

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re: § Chapter 11
ZENERGY BRANDS, INC., *et al.*,¹ § Case No. 19-42886
Debtor. § (Jointly Administered)

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR
ORDER AUTHORIZING EXAMINATION OF DEBTORS AND INSIDERS AND
AFFILIATES THEREOF PURSUANT TO BANKRUPTCY RULE 2004**

14-DAY NEGATIVE NOTICE – LBR 2004(a):

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this Motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading ***WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE*** shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

The Official Committee of Unsecured Creditors (the "**Committee**") for Zenergy Brands, Inc. and related Debtor entities (collectively, the "**Debtors**") files this *Motion for Order Authorizing Examination of Debtors and Insiders and Affiliates Thereof Pursuant to Bankruptcy Rule 2004* (the "**Motion**").

In support of the Motion, the Committee respectfully states as follows:

¹ The Debtors in the above-captioned chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Zenergy Brands, Inc. (1686); NAUP Brokerage, LLC (7899); Zenergy Labs, LLC (8045); Zenergy Power & Gas, Inc. (1963); Enertrade Electric, LLC (8649); Zenergy & Associates, Inc. (4022); and Zen Technologies, Inc. (7309). The above-captioned Debtors' mailing address is 5700 Granite Pkwy, #200, Plano, TX 75024.

JURISDICTION & VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the "**Bankruptcy Code**"), and Rule 2004 of the Federal and Local Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**").

BACKGROUND

3. On October 24, 2019 ("**Petition Date**"), the Debtors commenced their Chapter 11 cases, which are jointly administered under lead case of Zenergy Brands, Inc., Case No. 19-42886.

4. On October 31, 2019, the Court entered an *Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 (I) Approving Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay, and (VI) Granting Related Relief, and (VII) Scheduling Final Hearing* [Dkt. #61] (the "**Interim DIP Financing Order**").

5. Paragraph 33 of the Interim DIP Financing Order, as modified on the record on November 18, 2019, provides the Committee until February 10, 2020, to file claims and causes of action (the "**Challenge Period**") against TCA Global Credit Master Fund, L.P. (the "**Prepetition Lender**"). Otherwise, the potential exists that certain releases currently found in the Interim DIP Financing Order and related proposed Debtor-in-Possession financing documents, will be deemed enforceable against "all parties-in-interest...and [the Committee]...." *See* INTERIM DIP FINANCING ORDER, ¶ 33(a).

6. On November 4, 2019, the United States Trustee for the Eastern District of Texas filed its *Appointment of Official Unsecured Creditors' Committee* [Dkt. #69] in the Debtors' bankruptcy cases.

On November 18, 2019, the Court held a final hearing on the Debtors' *Emergency Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Obtain Post-Petition Financing, Granting Senior Postpetition Security Interests And According Superpriority Administrative Expense Status Pursuant To Sections 364(c) And 364(d) Of The Bankruptcy Code; (II) Authorizing The Use Of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying The Automatic Stay; And (V) Granting Related Relief* [Dkt. #19] (the "**DIP Motion**"), wherein it was agreed among the parties and read into the Court record that Challenge Period would expire on February 10, 2020. As a result, the Challenge Period expires on February 10, 2020.

7. On November 12, 2019, the undersigned law firm ("**KRCL**") filed its *Application to Employ Kane Russell Coleman Logan PC as Counsel for the Official Unsecured Creditors' Committee* [Dkt. #80]. Shortly after the Committee's formation, KRCL issued informal document requests to the Debtors, negotiated and executed a nondisclosure agreement, and began conducting investigatory interviews with creditors and certain of Debtors' representatives about potential claims and causes of action.

8. Also on November 12, 2019, the Committee forwarded a letter requesting information to the Debtors' counsel, Marcus Helt (the "**Preliminary Document Request**"), a true and correct copy of which is included in **Exhibit "A"** attached hereto. To date, the Debtors have produced certain prepetition loan documents, perfection documents, a resignation letter from Byron Young and from Alex Rodriguez, certain insurance information, an investment banking services letter agreement, and related information.

9. On November 19, 2019, the Debtors filed their *Bankruptcy Schedules A-H* [Dkt. #93] and *Statement of Financial Affairs* [Dkt. #94] (the "**Schedules and Statements**"). KRCL has reviewed the Schedules and Statements and the other documents provided by the Debtors pursuant to the Preliminary Document Request. KRCL has also discussed potential claims and causes of actions against third parties with the Debtors' representatives and counsel to Prepetition Lender and TCA

Special Situations Credit Strategies ICAV (the "**DIP Lender**").

10. In short, the Committee has been very diligent in its short existence to exhaust internal investigative opportunities and appreciates the Debtors' cooperation to date. Based upon its investigation to date, however, the Committee has made the informed decision that they must pursue its investigation through the present Motion.

11. Specifically, the Committee has determined that in order to fulfill its duties to its constituents under section 1103 of the Bankruptcy Code, it requires additional information about the Debtors' business operations, capital structure, and financial condition, beyond what is included in the Schedules and Statements. In addition, the Committee needs additional information about the Debtors' prepetition actions, officers, directors, and lenders and their respective actions and potentially, omissions. To further its investigation, the Committee seeks, among other things, information pertaining to the Debtors' relationship and prepetition agreements with the Prepetition Lender and DIP Lender.

RELIEF REQUESTED AND BASIS THEREFOR

12. Bankruptcy Rule 2004 provides that, upon the motion of a party in interest, the Court may order the examination of any entity and compel the production of documents. FED. R. BANKR. P. 2004(a), (c). The examination may relate to, among other things, any matter that "may affect the administration of the debtor's estate, ... the operation of any business and the desirability of its continuance, the source of any money or property acquired or to be acquired by the debtor for purposes of consummating a plan and the consideration given or offered therefor, and any other matter relevant to the case or to the formulation of a plan." FED. R. BANKR. P. 2004(b). The scope of an examination under Bankruptcy Rule 2004 is "extremely broad," and has been likened to a "lawful" fishing expedition. *In re M4 Enters, Inc.*, 190 B.R. 471, 474 (Bankr. N.D. Ga. 1995); *In re Lufkin*, 255, B.R. 204, 208 (Bankr. E.D. Tenn. 2000) (quoting *Bank One Columbus, N.A. v. Hammond*

(*In re Hammond*), 140 B.R. 197, 201 (S.D. Ohio 1992); *In re Bakalis*, 199 B.R. 443, 447 (Bankr. E.D.N.Y. 1996). The standard for granting a Bankruptcy Rule 2004 examination is whether the movant has established "good cause." *In re Hammond*, 140 B.R. 197, 201 (S.D. Ohio 1992).

