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12 Attorneys for Province, LLC, solely in its capacity as
 13 the Liquidating Trustee of the Front Sight Creditors Trust

14 **UNITED STATES BANKRUPTCY COURT**
 15 **FOR THE DISTRICT OF NEVADA**

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| <p>16 In re:</p> <p>17 Front Sight Management LLC,</p> <p>18 Debtor.</p> | <p>19 Case No. 22-11824-abl</p> <p>20 Chapter 11</p> <p>21 Hearing Date: April 13, 2023 Hearing Time: 9:30 a.m.</p> |
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22 **DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF NINTH OMNIBUS**
 23 **OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2)**
 24 **DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

25 I, Amanda Demby Swift, hereby declare as follows:

26 1. I am a principal of Province, LLC (the “Liquidating Trustee”), which is the duly
 27 appointed liquidating trustee for the Front Sight Creditors Trust (the “Trust”), and I am the
 28 individual charged with acting on the Liquidating Trustee’s behalf. In my capacity in serving on
 behalf of the Liquidating Trustee, I am responsible for overseeing and generally managing the
 Trust’s efforts to maximize the value of the estate for distributions to holders of allowed general
 unsecured claims.

2. Except as otherwise indicated, all statements herein are based on my personal
 knowledge, my review of Front Sight Management LLC’s (the “Debtor”) books and records, and/or

1 my opinion based upon my experience and knowledge of the matters at issue. I am over 18 years of
 2 age, and if called upon to testify, I could and would competently testify to each of the facts set forth
 3 herein based on my personal knowledge, review of the documents, or opinion.

4 3. I make this declaration in support of the *Ninth Omnibus Objection (1) Reducing and*
 5 *Allowing Certain Member Claims and (2) Disallowing and Expunging Certain Other Member*
 6 *Claims* (the “Omnibus Objection”) filed herewith. If called upon to testify, I would testify
 7 competently to the facts set forth in this Declaration and the Omnibus Objection. I am authorized to
 8 submit this Declaration on the Liquidating Trustee’s behalf. Any capitalized term not defined in this
 9 Declaration has the same meaning ascribed to it in the Omnibus Objection.

10 4. The Liquidating Trustee and its professionals are in possession of the Debtor’s books
 11 and records including those records relating to amounts paid to the Debtor by its pre-petition
 12 members. After reviewing the Claims and in consultation with the Trust’s professionals, the
 13 Liquidating Trustee has determined that the Claims are subject to reduction and/or disallowance
 14 because the amount of each of the Claims exceeds the amount paid by the Claimants to the Debtor.
 15 To the best of my knowledge and upon information and belief, it appears that each of the Claimants
 16 is a former member of the Debtor who is asserting a Claim or Claims against the estate based either
 17 on nothing or based on account of member benefits or member rewards. To the best of my
 18 knowledge and upon information and belief, it appears that each Claimant purchased or was given
 19 memberships to the Debtor and subsequently purchased or was given membership rewards.

20 5. The Debtor’s books and records show that the Claimants paid the following amounts
 21 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 |
|-----------------------|-----------|--------------|--|
| John P. Hancock | 2-1 | \$5,000.00 | \$3,476.00 |
| James Grant | 4-1 | \$1,997.00 | \$0.00 |
| Shaun Clements | 16-1 | \$1,800.00 | \$0.00 |
| Sean Barber | 19-1 | \$6,000.00 | \$0.00 |
| Peter Theodore Malone | 35-1 | \$5,000.00 | \$3,317.00 |

