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12
13 **UNITED STATES BANKRUPTCY COURT**
14 **DISTRICT OF NEVADA**

15 In re:
16 FRONT SIGHT MANAGEMENT, LLC
17 Debtor.

Case No. BK-S-22-11824-ABL
Chapter 11

DECLARATION OF ANDREA M. CHAMPION, ESQ.

18 I, Andrea M. Champion, Esq., hereby declare as follows:

- 19 1. I am over eighteen (18) years of age and a resident of Clark County, Nevada.
20 2. I am an attorney duly licensed to practice law in the State of Nevada and am
21 counsel of record for Las Vegas Development Fund, LLC (“LVDF”), Robert Dziubla, Jon
22 Fleming, Linda Stanwood, EB5 Impact Advisors LLC (“EB5IA”), and EB5 Impact Capital
23 Regional Center LLC (“EB5IC”) (collectively, the “EB5 Parties”) in *Front Sight Management*
24 *LLC v. Las Vegas Development Fund, LLC*, which was previously pending before the Eighth
25 Judicial District Court, under Case No. A-18-781084-B and which has since been removed and
26 is pending under Adversary Case No. 22-01116-ABL (the “Action”).

27 ///

1 3. I have personal knowledge of and am competent to testify to the facts contained in
2 this Declaration. If called on to do so, I would competently and truthfully testify to all matters
3 set forth herein, except for those matters stated to be based upon information and belief.

4 4. Early on in the Action, Debtor filed a Motion for Temporary Restraining Order
5 and Motion for Preliminary Injunction which proceeded to an evidentiary hearing before the
6 Eighth Judicial District Court (the “State Court”). Although the evidentiary hearing was never
7 completed, Mr. Dziubla, on behalf of himself and LVDF, testified at the partial evidentiary
8 hearing for two days: on June 3, 2019 and July 22, 2019.

9 5. Throughout the Action, Debtor has repeatedly attached transcripts from Mr.
10 Dziubla’s testimony from 2019 in support of various motions and briefs filed with the State Court.
11 Therefore, it is my understanding that those transcripts are not only in Debtor’s possession,
12 custody, and control, but that are also part of the public record.

13 6. At the conclusion of Mr. Dziubla’s testimony on July 22, 2019, the State Court
14 noted, on the record, that Debtor had so much testimony under oath from Mr. Dziubla that it
15 should “truncate the length of any deposition in this case, because I would anticipate the
16 depositions would be limited to [things that came up during written discovery because] there’s
17 so much other background and other type of information you already have.” 7/22/19 Hr’g Tr., at
18 8:16-9:3. In response, Debtor recognized that because it had two days to question Mr. Dziubla
19 under oath that it would “need to justify additional deposition time.” *Id.* at 9:6-15.

20 7. Despite Debtor’s recognition, on the record, that any future depositions of Mr.
21 Dziubla would need to be justified or limited, Debtor went on to notice Mr. Dziubla’s depositions
22 in his individual capacity and on behalf of LVDF, EB5IA, and EB5IC.

23 8. Debtor completed depositions of Mr. Dziubla on the following dates: May 10,
24 2021 (on behalf of EB5IA), May 11, 2021 (on behalf of EB5IC), and May 20, 2021 (both
25 individually and on behalf of LVDF).

26 9. Because Debtor had exhausted the time prescribed by NRCPC 30(d)(1) to depose
27 Mr. Dziubla, Debtor subsequently moved for an order allowing Debtor additional time to depose
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1 Mr. Dziubla on behalf of LVDF. The State Court granted Debtor's motion and Debtor
2 subsequently completed its deposition of LVDF on October 13, 2021 (on behalf of LVDF).

3 10. Consequently, Debtor has taken a cumulative total of six days of testimony from
4 Mr. Dziubla.

5 11. Mr. Dziubla's depositions were taken at Debtor's request, scheduled by Debtor,
6 and recorded by a court reporter that Debtor chose and hired. On each instance, Debtor, through
7 its counsel, questioned Mr. Dziubla at length about all the claims and defenses between the
8 parties.

9 12. I know that Debtor has copies of its prior depositions of Mr. Dziubla because it
10 has often attached, and relied on, those transcripts in briefs filed before the Court.

11 13. I have reviewed Debtor's Subpoenas to Produce Documents, Information, or
12 Objects or to Permit Inspection of Premises in a Bankruptcy Case, served on LVDF and Mr.
13 Dziubla on July 15, 2022 (the "Subpoenas").

14 14. The Subpoenas call for the production of documents and information subject to
15 various protective orders entered in the Action.

16 15. In addition, the Subpoenas call for the production of documents already provided
17 by LVDF and Mr. Dziubla to Debtor.

18 16. Specifically, the EB5 Parties have produced initial disclosures and eighteen
19 supplements thereto in the Action. In conjunction with those disclosures, the EB5 Parties have
20 produced in excess of 32,007 pages of documents to Debtor. Each disclosure, and the
21 corresponding documents, were served on Debtor through its state court counsel, John Aldrich.

22 17. True and correct copies of each of the EB5 Parties' disclosures, with certificates
23 of service reflecting service on Mr. Aldrich, are attached hereto as Exhibits 1-18.

24 18. In 2020, the parties got into a discovery dispute over particular documents that the
25 EB5 Parties produced as "Outside Counsel Eyes Only" pursuant to the Protective Order entered
26 in the Action. I personally met and conferred with Debtor's state court counsel on that issue.
27 During our meet and confers, Debtor took the position that the documents produced as "Outside
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1 Counsel Eyes Only” needed to be de-designated as merely “Confidential” under the Protective
2 Order. The distinction is that the first designation would preclude Mr. Aldrich from providing
3 those documents to his client (Debtor, through its principal, Ignatius Piazza), but a “Confidential”
4 designation would allow Debtor to obtain and review those documents.

5 19. During our meet and confers, Mr. Aldrich repeatedly represented to me that Mr.
6 Piazza was extremely involved in the litigation, personally reviewed the documents produced,
7 and that counsel needed Mr. Piazza to review all document to aid in Debtor’s prosecution of its
8 claims and in defense of LVDF’s counterclaims.

9 20. Debtor subsequently filed, and prevailed, on a motion to de-designate those same
10 documents to “Confidential” and thus, Debtor was legally entitled to obtain and review the same.

11 21. After over four years of litigating in the Action, and at the time Debtor filed its
12 voluntary bankruptcy petition, very little discovery remained to be completed in the State Court
13 Proceeding, including but not limited to, the depositions of expert witnesses and third-party
14 defendant Michael Meacher.

15 22. Before Debtor filed its voluntary bankruptcy petition, LVDF had duly noticed the
16 deposition of Michael Meacher on June 2, 2022. Mr. Meacher is a third-party defendant named
17 in the Action. LVDF appeared for Mr. Meacher’s deposition on June 2, 2022 after receiving
18 confirmation from his counsel, just days earlier, that he would be appearing. However, while Mr.
19 Meacher initially appeared for his deposition, before LVDF could go on the record, Mr. Meacher
20 suddenly dropped off the Zoom deposition and LVDF was later informed that Debtor, through its
21 bankruptcy counsel, had informed Mr. Meacher and his counsel that the entire action was stayed
22 and that appearing for the deposition of a third-party would constitute a violation of the automatic
23 stay. In other words, it was Debtor’s position that all discovery was stayed. I later met and
24 conferred with Mr. Aldrich on this issue and we agreed that while the parties disagreed as to the
25 scope of the automatic stay, if the entire matter was not stayed, discovery was not complete and
26 the discovery deadline should not lapse. Accordingly, out of an abundance of caution, and to
27 memorialize the agreement with Mr. Aldrich, on June 16, 2016, I filed a Motion to Extend
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1 Discovery Deadlines on behalf of my clients. That Motion remains pending in the Adversary
2 Proceeding.

3 23. I understand that Mr. Shapiro initially reached out to Debtor regarding the 2004
4 exams and Subpoenas on July 18, 2022. However, I was not a part of that meet and confer call.

5 24. I did, however, attend a meet and confer call with Mr. Shapiro, Stephen Gubner,
6 and Susie Seflin on Wednesday, July 20, 2022 at 8:00 a.m. The night before, I attempted to email
7 counsel discussion points but apparently the email did not go through until after the second meet
8 and confer call began (I believe it may have been stuck in my out box until I turned on my
9 computer the next morning for our call). A true and correct copy of that email is attached hereto
10 as Exhibit 19.

11 25. During that meet and confer call, Mr. Shapiro explained that he was not available
12 on August 1, 2022 (the date Debtor unilaterally scheduled the 2004 exams), that the Subpoenas
13 and 2004 exams should have been filed through the Adversary Action, and that Debtor's claimed
14 reason for the 2004 exams—to estimate LVDF's claim—did not justify 2004 exams of LVDF
15 and Mr. Dziubla because the State Court already estimated LVDF's claims in the Adversary
16 Proceeding. Mr. Shapiro noted that while the parties may disagree with the State Court's
17 estimation of LVDF's claim, it would ultimately be up to the bankruptcy or state court to
18 determine the final value of LVDF's claim.

19 26. I then went on to further explain that LVDF and Mr. Dziubla had already produced
20 all responsive information to the Subpoenas to Debtor that was not subject to a protective order
21 entered in the Adversary Action, that the vast majority of Debtor's document requests sought
22 documents subject to the protective orders, that a third-party vendor—HOLO discovery—hosts
23 LVDF and Mr. Dziubla's relativity platform, that only the third-party vendor has the access to
24 create an electronic load file of the documents previously produced by LVDF and Mr. Dziubla to
25 Debtor, that if Debtor's bankruptcy counsel was unable to obtain those documents from their own
26 client or state court counsel, I had already reached out to the third-party vendor for an estimate of
27 the time and cost associated with creating a new economic load file and was told doing so would
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1 not cost more than \$600.00. I offered to work with Debtor and the third-party vendor to get
2 Debtor another copy of the documents previously produced to it.

3 27. Debtor refused LVDF and Mr. Dziubla's proposal. In addition, Debtor's counsel
4 stated that it was not aware of the protective orders entered in the Adversary Case but,
5 nonetheless, went on to take the position that they were not binding now that the case was before
6 the bankruptcy court.

7 28. In addition, during our meet and confer discussion, I also explained to Mr. Gubner
8 and Ms. Seflin that Debtor had taken six days of testimony from Mr. Dziubla and I was unaware
9 of any additional information Debtor did not already adduce from Mr. Dziubla that was needed
10 for the bankruptcy action. Neither Mr. Gubner nor Ms. Seflin identified any such needed
11 testimony in response. Instead, they merely implied that they did not have Mr. Dziubla's prior
12 testimony. I offered, on behalf of LVDF and Mr. Dziubla, to provide them with the dates of
13 Debtor's prior examinations of Mr. Dziubla and the court reporting information so that Debtor
14 could obtain additional copies of those transcripts (if Debtor's counsel could not get the same
15 from Debtor itself or Debtor's state counsel). Debtor also refused that offer.

16 29. During our meet and confer call, Mr. Shapiro and I confirmed that we would be
17 filing a motion on behalf of LVDF and Mr. Dziubla by or before July 29, 2022. We offered to
18 work with Mr. Gubner and Ms. Seflin to come with an agreeable briefing schedule and to request
19 the motion be heard on shortened time. While Ms. Seflin initially claimed that this issue could
20 not be addressed on September 1, 2022, and needed to be addressed sooner, at the conclusion of
21 the call, Mr. Gubner stated that it was Debtor's position that this was an important issue, that the
22 parties should not short-cut the briefing on this issue, and that Debtor would be prejudiced by a
23 request to have these issues heard on shortened time.

24 30. Following our meet and confer call, I sent a letter to Debtor providing the very
25 information Debtor declined during our meet and confer call regarding Mr. Dziubla's prior
26 testimony (i.e., the dates of Debtor's prior examinations of LVDF and Mr. Dziubla and the court
27 reporter information for the same) and reiterating that we would work with Debtor's counsel to
28

1 obtain any documents that it could not get from their own counsel or state counsel. A true and
2 correct copy of that correspondence is attached to the Motion as Exhibit 15.

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

5 Andrea M. Champion

6 ANDREA M. CHAMPION, ESQ.

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EXHIBIT 1

1 **LTWT**
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12 Attorneys for Defendants
 LAS VEGAS DEVELOPMENT FUND LLC, EB5
 13 IMPACT CAPITAL REGIONAL CENTER LLC,
 EB5 IMPACT ADVISORS LLC, ROBERT W. DZIUBLA,
 14 JON FLEMING and LINDA STANWOOD

15 **EIGHTH JUDICIAL DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 FRONT SIGHT MANAGEMENT LLC, a)	CASE NO.: A-18-781084-B
Nevada Limited Liability Company,)	DEPT NO.: 16
)	
18 Plaintiff,)	DEFENDANTS AND
)	COUNTERCLAIMANT’S EARLY CASE
19 vs.)	CONFERENCE LIST OF WITNESSES AND
)	DOCUMENTS
20 LAS VEGAS DEVELOPMENT FUND LLC,)	NRCP RULE 16 and 16.1
21 et al.,)	
)	
22 Defendants.)	
)	
23 _____)	
AND RELATED COUNTERCLAIMS)	
24 _____)	

25
 26 **COMES NOW** Defendants and Counterclaimants LAS VEGAS DEVELOPMENT
 27 FUND LLC, EB5 IMPACT CAPITAL REGIONAL CENTER, LLC, EB5 IMPACT ADVISORS
 28 LLC, ROBERT W. DZIUBLA, JON FLEMING, and LINDA STANWOOD, by and through their

1 counsel of record and hereby provides the following Initial Disclosures pursuant to NRCP 16 and
2 16.1. These parties are in the initial stages of this litigation and reserve the right to supplement
3 this initial disclosure as may be appropriate.

4 **I. Identity of Witnesses Likely to Have Discoverable Information (NRCP 16(a)(1)(A)(i))**

5 1. Dr. Ignatius Piazza
6 c/o Aldrich Law Firm, Ltd.
7 7866 West Sahara Ave
8 Las Vegas, NV 89177

9 This witness is expected to testify concerning the facts and circumstances surrounding the
10 relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center,
11 and the allegations of the operative Complaint and Cross Complaints.

12 2. Mike Meacher
13 c/o Aldrich Law Firm, Ltd.
14 7866 West Sahara Ave
15 Las Vegas, NV 89177

16 This witness is expected to testify concerning the facts and circumstances surrounding the
17 relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center,
18 and the allegations of the operative Complaint and Cross Complaints.

19 3. Jennifer Piazza
20 c/o Aldrich Law Firm, Ltd.
21 7866 West Sahara Ave
22 Las Vegas, NV 89177

23 This witness is expected to testify concerning the facts and circumstances surrounding the the
24 allegations of the operative Complaint and Cross Complaints.

25 4. Robert Dziubla
26 c/o Greer & Associates, A.P.C.
27 17150 Via del Campo
28 San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the
relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center,
and the allegations of the operative Complaint and Cross Complaints.

5. Jon Fleming
c/o Greer & Associates, A.P.C.
17150 Via del Campo
San Diego, CA 92127

1 This witness is expected to testify concerning the facts and circumstances surrounding the
2 relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center,
3 and the allegations of the operative Complaint and Cross Complaints.

4 6. Sean Flynn
c/o Greer & Associates, A.P.C.
5 17150 Via del Campo
San Diego, CA 92127

6 This witness is expected to testify concerning the facts and circumstances surrounding the the
7 allegations of the operative Complaint and Cross Complaints.