13. Section 1103 of the Bankruptcy Code sets forth the duties of a creditors' committee including to "investigate the acts, conduct, assets, liabilities, and financial condition of the debtor" 11 U.S.C. § 1103(c); *Matter of Advisory Comm. of Major Funding Corp.*, 109 F.3d 219, 224 (5th Cir. 1997). By this Motion, the Committee seeks to continue fulfilling its statutory duty of investigating the Debtor's affairs in order to, among other things, assess the viability of the Debtors' reorganization efforts and determine whether the Debtors hold potential causes of action for recovery against third parties. In addition to the actions currently being taken by the Committee, the Committee should be permitted to conduct an examination of the Debtors under Bankruptcy Rule 2004 and to seek documents from the Debtors and their insiders, affiliates, and representatives.

14. The Committee, through counsel, seeks to take the oral examination of Joshua Campbell, the representative(s) of Zenergy Brands, Inc. and related Debtors, on January 10, 2020, at the offices of Kane Russell Coleman Logan PC, 901 Main Street, Suite 5200, Dallas, Texas 75202; Tel: (214) 777-4200; Fax: (214) 777-4299, or such other date and location as may be mutually agreed upon by the parties. The examination will relate to, among other things, the Debtors' relationships and arrangements with lenders, the Debtors' business operations, and the financial condition of the Debtors. The examination will be recorded by audio tape, digital audio recording, and/or stenographic recording. The Committee further seeks production from the Debtors of all documents and information set forth on **Exhibit "A"** attached hereto.

15. If this Motion is approved, the Committee demands: (a) that the Debtors produce for inspection and copying the documents set forth in **Exhibit "A"** commencing not later than December 7, 2019, and continuing through noon CST on December 18, 2019, either electronically or

at the offices of Kane Russell Coleman Logan PC, 901 Main Street, Suite 5200, Dallas, Texas 75202; Tel: (214) 777-4200; Fax: (214) 777-4299, unless otherwise agreed to by the Committee and Debtors; and (b) that Joshua Campbell or such other representative of the Debtors appear for examination by the Committee, through counsel, at the offices of the Committee's undersigned proposed counsel at a time that is mutually agreeable between the Debtors and the Committee or, if no agreement is reached, January 10, 2020.

WHEREFORE, the Committee respectfully requests that the Court enter an order (a) requiring the Debtors to produce all documents set forth on **Exhibit "A"** attached hereto, (b) authorizing the Committee to take the oral examination of the Debtors, and (c) granting the Committee such other and further relief to which it may be justly entitled.

Dated: November 26, 2019

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Joseph M. Coleman
Joseph M. Coleman
State Bar No. 04566100
John J. Kane
State Bar No. 24066794
S. Kyle Woodard
State Bar No. 24102661

901 Main Street, Suite 5200
Dallas, Texas 75202
(214) 777-4200 (Telephone)
(214) 777-4299 (Facsimile)
E-mail: jcoleman@krcl.com
E-mail: jkane@krcl.com
E-mail: kwoodard@krcl.com

***Proposed Counsel for the Official
Committee of Unsecured Creditors***

CERTIFICATE OF CONFERENCE

I hereby certify that I have spoken with counsel for the Debtors regarding this Motion, but a final agreement has not yet been reached as to the relief requested.

/s/ Joseph M. Coleman
Joseph M. Coleman

CERTIFICATE OF SERVICE

I hereby certify that (a) a true and correct copy of the foregoing document was served via the Court's electronic filing system (ECF) upon all parties receiving such service in this bankruptcy case on the date and time filed; and (b) a true and correct copy of foregoing document was served via first-class U.S. mail on the attached Limited Master Service List on November 26, 2019.

/s/ Joseph M. Coleman
Joseph M. Coleman

EXHIBIT "A"

This Exhibit provides a list of documents that you must produce pursuant the Committee's requests under Rule 2004 of the Federal and Local Rules of Bankruptcy Procedure. The Definitions and Instructions below apply to your production of documents. Please review and comply with such Definitions and Instructions when producing documents pursuant to the requests below.

I. Definitions

Unless the context otherwise requires, the following terms and rules of construction shall apply throughout this Exhibit, regardless of whether such terms are used in capitalized or lower-case form, and regardless of whether used in the singular or the plural. Undefined words used herein, to the extent applicable, shall have the meaning ascribed to them by 11 U.S.C. § 101.

1. **"Affiliate,"** when used with respect to a Person or entity, means a, parent, subsidiary, designee, assignee, predecessor or successor.

2. **"And"** and **"or"** shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.

3. The words **"any"** or **"all"** shall be construed to mean any and all.

4. **"Bankruptcy Case"** means the bankruptcy case styled *In re Zenergy Brands, et al.*, Case No. 19-42886, in the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division, being the lead case under which the Debtors' Chapter 11 bankruptcy cases are jointly administered.

5. **"Campbell Declaration"** means that certain *Declaration of Joshua Campbell In Support of Chapter 11 Petitions and First-Day Motions*, dated October 24, 2019 [Dkt. No. 10].

6. **"Communication(s)"** means any contact or act by which any information or knowledge is transmitted or conveyed between two or more persons and shall include, without limitation, written contact by such means as letters, memoranda, correspondence, electronic mail, telegrams, telex, facsimile, recorded telephone conversations or by any document, and oral contact by such means as face-to-face meetings and telephone conversations.