| | Claimant | Claim No. | Claim Amount | Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards |
|----|--|------------------|---------------------|---|
| 1 | Brandon A. Green | 36-1 | \$3,997.00 | \$2,196.00 |
| 2 | David C. McCarthy | 38-1 | \$2,020.00 | \$846.00 |
| 3 | Brian Werth | 40-1 | \$1,200.00 | \$0.00 |
| 4 | Eric Cisco | 43-1 | \$7,500.00 | \$299.00 |
| 5 | Kirk Christopher Skinner | 50-1 | \$5,00.00 | \$0.00 |
| 6 | Steven Kocsis | 53-1 | \$2,000.00 | \$299.00 |
| 7 | Kenneth Smith | 56-1 | \$5,000.00 | \$2,190.00 |
| 8 | James Charles Kutz | 59-1 | \$9,100.00 | \$1,943.00 |
| 9 | Peter Passaretti (420 Spotted Saddle Ct) | 64-1 | \$3,444.00 | \$2,144.00 |
| 10 | David Jacobs Kotz | 70-1 | \$3,000.00 | \$1,579.00 |
| 11 | Steven Greenstein | 83-1 | \$2,500.00 | \$138.00 |
| 12 | Robin Badart | 86-1 | \$5,000.00 | \$2,738.00 |
| 13 | Cameron O'Rourke | 97-1 | \$8,000.00 | \$1,749.00 |
| 14 | David Macer | 103-1 | \$2,000.00 | \$798.00 |
| 15 | John Pozar | 105-1 | \$2,500.00 | \$0.00 |
| 16 | Dawn Janz | 106-1 | \$3,000.00 | \$0.00 |
| 17 | Dennis Zaferis | 114-1 | \$2,500.00 | \$1,299.00 |
| 18 | Trin Astrella, Jr. | 124-1 | \$1,500.00 | \$0.00 |
| 19 | Michael Brusseau | 129-1 | \$9,900.00 | \$250.00 |
| 20 | Igor Shpak | 131-1 | \$3,900.00 | \$199.00 |
| 21 | John J. Lennon and Shari E. Lennon | 174-1 | \$3,000.00 | \$0.00 |
| 22 | Michael Oltmann | 177-1 | \$1,976.00 | \$0.00 |
| 23 | Gary Evans | 223-1 | \$9,500.00 | \$2,400.00 |
| 24 | Danielle R. Evansic | 241-1 | \$6,270.00 | \$0.00 |
| 25 | Graham Collings | 277-1 | \$1,997.00 | \$0.00 |
| 26 | Brent B. Adams | 296-1 | \$1,344.95 | \$349.00 |
| 27 | John J. Smith | 297-1 | \$3,700.00 | \$349.00 |
| 28 | William Ray Holley | 308-1 | \$4,500.00 | \$1,750.00 |
| | Kevin Hochstrat | 317-1 | \$1,500.00 | \$0.00 |
| | Thomas P Hillmer | 321-2 | \$5,700.00 | \$3,047.00 |

| | Claimant | Claim No. | Claim Amount | Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards |
|----|---|------------------|---------------------|---|
| 1 | Beth Mohr | 329-2 | \$7,200.00 | \$200.00 |
| 2 | Mark Fortune | 330-1 | \$2,000.00 | \$198.00 |
| 3 | Shelley Griffin | 337-1 | \$7,200.00 | \$0.00 |
| 4 | Matthew Baldwin | 338-1 | \$2,000.00 | \$0.00 |
| 5 | Jaime Clavito | 339-1 | \$1,800.00 | \$51.00 |
| 6 | Paul Clay (Employees of Front Sight Management LLC) | 352-1 | \$1,200.00 | \$0.00 |
| 7 | Shawn Cropper | 354-1 | \$2,000.00 | \$0.00 |
| 8 | Robert J. Byrne Jr. | 355-1 | \$1,000.00 | \$0.00 |
| 9 | David Michael Hodges | 357-1 | \$2,097.00 | \$199.00 |
| 10 | Jared Beach | 360-1 | \$6,000.00 | \$1,294.00 |
| 11 | Brian D. Allen (Dominic Allen) | 361-1 | \$3,000.00 | \$549.00 |
| 12 | David Eastman | 362-2 | \$6,500.00 | \$299.00 |
| 13 | Dennis Jerdan | 363-1 | \$5,093.00 | \$2,188.00 |
| 14 | Jason Russo | 377-1 | \$5,000.00 | \$1,749.00 |
| 15 | Anthony W Austin | 390-1 | \$7,200.00 | \$0.00 |
| 16 | Matthew Meyer | 399-1 | \$5,000.00 | \$299.00 |
| 17 | Joshua Weatherbie | 403-1 | \$5,000.00 | \$1,797.00 |
| 18 | Robert DeJong | 408-1 | \$2,500.00 | \$0.00 |
| 19 | David Marshall | 410-1 | \$5,000.00 | \$797.00 |
| 20 | Daniel Hughes | 413-1 | \$5,000.00 | \$894.00 |
| 21 | Keenan Hilman | 414-1 | \$1,000.00 | \$0.00 |
| 22 | Robert Wright | 419-1 | \$4,150.00 | \$350.00 |
| 23 | Andreas Hont | 422-1 | \$1,000.00 | \$0.00 |
| 24 | Kerem Kapkin | 426-1 | \$3,000.00 | \$0.00 |
| 25 | Ronald Hembd | 448-1 | \$5,796.00 | \$3,225.00 |
| 26 | Kevin Odom | 452-1 | \$1,000.00 | \$0.00 |
| 27 | Anthony Leanza | 455-1 | \$1,000.00 | \$0.00 |
| 28 | Trinidelita Nedy Garcia Lao | 457-1 | \$1,000.00 | \$0.00 |
| | Michael Chapman | 459-1 | \$8,037.00 | \$3,952.00 |
| | Douglas S. Rohrer | 462-1 | \$3,500.00 | \$997.00 |

