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

<p>11 In re:</p> <p>12 Front Sight Management LLC,</p> <p>13</p> <p>14 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p>Hearing Date: January 9, 2023 Hearing Time: 9:30 a.m.</p>
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18 **OMNIBUS DECLARATION OF IGNATIUS PIAZZA IN SUPPORT OF: (1) DEBTOR’S**
 19 **OBJECTION TO PROOF OF CLAIM 109-1 FILED BY STEVEN NESSEN; (2) DEBTOR’S**
 20 **OBJECTION TO PROOF OF CLAIM 454-1 FILED BY CHARLES SCHMIDT; AND (3)**
 21 **DEBTOR’S OBJECTION TO PROOF OF CLAIM 844-1 FILED BY STEVEN D. CASTON**

22 I, Ignatius Piazza, hereby declare as follows:

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

27 2. I make this declaration in support of the *Debtor’s Objection to Proof of Claim 109-1*
 28 *Filed by Steven Nessen* (the “Nessen Objection”), the *Debtor’s Objection to Proofs of Claim 454-1*

1 Filed by Charles Schmidt (the “Schmidt Objection”), and the Debtor’s Objection to Proofs of Claim
2 844-1 Filed by Steven D. Caston (the “Caston Objection,” and collectively with the Nessen
3 Objection and Schmidt Objection, the “Objections”)¹ filed herewith. If called upon to testify, I
4 would testify competently to the facts set forth in this Declaration and the Objections. I am
5 authorized to submit this Declaration on the Debtor’s behalf.

6 3. Each of the claims at issue in the Objections was filed by a claimant (each a
7 “Claimant” and collectively, the “Claimants”) that is a member of the Debtor who is asserting a
8 claim against the estate based on account of amounts paid by the Claimants for their memberships
9 and/or member rewards. These rewards have no value outside of the Debtor’s business. While the
10 Debtor believes that most, if not all, of the Claimants received services from the Debtor at least
11 equal to what was paid, the Debtor does not object to the Claimants retaining a claim in this case for
12 the amount each Claimant actually paid.

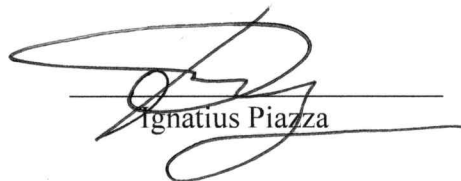
13 4. However, Proof of Claim Nos. 109-1, 454-1, and 844-1 (collectively, the “Claims”)
14 each assert that all or a portion of the claim is secured by a lien on the Debtor’s property. The
15 Claims are not secured by a lien on the Debtor’s property and none of the Claims include any
16 evidence demonstrating that the Claimants have a perfected security interest in any of the Debtor’s
17 assets.

18 5. The Claimants are general unsecured creditors of the Debtor—not secured creditors.

19 6. Accordingly, I respectfully request that the Court enter orders sustaining the
20 Objections and reclassifying the Claims as general unsecured claims.

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

23 Executed on this 29th day of November, 2022 in Dallas, Texas.

24
25 
26 Ignatius Piazza

27 _____
28 ¹ All capitalized terms used herein but not defined shall have the same meaning ascribed to them in
the applicable claim objection.