7. **"Debtors"** refers, collectively, to Zenergy Brands, Inc., Enertrade Electric, LLC, NAUP Brokerage, LLC, Zen Technologies, Inc., Zenergy & Associates, Inc, Zenergy Labs, LLC, and Zenergy Power & Gas, Inc., including any Affiliate(s) or Representative(s) thereof. The term Debtors is used conjunctively and disjunctively. As a result, a request to produce communications between a Person and Debtors would require the production of all communications between that Person and any and all of the Debtors.

8. **"DIP Facility"** means the proposed Postpetition TCA Indebtedness described in the DIP Motion.

9. **"DIP Motion"** refers to the Debtors' *Emergency Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Obtain Post-Petition Financing, Granting Senior Postpetition Security*

Interests And According Superpriority Administrative Expense Status Pursuant To Sections 364(c) And 364(d) Of The Bankruptcy Code; (II) Authorizing The Use Of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying The Automatic Stay; And (V) Granting Related Relief [Dkt. No. 19] filed in the Bankruptcy Case on October 27, 2019.

10. "**Document**" is used in the broadest possible sense and includes, but is not limited to, all original and all non-identical copies of any writing or record of any type or description, including, but not limited to, the following items, and each draft thereof: writings, recordings, notes, photographs, financial statements, agreements, contracts, legal documents, communications, e-mails, correspondence, letters, statements, reports, envelopes, phone messages, telephone logs, agendas, books, articles, receipts, purchase orders, sales orders, tape recordings, affidavits, opinions, notices, proposals, invoices, confirmations, telegrams, cables, memoranda, records, summaries of records, summaries of data, summaries of personal conversations or interviews, diaries, appointment books, appointment logs, desk calendars, pocket calendars, forecasts, statistical statements, accounts, work papers and related supporting documents, graphs, charts, maps, diagrams, blue prints, tables, indexes, pictures, tapes, microfilms, charges, analytical records, minutes or records of meetings or conferences, reports and/or summaries of interviews, reports and/or summaries of investigations, opinions or reports of consultants, appraisals, records, reports or summaries of negotiations, brochures, pamphlets, circulars, trade letters, press releases, stenographic, handwritten or any other notes, projections, bank statements, checks (front and back), check stubs or receipts, checkbooks, canceled checks, invoice vouchers, electronically or magnetically recorded or stored data, data tapes and sheets or data processing cards or discs or any other computer-related data compilation, and any other written, recorded, printed, typed, photographed, transcribed, punched, taped, filmed, or electronically or graphically recorded documents or writings of whatever description however produced or reproduced, including but not limited to, any information contained in any computer although not yet printed, within your possession, custody or control or in the possession, custody or control of any agent, employee (including without limitation, attorneys, accountants and investment bankers or advisors), or other person acting on your behalf.

11. "**Draft**" shall include but not be limited to any preliminary form of, or any copy bearing notations, marks, or matter not found on the original of, any Document.

12. The use of the word "**including**" shall be construed to mean "**without limitation**."

13. "**Loan Documents**" means any documents, agreements, or contract of any nature related to the TCA Indebtedness.

14. An "**Original**" of a writing or recording is the writing or recording itself or any counterpart thereof intended to have the same effect by a person executing or issuing it. An "original" of a photograph includes the negative and/or any print made therefrom. If data is stored in a computer or similar device, any printout or other output readable by sight, shown to reflect the data accurately and in its native file format, is an "original."

15. "**Person**" means any individual, firm, partnership, joint venture, corporation, d/b/a ("doing business as"), association, company, estate, trust, or other legal, government, or business entity.

16. "**Petition Date**" means October 24, 2019.

17. **"Possession, custody or control"** includes constructive possession, whereby the party to whom this request is directed has the right to compel the production of a matter or documents from a third party (including an agency, authority or representative).

18. **"Preliminary Document Request"** means the document attached hereto as **Exhibit "A-1"**.

19. **"Proposed Buyout(s)"** refers to any attempts, offers, discussions, or any other form of Communication pertaining to the purchase, satisfaction, or refinancing of any debt owed by any Debtor to TCA.

20. The words **"relate to"** a given subject means relating to, concerning, referring to, alluding to, responding to, connected with, commenting on, in respect of, about, regarding, discussing, showing, describing, mentioning, reflecting, analyzing, constituting, evidencing, supporting, or in any way pertinent to that certain subject.

21. **"Relevant Time Period"** means June 1, 2018, through the current date, unless otherwise stated.

22. **"Representative,"** when used with respect to a Person or entity, means, without limitation, any insider, officer, director, employee, attorney, accountant, consultant, advisor, agent, or any other such representative of the Person or entity in question.

23. **"TCA"** means and refers to TCA Global Credit Master Fund, LP and includes, without limitation, TCA Capital International Group, TCA Fund Management Group, and any Affiliate(s) or Representative(s) thereof.

24. **"TCA Indebtedness"** means any and all debts owed by one or more of the Debtors to TCA. References to **"Prepetition TCA Indebtedness"** mean any debts incurred prior to the Petition Date. References to **"Postpetition Indebtedness"** mean any debts incurred after the Petition Date, including, without limitation, the DIP Facility.

25. **"Writings"** and **"Recordings"** consist of letters, words, numbers or their equivalent, set down by handwriting, typewriting, printing, photographing, mechanical or electronic recording, or any other form of data production, reproductions or compilations, however stored.

26. Use of the word **"you"** refers to the Debtors.

II. Instructions

1. **Production of Documents.** You are required to produce all documents in your possession, custody or control that are requested herein. All documents requested herein may be produced in electronic format unless otherwise instructed.

2. **Lost or Destroyed Documents.** If any documents requested herein have been lost, discarded, or destroyed, the document so lost, discarded, or destroyed should be identified as completely as possible, including without limitation the following information: (a) a description of the document and the contents of the document; and (b) the date of disposal, the manner of

disposal, the reason for disposal, the name of the person authorizing the disposal, and the name of the person disposing of the document.

3. **Lack of Custody.** If any document herein requested is claimed by you not to be in your possession, custody or control, then you are directed to identify (a) the nature of the document, (b) the name, address and telephone number of any person who has or may have possession, custody or control of such demanded item, and (c) whether and how you presently have access to the document and can obtain a duplicate of it.