8 **II. List of Documents That May Be Used for Support of Claims or Defenses, Including for**
9 **Impeachment or Rebuttal.**

Date of Document	Document Title	Bates
9/13/2012	Front Sight EB-5 letter (final)	A 00001-00005
11/15/2017	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	A(1)00006-00012
11/15/2017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	A(1)00013-00017
8/20/2018	Front Sight Response to Notice of Default	A(1)00018-00165
8/25/2018	Front Sight Response to Second Notice of Default - Aug 25 2018	A(1)00166-00169
8/29/2018	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	A(1)00170-00299
8/30/2018	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	A(1)00300-00333
9/4/2018	AM response to stay of NOD	A(1)00334-00336
9/7/2018	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	A(1)00337-00338
10/5/2015	Brochure Side 1 final	A(1)00339
10/5/2015	Brochure Side 2 (final)	A(1)00340
10/31/2017	Construction Line of Credit Loan Agreement (Morales)	A(1)00341-00359
10/7/2016	Construction Loan Agreement (signed final)	A(1)00360-00416
7/1/2017	Deed of Trust - First Amendment	A(1)00417-00424
10/13/2016	Deed of Trust - Front Sight recorded 10/13/16	A(1)00425-00461
5/12/2016	Email to Meacher re deal restructure	A(1)00462-00465
7/14/2013	Engagement letter - Front Sight - fully signed 14Feb2013	A(1)00466-00473
3/12/2012	Executive Summary Front Sight	A(1)00474-00482
2/16/2017	Inspection Notice - Front Sight Books & Records	A(1)00483

1	8/20/2018	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED (003)	A(1)00484
2	9/20/2018	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate (005)	A(1)00485
3	5/7/2016	Marketing Report - Front Sight	A(1)00486
4	4/9/2016	Marketing Report - Front Sight	A(1)00487
5	4/16/2016	Marketing Report - Front Sight	A(1)00488
6	4/23/2016	Marketing Report - Front Sight	A(1)00489-00490
7	4/30/2016	Marketing Report - Front Sight	A(1)00491-00492
8	2/25/2016	Marketing Report	A(1)00493
9	3/29/2016	Marketing Report	A(1)00494
10	9/13/2018	Meacher email - Sept. 13, 2018 - in response to NOD recordation	A(1)00495-00498
11	7/4/2018	Meacher email on July 4, 2018, re senior debt	A(1)00499-00500
12	8/11/2015	Meacher email re marketing costs (Aug. 2015)	A(1)00501-00505
13	11/3/2015	Memo - Front Sight marketing update	A(1)00506-00508
14	10/25/2015	Memo - Front Sight marketing update	A(1)00509-00513
15	3/11/2016	Mike Meacher response	A(1)00514-00519
16	4/27/2018	Notes of calls with Piazza and Meacher	A(1)00520
17	6/14/2018	Notes of calls with Piazza and Meacher	A(1)00521
18	8/24/2018	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	A(1)00522-00528
19	8/31/2018	Notice of Default - stay - workout agreement (8-31-2018)	A(1)00529
20	8/28/2018	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	A(1)00530-00533
21	7/30/2018	Notice of Default	A(1)00534-00540
22	7/16/2018	Piazza email 7-16-2018 re spending on whatever	A(1)00541-00548
23	10/7/2014	Picture of Naish Piazza with King Liu and Jay Li of Sinowel	A(1)00549
24	12/1/2016	PPT - Front Sight - Chinese (Dec. 2016 final)	A(1)00550-00589
25	12/1/2016	PPT - Front Sight - Vietnamese translation	A(1)00590-00629
26	8/25/2015	PPT - Frontsight Timeshare Presentation 25 August 2015	A(1)00630-00664
27	7/1/2015	PPT Front Sight - Chinese	A(1)00665-00694
28	7/1/2017	Promissory Note - Amended and Restated (July 1, 2017)	A(1)00695-00701

Dated: July 9, 2019

FARMER CASE & FEDOR

/s/ Kathryn Holbert
KATHRYN HOLBERT, ESQ.
Attorney for Defendants

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CERTIFICATE OF SERVICE and/or MAILING

Pursuant to NRCp 5(b), I hereby certify that I am an employee of Farmer Case & Fedor, and that on this date, I caused true and correct copies of the following document(s):

NOTICE OF PRODUCTION OF ACCOUNTING DOCUMENTS BY DEFENDANT, EB5 IMPACT ADVISORS LLC

to be served on the following individuals/entities, in the following manner,

John P. Aldrich, Esq.	Attorneys for Plaintiff
Catherine Hernandez, Esq.	FRONT SIGHT MANAGEMENT, LLC
ALDRICH LAW FIRM, LTD.	
1601 S. Rainbow Blvd., Suite 160	
Las Vegas, Nevada 89146	

By:

- ELECTRONIC SERVICE: Said document(s) was served electronically upon all eligible electronic recipients pursuant to the electronic filing and service order of the Court (NECRF 9).
- U.S. MAIL: I deposited a true and correct copy of said document(s) in a sealed, postage prepaid envelope, in the United States Mail, to those parties and/or above named individuals which were not on the Court’s electronic service list.
- () FACSIMILE: I caused said document(s) to be transmitted by facsimile transmission. The sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

Dated: July 9, 2019

/s/ Kathryn Holbert
An Employee of FARMER CASE &
FEDOR

EXHIBIT 2

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12 Attorneys for Defendants
 LAS VEGAS DEVELOPMENT FUND LLC, EB5
 13 IMPACT CAPITAL REGIONAL CENTER LLC,
 EB5 IMPACT ADVISORS LLC, ROBERT W. DZIUBLA,
 14 JON FLEMING and LINDA STANWOOD

15 **EIGHTH JUDICIAL DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 FRONT SIGHT MANAGEMENT LLC, a) Nevada Limited Liability Company,) 18 Plaintiff,) 19 vs.) 20 LAS VEGAS DEVELOPMENT FUND) 21 LLC, et al.,) 22 Defendants.) _____) 23) AND RELATED COUNTERCLAIMS) 24) _____)) CASE NO.: A-18-781084-B) DEPT NO.: 16)) DEFENDANTS AND COUNTER-) CLAIMANT'S LVD FUND'S FIRST) SUPPLEMENTAL EARLY CASE) CONFERENCE LIST OF) WITNESSES AND DOCUMENTS) NRCP RULES 16 AND 16.1
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25
 26 **COMES NOW** Defendants and Counter-Claimants LAS VEGAS DEVELOPMENT
 27 FUND LLC, EB5 IMPACT CAPITAL REGIONAL CENTER, LLC, EB5 IMPACT ADVISORS
 28 LLC, ROBERT W. DZIUBLA, JON FLEMING, and LINDA STANWOOD, by and through

1 their counsel of record and hereby provides the following First Supplemental Disclosures
2 pursuant to NRCPC Rule 16 and Rule 16.1. **Newly disclosed items are in bold.** These parties are
3 in the initial stages of this litigation and reserve the right to supplement this initial disclosure as
4 appropriate. These parties are currently in the process of reviewing the approximately 11,500+
5 pages identified to date currently in their possession for possible privilege claims. These
6 documents will be produced on a rolling basis as that review is completed and these parties will
7 provide a privilege log of all documents withheld on the basis of privilege.

8 **I. Identity of Witnesses Likely to Have Discoverable Information (NRCPC 16(a)(1)(A)(i))**

9 1. Dr. Ignatius Piazza
10 c/o Aldrich Law Firm, Ltd.
11 7866 West Sahara Ave
12 Las Vegas, NV 89177

13 This witness is expected to testify concerning the facts and circumstances surrounding the
14 relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center,
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 13 **Impeachment or Rebuttal**

Date of Document	Document Title	Bates
9/13/2012	Front Sight EB-5 letter (final)	A 00001-00005
11/15/2017	LVDF - Amended and Restated Promissory Note - \$50M (signed final)	A(1)00006-00012
11/15/2017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	A(1)00013-00017
8/20/2018	Front Sight Response to Notice of Default	A(1)00018-00165
8/25/2018	Front Sight Response to Second Notice of Default - Aug 25 2018	A(1)00166-00169
8/29/2018	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	A(1)00170-00299
8/30/2018	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	A(1)00300-00333
9/4/2018	AM response to stay of NOD	A(1)00334-00336
9/7/2018	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	A(1)00337-00338
10/5/2015	Brochure Side 1 final	A(1)00339
10/5/2015	Brochure Side 2 (final)	A(1)00340
10/31/2017	Construction Line of Credit Loan Agreement (Morales)	A(1)00341-00359
10/7/2016	Construction Loan Agreement (signed final)	A(1)00360-00416

1	7/1/2017	Deed of Trust - First Amendment	A(1)00417-00424
2	10/13/2016	Deed of Trust - Front Sight recorded 10/13/16	A(1)00425-00461
3	5/12/2016	Email to Meacher re deal restructure	A(1)00462-00465
4	7/14/2013	Engagement letter - Front Sight - fully signed 14Feb2013	A(1)00466-00473
5	3/12/2012	Executive Summary Front Sight	A(1)00474-00482
6	2/16/2017	Inspection Notice - Front Sight Books & Records	A(1)00483
7	8/20/2018	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED (003)	A(1)00484
8	9/20/2018	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate (005)	A(1)00485
9	5/7/2016	Marketing Report - Front Sight	A(1)00486
10	4/9/2016	Marketing Report - Front Sight	A(1)00487
11	4/16/2016	Marketing Report - Front Sight	A(1)00488
12	4/23/2016	Marketing Report - Front Sight	A(1)00489-00490
13	4/30/2016	Marketing Report - Front Sight	A(1)00491-00492
14	2/25/2016	Marketing Report	A(1)00493
15	3/29/2016	Marketing Report	A(1)00494
16	9/13/2018	Meacher email - Sept. 13, 2018 - in response to NOD recordation	A(1)00495-00498
17	7/4/2018	Meacher email on July 4, 2018, re senior debt	A(1)00499-00500
18	8/11/2015	Meacher email re marketing costs (Aug. 2015)	A(1)00501-00505
19	11/3/2015	Memo - Front Sight marketing update	A(1)00506-00508
20	10/25/2015	Memo - Front Sight marketing update	A(1)00509-00513
21	3/11/2016	Mike Meacher response	A(1)00514-00519
22	4/27/2018	Notes of calls with Piazza and Meacher	A(1)00520
23	6/14/2018	Notes of calls with Piazza and Meacher	A(1)00521
24	8/24/2018	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	A(1)00522-00528
25	8/31/2018	Notice of Default - stay - workout agreement (8-31- 2018)	A(1)00529
26	8/28/2018	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	A(1)00530-00533
27	7/30/2018	Notice of Default	A(1)00534-00540
28	7/16/2018	Piazza email 7-16-2018 re spending on whatever	A(1)00541-00548
29	10/7/2014	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	A(1)00549
30	12/1/2016	PPT - Front Sight - Chinese (Dec. 2016 final)	A(1)00550-00589
31	12/1/2016	PPT - Front Sight - Vietnamese translation	A(1)00590-00629
32	8/25/2015	PPT - Frontsight Timeshare Presentation 25 August 2015	A(1)00630-00664
33	7/1/2015	PPT Front Sight - Chinese	A(1)00665-00694
34	7/1/2017	Promissory Note - Amended and Restated (July 1, 2017)	A(1)00695-00701
35	Various	Accounting and Fees	A-000702-000856
36	5/31/2015	Independent contractor Agreement	A-000857

1	9/3/2014	Nevada Secretary of State Business License & Application	A-000858-000869
2	10/16/2015	Pre-Marketing Agreement	A-000870-000878
3	5/2/2018	Emails	A-000879-000894
4	9/23/2015	Forensic Accounting & Business Valuation	A-000895-000899
5	5/8/2015	Emails	A-000900-000903
6	Various	Accounting	A-000904-000922
7	11/14/2017	Amendment to Loan Agreement	A-000923-000927
8	7/30/2018	Piazza Response to Notice of Default with Exhibits	A-000928-001075
9	8/25/2018	Piazza Response to Notice of Default	A-001076-001079
10	8/29/2018	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	A-001080-001209
11	8/30/2018	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	A-001210-001213
12	8/30/2018	Current Major Contracts	A-001214-001243
13	9/4/2018	Response to Temporary Stay	A-001244-001246
14	9/7/2018	Piazza Construction Loan Agreement	A-001247-001248
15	?	Pictures- Exemplar Approval	A-001249-001250
16	10/31/2017	Loan Agreement	A-001252-001270
17	10/6/2016	Construction Loan Agreement	A-001271-001372
18	Various	Emails	A-001373-001376
19	2/14/2013	EB-5 Impact Advisors-Dziubla	A-001377-001384
20	3/12/2012	Front Sight Management Executive Summary	A-001385-001394
21	2/16/2017	Inspection of Front Sight Books and Records	A-001395-001406
22	Various	Emails	A-001407-001417
23	11/3/2015	Memo-Marketing Update	A-001418-001425
24	Various	Emails	A-001426-001431
25	8/24/2018	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	A-001432-001438
26	8/23/2018	Pictures	A-001447-001459
27		Pro Forma Statements of Income	A-001460-001461
28	2014	Front Sight EB-5 Investments Opportunity Presentation	A-001543-001619
	9/17/2018	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	A-001620-001635
	1/9/2019	Valuation Source Appraisal Report for Mike Brand	A-001636-001746

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	Kenworth EB-5 Funding of Front Sight Infrastructure/Resort Development	A-001747-001751
9/13/2012	Amended & Restated Promissory Note	A-001752-001763
7/1/2017	Front Sight Documents	A-001766-001917
	John Fleming Email	A-001918-006138
	Robert Dziubla Emails	A-006139-008763

Dated: August 19, 2019

FARMER CASE & FEDOR

/s/ Kathryn Holbert
KATHRYN HOLBERT, ESQ.
Attorney for Defendants

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CERTIFICATE OF SERVICE and/or MAILING

Pursuant to NRCPC 5(b), I hereby certify that I am an employee of Farmer Case & Fedor, and that on this date, I caused true and correct copies of the following document(s):

DEFENDANTS AND COUNTER-CLAIMANT’S LVD FUND’S FIRST SUPPLEMENTAL EARLY CASE CONFERENCE LIST OF WITNESSES AND DOCUMENTS NRCPC RULES 16 AND 16.1

to be served on the following individuals/entities, in the following manner,

John P. Aldrich, Esq. Attorneys for Plaintiff
Catherine Hernandez, Esq. FRONT SIGHT MANAGEMENT, LLC
ALDRICH LAW FIRM, LTD.
1601 S. Rainbow Blvd., Suite 160
Las Vegas, Nevada 89146

By:

- ELECTRONIC SERVICE: Said document(s) was served electronically upon all eligible electronic recipients pursuant to the electronic filing and service order of the Court (NECRF 9).
- U.S. MAIL: I deposited a true and correct copy of said document(s) in a sealed, postage prepaid envelope, in the United States Mail, to those parties and/or above named individuals which were not on the Court’s electronic service list.
- FACSIMILE: I caused said document(s) to be transmitted by facsimile transmission. The sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

Dated: August 19, 2019

/s/ Kathryn Holbert
An Employee of FARMER CASE & FEDOR

EXHIBIT 3

1 LTWT
 ANTHONY T. CASE, ESQ.
 Nevada Bar No. 6589
 2 tcase@farmercase.com
 KATHRYN HOLBERT, ESQ.
 3 Nevada Bar No. 10084
 kholbert@farmercase.com
 4 **FARMER CASE & FEDOR**
 2190 E. Pebble Rd., Suite #205
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 Telephone: (702) 579-3900
 6 Facsimile: (702) 739-3001

7 C. KEITH GREER, ESQ.
 keith.greer@greerlaw.biz
 8 Cal. Bar No. 135537 [*Pro Hac Vice*]
GREER & ASSOCIATES, A.P.C.
 9 17150 Via Del Campo, Suite #100
 San Diego, California 92128
 10 Telephone: (858) 613-6677
 Facsimile : (858) 613-6680

11 Attorneys for Defendants
 12 LAS VEGAS DEVELOPMENT FUND LLC, EB5
 IMPACT CAPITAL REGIONAL CENTER LLC,
 13 EB5 IMPACT ADVISORS LLC, ROBERT W. DZIUBLA,
 JON FLEMING and LINDA STANWOOD

14 **EIGHTH JUDICIAL DISTRICT COURT**
 15 **CLARK COUNTY, NEVADA**

16 FRONT SIGHT MANAGEMENT LLC, a) CASE NO.: A-18-781084-B
 17 Nevada Limited Liability Company,)
) DEPT NO.: 16
 18 Plaintiff,)
) DEFENDANTS AND COUNTER-CLAIMANT'S
 19 vs.) LVD FUND'S THIRD EARLY CASE CONFERENCE
) LIST OF WITNESSES AND DOCUMENTS
 20 LAS VEGAS DEVELOPMENT FUND LLC,) NRCP RULE 16 AND 16.1
 et al.,)
 21)
 22 Defendants.)
)
 23 AND RELATED COUNTERCLAIMS)
 24)

1 COMES NOW Defendants and Counter-Claimants LAS VEGAS DEVELOPMENT FUND
2 LLC, EB5 IMPACT CAPITAL REGIONAL CENTER, LLC, EB5 IMPACT ADVISORS LLC,
3 ROBERT W. DZIUBLA, JON FLEMING, and LINDA STANWOOD, by and through their counsel of
4 record and hereby provides the following Supplemental Disclosures pursuant to NRCP Rule 16 and
5 Rule 16.1. These parties are in the discovery stage of this litigation and reserve the right to
6 supplement this disclosure as appropriate.

