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 and Debtor in Possession  
 8

9 **UNITED STATES BANKRUPTCY COURT**  
 10 **FOR THE DISTRICT OF NEVADA**  
 11

<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 SECOND**  
 18 **OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS**  
 19 **AND (2) 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 Second Omnibus Objection (1)*  
 27 *Reducing and Allowing Certain Member Claims and (2) Disallowing and Expunging Certain Other*  
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1 *Member Claims* (the “Omnibus Objection”)<sup>1</sup> filed herewith. If called upon to testify, I would testify  
2 competently to the facts set forth in this Declaration and the Omnibus Objection. I am authorized to  
3 submit this Declaration on the Debtor’s behalf.

4 3. After reviewing the Claims, the Debtor has determined that the Claims are subject to  
5 reduction and/or disallowance because the amount of each of the Claims far exceeds the amount paid  
6 by the Claimants to the Debtor. Each of the Claimants is a member or former member of the Debtor  
7 (and not a creditor) who is asserting a Claim or Claims against the estate based either on nothing or  
8 based on account of member benefits or member rewards. Each Claimant purchased or was given  
9 memberships to the Debtor and subsequently purchased or was given membership rewards. These  
10 rewards have no value outside of the Debtor’s business. While I believe that most, if not all, of the  
11 Claimants received services from the Debtor at least equal to what was paid, the Debtor does not  
12 object to the Claimants retaining a claim in this case for the amount each Claimant actually 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
Edgar R. Bolanos	6-2	\$250,000.00	\$659.00
David C. Jones	27-1	\$100,000.00	\$2,142.00
Heather M. Jones	28-1	\$100,000.00	\$500.00
Maverick T. Jones	29-1	\$100,000.00	\$249.00
Marielle C. Jones	30-1	\$100,000.00	\$149.00
Gary Short	31-1	\$104,000.00	\$451.00
Kiersten E. Jones	32-1	\$100,000.00	\$149.00

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

	<b>Claimant</b>	<b>Claim No.</b>	<b>Claim Amount</b>	<b>Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards</b>
1	Judson Miers	47-1	\$100,000.00	\$2,162.00
2	Sam Linville	74-1	\$100,000.00	\$0.00
3	Nathaniel Short	88-1	\$100,250.00	\$0.00
4	Eli Short	90-1	\$100,250.00	\$0.00
5	Michael David Willis	93-1	\$100,00.00	\$950.00
6	PO Box 846 (Lindsey M. Willis)	94-1	\$100,000.00	\$100.00
7	Gregory A. Leafe	151-1	\$250,000.00	\$6,348.00
8	Christopher R. Douty	163-1	\$152,434.83	\$12,178.00
9	Bruce Logie	169-1	\$422,808.89	\$1,294.00
10	Kathy McCloud	187-1	\$104,000.00	\$3,495.00
11	Robert Neidich	227-1	\$228,687.00	\$29,054.00
12	Ollen L. Burnette, Sondra L. Burnette	234-1	\$100,000.00	\$23,876.00
13	Matthew Casavant	239-1	\$108,758.27	\$10,225.00
14	David L. Streck	244-1	\$280,760.00	\$50,505.80
15	Jerry Witt	261-1	\$180,502.00	\$5,339.00
16	Jordan W. Graham	294-1	\$104,644.73	\$3,439.00
17	Debra Ianucci	313-1	\$227,939.00	\$1,242.00
18	Robert Ianucci	314-1	\$622,994.00	\$1,643.00
19	Blain Roberts	372-1	\$95,310.00	\$600.00
20	David Schlossberg	376-1	\$480,845.00	\$950.00
21	Ignacio Valencia	396-1	\$1,783,795.00	\$946.00
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Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Matthew T. Bogosian	443-1	\$369,000.00	\$1,699.00
Jonathan H. Daniels	480-1	\$625,900.00	\$299.00
Roy Slettehaugh	510-1	\$100,000.00	\$2,198.00
Charles Phillips	520-1	\$100,000.00	\$399.00
Katy Phillips	522-1	\$100,000.00	\$0.00
David Ross	552-1	\$2,347,700.00	\$1,642.00
Matthew Nolte	570-1	\$403,498.00	\$2,096.00
Dolores M. Synovec	578-1	\$6,158,697.00	\$997.00

5. The Debtor's books and records reflect that the following Claimants were refunded after their memberships were terminated, i.e., the Debtor refunded the Claimants the total amount of money that the Claimants paid the Debtor for their memberships and membership benefits:

- a. Edgar R. Bolanos, Claim No. 6-2, refunded \$659.00,
- b. Gary Short, Claim No. 31-1, refunded \$451.00,
- c. Judson Miers, Claim No. 47-1, refunded \$2,162.00, and
- d. Bruce Logie, Claim No. 169-1, \$1,294.00.

6. Accordingly, Claim Nos. 6-2, 31-1, 47-1, and 169-1 should be disallowed in their entirety.

7. The Debtor's books and records do not reflect that the following Claimants paid any amounts to Debtor for their membership or member benefits:

- a. Sam Linville, Claim No. 74-1,
- b. Nathaniel Short, Claim No. 88-1,
- c. Eli Short, Claim No. 90-1, and
- d. Katy Phillips, Claim No. 522-1.

1 8. Accordingly, Claim Nos. 74-1, 88-1, 90-1, and 522-1 should be disallowed in their  
2 entirety.

3 9. Additionally, it appears that Claimant Gary Short has filed two additional proofs of  
4 claim, Claim Nos. 78-1 and 154-1, that are duplicative of Claim No. 31-1. It also appears that  
5 Claimant Charles Phillips has filed Claim No. 521-1, which appears to be duplicative of Claim No.  
6 520-1. Accordingly, the Debtor respectfully requests that Claim Nos. 78-1, 154-1, and 521-1 be  
7 disallowed in their entirety because they are duplicative of other Claims.

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

10 Executed on this 19th day of October 2022 in Dallas, Texas.

11   
12 \_\_\_\_\_  
13 Ignatius Piazza

**CERTIFICATE OF SERVICE**

I declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.

On **October 19, 2022**, I served the following document:

**DECLARATION OF IGNATIUS PIAZZA IN SUPPORT OF DEBTOR’S SECOND OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

**BY ELECTRONIC MAIL**

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

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I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed October 19, 2022, at Woodland Hills, California.

/s/ Jessica Studley  
JESSICA STUDLEY