4. **Selection of Documents.** The selection of documents from files and other sources shall be performed in such a manner as to insure that the file or other source from which a document is obtained may be identified.

5. **Separation of Documents.** Documents attached to other documents or other materials shall not be separated unless sufficient records are kept to permit reconstruction of the grouping.

6. **Electronic Documents.** All documents in electronic format shall be produced in their native file format, unless otherwise instructed by the Committee.

III. Requested Documents

1. All Communications, Documents, Drafts of Documents, Writings, and Recordings involving the Debtors pertaining to any Proposed Buyout prior to the Petition Date.

2. All Communications, Documents, Drafts, Writings, and Recordings between the Debtors and Bellridge Capital prior to the Petition Date.

3. All Communications, Documents, Drafts, Writings, and Recordings between the Debtors and RB Capital prior to the Petition Date.

4. All Communications, Documents, Drafts, Writings, and Recordings between the Debtors and TCA prior to the Petition Date.

5. All Communications, Documents, Drafts, Writings, and Recordings between the Debtors and TCA after the Petition Date.

6. All Communications, Documents, Drafts, Writings, and Recordings involving the Debtors and related to efforts by the Debtors to solicit or otherwise obtain post-petition debtor-in-possession financing from any Person other than TCA.

7. All Communications, Documents, Drafts, Writings, and Recordings related to any attempts of the Debtors to raise money for any purpose during the Relevant Time Period, including, attempts to obtain funding from TCA pursuant to the Loan Documents or attempts to raise money, including loans, equity or otherwise, from other sources besides TCA.

8. All Communications, Documents, Drafts, Writings, and Recordings related to the Investment Banking Services Agreement dated August 22, 2018, between Zenergy Brands, Inc. and

TCA, including, the Recording of the conference call between the Debtor(s) and TCA on August 14, 2019.

9. All Communications, Documents, Drafts, Writings, and Recordings related to any potential mergers, acquisitions or sale of the Debtor(s) or any part thereof.

10. All Communications, Documents, Drafts, Writings, and Recordings between Debtors and Alex Rodriguez.

11. All of Debtors' Communications, Documents, Drafts, Writings, and Recordings pertaining to the Debtors' acquisition of Entertrade Electric, LLC.

12. All of Debtors' insurance policies effective during the 12 months prior to the Petition Date and/or currently effective.

13. All of Debtors' internal Communications, Documents, Drafts, Writings, and Recordings related to any of Debtors' causes of action or potential causes of action prepared during the four years prior to the Petition Date.

14. All of Debtors' board minutes, including Drafts, prepared during the four years prior to the Petition Date.

15. All of Debtors' bank records, including check copies and wire and ACH transfer records evidencing distributions, dividends, or other non-salary payments made to Debtors' officers and directors during the four years prior to the Petition Date.

16. All yearly and monthly financial statements.

17. All Communications, Documents, Drafts, Writings and Recordings related to projections, financial models, budgets, analysis, and spreadsheets applicable to the Debtors' revenues, cash, expenses, financial performance and other performance information, expectations or scenarios.

18. Without regard to the Relevant Time Period, all Communications, Documents, Drafts, Writings and Recordings relating to each and all "Unsecured Creditors" as described in paragraphs 24 and/or 30 of the Campbell Declaration, including relating to information provided to such "Unsecured Creditors" as part of the process of obtaining loans or equity investments from such "Unsecured Creditors."

19. All Communications, Documents, Drafts, Writings and Recordings relating to the Debtors' current sales cycles or pipeline, including current contracts, outstanding proposals, potential customers for which analysis is being performed, potential customers for which the Debtors are offering to perform analysis and other customer, potential customer and potential revenue projections therefrom [a spreadsheet summarizing the above would initially be adequate, but the Committee reserves all of its rights to seek the underlying information and expressly does not agree to any such summary being introduced into evidence without producing all underlying documentation and otherwise complying fully with F.R.E. 1006].

20. All Communications, Documents, Drafts, Writings and Recordings related to the "Services Agreement" as defined at paragraph 25 of the Campbell Declaration.

21. All Communications, Documents, Drafts, Writings and Recordings related to the Securities and Exchange Commission, Debtors' publicly listed stock and/or other forms of equity and any other securities, governmental, trading board or other oversight or enforcement agencies or organizations, including the Public Company Accounting Oversight Board.

22. All Communications, Documents, Drafts, Writings and Recordings as set forth in the Preliminary Document Request that have not been previously produced.

KANE RUSSELL
COLEMAN LOGAN

JOSEPH M. COLEMAN
Direct (214) 777-4280
Email jcoleman@krcl.com

November 12, 2019

Via E-Mail – mhelt@gardere.com

Marcus A. Helt, Esq.
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201

Re: *In re Zenergy Brands, Inc., et al* (the "Debtors"), Case No. 19-42886; In the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division

Dear Mr. Helt:

As you know, Kane Russell Coleman Logan PC represents, pending court approval, the Official Committee of Unsecured Creditors (the "Committee") in the Zenergy Brands, Inc., et al. bankruptcy cases. In order to fulfill our duties to our constituency, we require the documents requested below.

We believe it is important to move quickly in this case and, to that end, require an expedient response from the Debtor to the Committee's requests for documents. Even so, we are cognizant of the Debtor's reduced staff and the other demands on their time associated with the bankruptcy process. As an accommodation, we divided our requests into high priority items and second priority—but important—items. We would appreciate receiving the high priority items as soon as possible. Of course, certain items may become "non-issues" and new matters may arise as the Committee works through its investigation. As we progress, please let us know of any additional matters the Debtor believes may be in the best interests of creditors for the Committee to investigate.

Unless otherwise stated, all documents should be produced from January 1, 2018 through and including the date of production. The term "document" expressly includes, but is not limited to correspondence, communications in any form, memos, analyses, presentations, excel spreadsheets, e-mails, written agreements, etc. All document requests are directed to the Debtor unless otherwise expressly provided.

HIGH PRIORITY ITEMS:

1. Any revised, modified or changed Budget from the Budget attached to the DIP Financing Motion [Dkt. No. 19] as Exhibit A.

