor
Larry Stuart Johnson	Investor
Lauralee & Raymond Lindholm	Investor
Lavada Parks	Investor
Leo C. Johnson	Investor
Leonard Neatherlin Jr.	Investor
Leroy Cagle	Investor
Leroy Howe	Investor
Linda J. McKinney	Investor
Linda J. Stuck	Investor
Linda Norwood	Investor
Linda Po-Fong Lau	Investor
Linda S. Bloomer	Investor
Lingnau	Investor
Lisa & Otto Kampa	Investor
Loy Sanders	Investor
LuAnn G. Robertson	Investor
Maame Broad	Investor
Malinda Mayer	Investor
Mandy R. Vowell	Investor
Margaret Lagrone	Investor

Margaret S. Flack	Investor
Margie M. Howeth	Investor
Margie Salazar	Investor
Maria Kuang-Chu Huang RLT	Investor
Mark Daniel Unterberger	Investor
Mark E. Fischer	Investor
Mark Juszli	Investor
Mark Mays	Investor
Mark Richard Rakvica	Investor
Martin Joe Salazar	Investor
Martin Salazar	Investor
Marvell Parker Morrow Sepecial Needs Trust	Investor
Marvin D. Leslie	Investor
Marvin L. Leslie	Investor
Mary E Roberts	Investor
Mary K. Erwin	Investor
Maureen Perry	Investor
Maurice E. Davis	Investor
Max Fuhlman	Investor
Maxine Gorski	Investor
Melvin & Mary A. Ward	Investor
Michael R. Martin	Investor
Michael W. Cmajdalka	Investor
Michele T. Kilpatrick	Investor
Midland Shrine Club	Investor
Mildred Naomi Johnson Estate	Investor
Molly M Lottridge	Investor
Monica Gerdes	Investor
Monica L. Gerdes	Investor
Mya Linderbaum	Investor
Nadine P. Archer	Investor
Nancy Moreland	Investor
Nancy Nix	Investor
Nancy Thompson Sexton	Investor
Nathan Timmerman	Investor
Nicholas J. Zikos	Investor
Nicholas Lewis	Investor
Nickie Kraemer	Investor
Nora Collins	Investor

Norbert Orndorff	Investor
O. C. Archer	Investor
Olen Anderson	Investor
Oliver W. Sprott	Investor
Pak Kuen Lau	Investor
Patricia Harris	Investor
Patricia Louise Wedel	Investor
Patrick Alan Weaver	Investor
Patrick Dace Ward	Investor
Patsy Franklin	Investor
Patti A. Busby	Investor
Paul A. Cmajdalka	Investor
Paul and Bobbie Fischer	Investor
Paul J. and Nancy E. Smith	Investor
Paul Kirk Kingsley	Investor
Paul Quarve	Investor
Paula Jean Lagrone	Investor
Rachel Alachnowicz	Investor
Randy Elrod	Investor
Randy J. McFarland	Investor
Raymond V. Lindholm	Investor
Reid Curtis Rasmussen	Investor
Reid M. Anderson	Investor
Revocable Living Trust of Jimmy Crabtree Crabtree	Investor
Richard & Carol A. Singer	Investor
Richard A. Ham	Investor
Richard O. Gumtau	Investor
Richard Perez	Investor
Richard Pietrusa	Investor
Richard Plotsky	Investor
Rick D James	Investor
Ringling Bell	Investor
Robby L. Blackstock	Investor
Robert Rea	Investor
Robert & Cynthia Tobin	Investor
Robert & Cynthia Tobin	Investor
Robert J. Beitter	Investor
Robert Jones	Investor

Robert Loyd	Investor
Robert Swanson	Investor
Robert Yudkin	Investor
Roberta Simon	Investor
Rochelle Van	Investor
Roger Anderson	Investor
Roger Graves	Investor
Roger Gutierrez	Investor
Roger Moreland	Investor
Roger O. Whitley	Investor
Roger R. Rush	Investor
Roland Moreland	Investor
Ron Acosta	Investor
Ron Humphreys	Investor
Ronald Ray Huffman	Investor
Ronnie McGlothlin	Investor
Rosalie Lane Beechler	Investor
Rosalinde Greensides	Investor
Rosemary Lagrone	Investor
Rosemary Rodriguez	Investor
Ruth A. McGill	Investor
Ruthann Dixon	Investor
Sam Gonzales	Investor
Sandra Crowe Rev Trust	Investor
Sandra Ferguson	Investor
Sandra Vincent	Investor
Sara K. Draper	Investor
Scott Hendricks	Investor
Sharon Henigsmith	Investor
Sharron A. Herbst	Investor
Sheila Brents Wilhelm	Investor
Shyrlee Reid	Investor
Silvestri Family Trust	Investor
SMG Land, LLC	Investor
Sreenivasa Patibandla	Investor
Stanley John Pietrusa	Investor
Stephen M. Reid	Investor
Stephen Rhodes	Investor
Stephen Stephens	Investor
Steve C. McGill	Investor
Steve L. Miller	Investor

Steven Carl POLLY	Investor
Steven Hughes	Investor
Steven Rex Evans	Investor
Steven Winferd Darst	Investor
Suguna Rao Patibandla	Investor
Susan Denise Taylor	Investor
Susan Humphreys	Investor
Susan J. Wright	Investor
Sylvester Tri Diep	Investor
Tammy Wynn	Investor
Terena Dyer	Investor
Terry K Cardwell	Investor
The Berns Trust	Investor
The Gerry L Pearson and Patricia A Pearson Revocable Living Trust	Investor
THE MARTS FAMILY IRREVOCABLE TRUST	Investor
The Murdock Family Trust	Investor
The Sevcik Family Trust	Investor
Theresa P. Kilman	Investor
Theresa V. Crouch	Investor
Thomas E. Troupe	Investor
Thomas H. Skehan	Investor
Thomas Krystofiak	Investor
Thomas L. O'Kelley	Investor
Thomas McCumber	Investor
Tim B. Gorski	Investor
Tim Fitzgerald	Investor
Timothy A. Berberich	Investor
Timothy Andrew Berberich Trust	Investor
Timothy Craig Allen, MD JD	Investor
Timothy Renberg	Investor

Todd C. Falstad	Investor
Todd Dunn	Investor
Tony & Deborah Marrs	Investor
Trustee of: Alagadon Farms	Investor
Trustee: Dale Jones Three Angels Investments	Investor
Trustee: Dorothy Brorman AHB&D Farms	Investor
Trustee: Nancy & Charles Aubin Aubin Family Trust	Investor
Trustee: John A. Palumbo BP Resources LLC	Investor
Tyler Child	Investor
Velma Sharlene Clark	Investor
Vicki L. Broadus	Investor
Vickie S. Williams	Investor
Vicky L. Gutierrez	Investor
Vipul Surlekar	Investor
Virginia Hu	Investor
Walter Lancaster	Investor
Wendolyn Washington	Investor
Wilbert D. Pearson	Investor
William Lusk	Investor
William Francis Boles	Investor
William K. Scoggins	Investor
William M. Rohde	Investor
William R. Schumann	Investor
William Welsh	Investor
Willie H. Johnson	Investor
Wilson Tann	Investor
Wynona B. Rush	Investor

**SCHEDULE 2**

**Client Match List**

<b>Interested Parties</b>	<b>Type</b>
Citizens Bank	Bank
Wells Fargo	Bank