

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF CONNECTICUT
NEW HAVEN DIVISION**

IN RE:	:	CASE NO.: 25-30605 (AMN)
	:	
TAOM Heritage New Haven LLC,	:	CHAPTER 7
	:	
Debtor.	:	SEPTEMBER 15, 2025
	:	

**JOINT MOTION TO DISMISS
INVOLUNTARY PROCEEDING**

Pursuant to 11 U.S.C. §303(j)(1) and 303(j)(2), the petitioning creditors, C. William Kraus d/b/a C.W. Kraus Preservation & Development; Rescue 1 Pest and Termite Control LLC; Decontamination Decommissioning and Environmental Services, LLC; T.S.J., Inc.; Sydney Simpkins d/b/a Sydney Simpkins Associates; CT Environmental and Demo Limited Liability Co.; Triton Environmental, Inc.; and Capital for Change, Inc. (collectively, the “Petitioning Creditors”) and the alleged debtor, TAOM Heritage New Haven, LLC (the “Alleged Debtor”) hereby move to dismiss the above-captioned bankruptcy petition and in support represent the following:

1. The Petition was filed on June 26, 2025 to prevent termination of the Alleged Debtor’s contract to sell its property to the Housing Authority of New Haven.
2. The Petitioning Creditors believed when filing the Petition that the Alleged Debtor’s former management was unable or unwilling to take the steps necessary to complete the sale of the Property.
3. Pursuant to the Power of Attorney attached as Exhibit A, the Alleged Debtor’s former management has relinquished all managerial authority over the Alleged Debtor and

granted said authority to Clock Factory Conveyance, LLC and its manager, C. William Kraus.

Declaration of C. William Kraus ¶ 3.

4. The Alleged Debtor's former management has sold its management interest in the Alleged Debtor to Clock Factory Conveyance, LLC.

5. The undersigned Petitioning Creditors and the Alleged Debtor believe that the bankruptcy is no longer necessary.

6. Accordingly, the undersigned Petitioning Creditors and the Alleged Debtor seek dismissal of the Petition without any fees or costs assessed against any party. The Alleged Debtor hereby waives any claim pursuant to 11 U.S.C. §303(i).

7. Pursuant to 11 U.S.C. §303(j), the undersigned Petitioning Creditors and the Alleged Debtor shall give notice to all known creditors of the Alleged Debtor and ask the Court to set a hearing on the proposed dismissal.

8. Pursuant to Fed. R. Bankr. P. 2002(a)(4) and Fed. R. Bankr. P. 1017(a), all creditors and parties in interest should receive at least 21 day notice of this hearing. In Re: Taub, 150 B.R. 96 (Bankr. D. Conn. 1993).

Accordingly, the undersigned Petitioning Creditors and the Alleged Debtor hereby request this Court to set a hearing date sufficient to provide the required 21 day notice to all creditors.

PETITIONING CREDITORS

C. WILLIAM KRAUS d/b/a C.W.
KRAUS PRESERVATION &
DEVELOPMENT; RESCUE 1 PEST
and TERMITE CONTROL LLC;
DECONTAMINATION
DECOMMISSIONING and
ENVIRONMENTAL SERVICES, LLC;
T.S.J., INC.; SYDNEY SIMPKINS d/b/a
SYDNEY SIMPKINS ASSOCIATES; and
CT ENVIRONMENTAL AND DEMO
LIMITED LIABILITY CO.; TRITON
ENVIRONMENTAL, LLC f/k/a TRITON
ENVIRONMENTAL, INC. and CAPITAL
FOR CHANGE, INC.

ALLEGED DEBTOR

TAOM HERITAGE NEW HAVEN LLC

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DECLARATION OF C. WILLIAM KRAUS

I, C. William Kraus, hereby state as follows:

1. I am over the age of eighteen and understand the obligations of an oath.
2. I am the manager of Clock Factory Conveyance, LLC, a limited liability company organized under Connecticut law.
3. Pursuant to the Power of Attorney attached as Exhibit A, the Debtor's former management has relinquished all managerial authority over the Debtor and granted said authority to Clock Factory Conveyance, LLC and me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

September 15, 2022



C. William Kraus

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**PROPOSED ORDER FOR
JOINT MOTION TO DISMISS INVOLUNTARY PROCEEDING**

Upon consideration of the Joint Motion to Dismiss Involuntary Proceeding (“Motion”) submitted by the Alleged Debtor and Petitioning Creditors in the above-captioned case and after this Court’s hearing on the Motion:

IT IS HEREBY ORDERED that this involuntary proceeding is hereby dismissed.

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CERTIFICATE OF SERVICE

I hereby certify that, on September 15, 2025, the foregoing has been served by operation of the Court's CM/ECF system on the following:

- **Gregory F. Arcaro:** garcaro@grafsteinlaw.com; 5806@notices.nextchapterbk.com; office@grafsteinlaw.com; ArcaroGR49801@notify.bestcase.com
- **Jeffrey T. Beatty:** jtbeatty@cshore.com
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- **Kim L. McCabe:** kim.mccabe@usdoj.gov
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- **U. S. Trustee:** USTPRegion02.NH.ECF@USDOJ.GOV

/s/ Jeffrey Hellman
Jeffrey Hellman, Esq.