Dallas
901 Main Street
Suite 5200
Dallas, Texas 75202
214.777.4200

Houston
5051 Westheimer Road
Suite 1000
Houston, Texas 77056
713.425.7400

7319810 v1 (72278.00002.000)

Marcus A. Helt, Esq.
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2. Any and all loan, collateral, and perfection documents, including, but not limited to, all loan agreements, security agreements, promissory notes, debentures, notices of default, forbearance agreements, inter-creditor agreements, covenant waivers, guaranties, and financing statements applicable to any of the Debtor's allegedly secured and unsecured creditors ("Loan Documents"), including those that evidence any indebtedness owed or agreements with TCA (as defined below), including without limitation the TCA Senior Security Facility Convertible Notes; TCA Investment Banking Services Agreement, TCA Capital International Group, TCA Global and any direct or indirect affiliates of the above (collectively "TCA").¹

3. All correspondence, e-mails, other electronic or written communications, memoranda (collectively "communications") from, to, or referencing TCA, including without limitation, notices of default, letters relating to the exercise of remedies, forbearance requests, the attempted workout or restructuring of outstanding loans, communications concerning reserves and eligible or ineligible accounts or inventory, and any requests for certain action or information, or documents evidencing any lender or creditor's efforts to exert control over the Debtor's operations.

4. All Communications with, from, to or referencing TCA related, directly or indirectly, to (i) Debtor's obtaining additional debt or refinancing, (ii) sale of Debtor's assets outside the ordinary course of business, (iii) investment in the Debtor, (iv) obtaining a payoff of amounts owed to TCA, (v) indebtedness owed or allegedly owed by TCA, (vi) any alleged defaults or breaches of the Debtor's obligations owed to TCA, (vii) officers of the Debtor, (viii) Debtor's business decisions, and (ix) Debtor's refinancing efforts.

5. Any and all Default Letters, notices of default or communications from TCA regarding any breach, violation, or failure to comply with any term, provision or obligation owed by the Debtors to TCA.

6. All documents evidencing TCA's efforts to exert any undue influence, dominion, or control over any operations or material decisions, actions, or omissions of the Debtor.

7. Any documentation, communication, analysis or reference to attempt to pay off or otherwise satisfy indebtedness owed to TCA, including, without limitation,² (i) TCA charging the Debtors any amounts due; (ii) calculation of monthly principal and/or interest due TCA at any time; (iii) amount of interest due and whether default interest is owed; (iv) total indebtedness at any time due TCA; and (v) attempts to pay off TCA.

8. Any documentation, communication, analysis or reference to efforts by the Debtors at any time after August 2018 to obtain any financing debt, capital, funding, advances or equity from any source, including DIP Financing

9. Any documentation, communication, analysis or reference to that certain Investment Banking Services Agreement, from TCA Capital, dated August 22, 2019, as referenced in the Declaration of Joshua Campbell in Support of Chapter 11 Petition and First Day Motions [Dkt. No. 10] at pg. 10, ¶24

¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them or otherwise referenced in the *Declaration of Joshua Campbell in Support of Chapter 11 Petitions and First-Day Motions* (the "First-Days Declaration" [Docket No. 10]).

² Use of "including" herein is the same as and means "including without limitation" with repeating same each time.

Marcus A. Helt, Esq.

November 12, 2019

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10. Any documentation, communication, analysis or reference relating to advances or failure to advance funds by TCA, the lockbox or complaints by the Debtor about TCA

11. All valuations, analysis, examinations, appraisals, or reports concerning collateral securing any of the Debtor's obligations to any of the parties identified in demand number 1.

12. All availability analyses, borrowing base reports, and related information and correspondence applicable to the Debtor's borrowing base or availability of funds from the Secured Parties since the commencement of the Debtor's relationship with TCA.

13. The following financial statements for the Debtors:

- a. Monthly financial statements, including income statements, balance sheets, cash flow statements and other regularly generated monthly financial statements since **August 1, 2018**;
- b. Audited financial statements for the two years preceding the commencement of the bankruptcy cases; and
- c. Tax returns for the two years preceding the commencement of the bankruptcy cases; and
- d. All income, expenses, asset sale or other projections (or other financial modeling) generated since **January 1, 2018**, including without limitation any budgets prepared in connection therewith.

14. A detailed list of all of the Debtor's assets and, if not already provided in response to a prior request, a detailed appraisal, report, or valuation of all of the Debtor's assets.

15. Access to the Debtor's data room, if any.

SECOND PRIORITY ITEMS:

1. All documentation evidencing transfers between the Debtor and its affiliates, including an accounting of all receivables and payables outstanding.

2. Documentation evidencing any Insider loans, claims, or transfers, including any transfers to affiliate entities outside of the ordinary course of the Debtor's business.

3. If not previously provided, please provide all "loan packages", prospectus, or other materials relating to:

- a. Attempts to retain investment bankers, financial advisors or other parties to aid the Debtor with potential fund raising, financing, capitalization, mergers, acquisitions, cost-cutting or other significant transactions;
- b. Attempts to obtain an equity infusion, capitalization, debt restructure, debt refinancing or other similar transaction affecting the capital structure, balance sheet, liquidity, solvency or the equity of the Debtor; and
- c. Efforts to obtain new or additional loans.

Marcus A. Helt, Esq.
November 12, 2019
Page 4

4. Documentation detailing the Debtor's equity structure, and ownership interests in any other business entities and affiliates
5. Documentation evidencing all claims and causes of action the Debtor has or may have against any party, including any Insider, former Insider, lender, or any other party, and copies of all non-privileged correspondence and pleadings pertaining to any such claim or pending lawsuit in which the Debtor is a plaintiff.
6. Copies of all non-privileged correspondence and pleadings pertaining to any lawsuit pending with the Debtor as a defendant.
7. Information and documents relating to any departure of an insider, officer, or director from the Debtor since **January 1, 2018**.
8. A schedule of payments made by the Debtor to any of the parties listed in demand number 1 since **January 1, 2018**.
9. All (i) employment agreements, (ii) stock, shareholder, membership and operating, (iii) compensation, ownership or related agreements between the Debtor and any insider, officer, or director.
10. The following documentation related to all Board of Directors' Meetings since **January 1, 2018**.
 - a. Agenda related information packages;
 - b. Board resolutions and minutes; and
 - c. All other communications, reports, analysis and directions to or by the Debtor's board.