7 **I. Identity of Witnesses Likely to Have Discoverable Information (NRCP 16(a)(1)(A)(i))**

8

- 9 1. Dr. Ignatius Piazza
10 c/o Aldrich Law Firm, Ltd.
11 7866 West Sahara Ave
12 Las Vegas, NV 89177

11

12 This witness is expected to testify concerning the facts and circumstances surrounding the
13 relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and
14 the allegations of the operative Complaint and Cross Complaints.

14

- 15 2. Mike Meacher
16 c/o Aldrich Law Firm, Ltd.
17 7866 West Sahara Ave
18 Las Vegas, NV 89177

17

18 This witness is expected to testify concerning the facts and circumstances surrounding the
19 relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and
20 the allegations of the operative Complaint and Cross Complaints.

21

- 22 3. Jennifer Piazza
23 c/o Aldrich Law Firm, Ltd.
24 7866 West Sahara Ave
25 Las Vegas, NV 89177

24

25 This witness is expected to testify concerning the facts and circumstances surrounding the the
26 allegations of the operative Complaint and Cross Complaints.

26

27

28

4. Robert Dziubla
 c/o Greer & Associates, A.P.C.
 16855 West Bernardo Drive., Suite 255
 San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.

5. Jon Fleming
 c/o Greer & Associates, A.P.C.
 16855 West Bernardo Drive., Suite 255
 San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.

6. Sean Flynn
 c/o Greer & Associates, A.P.C.
 16855 West Bernardo Drive., Suite 255
 San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

II. List of Documents That May Be Used for Support of Claims or Defenses, Including for Impeachment or Rebuttal

Date of Document	Document Title	Bates
9/13/2012	Front Sight EB-5 letter (final)	A 00001-00005
11/15/2017	LVDF - Amended and Restated Promissory Note - \$50M (signed final)	A(1)00006-00012
11/15/2017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	A(1)00013-00017
8/20/2018	Front Sight Response to Notice of Default	A(1)00018-00165
8/25/2018	Front Sight Response to Second Notice of Default - Aug 25 2018	A(1)00166-00169

1	8/29/2018	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	A(1)00170-00299
2	8/30/2018	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	A(1)00300-00333
3	9/4/2018	AM response to stay of NOD	A(1)00334-00336
4	9/7/2018	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	A(1)00337-00338
5	10/5/2015	Brochure Side 1 final	A(1)00339
6	10/5/2015	Brochure Side 2 (final)	A(1)00340
7	10/31/2017	Construction Line of Credit Loan Agreement (Morales)	A(1)00341-00359
8	10/7/2016	Construction Loan Agreement (signed final)	A(1)00360-00416
9	7/1/2017	Deed of Trust - First Amendment	A(1)00417-00424
10	10/13/2016	Deed of Trust - Front Sight recorded 10/13/16	A(1)00425-00461
11	5/12/2016	Email to Meacher re deal restructure	A(1)00462-00465
12	7/14/2013	Engagement letter - Front Sight - fully signed	A(1)00466-00473
13	3/12/2012	Executive Summary Front Sight	A(1)00474-00482
14	2/16/2017	Inspection Notice - Front Sight Books & Records	A(1)00483
15	8/20/2018	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED (003)	A(1)00484
16	9/20/2018	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate (005)	A(1)00485
17	5/7/2016	Marketing Report - Front Sight	A(1)00486
18	4/9/2016	Marketing Report - Front Sight	A(1)00487
19	4/16/2016	Marketing Report - Front Sight	A(1)00488
20	4/23/2016	Marketing Report - Front Sight	A(1)00489-00490
21	4/30/2016	Marketing Report - Front Sight	A(1)00491-00492
22	2/25/2016	Marketing Report	A(1)00493
23	3/29/2016	Marketing Report	A(1)00494
24	9/13/2018	Meacher email - Sept. 13, 2018 - in response to NOD recordation	A(1)00495-00498
25	7/4/2018	Meacher email on July 4, 2018, re senior debt	A(1)00499-00500
26	8/11/2015	Meacher email re marketing costs (Aug. 2015)	A(1)00501-00505
27	11/3/2015	Memo - Front Sight marketing update	A(1)00506-00508
28	10/25/2015	Memo - Front Sight marketing update	A(1)00509-00513
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32	8/24/2018	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	A(1)00522-00528
33	8/31/2018	Notice of Default - stay - workout agreement (8-31-	A(1)00529
34	8/28/2018	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	A(1)00530-00533

1	7/30/2018	Notice of Default	A(1)00534-00540
	7/16/2018	Piazza email 7-16-2018 re spending on whatever	A(1)00541-00548
2	10/7/2014	Picture of Ignatius Piazza with King Liu and Jay Li of	A(1)00549
	12/1/2016	PPT - Front Sight - Chinese (Dec. 2016 final)	A(1)00550-00589
3	12/1/2016	PPT - Front Sight - Vietnamese translation	A(1)00590-00629
	8/25/2015	PPT - Frontsight Timeshare Presentation	A(1)00630-00664
4	7/1/2015	PPT Front Sight - Chinese	A(1)00665-00694
	7/1/2017	Promissory Note - Amended and Restated (July 1, 2017)	A(1)00695-00701
	Various	Accounting and Fees	A-000702-000856
6	5/31/2015	Independent contractor Agreement	A-000857
	9/3/2014	Nevada Secretary of State Business License &	A-000858-000869
7	10/16/2015	Pre-Marketing Agreement	A-000870-000878
	5/2/2018	Emails	A-000879-000894
8	9/23/2015	Forensic Accounting & Business Valuation	A-000895-000899
	5/8/2015	Emails	A-000900-000903
9	Various	Accounting	A-000904-000922
10			
11	11/14/2017	Amendment to Loan Agreement	A-000923-000927
	7/30/2018	Piazza Response to Notice of Default with Exhibits	A-000928-001075
12			
13	8/25/2018	Piazza Response to Notice of Default	A-001076-001079
14			
15	8/29/2018	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	A-001080-001209
16			
17	8/30/2018	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	A-001210-001213
18			
19	8/30/2018	Current Major Contracts	A-001214-001243
20			
21	9/4/2018	Response to Temporary Stay	A-001244-001246
22			
23	9/7/2018	Piazza Construction Loan Agreement	A-001247-001248
24	?	Pictures- Exemplar Approval	A-001249-001250
25			
26	10/31/2017	Loan Agreement	A-001252-001270
27			

1	10/6/2016	Construction Loan Agreement	A-001271-001372
2	Various	Emails	A-001373-001376
3			
4	2/14/2013	EB-5 Impact Advisors-Dziubla	A-001377-001384
5			
6	3/12/2012	Front Sight Management Executive Summary	A-001385-001394
7	2/16/2017	Inspection of Front Sight Books and Records	A-001395-001406
8	Various	Emails	A-001407-001417
9			
10	11/3/2015	Memo-Marketing Update	A-001418-001425
11	Various	Emails	A-001426-001431
12	8/24/2018	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	A-001432-001438
13			
14	8/23/2018	Pictures	A-001447-001459
15		Pro Forma Statements of Income	A-001460-001461
16	2014	Front Sight EB-5 Investments Opportunity Presentation	A-001543-001619
17			
18	9/17/2018	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	A-001620-001635
19	1/9/2019	Valuation Source Appraisal Report for Mike Brand	A-001636-001746
20			

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23	7/1/2017	Amended & Restated Promissory Note	A-001752-001763
24			
25		Front Sight Documents	A-001766-001917
		John Fleming Email	A-001918-006138
26		Robert Dziubla Emails	A-006139-008763

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1	EB5IA	A-008764-008976
	Dzuibla Front Sight File	A-008977-009925
2	Dzuibla Project Files (Cover Pages Only)	A-009926-010007

3

4 Dated: January 10, 2020

FARMER CASE & FEDOR

5

6

/s/ Kathryn Holbert
KATHRYN HOLBERT, ESQ.
Attorney for Defendants

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CERTIFICATE OF SERVICE and/or MAILING

Pursuant to NRCPC 5(b), I hereby certify that I am an employee of Farmer Case & Fedor,
and that on this date, I caused true and correct copies of the following document(s):

**DEFENDANTS AND COUNTER-CLAIMANT'S LVD FUND'S THIRD EARLY CASE
CONFERENCE LIST OF WITNESSES AND DOCUMENTS
NRCPC RULE 16 AND 16.1**

to be served on the following individuals/entities, in the following manner,

John P. Aldrich, Esq.	Attorneys for Plaintiff
Catherine Hernandez, Esq.	FRONT SIGHT MANAGEMENT, LLC
ALDRICH LAW FIRM, LTD.	
1601 S. Rainbow Blvd., Suite 160	
Las Vegas, Nevada 89146	

By:

■ ELECTRONIC SERVICE: Said document(s) was served electronically upon all eligible electronic recipients pursuant to the electronic filing and service order of the Court (NECRF 9).

() U.S. MAIL: I deposited a true and correct copy of said document(s) in a sealed, postage prepaid envelope, in the United States Mail, to those parties and/or above named individuals which were not on the Court's electronic service list.

() FACSIMILE: I caused said document(s) to be transmitted by facsimile transmission. The sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

Dated: January 10, 2020

/s/ Kathryn Holbert
An Employee of FARMER CASE & FEDOR

EXHIBIT 4

1
2 **16.1- 4th Supp**

3 ANTHONY T. CASE, ESQ.
4 Nevada Bar No. 6589
5 tcase@farmercase.com

6 KATHRYN HOLBERT, ESQ.
7 Nevada Bar No. 10084
8 kholbert@farmercase.com

9 **FARMER CASE & FEDOR**
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13 Facsimile: (702) 739-3001

14 C. KEITH GREER, ESQ.
15 Cal. Bar. No. 135537 (*Pro Hac Vice*)
16 Keith.greer@greerlaw.biz

17 **GREER & ASSOCIATES, A.P.C.**
18 16855 W. Bernardo Dr., Suite #255
19 San Diego, California 92128
20 Telephone: (858) 613-6677
21 Facsimile: (858) 613-6680

22 Attorneys for Defendants
23 LAS VEGAS DEVELOPMENT FUND LLC,
24 EB5 IMPACT CAPITAL REGIONAL CENTER, LLC,
25 EB6 IMPACT ADVISORS, LLC, ROBERT W. DZIUBLA,
26 JON FLEMING and LINDA STANWOOD

27 **EIGHTH JUDICIAL DISTRICT COURT**

28 **CLARK COUNTY, STATE OF NEVADA**

FRONT SIGHT MANAGEMENT, LLC., a)
Nevada Limited Liability Company,)

Plaintiff,)

v.)

LAS VEGAS DEVELOPMENT FUND LLC,)
a Nevada Limited Liability Company, EB5)
IMPACT CAPITAL REGIONAL CENTER)
LLC, a Nevada Limited Company, EB5)
IMPACT ADVISORS LLC, a Nevada)
Limited Liability Company; ROBERT W.)
DZIUBLA, individually and as President and)
CEO of LAS VEGAS DEVELOPMENT)
FUND LLC and EB5 IMPACT ADVISORS)
LLC; JON FLEMING, individually and as an)
agent of LAS VEGAS DEVELOPMENT)
FUND LLC and EB5 IMPACT ADVISORS)

CASE NO.: A-18-781084-B

DEPT NO.: XVI

DEFENDANTS AND COUNTER-CLAIMANT'S 16.1 LIST OF WITNESSES AND DOCUMENTS

FOURTH SUPPLEMENT

1
2 LLC; LINDA STANWOOD, individually and)
3 as Senior Vice President of LAS VEGAS)
4 DEVELOPMENT FUND LLC and EB5)
5 IMPACT ADVISORS LLC; CHICAGO)
6 TITLE COMPANY, a California corporation;)
7 DOES 1-10, inclusive; and ROE)
8 CORPORATIONS 1-10, inclusive,)

9 Defendants.)

10 _____)
11 and related Cross-Claims.)
12 _____)

13 **DEFENDANTS AND COUNTER-CLAIMANT'S 16.1**
14 **LIST OF WITNESSES AND DOCUMENTS**
15 **FOURTH SUPPLEMENT**

16 COMES NOW Defendants and Counter-Claimants LAS VEGAS DEVELOPMENT
17 FUND LLC, EB5 IMPACT CAPITAL REGIONAL CENTER, LLC, EB5 IMPACT
18 ADVISORS LLC, ROBERT W. DZIUBLA, JON FLEMING, and LINDA STANWOOD, by
19 and through their counsel of record and hereby provides the following Supplemental
20 Disclosures pursuant to NRCP Rule 16 and Rule 16.1. These parties are in the discovery stage
21 of this litigation and reserve the right to supplement this disclosure as appropriate.

22 **NEWLY DISCLOSED WITNESSES and DOCUMENTS ARE IN BOLD.**

23 **I. Witnesses Likely to Have Discoverable Information (NRCP 16(a)(1)(A)(i))**

- 24 1. **Dr. Ignatius Piazza**
25 **c/o Aldrich Law Firm, Ltd.**
26 **7866 West Sahara Ave**
27 **Las Vegas, NV 89177**

28 This witness is expected to testify concerning the facts and circumstances surrounding
the relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource
Center, and the allegations of the operative Complaint and Cross Complaints.

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2. Mike Meacher
c/o Aldrich Law Firm, Ltd.
7866 West Sahara Ave
Vegas, NV 89177

This witness is expected to testify concerning the facts and circumstances surrounding the relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.

3. Jennifer Piazza
c/o Aldrich Law Firm, Ltd.
7866 West Sahara Ave
Las Vegas, NV 89177

This witness is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

4. Robert Dziubla
c/o Greer & Associates, A.P.C.
16855 West Bernardo Drive., Suite 255
San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.

5. Jon Fleming
c/o Greer & Associates, A.P.C.
16855 West Bernardo Drive., Suite 255
San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the relationship between Front Sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.