| Claimant | Claim No. | Claim Amount | Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards |
|---|-----------|--------------|--|
| Peter Konrad (Denelle, Jordan, Garrett & Amanda Konrad) | 477-1 | \$7,250.00 | \$2,894.00 |
| Lloyd C. Phillips | 478-1 | \$8,000.00 | \$289.00 |
| Paul Bickley | 496-1 | \$2,100.00 | \$100.00 |
| Steve Rose | 502-1 | \$1,000.00 | \$0.00 |
| Douglas Olivier | 512-1 | \$1,200.00 | \$0.00 |
| Michael David | 513-1 | \$5,500.00 | \$499.00 |
| Melinda C. Sanchez | 524-1 | \$2,000.00 | \$0.00 |
| Ernesto A. Sanchez | 525-1 | \$2,000.00 | \$0.00 |
| Jason Damon | 528-1 | \$1,200.00 | \$149.00 |
| William E. Katon | 538-1 | \$3,900.00 | \$0.00 |
| Giovanni Angelo Rossetti | 539-1 | \$2,596.02 | \$1,236.00 |

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

- Nick Goit, Claim 22-1, refunded \$1,099.00;
- Chester Hansen, Claim 42-1, refunded \$2,997.00;
- Sarah Boss, Claim 46-1, refunded \$997.00;
- Barry McCann, Claim 65-1, refunded \$1,199.00;
- Sandra D. Jensen, Claim 66-1, refunded \$218.00;
- Michael Deslauriers, Claim 82-1, refunded \$2,891.00; and
- Brett William McCann, Claim 523-1, refunded \$2,839.00.

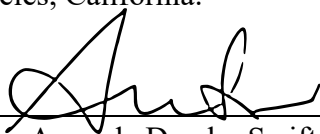
7. Accordingly, the Liquidating Trustee respectfully requests that the Court disallow those Claims in their entirety because, to the best of my knowledge, the Debtor previously refunded Claimants all moneys paid to the Debtor.

8. Further, the Debtor previously objected to Claim 849-1 filed by Claimant Kenneth R. Greenwood in its Amended Fourth Omnibus Objection [ECF No. 480], which objection was

1 sustained by the Court [ECF No. 670] and Claim 849-1 was reduced to \$599.00. As Claimant
2 Kenneth R. Greenwood already has an allowed claim for the amounts he paid to the Debtor
3 (\$599.00), Claim 295-1 should be disallowed in its entirety.

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

6 Executed on this 14th day of February, 2023 in Los Angeles, California.

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Amanda Demby Swift