Please do not hesitate to call if you have any questions or comments about the above demands for production.

Sincerely,

KANE RUSSELL COLEMAN LOGAN PC

By: _____
Joseph M. Coleman

JMC/cd

cc: Official Committee of Unsecured Creditors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re:	§	Chapter 11
ZENERGY BRANDS, INC., <i>et al.</i> , ¹	§	Case No. 19-42886
Debtor.	§	(Jointly Administered)

**ORDER GRANTING OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
MOTION FOR ORDER AUTHORIZING EXAMINATION OF DEBTORS AND
INSIDERS AND AFFILIATES THEREOF PURSUANT TO BANKRUPTCY RULE 2004**

On this day came on for consideration the *Motion for Order Authorizing Examination of Debtors and Insiders and Affiliates Thereof Pursuant to Bankruptcy Rule 2004* [Dkt. No. ____] (the "**Motion**") filed on November 26, 2019, by the Official Committee of Unsecured Creditors (the "**Committee**") for Zenergy Brands, Inc. and related Debtor entities (collectively, the "**Debtors**") seeking, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, this Court's entry of an order that requires the Debtors to: (a) produce the documents set forth in **Exhibit "A"** attached to the Motion; and (b) appear for an oral examination. Having reviewed the Motion and considered all other evidence presented, the Court finds that good cause exists for entry of the following order.

IT IS THEREFORE ORDERED that the Motion is **GRANTED** as set forth herein.

IT IS FURTHER ORDERED that the Debtors shall produce for inspection and copying all documents set forth in **Exhibit "A"** attached to the Motion, either electronically or at the offices of Kane Russell Coleman Logan PC, 901 Main Street, Suite 5200, Dallas, Texas 75202; Tel: (214) 777-4200; Fax: (214) 777-4299, commencing not later than December 7, 2019, and continuing through **noon CST on December 18, 2019**, or as otherwise agreed to by the Parties.

¹ The Debtors in the above-captioned chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Zenergy Brands, Inc. (1686); NAUP Brokerage, LLC (7899); Zenergy Labs, LLC (8045); Zenergy Power & Gas, Inc. (1963); Enertrade Electric, LLC (8649); Zenergy & Associates, Inc. (4022); and Zen Technologies, Inc. (7309). The above-captioned Debtors' mailing address is 5700 Granite Pkwy, #200, Plano, TX 75024.

IT IS FURTHER ORDERED that: (a) the Committee is authorized to take the oral examination of Joshua Campbell, as the representative(s) for Zenergy Brands, Inc. and related Debtors, or such representative as may designated by the Debtors (the "**Examination**"); (b) the Examination shall take place on January 10, 2020, at the offices of Kane Russell Coleman Logan PC, 901 Main Street, Suite 5200, Dallas, Texas 75202, or such other date and location that the Parties may mutually agree upon, and shall continue thereafter from day to day until complete; and (c) the Examination may be recorded by audio tape, digital audio recording, and/or stenographic recording.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re: § Chapter 11
ZENERGY BRANDS, INC., et al.,¹ §
§ Case No. 19-42886
§
Debtors. § (Jointly Administered)

LIMITED MASTER SERVICE LIST
As of November 22, 2019

Attached are clean and redlined copies of the updated Limited Master Service List (as of November 22, 2019) filed and to be used in accordance with the Court’s *Order Granting Chapter 11 Complex Case Treatment* [Docket No. 56].

Dated: November 22, 2019

By: /s/Stephen D. Cady
Stephen D. Cady
Stretto
410 Exchange
Suite 100
Irvine, CA 92602
Telephone: 855-366-3672
Email: TeamZenergy@stretto.com

**CLAIMS AND NOTICING AGENT
FOR THE DEBTORS**

¹ The Debtors in the above-captioned chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Zenergy Brands, Inc. (1686); NAUP Brokerage, LLC (7899); Zenergy Labs, LLC (8045); Zenergy Power & Gas, Inc. (1963); Enertrade Electric, LLC; Zenergy & Associates, Inc. (4022); and Zen Technologies, Inc. (7309). The above-captioned Debtors’ mailing address is 5700 Grante Pkwy, #200, Plano, TX 75024.



Service List Page 2 of 3
 Master Service List
 (As of November 22, 2019)