///
///

6. Sean Flynn
 c/o Greer & Associates, A.P.C.
 16855 West Bernardo Drive., Suite 255
 San Diego, CA 92127

This witness is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

II. List of Documents That May Be Used for Support of Claims or Defenses, Including for Impeachment or Rebuttal

A. EB5IA DOCUMENTS

1. Contract documents

9/13/2012	Front Sight EB-5 letter (final)	A 00001-00005
7/14/2013	Engagement letter - Front Sight - fully signed	A(1)00466-00473
10/16/2015	Pre-Marketing Agreement	A-000870-000878
5/31/2015	Independent contractor Agreement	A-000857
2/14/2013	EB-5 Impact Advisors-Dziubla	A-001377-001384

2. Accounting documents

Various	Accounting and Fees	A-000702-000856
Various	Accounting	A-000904-000922

EB5IA A-008764-008976

3. Marketing documents

09/7/2018	Front Sight Response to Pre-Negotiation Letter	A(1)00337-00338
10/5/2015	Brochure Side 1 final	A(1)00339
10/5/2015	Brochure Side 2 (final)	A(1)00340

1			
2	10/7/2014	Photo of Ignatius Piazza with King Liu and	
3		Jay Li of Sinowel	A(1)00549
4	05/07/2016	Marketing Report - Front Sight	A(1)00486
5	04/09/2016	Marketing Report - Front Sight	A(1)00487
6	4/16/2016	Marketing Report - Front Sight	A(1)00488
7	4/23/2016	Marketing Report - Front Sight	A(1)00489-00490
8	4/30/2016	Marketing Report - Front Sight	A(1)00491-00492
9	2/25/2016	Marketing Report	A(1)00493
10	3/29/2016	Marketing Report	A(1)00494
11	11/3/2015	Memo - Front Sight marketing update	A(1)00506-00508
12	10/25/2015	Memo - Front Sight marketing update	A(1)00509-00513
13	2014	Front Sight EB-5 Investments Opportunity Prsntn	A-001543-001619
14	9/13/2012	Kenworth EB-5 Funding of Front Sight	
15		Infrastructure/Resort Development	A-001747-001751

17 4. Due Diligence

18			
19	3/11/2016	Mike Meacher response	A(1)00514-00519
20	11/3/2015	Memo-Marketing Update	A-001418-001425
21	11/23/13	Economic Impact Analysis	A-010097-010192

22 5. S.D. Hilton

23	various	Empyrean West Emails	A-010756-010910
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24 **B. EB5IA REGIONAL CENTER DOCUMENTS**

25 1. USICS Reporting documents

26 **EB5 Impact Capital Regional Center USCIS Filing A-018193-019194**

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C. LAS VEGAS DEVELOPMENT FUND DOCUMENTS

1. Contract documents

10/6/2016	Construction Loan Agreement	A-001271-001372
10/7/2016	Construction Loan Agreement (signed final)	A(1)00360-00416
10/13/2016	Deed of Trust - Front Sight recorded	A(1)00425-00461
07/1/2017	Deed of Trust - First Amendment	A(1)00417-00424
11/15/2017	Amended and Restated Promissory Note - \$50M (signed)	A(1)00006-00012
11/15/2017	First Amendment to Loan Agreement - (Executed)	A(1)00013-00017
2/16/2017	Inspection Notice - Front Sight Books & Records	A(1)00483
11/14/2017	Amendment to Loan Agreement	A-000923-000927
7/1/2017	Amended & Restated Promissory Note	A-001752-001763
9/7/2018	Piazza Construction Loan Agreement	A-001247-001248
10/31/2017	Loan Agreement	A-001252-001270
02/28/18	Loan Agreement - Second Amendment	A-010221-010222

2. Accounting documents

8/20/2018	Loan Statement Invoice	A(1)00484
9/20/2018	Loan Statement Invoice	A(1)00485
7/1/2017	Promissory Note - Amended and Restated (7/12017)	A(1)00695-00701

3. Notices of Default and Responses/Compliance

8/20/2018	Front Sight Response to Notice of Default	A(1)00018-00165
8/25/2018	Front Sight Response to Second Notice of Default	A(1)00166-00169
8/29/2018	Front Sight Follow Up Response to Notices of Default	A(1)00170-00299

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2	8/30/2018	Front Sight Supp Response to Third Notice of Default	A(1)00300-00333
3	8/24/2018	Notice of Default - additional defaults	
4		- response to AM's letter of (8-24-2018)	A(1)00522-00528
5	8/31/2018	Notice of Default - stay - workout agreement	A(1)00529
6	8/28/2018	Notice of Default - third	A(1)00530-00533
7	7/30/2018	Notice of Default	A(1)00534-00540
8	7/30/2018	Piazza Response to Notice of Default with Exhibits	A-000928-001075
9	8/25/2018	Piazza Response to Notice of Default	A-001076-001079
10	8/29/2018	Piazza Additional Responses to NODs	A-001080-001209
11	8/30/2018	Piazza Additional Responses to NODs	A-001210-001213
12	9/17/2018	Chicago Title NOD	A-001620-001635
13	9/4/2018	AM response to stay of NOD	A(1)00334-00336
14	9/4/2018	Response to Temporary Stay	A-001244-001246
15			
16	2/16/2017	Inspection of Front Sight Books and Records	A-001395-001406
17			
18	8/24/2018	Dziubla Notice of Multiple Defaults, Notice of	
19		Inspection, Monthly Proof of Project Costs	A-001432-001438
20			
21	09/10/18	NOD - Formal Notice	A-010223-010227
22	5.	<u>EB5</u>	
23	10/30/18	Letter from FS re EB5 prove up documents	A-010218-010220
24		PPM - LVDF & Front Sight (as filed w/ USCIS) 82	A-010248-010329
25			
26	07/01/16	PPM Front Sight 88	A-010330-010417
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2	10/08/14	Valuation (as completed Front Sight	
3		Timeshare Update) 116	A-010621-010736
4	12/31/14	Valuation - business enterprise	A-010737-010756
5	D.	<u>ROBERT DZIUBLA DOCUMENTS</u>	
6		1. Dzuibla Front Sight File	A-008977-009925
7	9/3/2014	Nevada Secy of State Business License & Application	A-000858-000869
8		2. <u>Prior Experience Documents</u>	
9		Dziubla Project Files (Cover Pages Only)	A-009926-010007
10		Three boxes available for review and/or photocopying	
11		3. <u>Notes</u>	
12	4/27/2018	Notes of calls with Piazza and Meacher	A(1)00520
13	6/14/2018	Notes of calls with Piazza and Meacher	A(1)00521
14		4. Emails	A-006139-008763
15	9/23/2015	Forensic Accounting & Business Valuation	A-000895-000899
16		E. <u>JON FLEMING DOCUMENTS</u>	
17		Emails	A-001918-006138
18	2012-2015	Further Flemming Emails re: Frontsight	A-013352-015269
19		F. <u>FRONT SIGHT DOCUMENTS</u>	
20		1. <u>Misc. Front Sight Documents</u>	A-001766-001917
21	3/12/2012	Executive Summary Front Sight	A(1)00474-00482
22	12/1/2016	PPT - Front Sight - Chinese (Dec. 2016 final)	A(1)00550-00589
23	12/1/2016	PPT - Front Sight - Vietnamese translation	A(1)00590-00629
24	8/25/2015	PPT - Frontsight Timeshare Presentation 8.25.15	A(1)00630-00664
25	7/1/2015	PPT Front Sight - Chinese	A(1)00665-00694
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2	?	Pictures- Exemplar Approval	A-001249-001250
3	3/12/2012	Front Sight Management Executive Summary	A-001385-001394
4	8/23/2018	Pictures	A-001447-001459
5		Pro Forma Statements of Income	A-001460-001461
6	1/9/2019	Valuation Source Appraisal Report for Mike Brand	A-001636-001746
7		Concourse Photo	A-010048
8		Construction Timeline	A-010049-010096
9		Front Entry Looking West Composite	A-010193
10		Hotel for Life Screenshot	A-010217
11		Patriot Pavillion renderings	A-010228-010232
12		Patriot Pavillion description in USCIS plan	A-010233
13			
14	10/11/18	Patriot Pavillion Pad	A-010234
15		Pictures and renderings	A-010235-010247
16	11/04/16	PPT-Front Sight Timeshare Presentation	A-010418-010454
17	03/17/14	Project Business Plan	A-010455-010616
18		Renderings - FS	A-010617-010619
19			
20	10/11/18	Resort Pad	A-010620
21	2.	<u>Loan Documents with other entities</u>	
22	10/31/2017	Construction Line of Credit Loan Agreement (Morales)	A(1)00341-00359
23			
24	05/01/12	Holecek Mortgage Extention Agreement	A-010194-010199
25	02/07/06	Holecek Loan Agreement	A-010200-010216
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2		3. <u>Construction Documents</u>	
3	8/30/2018	Current Major Contracts	A-001214-001243
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5		4. <u>Documents Subpoenaed from Horsfall</u>	A-010911-013173
6		5. <u>Documents Subpoenaed from BofA</u>	A-013174-013351
7		6. <u>Other Financial Documents</u>	
8			
9	2016	FS Fed Tax Return relevant pages	A-010008-010013
10	2017	FS YE Financial Statements	A-010014-010018
11	2017	FS Tax Return Relevant Pages	A-010019-010024
12	2017	FS Federal Tax Return	A-010025-010047
13			
14		G. <u>EMAILS</u>	
15	5/12/2016	Email email re senior debt	A(1)00499-00500
16	8/11/2015	Meacher email re marketing costs	A(1)00501-00505
17	7/16/2018	Piazza email 7-16-2018 re spending on whatever	A(1)00541-00548
18	5/2/2018	Emails re: "Clarification of Your Success Fee"	A-000879-000894
19	5/8/2015	Emails re "Agreement with typo corrections"	A-000900-000903
20	5/12/16	Emails re "Meeting on May 18 th "	A-001373-001376
21	9/13/18	Emails from Meacher to Dziubla	A-001407-001417
22	3/2016	Email re "Sinowel"	A-001426-001431
23	Various	John Fleming Emails	A-001918-006138
24	Various	Robert Dziubla Emails	A-006139-008763
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2	2012-2015	Front Sight emails	A-013352-015269
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4	5/2016-10/2016	Emails post deal novation and pre CLA	A-019195-020635
5	Various	Flynn Emails	A-020635 -020816

6 III. INSURANCE

7 Defendants/Counterclaimants are not insured regarding this matter.

8 IV. DAMAGES CLAIMED BY COUNTER-CLAIMANTS

9 Defendants/Counter Claimants are working to compile this information and will
10 supplement this response at a later date. However, this includes repayment by Front
11 Sight of all monies lent to it plus, interests, costs and attorney fees, plus all special and
12 consequential damages, including those damages caused by Plaintiff/Counter
13 Defendants' improper removal and/or use of funds from Front Sight.
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2 As to Jennifer and Ignatious Piazza, Counter Claimant seek all monies they
3 diverted from Front Sight to their own devices, making it such that Front Sight could not
4 perform its obligations under the Construction Loan Agreement and which caused harm
5 to Front Sight's financial status and its ability to repay monies it borrowed under the
6 CLA.
7

8 DATED this 4th day of February, 2020.

FARMER CASE & FEDOR

9
10 /s/ Kathryn Holbert
KATHRYN HOLBERT, ESQ.
11 Nevada Bar No. 10084
2190 E. Pebble Rd., Suite #205
12 Las Vegas, NV 89123
Telephone: (702) 579-3900
13 kholbert@farmercase.com
Attorney for Defendants
14 LAS VEGAS DEVELOPMENT FUND
15 LLC., EB5 IMPACT CAPITAL
REGIONAL CENTER, LLC, EB6
16 IMPACT ADVISORS, LLC, ROBERT W.
DZIUBLA, JON FLEMING and LINDA
17 STANWOOD
18
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CERTIFICATE OF SERVICE and/or MAILING

Pursuant to NRCF 5(b), I hereby certify that I am an employee of Farmer Case & Fedor, and that on this date, I caused true and correct copies of the following document(s):

**DEFENDANTS AND COUNTER-CLAIMANT'S 16.1
LIST OF WITNESSES AND DOCUMENTS**

FOURTH SUPPLEMENT

to be served on the following individuals/entities, in the following manner,

John P. Aldrich, Esq.	Attorneys for Plaintiff
Catherine Hernandez, Esq.	FRONT SIGHT MANAGEMENT, LLC
ALDRICH LAW FIRM, LTD.	
1601 S. Rainbow Blvd., Suite 160	
Las Vegas, Nevada 89146	

By:

■ **ELECTRONIC SERVICE:** Said document(s) was served electronically upon all eligible electronic recipients pursuant to the electronic filing and service order of the Court (NECRF 9).

■ **U.S. MAIL:** I deposited a true and correct copy of said document(s) in a sealed, postage prepaid envelope, in the United States Mail, to those parties and/or above named individuals which were not on the Court's electronic service list.

FACSIMILE: I caused said document(s) to be transmitted by facsimile transmission. The sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

Dated: February 4th, 2020

/s/ Kathryn Holbert
An Employee of FARMER CASE & FEDOR

EXHIBIT 5

BAILEY ♦ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

1 JOHN R. BAILEY
Nevada Bar No. 0137
2 JOSHUA M. DICKEY
Nevada Bar No. 6621
3 ANDREA M. CHAMPION
Nevada Bar No. 13461
4 **BAILEY ♦ KENNEDY**
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7 JDickey@BaileyKennedy.com
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11 Telephone: 858.613.6677
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12 keith.greer@greerlaw.biz

13 *Attorneys for Defendants*
LAS VEGAS DEVELOPMENT FUND LLC;
14 EB5 IMPACT CAPITAL REGIONAL CENTER
LLC; EB5 IMPACT ADVISORS LLC; ROBERT
15 W. DZIUBLA; JON FLEMING; and
LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

19 FRONT SIGHT MANAGEMENT LLC, a
Nevada Limited Liability Company,

Plaintiff,

21 vs.

22 LAS VEGAS DEVELOPMENT FUND LLC, a
23 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
Dept. No. XVI

**DEFENDANTS AND COUNTER-
CLAIMANT'S FIFTH SUPPLEMENT
TO INITIAL DISCLOSURES**

25
26 AND ALL RELATED COUNTERCLAIMS.
27

Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), Defendant Las Vegas Development Fund, LLC (“LVDF”) makes the following Fifth Supplement to Initial Disclosures:

- A. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.**

Documents bearing Bates numbers A-020817 – A-021628 are provided herewith these Fifth Supplemental Disclosures.

Bates Number	Document Description	Date
A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
A-021507-021512	Robert Dziubla Resume	N/A
A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14

A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
A-021533-021628	Immigration Consultant Agreements ¹	Various

DATED this 13th day of May, 2020.

BAILEY ❖ KENNEDY

By: /s/ Andrea M. Champion
JOHN R. BAILEY
JOSHUA M. DICKEY
ANDREA M. CHAMPION

Attorneys for Defendants
LAS VEGAS DEVELOPMENT FUND
LLC; EB5 IMPACT CAPITAL
REGIONAL CENTER LLC; EB5 IMPACT
ADVISORS LLC; ROBERT W.
DZIUBLA; JON FLEMING; and LINDA
STANWOOD

BAILEY ❖ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

¹ Defendants have redacted the Immigration Consultant Agreements so that only the relevant portions of the Agreements remain. In producing these redacted documents, Defendants in no way waive their objection to the production of the unredacted Immigration Consultant Agreements.

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 13th day of May, 2020, service of the foregoing **DEFENDANTS AND COUNTER-CLAIMANT’S FIFTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

JOHN P. ALDRICH
CATHERINE HERNANDEZ
ALDRICH LAW FIRM, LTD.
7866 West Sahara Avenue
Las Vegas, Nevada 89117

Email: jaldrich@johnaldrichlawfirm.com
Attorneys for Plaintiff
FRONT SIGHT MANAGEMENT LLC

/s/ Josephine Baltazar
Employee of BAILEY ❖ KENNEDY

BAILEY ❖ KENNEDY
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EXHIBIT 6

BAILEY ♦ KENNEDY
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Nevada Bar No. 6621
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9 Cal. Bar. No. 135537 (*Pro Hac Vice*)
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13 *Attorneys for Defendants*
LAS VEGAS DEVELOPMENT FUND LLC;
14 EB5 IMPACT CAPITAL REGIONAL CENTER
LLC; EB5 IMPACT ADVISORS LLC; ROBERT
15 W. DZIUBLA; JON FLEMING; and
LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

19 FRONT SIGHT MANAGEMENT LLC, a
Nevada Limited Liability Company,

Plaintiff,

21 vs.

