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7 Attorneys for Chapter 11 Debtor  
 and Debtor in Possession

9 **UNITED STATES BANKRUPTCY COURT**  
 10 **FOR THE DISTRICT OF NEVADA**

<p>12 In re:</p> <p>13 Front Sight Management LLC,</p> <p>14</p> <p>15 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p><b>Hearing Date:</b> November 18, 2022  <b>Hearing Time:</b> 9:30 a.m.</p>
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17 **DECLARATION OF IGNATIUS PIAZZA IN SUPPORT OF DEBTOR’S FIRST OMNIBUS**  
 18 **OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2)**  
 19 **DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

20 I, Ignatius Piazza, hereby declare as follows:

21 1. I am the manager of Front Sight Management LLC, the chapter 11 debtor in  
 22 possession herein (the “Debtor”). The facts stated herein are within my personal knowledge unless  
 23 otherwise indicated. Unless stated on information and belief, I have personal knowledge of the facts  
 24 set forth herein and, if called upon to testify, could and would do so. For those items stated on  
 25 information and belief, I believe them to be true.

26 2. I make this declaration in support of the Debtor’s *Omnibus Objection to Certain*  
 27 *Members’ Claims* [ECF No. 411] (the “Omnibus Objection”)<sup>1</sup> filed herewith. If called upon to

28 <sup>1</sup> All capitalized terms used herein but not defined shall have the same meaning ascribed to them in the Omnibus Objection.

1 testify, I would testify competently to the facts set forth in this Declaration and the Omnibus  
2 Objection. I am authorized to submit this Declaration on the Debtor's behalf.

3 3. After reviewing the Claims, the Debtor has determined that the Claims are subject to  
4 reduction and/or disallowance because the amount of each of the Claims far exceeds the amount paid  
5 by the Claimants to the Debtor. Each of the Claimants is a member or former member of the Debtor  
6 (and not a creditor) who is asserting a Claim or Claims against the estate based either on nothing or  
7 based on account of member benefits or member rewards. Each Claimant purchased or was given  
8 memberships to the Debtor and subsequently purchased or was given membership rewards. These  
9 rewards have no value outside of the Debtor's business. While the Debtor believes that most, if not  
10 all, of the Claimants received services from the Debtor at least equal to what was paid, the Debtor  
11 does not object to the Claimants retaining a claim in this case for the amount each Claimant actually  
12 paid.

13 4. The Debtor's books and records show that the Claimants paid the following amounts  
14 to Debtor for their memberships and membership rewards:

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Dr. Gary P. Miller	12-1	\$21,471,000.00	\$13,869.00
David Clyde Lewis	20-1	\$2,991,000.00	\$7,020.00
William Sheeder	95-1	\$3,536,400.00	\$34,128.00
Francis Van Landingham	138-1	\$600,000.00	\$200.00
Robert A. Morrison	183-1	\$13,309,899.05	\$794.00
Birdie Carol Morrison	184-1	\$13,110,084.05	\$794.00
John M. Castagno	190-1	\$27,301,777.00	\$10,050.00
Eric H. Sampson	199-1	\$1,912,573.07	\$11,477.00
James Harriss	217-1	\$360,691.00	\$1,250.00
Mark Giblin	222-1	\$18,831,863.28	\$6,880.00

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Kenneth E. Johnson III	238-1	\$1,121,435,079.00	\$14,860.00
Lance F. Wood	248-1	\$4,227,400.04	\$1,149.00
Amelia Fan	256-1	\$737,000.00	\$499.00
Sebastian Fan	257-1	\$737,000.00	\$499.00
Michael Steel	271-1	\$1,350,781.00	\$1,247.00
Mike Montesano	275-1	\$1,614,500.00	\$499.00
Stacey A. Edwards	311-1	\$650,000.00	\$0.00
Robert Ianucci	314-1	\$622,994.00	\$1,643.00
Kenneth D. Roberts	323-1, 324-1, 325-1, 326-1, 327-1, 328-1	\$74,104,823,456.00	\$32,134.80

5. Accordingly, the Debtor objects to the Claims because the Claims far exceed the amount the Claimants paid to the Debtor. The Debtor seeks to (i) disallow certain claims in their entirety and (ii) reduce the amount of certain of the Claims to the amount reflected on the Debtor's books and records as to what was actually paid by the Claimants to the Debtor for their respective memberships and membership rewards.

6. Additionally, the Debtor's books and records reflect that Claimant Dr. Gary Miller was refunded \$13,869.00, i.e., the amount Claimant paid to the Debtor, after his membership was terminated, and Claimant Francis Van Landingham was refunded \$200.00 after his membership was terminated. Accordingly, the Debtor respectfully requests that Claim Nos. 12 and 138 be disallowed in their entirety.

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