Name	Attention	Address 1	Address 2	Address 3	City	State	Postal Code	Country	Phone	Fax	Email
Alex Rodriguez		6459 Village Springs Drive			Plano	TX	75024		214-205-3870		rainmaker84@yahoo.com
Anthony L.G., PLLC	Attn: Officer or Director	625 N Flager Dr #600			West Palm Beach	FL	33401				LAnthony@AnthonyPLLC.com
Ashley Gee		3314 Rolling Hills			Flower Mound	TX	75022		940-231-3019		ashleykgee@yahoo.com
Ashley Steffan		3313 Rolling Hills			Flower Mound	TX	75022				ashleykgee@yahoo.com
Bellridge Capital	Attn: David E. Danovitch	c/o Sullivan & Worcester LLP	1633 Broadway		New York	NY	10019		212-660-3060		ddanovitch@sullivanlaw.com
Bellridge Capital	Attn: Officer or Director	515 E. Las Boulevard #120A			Fort Lauderdale	FL	33301		954-745-7989		ddanovitch@sullivanlaw.com
Byron Young		8616 Heron Dr.			Ft. Worth	TX	76108				byrontoddyoung@icloud.com
CliftonLarsonAllen	Attn: Officer or Director	9901, I-10 Suite 350			San Antonio	TX	78230		210-298-7900		deana.acosta@CLAconnect.com
Collision Capital	Attn: Officer or Director	4830 W. Kennedy Blvd. #600			Tampa	FL	33609		813-258-0852		
Donnie "Tug" Goodwin	c/o Joel B. Colvin	3605 Katy Freeway #224			Houston	TX	77007		713-426-5151		jcolvin@jcolvinlaw.com
EMA Financial, LLC	Attn: Officer or Director	40 Wall St.			New York	NY	10005		212-453-0020		joelc@cthouston.com
Foley & Lardner LLP	Attn: Jack G. Haake	Washington Harbour	3000 K Street, N.W., Suite 600		Washington	DC	20007-5109		202-295-4085	202-672-5399	jhaake@foley.com
Foley Gardere	Attn: Marcus A. Helt	c/o Foley & Lardner LLP	2021 McKinney Avenue, Suite 1600		Dallas	TX	75201		214-999-3000	214-999-4667	mhelt@foley.com
Free & Free Enterprises, LLC	c/o W.T. Skip Leake PC	Attn: Donald R. Miller & W.T. Skip Leake	2201 North Collins Street, Suite 130	PO Box 201786	Arlington	TX	76006-1786		817-469-7711		drmler@eakelaw.com
Genaro Gomez Castanares		5868A Westgeuner Rd	Ste 1-422		Houston	TX	77057		713-568-3064	832-550-2834	INFO@GFINT.COM
Greentree Financial Group, Inc.	Attn: Officer or Director	19720 Jetton Road, 3rd Floor			Cornelius	NC	28031		704-892-8733	704-892-6487	mikebongiovanni@gtfinancial.com
Harris County et al.	c/o Linebarger Goggan Blair & Sampson, LLP	Attn: John P. Dillman	PO Box 3064		Houston	TX	77253-3064		713-844-3400	713-844-3503	houston_bankruptcy@publicans.com
Internal Revenue Service		825 E. Rundberg Ln			Austin	TX	78753				
Internal Revenue Service	Attn: Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346				
Internal Revenue Service	Attn: Centralized Insolvency Operation	2970 Market St.			Philadelphia	PA	19104-5016				
Investor Brand Network		8033 Sunset Blvd			Los Angeles	CA	90046		310-299-1717		
John Brooks Klingenberg		10 Augusta Way			Shoal Creek	AL	35242		205-617-1482	214-594-5055	jbklingenbeck@gmail.com jklingenbeck@zenergybrands.com jbrooks@whatszenergy.com
Liberty Trust Co. LTD	Custodian FBO Michael A. Ziegler, IRA	1611 Maxwell Ct.			Euless	TX	76039				
Luminant Energy	Attn: Officer or Director	6555 Sierra Drive			Irving	TX	75039		214-812-4600	972-556-6119	steve.rod@vistraenergy.com
Michael A. Ziegler		1611 Maxwell Ct.			Euless	TX	76039		817-690-5768		mickziegler@sbcglobal.net
Michigan Department of the Attorney General	G. Mennen Williams Building, 7th Floor	525 W Ottawa St			Lansing	MI	48933		517-373-1110		
Michigan Department of Treasury		3060 W. Grand Blvd.			Detroit	MI	48202				
Montgomery Coscia Greulich LLP	Attn: Officer or Director	2500 Dallas Parkway			Plano	TX	75093		972-748-0300	972-748-0700	info@mcggroup.com
Office of the United States Trustee	Earle Cabell Federal Building	1100 Commerce Street, Room 976			Dallas	TX	75242		214-767-8967	214-767-8971	
Office of the United States Trustee	Attn: Timothy O'Neal & John Vardeman	Bank of America Building	110 North College Avenue, Room 300		Tyler	TX	75702		903-590-1450	903-590-1461	John.M.Vardeman@usdoj.gov Samuel.M.Baker@usdoj.gov
Official Unsecured Creditors' Committee	Attn: Joseph M. Coleman & S. Kyle Woodard	c/o Kane Russell Coleman Logan PC	3700 Thanksgiving Tower	1601 Elm Street	Dallas	TX	75201		214-777-4200	214-777-4299	jcoleman@krcl.com kwoodard@krcl.com
Official Unsecured Creditors' Committee	Attn: Joseph M. Coleman & S. Kyle Woodard	c/o Kane Russell Coleman Logan PC	901 Main Street	Suite 5200	Dallas	TX	75202		214-777-4200	214-777-4299	jcoleman@krcl.com kwoodard@krcl.com
Oklahoma Office of the Attorney General		313 NE 21st St			Oklahoma City	OK	73105		405-521-3921		
Oklahoma Secretary of State		421 NW 13th St #210			Oklahoma City	OK	73103				
OTCBB	c/o Financial Industry Regulatory Authority	Attn: Angela Nacchio, Qualifications Analyst	9509 Key West Ave		Rockville	MD	20850				otc.bankruptcies@finra.org
RB Capital Partners, Inc.	Attn: Brett Rosen	2856 Torrey Pines Road			La Jolla	CA	92037		619-392-9829		brett.rosen325@gmail.com
Securities and Exchange Commission	New York Regional Office	Attn: Andrew Calamari, Regional Director	200 Vesey St Ste 400		New York	NY	10281-1022				
Securities and Exchange Commission		100 F Street, NE			Washington	DC	20549				JT@SHRGINC.COM
Sharing Services, Inc. et al	Attn: Officer or Director	1700 Coit Rd.	Suite 100		Plano	TX	75075		469-304-9400		Cathy@shrginc.com
Steven Boss		10670 N. Central Expy	Suite 500		Dallas	TX	75231		214-382-3342		stevenboss@stevenbosslaw.com
TCA Global Credit Master Fund, L.P.	c/o Shraiberg, Landau & Page, P.A.	Attn: Bradley S. Shraiberg	2385 N.W. Executive Center Dr., Suite 300		Boca Raton	FL	33431		561-443-0800	561-998-0047	bss@slp.law dwoodall@slp.law
TCA Special Situations Credit Strategies ICAV	c/o Shraiberg, Landau, Page P.A.	Attn: Bradley S. Shraiberg	2385 N.W. Executive Center Dr., Suite 300		Boca Raton	FL	33431		561-443-0800	561-998-0047	bss@slp.law
Terrence Gray		2727 Travis St.	#605		Houston	TX	77006		347-668-9484		
Texas Comptroller	Lyndon B Johnson State Office Bldg	111 East 17th St			Austin	TX	78774				
Texas Comptroller of Public Accounts		PO Box 13528	Capitol Station		Austin	TX	78711-3528				
Texas Comptroller of Public Accounts	Attn: Kimberly A. Walsh	c/o Sherri K. Simpson	Attorney General's Office, Bankruptcy & Collections Division	P.O. Box 12548	Austin	TX	78711-2548		512-475-4562	512-936-1409	bk-kwalsh@oag.texas.gov
Texas Office of the Attorney General		300 W. 15th St			Austin	TX	78701		512-463-2100		sherri.simpson@oag.texas.gov
Texas State Securities Board	Attn Legal Department	208 E. 10th St.	Thomas Jefferson Rusk State Office Building		Austin	TX	78701			512-305-8310	
United States Attorney's Office for the Eastern District of Texas	Joseph D. Brown	600 East Taylor Street, Suite 2000			Sherman	TX	75090		903-868-9454		
Viridian International	Attn: Officer or Director	1055 Washington Blvd. 7th Floor			West Hartland	CT	06091				customercare@viridian.com
Vista Capital Investments	Attn: David Clark, Principal	406 9th Ave, Suite 201			San Diego	CA	92101		619-543-0328		dclark@vci.us.com