22 LAS VEGAS DEVELOPMENT FUND LLC, a
23 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
Dept. No. XVI

**DEFENDANTS AND COUNTER-
CLAIMANT'S SIXTH SUPPLEMENT
TO INITIAL DISCLOSURES**

24
25
26
27 AND ALL RELATED COUNTERCLAIMS.
28

Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), Defendant Las Vegas Development Fund, LLC (“LVDF”) makes the following Sixth Supplement to Initial Disclosures:

B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Documents bearing Bates numbers A-021629 – A-021819 are provided herewith these Sixth Supplemental Disclosures.

Bates Number	Document Description	Date
A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020

A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
A-021810-021834	Verified Complaint	11/13/2018
A-021835-021844	Front Sight Emergency Action Alert	1/28/2019

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DATED this 18th day of May, 2020.

BAILEY ❖ KENNEDY

By: /s/ Andrea M. Champion
JOHN R. BAILEY
JOSHUA M. DICKEY
ANDREA M. CHAMPION

Attorneys for Defendants
LAS VEGAS DEVELOPMENT FUND
LLC; EB5 IMPACT CAPITAL
REGIONAL CENTER LLC; EB5 IMPACT
ADVISORS LLC; ROBERT W.
DZIUBLA; JON FLEMING; and LINDA
STANWOOD

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702.562.8820

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 18th day of May, 2020, service of the foregoing **DEFENDANTS AND COUNTER-CLAIMANT’S SIXTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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Notification of Service

Case Number: A-18-781084-B
Case Style: Front Sight Management LLC,
Plaintiff(s)vs.Las Vegas Development Fund LLC,
Defendant(s)
Envelope Number: 6063332



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Filing Details

Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	5/18/2020 11:22 AM PST
Filing Type	Service Only
Filing Description	Defendants and Counter-Claimant's Sixth Supplement to Initial Disclosures
Filed By	Josephine Baltazar
Service Contacts	<p>Front Sight Management LLC:</p> <p>Traci Bixenmann (traci@johnaldrichlawfirm.com)</p> <p>John Aldrich (jaldrich@johnaldrichlawfirm.com)</p> <p>Las Vegas Development Fund LLC:</p> <p>Joshua Dickey (jdickey@baileykennedy.com)</p> <p>John Bailey (jbailey@baileykennedy.com)</p> <p>Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com)</p>

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EXHIBIT 7

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9 LAS VEGAS DEVELOPMENT FUND LLC;
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 10 LLC; EB5 IMPACT ADVISORS LLC; ROBERT
 W. DZIUBLA; JON FLEMING; and
 11 LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

14 FRONT SIGHT MANAGEMENT LLC, a
 Nevada Limited Liability Company,

Plaintiff,

vs.

17 LAS VEGAS DEVELOPMENT FUND LLC, a
 18 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
 Dept. No. XVI

**THE EB5 PARTIES' SEVENTH
 SUPPLEMENT TO INITIAL
 DISCLOSURES**

20 _____
 21 AND ALL RELATED COUNTERCLAIMS.
 22 _____

23
 24 Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following
 25 Seventh Supplement to Initial Disclosures. The information added to this disclosure are **bolded**
 26 below.
 27
 28

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B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Documents bearing Bates Numbers A-021845 - A-030224 are being produced through Sharefile.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
A-00334-00336	AM response to stay of NOD	9/4/2018
A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
A-00339	Brochure Side 1 final	10/5/2015
A-00340	Brochure Side 2 (final)	10/5/2015
A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
A-00417-00424	Deed of Trust - First Amendment	7/1/2017
A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
A-00462-00465	Email to Meacher re deal restructure	5/12/2016
A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
A-00474-00482	Executive Summary Front Sight	3/12/2012
A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018

1	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
2	A-00486	Marketing Report - Front Sight	5/7/2016
3	A-00487	Marketing Report - Front Sight	4/9/2016
4	A-00488	Marketing Report - Front Sight	4/16/2016
5	A-00489-00490	Marketing Report - Front Sight	4/23/2016
6	A-00491-00492	Marketing Report - Front Sight	4/30/2016
7	A-00493	Marketing Report	2/25/2016
8	A-00494	Marketing Report	3/29/2016
9	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
10	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
11	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
12	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
13	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
14	A-00514-00519	Mike Meacher response	3/11/2016
15	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
16	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
17	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
18	A-00529	Notice of Default - stay - workout agreement (8-31-2018)	8/31/2018
19	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
20	A-00534-00540	Notice of Default	7/30/2018
21	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
22	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
23	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
24	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
25	A-00630-00664	PPT - Front Sight Timeshare Presentation 25 August 2015	8/25/2015
26	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
27	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
28	First Supplemental Disclosure		
	A-000702-000856	Accounting and Fees	Various
	A-000857	Independent contractor Agreement	5/31/2015
	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
	A-000870-000878	Pre-Marketing Agreement	10/16/2015
	A-000879-000894	Emails	5/2/2018

1	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
2	A-000900-000903	Emails	5/8/2015
3	A-000904-000922	Accounting	Various
4	A-000923-000927	Amendment to Loan Agreement	11/14/2017
5	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
6	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
7	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
8	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
9	A-001214-001243	Current Major Contracts	8/30/2018
10	A-001244-001246	Response to Temporary Stay	9/4/2018
11	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
12	A-001249-001251	Pictures- Exemplar Approval	N/A
13	A-001252-001270	Loan Agreement	10/31/2017
14	A-001271-001372	Construction Loan Agreement	10/6/2016
15	A-001373-001376	Emails	Various
16	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
17	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
18	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
19	A-001407-001417	Emails	Various
20	A-001418-001425	Memo-Marketing Update	11/3/2015
21	A-001426-001431	Emails	Various
22	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
23	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
24	A-001447-001459	Pictures	8/23/2018
25	A-001460-001461	Pro Forma Statements of Income	N/A
26	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
27	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
28	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019

1	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
2	A -001764-001765	Receipt of Copy	10/30/18
3	A-001766-001917	Front Sight Documents	Various
4	A-001918-006138	John Fleming Emails	Various
5	A-006139-008763	Robert Dziubla Emails	Various
6	Third Supplemental Disclosure¹		
7	A-008764-008976	EB5IA Cost and Expense Backup	Various
8	A-008977-009925	Dziubla Front Sight File	Various
9	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
10	Fourth Supplemental Disclosure		
11	A-010008-010013	FS Fed Tax Return relevant pages	2016
12	A-010014-010018	FS YE Financial Statements	2017
13	A-010019-010024	FS Tax Return Relevant Pages	2017
14	A-010025-010047	FS Federal Tax Return	2017
15	A-010048	Concourse Photo	N/A
16	A-010049-010096	Construction Timeline	N/A
17	A-010097-010192	Economic Impact Analysis	11/23/13
18	A-010193	Front Entry Looking West Composite	N/A
19	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
20	A-010200-010216	Holecek Loan Agreement	02/07/06
21	A-010217	Hotel for Life Screenshot	N/A
22	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
23	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
24	A-010223-010227	NOD - Formal Notice	09/10/18
25	A-010228-010232	Patriot Pavilion renderings	N/A
26	A-010233	Patriot Pavilion description in USCIS plan	N/A
27	A-010234	Patriot Pavilion Pad	10/11/18
28	A-010235-010247	Pictures and renderings	N/A
	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
	A-010330-010417	PPM Front Sight 88	07/01/16
	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
	A-010455-010616	Project Business Plan	03/17/14
	A-010617-010619	Renderings - FS	N/A
	A-010620	Resort Pad	10/11/18
	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010737-010756	Valuation - business enterprise	12/31/14
2	A-010756-010910	Empyrean West Emails	Various
3	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
4	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
5	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
6	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
7	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
8	A-020635 -020816	Flynn Emails	Various
9	Fifth Supplemental Disclosure		
10	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
11	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
12	A-021507-021512	Robert Dziubla Resume	N/A
13	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
14	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
15	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
16	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
17	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
18	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
19	A-021533-021628	Immigration Consultant Agreements	Various
20	Sixth Supplemental Disclosure		
21	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
22	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
23	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
24	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
25	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
26	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
27	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
28	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
2	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
3	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
4	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
5	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
6	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
7	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
8	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
9	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
10	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
11	A-021810-021834	Verified Complaint	11/13/2018
12	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
13	Seventh Supplemental Disclosure		
14	A-021845-021852	Default Notices	Various
15	A-021853-021869	Inspection Photos	N/A
16	A-021870-021883	Loan Documents and Demand Letters	Various
17	A-021884-021909	Site Renderings	N/A
18	A-021910-021942	NES Financial Loan Statements & Invoices	Various
19	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
20	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
21	A-021975-021984	Marketing Reports	Various
22	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
23	A-022025-022049	Travel Documentation and Receipts	Various
24	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
25	A-022199-022244	Front Sight Marketing Materials	N/A
26	A-022245-022261	Holocek Loan Agreement	2/7/2006
27	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
28	A-022268	HREC Invoice	9/29/2014
29	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
30	A-022275-022277	Front Sight Marketing Materials	N/A
31	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
32	A-022284-022287	Front Sight Letter to Members	8/1/2014
33	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
34	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
35	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
36	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014

1	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
2	A-022296	HREC Invoice for Professional Services	9/29/2014
3	A-022297-022298	Front Sight Competitor Comparison	N/A
4	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
5	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
6	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
7	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
8	A-022313-022325	Front Sight Pro Forma	N/A
9	A-022326	Front Sight Resorts Land Use Plan	N/A
10	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017
11	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
12	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
13	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
14	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
15	A-022405-022482	Sinowel Communications and Marketing Materials	Various
16	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
17	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
18	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
19	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
20	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
21	A-027350-027351	Administrative Fee	N/A
22	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
23	A-027359-027521	Confidential Private Placement Memorandum -Draft	N/A
24	A-027522-027523	Email Correspondence with C. Matthew	8/20/2015

1		Schulz re: Introduction	
2	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
3	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
4	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
5	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
6	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
7	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
8	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
9	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
10	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
11	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
12	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
13	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
14	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
15	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
16	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
17	A-028771-028839	Email Correspondence with Preston Arza	Various
18	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
19	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
20	A-029211-029255	Front Sight Email Blasts	Various
21	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
22	A-029270-A-029512	Email Correspondence Re Potential	Various

	Investors and related documents	
A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
A-029582	Project Update to EB5 Investors	10/14/2016
A-029583-029584	Project Update for Agents	8/27/2019

1	A-029585	Project Update Q1 2017	4/21/2017
2	A-029586-029587	Project Update Q1 2018	7/26/2018
3	A-029588-029589	Project Update Q3 2017	10/21/2017
4	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
5	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
6	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
7			
8	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
9	A-029648-029657	Immigration Consultant Fee Agreement	N/A
10	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
11	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
12			
13			
14	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
15	A-029730-029740	Home Depo Account Statements	Various
16	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
17			
18			
19	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
20			
21	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
22			
23	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
24	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
25	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3rd Payment Default	9/12/2019
26			
27	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
28			

1	A-029761-029763	UCC Financing Statement	10/13/2016
2	A-029764-029767	NES Loan Statements & Invoices	Various
3	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
4	A-029770	NES Loan Advance Form	10/7/2016
5	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
6	A-029773	NES Financial Master Account Statement	8/31/2016
7	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
8	A-029775-029798	Front Sight Email Blasts	Various
9	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
10	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
11	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
12	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
13	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
14	A-030044-030051	Notice of Entry of Order Granting Las	5/18/2020

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	Vegas Development Fund, LLC’s Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight’s Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	
A-030052-030101	Las Vegas Development Fund, LLC’s Motion for Sanctions for Violation of the Court’s Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
A-030102-030144	Front Sight Management LLC’s Opposition to Las Vegas Development Fund LLC’s Motion for Sanctions for Violation of the Court’s Order Regarding the Production of Documents Needed to Support the EB-5 Investors’ I-829 Petitions on Order Shortening Time	6/22/2020
A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC’s Motion for Sanctions for Violation of the Court’s Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019

DATED this 30th day of July 2020.

BAILEY ❖ KENNEDY

By: /s/ Andrea M. Champion
 JOHN R. BAILEY
 JOSHUA M. DICKEY
 ANDREA M. CHAMPION

Attorneys for Defendants
 LAS VEGAS DEVELOPMENT FUND
 LLC; EB5 IMPACT CAPITAL
 REGIONAL CENTER LLC; EB5 IMPACT
 ADVISORS LLC; ROBERT W.
 DZIUBLA; JON FLEMING; and LINDA
 STANWOOD

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 30th day of July, 2020, service of the foregoing **THE EB5 PARTIES’ SEVENTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

JOHN P. ALDRICH
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FRONT SIGHT MANAGEMENT,
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JENNIFER PIAZZA; VNV
DYNASTY TRUST I; VNV
DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK
BUILDERS INC.; ALL
AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND
EFRAIN RENE MORALES-
MORENO

/s/ Jennifer Kennedy
Employee of BAILEY ❖ KENNEDY

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Reception

From: efilimgmail@tylerhost.net
Sent: Thursday, July 30, 2020 11:20 PM
To: BKfederaldownloads
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 6402472

Notification of Service

Case Number: A-18-781084-B
Case Style: Front Sight Management LLC,
Plaintiff(s)vs.Las Vegas Development Fund LLC,
Defendant(s)
Envelope Number: 6402472



This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details

Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	7/30/2020 11:19 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Seventh Supplement to Initial Disclosures
Filed By	Jennifer Kennedy
Service Contacts	<p>Front Sight Management LLC:</p> <p>Traci Bixenmann (traci@johnaldrichlawfirm.com)</p> <p>John Aldrich (jaldrich@johnaldrichlawfirm.com)</p> <p>Las Vegas Development Fund LLC:</p> <p>Joshua Dickey (jdickey@baileykennedy.com)</p> <p>John Bailey (jbailey@baileykennedy.com)</p> <p>Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com)</p> <p>Kathryn Holbert (kholbert@farmercase.com)</p>

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Document Details	
Served Document	Download Document
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EXHIBIT 8

1 JOHN R. BAILEY
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9 LAS VEGAS DEVELOPMENT FUND LLC;
 EB5 IMPACT CAPITAL REGIONAL CENTER
 10 LLC; EB5 IMPACT ADVISORS LLC; ROBERT
 W. DZIUBLA; JON FLEMING; and
 11 LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

14 FRONT SIGHT MANAGEMENT LLC, a
 Nevada Limited Liability Company,

Plaintiff,

vs.

17 LAS VEGAS DEVELOPMENT FUND LLC, a
 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
 Dept. No. XVI

**THE EB5 PARTIES' EIGHTH
 SUPPLEMENT TO INITIAL
 DISCLOSURES**

20 _____
 21
 22 AND ALL RELATED COUNTERCLAIMS.
 23 _____

24 Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following
 25 Eighth Supplement to Initial Disclosures. The information added to this disclosure is **bolded** below.

26 ///

27 ///

28

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1 **A. The name and, if known, the address and telephone number of each**
 2 **individual likely to have information discoverable under Rule 26(b),**
 3 **including for impeachment or rebuttal, identifying the subjects of the**
 4 **information.**

5 EB5 Parties identify the following individuals as likely to have discoverable information
 6 relevant to the facts at issue in this matter, as well as the subjects of such information. The
 7 disclosure provided herein is based on information reasonably available at this time.

8 By disclosing the following individuals, EB5 Parties do not waive any objections that they
 9 have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify
 10 additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on
 11 witnesses identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Robert Dziubla c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Linda Stanwood c/o Bailey ❖ Kennedy, LLP	Ms. Stanwood is expected to testify concerning the facts and circumstances

1	8984 Spanish Ridge Avenue Las Vegas, NV 89148	surrounding the allegations of the operative Complaint and Cross Complaints.
2	Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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5 **B. A copy — or a description by category and location — of all documents,
electronically stored information, and tangible things that the disclosing party
has in its possession, custody, or control and may use to support its claims or
6 defenses, including for impeachment or rebuttal, and, unless privileged or
7 protected from disclosure, any record, report, or witness statement, in any form,
concerning the incident that gives rise to the lawsuit.**

8
9 **Documents bearing Bates Numbers A-030225 – A-030338 are being produced through
10 Sharefile.**

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
A-00334-00336	AM response to stay of NOD	9/4/2018
A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
A-00339	Brochure Side 1 final	10/5/2015
A-00340	Brochure Side 2 (final)	10/5/2015
A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
A-00417-00424	Deed of Trust - First Amendment	7/1/2017
A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
A-00462-00465	Email to Meacher re deal restructure	5/12/2016
A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013

1	A-00474-00482	Executive Summary Front Sight	3/12/2012
2	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
3	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
4	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
5	A-00486	Marketing Report - Front Sight	5/7/2016
6	A-00487	Marketing Report - Front Sight	4/9/2016
7	A-00488	Marketing Report - Front Sight	4/16/2016
8	A-00489-00490	Marketing Report - Front Sight	4/23/2016
9	A-00491-00492	Marketing Report - Front Sight	4/30/2016
10	A-00493	Marketing Report	2/25/2016
11	A-00494	Marketing Report	3/29/2016
12	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
13	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
14	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
15	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
16	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
17	A-00514-00519	Mike Meacher response	3/11/2016
18	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
19	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
20	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
21	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
22	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
23	A-00534-00540	Notice of Default	7/30/2018
24	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
25	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
26	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
27	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
28	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017

First Supplemental Disclosure		
A-000702-000856	Accounting and Fees	Various
A-000857	Independent contractor Agreement	5/31/2015
A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
A-000870-000878	Pre-Marketing Agreement	10/16/2015
A-000879-000894	Emails	5/2/2018
A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
A-000900-000903	Emails	5/8/2015
A-000904-000922	Accounting	Various
A-000923-000927	Amendment to Loan Agreement	11/14/2017
A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
A-001076-001079	Piazza Response to Notice of Default	8/25/2018
A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
A-001214-001243	Current Major Contracts	8/30/2018
A-001244-001246	Response to Temporary Stay	9/4/2018
A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
A-001249-001251	Pictures- Exemplar Approval	N/A
A-001252-001270	Loan Agreement	10/31/2017
A-001271-001372	Construction Loan Agreement	10/6/2016
A-001373-001376	Emails	Various
A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
A-001385-001394	Front Sight Management Executive Summary	3/12/2012
A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
A-001407-001417	Emails	Various
A-001418-001425	Memo-Marketing Update	11/3/2015
A-001426-001431	Emails	Various
A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
A-001447-001459	Pictures	8/23/2018
A-001460-001461	Pro Forma Statements of Income	N/A
A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A

1	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
2	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
3	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
4	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
5	A -001764-001765	Receipt of Copy	10/30/18
6	A-001766-001917	Front Sight Documents	Various
7	A-001918-006138	John Fleming Emails	Various
8	A-006139-008763	Robert Dziubla Emails	Various
9	Third Supplemental Disclosure¹		
10	A-008764-008976	EB5IA Cost and Expense Backup	Various
11	A-008977-009925	Dziubla Front Sight File	Various
12	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
13	Fourth Supplemental Disclosure		
14	A-010008-010013	FS Fed Tax Return relevant pages	2016
15	A-010014-010018	FS YE Financial Statements	2017
16	A-010019-010024	FS Tax Return Relevant Pages	2017
17	A-010025-010047	FS Federal Tax Return	2017
18	A-010048	Concourse Photo	N/A
19	A-010049-010096	Construction Timeline	N/A
20	A-010097-010192	Economic Impact Analysis	11/23/13
21	A-010193	Front Entry Looking West Composite	N/A
22	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
23	A-010200-010216	Holecek Loan Agreement	02/07/06
24	A-010217	Hotel for Life Screenshot	N/A
25	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
26	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
27	A-010223-010227	NOD - Formal Notice	09/10/18
28	A-010228-010232	Patriot Pavilion renderings	N/A
	A-010233	Patriot Pavilion description in USCIS plan	N/A
	A-010234	Patriot Pavilion Pad	10/11/18
	A-010235-010247	Pictures and renderings	N/A
	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
	A-010330-010417	PPM Front Sight 88	07/01/16

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
2	A-010455-010616	Project Business Plan	03/17/14
3	A-010617-010619	Renderings - FS	N/A
4	A-010620	Resort Pad	10/11/18
5	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
6	A-010737-010756	Valuation - business enterprise	12/31/14
7	A-010756-010910	Empyrean West Emails	Various
8	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
9	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
10	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
11	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
12	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
13	A-020635 -020816	Flynn Emails	Various
14	Fifth Supplemental Disclosure		
15	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
16	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
17	A-021507-021512	Robert Dziubla Resume	N/A
18	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
19	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
20	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
21	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
22	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
23	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
24	A-021533-021628	Immigration Consultant Agreements	Various
25	Sixth Supplemental Disclosure		
26	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
27	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
28	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
2	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
3	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
4	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
5	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
6	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
7	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
8	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
9	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
10	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
11	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
12	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
13	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
14	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
15	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
16	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
17	A-021810-021834	Verified Complaint	11/13/2018
18	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
19	Seventh Supplemental Disclosure		
20	A-021845-021852	Default Notices	Various
21	A-021853-021869	Inspection Photos	N/A
22	A-021870-021883	Loan Documents and Demand Letters	Various
23	A-021884-021909	Site Renderings	N/A
24	A-021910-021942	NES Financial Loan Statements & Invoices	Various
25	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
26	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
27	A-021975-021984	Marketing Reports	Various
28	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
29	A-022025-022049	Travel Documentation and Receipts	Various
30	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
31	A-022199-022244	Front Sight Marketing Materials	N/A
32	A-022245-022261	Holocek Loan Agreement	2/7/2006
33	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
34	A-022268	HREC Invoice	9/29/2014
35	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
36	A-022275-022277	Front Sight Marketing Materials	N/A
37	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
38	A-022284-022287	Front Sight Letter to Members	8/1/2014

1	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
2	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
3	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
4	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
5	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
6	A-022296	HREC Invoice for Professional Services	9/29/2014
7	A-022297-022298	Front Sight Competitor Comparison	N/A
8	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
9			
10	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
11	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
12	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
13	A-022313-022325	Front Sight Pro Forma	N/A
14	A-022326	Front Sight Resorts Land Use Plan	N/A
15	A-022327-022386	EB5 Impact Capital Regional Center, LLC Business Plan	March 2017
16	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
17			
18	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
19	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
20	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
21			
22	A-022405-022482	Sinowel Communications and Marketing Materials	Various
23	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
24	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
25	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
26	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
27	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
28	A-027350-027351	Administrative Fee	N/A

1	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
2			
3	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
4	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
5	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
6			
7	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
8	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
9			
10	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
11	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
12			
13	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
14	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
15			
16	A-027712-027803	Confidential Private Placement Memorandum - Draft	N/A
17	A-027804-027892	Confidential Private Placement Memorandum - Draft	N/A
18	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
19	A-027899-027988	Confidential Private Placement Memorandum - Draft	N/A
20			
21	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF - Loan Agreement	9/30/2015
22			
23	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
24	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
25	A-028714-028770	Construction Loan Agreement - Fully Executed	10/6/2016
26	A-028771-028839	Email Correspondence with Preston Arza	Various
27	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
28			

1	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
2	A-029211-029255	Front Sight Email Blasts	Various
3	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
4	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
5	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
6	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
7	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
8	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
9	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
10	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
11	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
12	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
13	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
14	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
15	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
16	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
17	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
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1	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
2			
3	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
4			
5	A-029582	Project Update to EB5 Investors	10/14/2016
6	A-029583-029584	Project Update for Agents	8/27/2019
7	A-029585	Project Update Q1 2017	4/21/2017
8	A-029586-029587	Project Update Q1 2018	7/26/2018
9	A-029588-029589	Project Update Q3 2017	10/21/2017
10	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
11	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
12	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
13	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
14	A-029648-029657	Immigration Consultant Fee Agreement	N/A
15	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
16	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
17			
18			
19	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
20	A-029730-029740	Home Depo Account Statements	Various
21	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
22			
23			
24	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
25	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
26			
27	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
28			

1	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
2	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
3			
4	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
5			
6	A-029761-029763	UCC Financing Statement	10/13/2016
7	A-029764-029767	NES Loan Statements & Invoices	Various
8	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
9	A-029770	NES Loan Advance Form	10/7/2016
10	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
11	A-029773	NES Financial Master Account Statement	8/31/2016
12	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
13	A-029775-029798	Front Sight Email Blasts	Various
14	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
15	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
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18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
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20	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
21	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
22	Eighth Supplemental Disclosure		
23	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
24	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
25			
26	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
27			
28			

A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A

DATED this 6th day of August, 2020.

BAILEY ❖ KENNEDY

By: /s/ Andrea M. Champion

JOHN R. BAILEY
 JOSHUA M. DICKEY
 ANDREA M. CHAMPION

Attorneys for Defendants
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 LLC; EB5 IMPACT CAPITAL
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 DZIUBLA; JON FLEMING; and LINDA
 STANWOOD

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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 6th day of August, 2020, service of the foregoing **THE EB5 PARTIES’ EIGHTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

JOHN P. ALDRICH
CATHERINE HERNANDEZ
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7866 West Sahara Avenue
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*Attorneys for
Plaintiff/Counterdefendants*
FRONT SIGHT MANAGEMENT,
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JENNIFER PIAZZA; VNV
DYNASTY TRUST I; VNV
DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK
BUILDERS INC.; ALL
AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND
EFRAIN RENE MORALES-
MORENO

/s/ Angelique Mattox
Employee of BAILEY ❖ KENNEDY

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Reception

From: efilimgmail@tylerhost.net
Sent: Thursday, August 6, 2020 1:28 PM
To: BKfederaldownloads
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 6433328

Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 6433328



This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	8/6/2020 1:27 PM PST
Filing Type	Service Only
Filing Description	The EB Parties' Eighth Supplement to Initial Disclosures
Filed By	Angelique Mattox
Service Contacts	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Joshua Dickey (jdickey@baileykennedy.com) John Bailey (jbailey@baileykennedy.com) Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com) Kathryn Holbert (kholbert@farmercase.com)

	Andrea Champion (achampion@baileykennedy.com) Keith Greer (keith.greer@greerlaw.biz) Dianne Lyman (dianne.lyman@greerlaw.biz) Mona Gantos (mona.gantos@greerlaw.biz)
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Document Details	
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EXHIBIT 9

1 JOHN R. BAILEY
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 2 JOSHUA M. DICKEY
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9 LAS VEGAS DEVELOPMENT FUND LLC;
 EB5 IMPACT CAPITAL REGIONAL CENTER
 10 LLC; EB5 IMPACT ADVISORS LLC; ROBERT
 W. DZIUBLA; JON FLEMING; and
 11 LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

14 FRONT SIGHT MANAGEMENT LLC, a
 Nevada Limited Liability Company,

Plaintiff,

vs.

18 LAS VEGAS DEVELOPMENT FUND LLC, a
 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
 Dept. No. XVI

**THE EB5 PARTIES' NINTH
 SUPPLEMENT TO INITIAL
 DISCLOSURES**

21 _____
 22 AND ALL RELATED COUNTERCLAIMS.
 23 _____

24 Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following
 25 Ninth Supplement to Initial Disclosures. The information added to this disclosure is **bolded** below.

26 ///

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A. The name and, if known, the address and telephone number of each individual likely to have information discoverable under Rule 26(b), including for impeachment or rebuttal, identifying the subjects of the information.

EB5 Parties identify the following individuals as likely to have discoverable information relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure provided herein is based on information reasonably available at this time.

By disclosing the following individuals, EB5 Parties do not waive any objections that they have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Robert Dziubla c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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1 2 3 4 5	Linda Stanwood c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
6 7 8 9	Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Documents bearing Bates Numbers A-030339 – A-030784 are being produced through Sharefile.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
A-00334-00336	AM response to stay of NOD	9/4/2018
A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
A-00339	Brochure Side 1 final	10/5/2015
A-00340	Brochure Side 2 (final)	10/5/2015
A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
A-00417-00424	Deed of Trust - First Amendment	7/1/2017
A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
A-00462-00465	Email to Meacher re deal restructure	5/12/2016

1	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
2	A-00474-00482	Executive Summary Front Sight	3/12/2012
3	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
4	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
5	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
6	A-00486	Marketing Report - Front Sight	5/7/2016
7	A-00487	Marketing Report - Front Sight	4/9/2016
8	A-00488	Marketing Report - Front Sight	4/16/2016
9	A-00489-00490	Marketing Report - Front Sight	4/23/2016
10	A-00491-00492	Marketing Report - Front Sight	4/30/2016
11	A-00493	Marketing Report	2/25/2016
12	A-00494	Marketing Report	3/29/2016
13	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
14	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
15	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
16	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
17	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
18	A-00514-00519	Mike Meacher response	3/11/2016
19	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
20	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
21	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
22	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
23	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
24	A-00534-00540	Notice of Default	7/30/2018
25	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
26	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
27	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
28	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
	A-00665-00694	PPT Front Sight - Chinese	7/1/2015

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A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
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BAILEY ♦ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

First Supplemental Disclosure		
A-000702-000856	Accounting and Fees	Various
A-000857	Independent contractor Agreement	5/31/2015
A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
A-000870-000878	Pre-Marketing Agreement	10/16/2015
A-000879-000894	Emails	5/2/2018
A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
A-000900-000903	Emails	5/8/2015
A-000904-000922	Accounting	Various
A-000923-000927	Amendment to Loan Agreement	11/14/2017
A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
A-001076-001079	Piazza Response to Notice of Default	8/25/2018
A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
A-001214-001243	Current Major Contracts	8/30/2018
A-001244-001246	Response to Temporary Stay	9/4/2018
A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
A-001249-001251	Pictures- Exemplar Approval	N/A
A-001252-001270	Loan Agreement	10/31/2017
A-001271-001372	Construction Loan Agreement	10/6/2016
A-001373-001376	Emails	Various
A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
A-001385-001394	Front Sight Management Executive Summary	3/12/2012
A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
A-001407-001417	Emails	Various
A-001418-001425	Memo-Marketing Update	11/3/2015
A-001426-001431	Emails	Various
A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
A-001447-001459	Pictures	8/23/2018
A-001460-001461	Pro Forma Statements of Income	N/A
A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A

1	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
2	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
3	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
4	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
5	A -001764-001765	Receipt of Copy	10/30/18
6	A-001766-001917	Front Sight Documents	Various
7	A-001918-006138	John Fleming Emails	Various
8	A-006139-008763	Robert Dziubla Emails	Various
9	Third Supplemental Disclosure¹		
10	A-008764-008976	EB5IA Cost and Expense Backup	Various
11	A-008977-009925	Dziubla Front Sight File	Various
12	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
13	Fourth Supplemental Disclosure		
14	A-010008-010013	FS Fed Tax Return relevant pages	2016
15	A-010014-010018	FS YE Financial Statements	2017
16	A-010019-010024	FS Tax Return Relevant Pages	2017
17	A-010025-010047	FS Federal Tax Return	2017
18	A-010048	Concourse Photo	N/A
19	A-010049-010096	Construction Timeline	N/A
20	A-010097-010192	Economic Impact Analysis	11/23/13
21	A-010193	Front Entry Looking West Composite	N/A
22	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
23	A-010200-010216	Holecek Loan Agreement	02/07/06
24	A-010217	Hotel for Life Screenshot	N/A
25	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
26	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
27	A-010223-010227	NOD - Formal Notice	09/10/18
28	A-010228-010232	Patriot Pavilion renderings	N/A
	A-010233	Patriot Pavilion description in USCIS plan	N/A
	A-010234	Patriot Pavilion Pad	10/11/18
	A-010235-010247	Pictures and renderings	N/A
	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
	A-010330-010417	PPM Front Sight 88	07/01/16