Service List Page 3 of 3

Master Service List
Redlined Version
(As of November 22, 2019)

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Ashley Steffan		3313 Rolling Hills			Flower Mound	TX	75022				ashleykgee@yahoo.com
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EMA Financial, LLC	Attn: Officer or Director	40 Wall St.			New York	NY	10005		212-453-0020		info@emafin.com
Foley & Lardner LLP	Attn: Jack G. Haake	Washington Harbour	3000 K Street, N.W., Suite 600		Washington	DC	20007-5109		202-672-5399	202-672-5399	jhaake@foley.com
Foley Gardere	Attn: Marcus A. Helt	c/o Foley & Lardner LLP	2021 McKinney Avenue, Suite 1600		Dallas	TX	75201		214-999-3000	214-999-4667	mhelt@foley.com
Free & Free Enterprises, LLC	c/o W.T. Skip Leake PC	Attn: Donald R. Miller & W.T. Skip Leake	2201 North Collins Street, Suite 130	PO Box 201786	Arlington	TX	76006-1786		817-460-7711	817-469-7020	drmiller@leakelaw.com;
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Michigan Department of Treasury		3060 W. Grand Blvd.			Detroit	MI	48202				
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Office of the United States Trustee	Attn: Timothy O'Neal & John Vardeman	Bank of America Building	110 North College Avenue, Room 300		Tyler	TX	75702		903-590-1450	903-590-1461	John.M.Vardeman@usdoj.gov;
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Oklahoma Office of the Attorney General		313 NE 21st St			Oklahoma City	OK	73105		405-521-3921		kwoodard@krcl.com;
Oklahoma Secretary of State		421 NW 13th St #210			Oklahoma City	OK	73103				kwoodard@krcl.com
OTCBB	c/o Financial Industry Regulatory Authority	Attn Angela Nacchio, Qualifications Analyst	9509 Key West Ave		Rockville	MD	20850				otc.bankruptcies@finra.org
RB Capital Partners, Inc.	Attn: Brett Rosen	2856 Torrey Pines Road			La Jolla	CA	92037		619-392-9829		brett.rosen325@gmail.com
Securities and Exchange Commission	New York Regional Office	Attn Andrew Calamari, Regional Director	200 Vesey St Ste 400		New York	NY	10281-1022				
Securities and Exchange Commission		100 F Street, NE			Washington	DC	20549				
Sharing Services, Inc. et al	Attn: Officer or Director	1700 Coit Rd.	Suite 100		Plano	TX	75075		469-304-9400		JT@SHRGINC.COM;
Steven Boss		10670 N. Central Expy	Suite 500		Dallas	TX	75231		214-382-3342		Cathy@shrginc.com
TCA Global Credit Master Fund, L.P.	c/o Shraiberg, Landau & Page, P.A.	Attn: Bradley S. Shraiberg	2385 N.W. Executive Center Dr., Suite 300		Boca Raton	FL	33431		561-443-0800	561-998-0047	stevenboss@stevenbosslaw.com
TCA Special Situations Credit Strategies ICAV	c/o Shraiberg, Landau, Page P.A.	Attn: Bradley S. Shraiberg	2385 N.W. Executive Center Dr., Suite 300		Boca Raton	FL	33431		561-443-0800	561-998-0047	bss@slp.law
Terrence Gray		2727 Travis St.	#505		Houston	TX	77006		347-668-9484		dwoodall@slp.law; bss@slp.law
Texas Comptroller	Lyndon B Johnson State Office Bldg	111 East 17th St			Austin	TX	78774				
Texas Comptroller of Public Accounts		PO Box 13528	Capitol Station		Austin	TX	78711-3528				
Texas Comptroller of Public Accounts	Attn: Kimberly A. Walsh	c/o Sherri K. Simpson	Attorney General's Office, Bankruptcy & Collections Division	P.O. Box 12548	Austin	TX	78711-2548		512-475-4562	512-936-1409	bk-kwalsh@oag.texas.gov;
Texas Office of the Attorney General		300 W. 15th St			Austin	TX	78701		512-463-2100		sherri.simpson@oag.texas.gov
Texas State Securities Board	Attn Legal Department	208 E. 10th St.	Thomas Jefferson Rusk State Office Building		Austin	TX	78701			512-305-8310	
United States Attorney's Office for the Eastern District of Texas	Joseph D. Brown	600 East Taylor Street, Suite 2000			Sherman	TX	75090		903-868-9454		
Viridian International	Attn: Officer or Director	1055 Washington Blvd. 7th Floor			West Hartland	CT	06091				customer@viridian.com
Vista Capital Investments	Attn: David Clark, Principal	406 9th Ave, Suite 201			San Diego	CA	92101		619-543-0328		dclark@vci.us.com
Zenergy Brands, Inc.		5700 Granite Parkway, Suite 200			Plano	TX	75024				