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
2	A-010455-010616	Project Business Plan	03/17/14
3	A-010617-010619	Renderings - FS	N/A
4	A-010620	Resort Pad	10/11/18
5	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
6	A-010737-010756	Valuation - business enterprise	12/31/14
7	A-010756-010910	Empyrean West Emails	Various
8	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
9	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
10	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
11	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
12	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
13	A-020635 -020816	Flynn Emails	Various
14	Fifth Supplemental Disclosure		
15	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
16	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
17	A-021507-021512	Robert Dziubla Resume	N/A
18	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
19	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
20	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
21	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
22	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
23	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
24	A-021533-021628	Immigration Consultant Agreements	Various
25	Sixth Supplemental Disclosure		
26	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
27	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
28	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
2	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
3	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
4	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
5	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
6	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
7	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
8	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
9	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
10	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
11	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
12	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
13	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
14	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
15	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
16	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
17	A-021810-021834	Verified Complaint	11/13/2018
18	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
19	Seventh Supplemental Disclosure		
20	A-021845-021852	Default Notices	Various
21	A-021853-021869	Inspection Photos	N/A
22	A-021870-021883	Loan Documents and Demand Letters	Various
23	A-021884-021909	Site Renderings	N/A
24	A-021910-021942	NES Financial Loan Statements & Invoices	Various
25	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
26	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
27	A-021975-021984	Marketing Reports	Various
28	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
29	A-022025-022049	Travel Documentation and Receipts	Various
30	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
31	A-022199-022244	Front Sight Marketing Materials	N/A
32	A-022245-022261	Holocek Loan Agreement	2/7/2006
33	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
34	A-022268	HREC Invoice	9/29/2014
35	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
36	A-022275-022277	Front Sight Marketing Materials	N/A
37	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
38	A-022284-022287	Front Sight Letter to Members	8/1/2014

1	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
2	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
3	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
4	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
5	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
6	A-022296	HREC Invoice for Professional Services	9/29/2014
7	A-022297-022298	Front Sight Competitor Comparison	N/A
8	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
9			
10	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
11	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
12			
13	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
14	A-022313-022325	Front Sight Pro Forma	N/A
15	A-022326	Front Sight Resorts Land Use Plan	N/A
16	A-022327-022386	EB5 Impact Capital Regional Center, LLC Business Plan	March 2017
17	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
18	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
19	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
20	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
21			
22	A-022405-022482	Sinowel Communications and Marketing Materials	Various
23	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
24	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
25	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
26	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
27	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
28	A-027350-027351	Administrative Fee	N/A

1	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
2			
3	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
4	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
5	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
6			
7	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
8	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
9			
10	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
11	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
12			
13	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
14	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
15			
16	A-027712-027803	Confidential Private Placement Memorandum - Draft	N/A
17	A-027804-027892	Confidential Private Placement Memorandum - Draft	N/A
18	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
19	A-027899-027988	Confidential Private Placement Memorandum - Draft	N/A
20			
21	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF - Loan Agreement	9/30/2015
22			
23	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
24	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
25	A-028714-028770	Construction Loan Agreement - Fully Executed	10/6/2016
26	A-028771-028839	Email Correspondence with Preston Arza	Various
27	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
28			

1	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
2	A-029211-029255	Front Sight Email Blasts	Various
3	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
4	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
5	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
6	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
7	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
8	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
9	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
10	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
11	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
12	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
13	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
14	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
15	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
16	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
17	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
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1	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
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3	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
4			
5	A-029582	Project Update to EB5 Investors	10/14/2016
6	A-029583-029584	Project Update for Agents	8/27/2019
7	A-029585	Project Update Q1 2017	4/21/2017
8	A-029586-029587	Project Update Q1 2018	7/26/2018
9	A-029588-029589	Project Update Q3 2017	10/21/2017
10	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
11	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
12	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
13	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
14	A-029648-029657	Immigration Consultant Fee Agreement	N/A
15	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
16	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
17			
18			
19	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
20	A-029730-029740	Home Depo Account Statements	Various
21	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
22			
23			
24	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
25	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
26			
27	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
28			

1	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
2	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
3			
4	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
5			
6	A-029761-029763	UCC Financing Statement	10/13/2016
7	A-029764-029767	NES Loan Statements & Invoices	Various
8	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
9	A-029770	NES Loan Advance Form	10/7/2016
10	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
11	A-029773	NES Financial Master Account Statement	8/31/2016
12	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
13	A-029775-029798	Front Sight Email Blasts	Various
14	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
15	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
16			
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19			
20	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
21	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
22	Eighth Supplemental Disclosure		
23	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
24	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
25			
26	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
27			
28			

1	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
2			
3	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
4			
5	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
6	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
7			
8	Ninth Supplemental Disclosure		
9	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
10	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
11	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
12			
13	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
14			
15	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
16			
17	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
18	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
19			
20	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
21			
22	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
23			
24	A-030375	Front Sight Marketing Report	3/29/2016
25	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
26			
27	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
28			

1	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
2			
3	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
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6	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
7			
8	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
9			
10	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
11	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
12			
13	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
14	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
15			
16	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
17			
18	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
19			
20	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
21			
22	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
23			
24	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
25			
26	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
27	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
28			

1	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
2	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
3	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015
4	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
5	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
6	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
7	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
8	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
9	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
10	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
11	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
12	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
13	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
14	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
15	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
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1	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
2			
3	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
4			
5			
6	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
7			
8	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015
9			
10			
11	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
12			
13			
14	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
15			
16	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
17			
18	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
19			
20	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
21			
22	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
23	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
24			
25	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
26	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
27			
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1	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
2			
3	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
4			
5	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
6			
7	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
8			
9	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
10			
11	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
12			
13	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
14			
15	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
16			
17	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
18			
19	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
20			
21	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
22			
23	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
24			
25	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
26			
27	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
28			
	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016

1	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
2			
3	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
4			
5	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
6	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
7			
8	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
9			
10	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
11			
12	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
13	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
14	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
15			
16	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
17	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
18			
19	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi’s Visit	7/4/2017
20			
21	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
22			
23	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
24	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
25			
26	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
27			
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1	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
2			
3	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
4			
5	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
6			
7	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
8			
9	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
10	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
11			
12	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment - [Redacted] Skype Call	1/28/2018
13			
14	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
15			
16	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
17			
18	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
19			
20	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
21			
22	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
23	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
24			
25	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
26			
27	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
28			

1	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
2	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
3	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
4	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
5	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
6	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
7	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
8	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
9	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
10	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
11	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
12	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
13	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
14	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015

1	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
2	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
3	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
4	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
5	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
6	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
7	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
8	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
9	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
10	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
11	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
12	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015
13	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
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1 2 3 4 A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017

DATED this 21st day of September, 2020.

BAILEY ❖ KENNEDY

By: /s/ Andrea M. Champion
JOHN R. BAILEY
JOSHUA M. DICKEY
ANDREA M. CHAMPION

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REGIONAL CENTER LLC; EB5 IMPACT
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 21st day of September, 2020, service of the foregoing **THE EB5 PARTIES’ NINTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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JENNIFER PIAZZA; VNV
DYNASTY TRUST I; VNV
DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK
BUILDERS INC.; ALL
AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND
EFRAIN RENE MORALES-
MORENO

/s/ Angelique Mattox
Employee of BAILEY ❖ KENNEDY

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Reception

From: efilinmail@tylerhost.net
Sent: Monday, September 21, 2020 8:36 PM
To: BKfederaldownloads
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 6657305

Notification of Service

Case Number: A-18-781084-B
Case Style: Front Sight Management LLC,
Plaintiff(s)vs.Las Vegas Development Fund LLC,
Defendant(s)
Envelope Number: 6657305



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Filing Details

Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	9/21/2020 8:34 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Ninth Supplement to Initial Disclosures
Filed By	Angelique Mattox
Service Contacts	Las Vegas Development Fund LLC: Andrea Champion (achampion@baileykennedy.com) Keith Greer (keith.greer@greerlaw.biz) Dianne Lyman (dianne.lyman@greerlaw.biz) Mona Gantos (mona.gantos@greerlaw.biz) Kathryn Holbert (kholbert@farmercase.com) Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com) Joshua Dickey (jdickey@baileykennedy.com) John Bailey (jbailey@baileykennedy.com)

	<p>Front Sight Management LLC:</p> <p>John Aldrich (jaldrich@johnaldrichlawfirm.com)</p> <p>Traci Bixenmann (traci@johnaldrichlawfirm.com)</p>
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EXHIBIT 10

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 2 JOSHUA M. DICKEY
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 8

Attorneys for Defendants

9 LAS VEGAS DEVELOPMENT FUND LLC;
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 10 LLC; EB5 IMPACT ADVISORS LLC; ROBERT
 W. DZIUBLA; JON FLEMING; and
 11 LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

14 FRONT SIGHT MANAGEMENT LLC, a
 Nevada Limited Liability Company,

Plaintiff,

vs.

18 LAS VEGAS DEVELOPMENT FUND LLC, a
 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
 Dept. No. XVI

**THE EB5 PARTIES' TENTH
 SUPPLEMENT TO INITIAL
 DISCLOSURES**

21 _____
 22 AND ALL RELATED COUNTERCLAIMS.
 23 _____

24 Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following
 25 Tenth Supplement to Initial Disclosures. The information added to this disclosure is **bolded** below.

26 ///

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A. The name and, if known, the address and telephone number of each individual likely to have information discoverable under Rule 26(b), including for impeachment or rebuttal, identifying the subjects of the information.

EB5 Parties identify the following individuals as likely to have discoverable information relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure provided herein is based on information reasonably available at this time.

By disclosing the following individuals, EB5 Parties do not waive any objections that they have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Robert Dziubla c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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 LAS VEGAS, NEVADA 89148-1302
 702.562.8820

1 Linda Stanwood c/o Bailey ❖ Kennedy, LLP 2 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
3 Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 4 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

5
 6 **B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.**

7
 8
 9 Documents bearing Bates Numbers CW000001-CW08622 and SF000001-SF001610 are
 10 being produced through Sharefile.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
A-00334-00336	AM response to stay of NOD	9/4/2018
A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
A-00339	Brochure Side 1 final	10/5/2015
A-00340	Brochure Side 2 (final)	10/5/2015
A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
A-00417-00424	Deed of Trust - First Amendment	7/1/2017
A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
A-00462-00465	Email to Meacher re deal restructure	5/12/2016

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1	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
2	A-00474-00482	Executive Summary Front Sight	3/12/2012
3	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
4	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
5	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
6	A-00486	Marketing Report - Front Sight	5/7/2016
7	A-00487	Marketing Report - Front Sight	4/9/2016
8	A-00488	Marketing Report - Front Sight	4/16/2016
9	A-00489-00490	Marketing Report - Front Sight	4/23/2016
10	A-00491-00492	Marketing Report - Front Sight	4/30/2016
11	A-00493	Marketing Report	2/25/2016
12	A-00494	Marketing Report	3/29/2016
13	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
14	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
15	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
16	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
17	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
18	A-00514-00519	Mike Meacher response	3/11/2016
19	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
20	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
21	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
22	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
23	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
24	A-00534-00540	Notice of Default	7/30/2018
25	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
26	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
27	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
28	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
	A-00665-00694	PPT Front Sight - Chinese	7/1/2015

1	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
2	First Supplemental Disclosure		
3	A-000702-000856	Accounting and Fees	Various
4	A-000857	Independent contractor Agreement	5/31/2015
5	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
6	A-000870-000878	Pre-Marketing Agreement	10/16/2015
7	A-000879-000894	Emails	5/2/2018
8	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
9	A-000900-000903	Emails	5/8/2015
10	A-000904-000922	Accounting	Various
11	A-000923-000927	Amendment to Loan Agreement	11/14/2017
12	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
13	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
14	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
15	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
16	A-001214-001243	Current Major Contracts	8/30/2018
17	A-001244-001246	Response to Temporary Stay	9/4/2018
18	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
19	A-001249-001251	Pictures- Exemplar Approval	N/A
20	A-001252-001270	Loan Agreement	10/31/2017
21	A-001271-001372	Construction Loan Agreement	10/6/2016
22	A-001373-001376	Emails	Various
23	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
24	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
25	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
26	A-001407-001417	Emails	Various
27	A-001418-001425	Memo-Marketing Update	11/3/2015
28	A-001426-001431	Emails	Various
	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
	A-001447-001459	Pictures	8/23/2018
	A-001460-001461	Pro Forma Statements of Income	N/A

1	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
2	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
3	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
4	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
5	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
6	A -001764-001765	Receipt of Copy	10/30/18
7	A-001766-001917	Front Sight Documents	Various
8	A-001918-006138	John Fleming Emails	Various
9	A-006139-008763	Robert Dziubla Emails	Various
10	Third Supplemental Disclosure¹		
11	A-008764-008976	EB5IA Cost and Expense Backup	Various
12	A-008977-009925	Dziubla Front Sight File	Various
13	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
14	Fourth Supplemental Disclosure		
15	A-010008-010013	FS Fed Tax Return relevant pages	2016
16	A-010014-010018	FS YE Financial Statements	2017
17	A-010019-010024	FS Tax Return Relevant Pages	2017
18	A-010025-010047	FS Federal Tax Return	2017
19	A-010048	Concourse Photo	N/A
20	A-010049-010096	Construction Timeline	N/A
21	A-010097-010192	Economic Impact Analysis	11/23/13
22	A-010193	Front Entry Looking West Composite	N/A
23	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
24	A-010200-010216	Holecek Loan Agreement	02/07/06
25	A-010217	Hotel for Life Screenshot	N/A
26	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
27	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
28	A-010223-010227	NOD - Formal Notice	09/10/18
	A-010228-010232	Patriot Pavilion renderings	N/A
	A-010233	Patriot Pavilion description in USCIS plan	N/A
	A-010234	Patriot Pavilion Pad	10/11/18
	A-010235-010247	Pictures and renderings	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
2	A-010330-010417	PPM Front Sight 88	07/01/16
3	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
4	A-010455-010616	Project Business Plan	03/17/14
5	A-010617-010619	Renderings - FS	N/A
6	A-010620	Resort Pad	10/11/18
7	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
8	A-010737-010756	Valuation - business enterprise	12/31/14
9	A-010756-010910	Empyrean West Emails	Various
10	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
11	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
12	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
13	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
14	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
15	A-020635 -020816	Flynn Emails	Various
16	Fifth Supplemental Disclosure		
17	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
18	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
19	A-021507-021512	Robert Dziubla Resume	N/A
20	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
21	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
22	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
23	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
24	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
25	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
26	A-021533-021628	Immigration Consultant Agreements	Various
27	Sixth Supplemental Disclosure		
28	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
2	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
3	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
4	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
5	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
6	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
7	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
8	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
9	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
10	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
11	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
12	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
13	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
14	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
15	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
16	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
17	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
18	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
19	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
20	A-021810-021834	Verified Complaint	11/13/2018
21	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
22	Seventh Supplemental Disclosure		
23	A-021845-021852	Default Notices	Various
24	A-021853-021869	Inspection Photos	N/A
25	A-021870-021883	Loan Documents and Demand Letters	Various
26	A-021884-021909	Site Renderings	N/A
27	A-021910-021942	NES Financial Loan Statements & Invoices	Various
28	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
29	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
30	A-021975-021984	Marketing Reports	Various
31	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
32	A-022025-022049	Travel Documentation and Receipts	Various
33	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
34	A-022199-022244	Front Sight Marketing Materials	N/A
35	A-022245-022261	Holocek Loan Agreement	2/7/2006
36	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
37	A-022268	HREC Invoice	9/29/2014
38	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
39	A-022275-022277	Front Sight Marketing Materials	N/A

1	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
2	A-022284-022287	Front Sight Letter to Members	8/1/2014
3	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
4	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
5	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
6	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
7	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
8	A-022296	HREC Invoice for Professional Services	9/29/2014
9	A-022297-022298	Front Sight Competitor Comparison	N/A
10	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
11	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
12	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
13	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
14	A-022313-022325	Front Sight Pro Forma	N/A
15	A-022326	Front Sight Resorts Land Use Plan	N/A
16	A-022327-022386	EB5 Impact Capital Regional Center, LLC Business Plan	March 2017
17	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
18	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
19	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
20	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
21	A-022405-022482	Sinowel Communications and Marketing Materials	Various
22	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
23	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
24	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
25	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015

1	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
2	A-027350-027351	Administrative Fee	N/A
3	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
4	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
5	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
6	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
7	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
8	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
9	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
10	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
11	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
12	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
13	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
14	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
15	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
16	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
17	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
18	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
19	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
20	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
21	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
22	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
23	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
24	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
25	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
26	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
27	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
28	A-028771-028839	Email Correspondence with Preston Arza	Various

1	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
2	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
3	A-029211-029255	Front Sight Email Blasts	Various
4	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
5	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
6	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
7	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
8	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
9	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
10	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
11	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
12	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
13	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
14	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
15	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
16	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
17	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
18	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017

1	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
2			
3	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
4			
5	A-029582	Project Update to EB5 Investors	10/14/2016
6	A-029583-029584	Project Update for Agents	8/27/2019
7	A-029585	Project Update Q1 2017	4/21/2017
8	A-029586-029587	Project Update Q1 2018	7/26/2018
9	A-029588-029589	Project Update Q3 2017	10/21/2017
10	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
11	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
12	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
13	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
14	A-029648-029657	Immigration Consultant Fee Agreement	N/A
15	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
16	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
17			
18			
19	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
20	A-029730-029740	Home Depo Account Statements	Various
21	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
22			
23			
24	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
25	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
26			
27	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
28			

1	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
2	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
3			
4	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
5			
6	A-029761-029763	UCC Financing Statement	10/13/2016
7	A-029764-029767	NES Loan Statements & Invoices	Various
8	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
9	A-029770	NES Loan Advance Form	10/7/2016
10	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
11	A-029773	NES Financial Master Account Statement	8/31/2016
12	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
13	A-029775-029798	Front Sight Email Blasts	Various
14	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
15	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
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18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
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13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19			
20	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
21	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
22	Eighth Supplemental Disclosure		
23	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
24	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
25			
26	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
27			
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1	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
2			
3	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
4			
5	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
6	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
7			
8	Ninth Supplemental Disclosure		
9	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
10	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
11	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
12			
13	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
14			
15	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
16			
17	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
18	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
19			
20	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
21			
22	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
23	A-030375	Front Sight Marketing Report	3/29/2016
24	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
25			
26	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
27			
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1	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
2			
3	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
4			
5	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
6			
7	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
8			
9	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
10			
11	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
12			
13	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
14			
15	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
16			
17	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
18			
19	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
20			
21	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
22			
23	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
24			
25	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
26			
27	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
28			
	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014

1	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
2			
3	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015
4			
5	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
6			
7	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
8			
9	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
10			
11	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
12			
13	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
14			
15	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
16			
17	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
18			
19	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
20			
21	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
22			
23	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
24			
25	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
26			
27	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
28			
	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015

1	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
2			
3			
4	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
5			
6	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015
7			
8			
9	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
10			
11			
12	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
13			
14	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
15			
16	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
17			
18	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
19			
20	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
21	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
22			
23	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
24	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
25			
26	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
27			
28	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016

1	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
2			
3	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
4			
5	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
6	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
7	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
8			
9			
10	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
11	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
12	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
13			
14	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
15			
16	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
17	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
18			
19	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
20			
21	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
22	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
23			
24	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
25			
26	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
27	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
28			

1	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
2			
3	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
4			
5	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
6			
7	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
8			
9	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
10			
11	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
12			
13	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
14			
15	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
16			
17	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi’s Visit	7/4/2017
18			
19	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
20			
21	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
22			
23	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
24			
25	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
26			
27	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
28			
	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017

1	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
2			
3	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
4	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
5			
6	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment - [Redacted] Skype Call	1/28/2018
7			
8	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
9			
10	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
11			
12	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
13			
14	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
15			
16	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
17	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
18			
19	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
20			
21	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
22			
23	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
24			
25	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
26			
27	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
28			
	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015

1	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
2			
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4	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
5			
6	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
7			
8	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
9			
10	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
11			
12	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
13			
14	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
15			
16	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
17			
18	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
19			
20	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
21			
22	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
23			
24	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
25			
26	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
27			
28	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015

1	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
2			
3	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
4			
5	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
6			
7	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
8			
9	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
10			
11	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
12			
13	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015
14			
15	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
16			
17	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
18			
19	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
20			
21	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
22			
23	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
24			
25	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
26			
27	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
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A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
	Tenth Supplemental Disclosure	
CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020

DATED this 16th day of October, 2020.

BAILEY ♦ KENNEDY

By: /s/ Andrea M. Champion
 JOHN R. BAILEY
 JOSHUA M. DICKEY
 ANDREA M. CHAMPION

Attorneys for Defendants
 LAS VEGAS DEVELOPMENT FUND
 LLC; EB5 IMPACT CAPITAL
 REGIONAL CENTER LLC; EB5 IMPACT
 ADVISORS LLC; ROBERT W.
 DZIUBLA; JON FLEMING; and LINDA
 STANWOOD

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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 16th day of October, 2020, service of the foregoing **THE EB5 PARTIES’ TENTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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FRONT SIGHT MANAGEMENT,
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DYNASTY TRUST I; VNV
DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK
BUILDERS INC.; ALL
AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND
EFRAIN RENE MORALES-
MORENO

/s/ Angelique Mattox
Employee of BAILEY ❖ KENNEDY

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Reception

From: efilimgmail@tylerhost.net
Sent: Friday, October 16, 2020 4:24 PM
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Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC,
 Plaintiff(s)vs.Las Vegas Development Fund LLC,
 Defendant(s)
 Envelope Number: 6792280



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Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	10/16/2020 4:23 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Tenth Supplement to Initial Disclosures
Filed By	Angelique Mattox
Service Contacts	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Joshua Dickey (jdickey@baileykennedy.com) John Bailey (jbailey@baileykennedy.com) Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com) Kathryn Holbert (kholbert@farmercase.com)

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EXHIBIT 11

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9 LAS VEGAS DEVELOPMENT FUND LLC;
 EB5 IMPACT CAPITAL REGIONAL CENTER
 10 LLC; EB5 IMPACT ADVISORS LLC; ROBERT
 W. DZIUBLA; JON FLEMING; and
 11 LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

14 FRONT SIGHT MANAGEMENT LLC, a
 Nevada Limited Liability Company,

Plaintiff,

vs.

18 LAS VEGAS DEVELOPMENT FUND LLC, a
 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
 Dept. No. XVI

**THE EB5 PARTIES' ELEVENTH
 SUPPLEMENT TO INITIAL
 DISCLOSURES**

20 _____
 21
 22 AND ALL RELATED COUNTERCLAIMS.
 23 _____

24 Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following
 25 Eleventh Supplement to Initial Disclosures. The information added to this disclosure is **bolded**
 26 below.

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A. The name and, if known, the address and telephone number of each individual likely to have information discoverable under Rule 26(b), including for impeachment or rebuttal, identifying the subjects of the information.

EB5 Parties identify the following individuals as likely to have discoverable information relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure provided herein is based on information reasonably available at this time.

By disclosing the following individuals, EB5 Parties do not waive any objections that they have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Robert Dziubla c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

BAILEY ❖ KENNEDY
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 LAS VEGAS, NEVADA 89148-1302
 702.562.8820

1 Linda Stanwood c/o Bailey ❖ Kennedy, LLP 2 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
3 Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 4 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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 6 **B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.**

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 8
 9 **Documents bearing Bates Numbers USCP00001-USCP03918 are being produced**
 10 **through Sharefile.**

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
A-00334-00336	AM response to stay of NOD	9/4/2018
A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
A-00339	Brochure Side 1 final	10/5/2015
A-00340	Brochure Side 2 (final)	10/5/2015
A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
A-00417-00424	Deed of Trust - First Amendment	7/1/2017
A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
A-00462-00465	Email to Meacher re deal restructure	5/12/2016

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1	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
2	A-00474-00482	Executive Summary Front Sight	3/12/2012
3	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
4	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
5	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
6	A-00486	Marketing Report - Front Sight	5/7/2016
7	A-00487	Marketing Report - Front Sight	4/9/2016
8	A-00488	Marketing Report - Front Sight	4/16/2016
9	A-00489-00490	Marketing Report - Front Sight	4/23/2016
10	A-00491-00492	Marketing Report - Front Sight	4/30/2016
11	A-00493	Marketing Report	2/25/2016
12	A-00494	Marketing Report	3/29/2016
13	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
14	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
15	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
16	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
17	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
18	A-00514-00519	Mike Meacher response	3/11/2016
19	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
20	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
21	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
22	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
23	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
24	A-00534-00540	Notice of Default	7/30/2018
25	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
26	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
27	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
28	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
	A-00665-00694	PPT Front Sight - Chinese	7/1/2015

1	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
2	First Supplemental Disclosure		
3	A-000702-000856	Accounting and Fees	Various
4	A-000857	Independent contractor Agreement	5/31/2015
5	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
6	A-000870-000878	Pre-Marketing Agreement	10/16/2015
7	A-000879-000894	Emails	5/2/2018
8	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
9	A-000900-000903	Emails	5/8/2015
10	A-000904-000922	Accounting	Various
11	A-000923-000927	Amendment to Loan Agreement	11/14/2017
12	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
13	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
14	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
15	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
16	A-001214-001243	Current Major Contracts	8/30/2018
17	A-001244-001246	Response to Temporary Stay	9/4/2018
18	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
19	A-001249-001251	Pictures- Exemplar Approval	N/A
20	A-001252-001270	Loan Agreement	10/31/2017
21	A-001271-001372	Construction Loan Agreement	10/6/2016
22	A-001373-001376	Emails	Various
23	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
24	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
25	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
26	A-001407-001417	Emails	Various
27	A-001418-001425	Memo-Marketing Update	11/3/2015
28	A-001426-001431	Emails	Various
	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
	A-001447-001459	Pictures	8/23/2018
	A-001460-001461	Pro Forma Statements of Income	N/A

1	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
2	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
3	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
4	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
5	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
6	A -001764-001765	Receipt of Copy	10/30/18
7	A-001766-001917	Front Sight Documents	Various
8	A-001918-006138	John Fleming Emails	Various
9	A-006139-008763	Robert Dziubla Emails	Various
10	Third Supplemental Disclosure¹		
11	A-008764-008976	EB5IA Cost and Expense Backup	Various
12	A-008977-009925	Dziubla Front Sight File	Various
13	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
14	Fourth Supplemental Disclosure		
15	A-010008-010013	FS Fed Tax Return relevant pages	2016
16	A-010014-010018	FS YE Financial Statements	2017
17	A-010019-010024	FS Tax Return Relevant Pages	2017
18	A-010025-010047	FS Federal Tax Return	2017
19	A-010048	Concourse Photo	N/A
20	A-010049-010096	Construction Timeline	N/A
21	A-010097-010192	Economic Impact Analysis	11/23/13
22	A-010193	Front Entry Looking West Composite	N/A
23	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
24	A-010200-010216	Holecek Loan Agreement	02/07/06
25	A-010217	Hotel for Life Screenshot	N/A
26	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
27	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
28	A-010223-010227	NOD - Formal Notice	09/10/18
	A-010228-010232	Patriot Pavilion renderings	N/A
	A-010233	Patriot Pavilion description in USCIS plan	N/A
	A-010234	Patriot Pavilion Pad	10/11/18
	A-010235-010247	Pictures and renderings	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
2	A-010330-010417	PPM Front Sight 88	07/01/16
3	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
4	A-010455-010616	Project Business Plan	03/17/14
5	A-010617-010619	Renderings - FS	N/A
6	A-010620	Resort Pad	10/11/18
7	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
8	A-010737-010756	Valuation - business enterprise	12/31/14
9	A-010756-010910	Empyrean West Emails	Various
10	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
11	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
12	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
13	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
14	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
15	A-020635 -020816	Flynn Emails	Various
16	Fifth Supplemental Disclosure		
17	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
18	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
19	A-021507-021512	Robert Dziubla Resume	N/A
20	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
21	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
22	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
23	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
24	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
25	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
26	A-021533-021628	Immigration Consultant Agreements	Various
27	Sixth Supplemental Disclosure		
28	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
2	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
3	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
4	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
5	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
6	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
7	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
8	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
9	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
10	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
11	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
12	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
13	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
14	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
15	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
16	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
17	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
18	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
19	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
20	A-021810-021834	Verified Complaint	11/13/2018
21	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
22	Seventh Supplemental Disclosure		
23	A-021845-021852	Default Notices	Various
24	A-021853-021869	Inspection Photos	N/A
25	A-021870-021883	Loan Documents and Demand Letters	Various
26	A-021884-021909	Site Renderings	N/A
27	A-021910-021942	NES Financial Loan Statements & Invoices	Various
28	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
29	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
30	A-021975-021984	Marketing Reports	Various
31	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
32	A-022025-022049	Travel Documentation and Receipts	Various
33	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
34	A-022199-022244	Front Sight Marketing Materials	N/A
35	A-022245-022261	Holocek Loan Agreement	2/7/2006
36	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
37	A-022268	HREC Invoice	9/29/2014
38	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
39	A-022275-022277	Front Sight Marketing Materials	N/A

1	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
2	A-022284-022287	Front Sight Letter to Members	8/1/2014
3	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
4	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
5	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
6	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
7	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
8	A-022296	HREC Invoice for Professional Services	9/29/2014
9	A-022297-022298	Front Sight Competitor Comparison	N/A
10	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
11	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
12	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
13	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
14	A-022313-022325	Front Sight Pro Forma	N/A
15	A-022326	Front Sight Resorts Land Use Plan	N/A
16	A-022327-022386	EB5 Impact Capital Regional Center, LLC Business Plan	March 2017
17	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
18	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
19	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
20	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
21	A-022405-022482	Sinowel Communications and Marketing Materials	Various
22	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
23	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
24	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
25	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015

1	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
2	A-027350-027351	Administrative Fee	N/A
3	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
4	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
5	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
6	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
7	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
8	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
9	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
10	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
11	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
12	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
13	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
14	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
15	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
16	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
17	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
18	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
19	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
20	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
21	A-028771-028839	Email Correspondence with Preston Arza	Various
22			
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1	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
2	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
3	A-029211-029255	Front Sight Email Blasts	Various
4	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
5	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
6	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
7	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
8	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
9	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
10	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
11	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
12	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
13	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
14	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
15	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
16	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
17	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
18	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017

1	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
2			
3	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
4			
5	A-029582	Project Update to EB5 Investors	10/14/2016
6	A-029583-029584	Project Update for Agents	8/27/2019
7	A-029585	Project Update Q1 2017	4/21/2017
8	A-029586-029587	Project Update Q1 2018	7/26/2018
9	A-029588-029589	Project Update Q3 2017	10/21/2017
10	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
11	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
12	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
13	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
14	A-029648-029657	Immigration Consultant Fee Agreement	N/A
15	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
16	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
17			
18			
19	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
20	A-029730-029740	Home Depo Account Statements	Various
21	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
22			
23			
24	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
25	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
26			
27	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
28			

1	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
2	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
3			
4	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
5			
6	A-029761-029763	UCC Financing Statement	10/13/2016
7	A-029764-029767	NES Loan Statements & Invoices	Various
8	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
9	A-029770	NES Loan Advance Form	10/7/2016
10	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
11	A-029773	NES Financial Master Account Statement	8/31/2016
12	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
13	A-029775-029798	Front Sight Email Blasts	Various
14	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
15	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
16			
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
24			
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
2			
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19			
20	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
21	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
22	Eighth Supplemental Disclosure		
23	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
24	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
25			
26	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
27			
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1	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
2			
3	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
4			
5	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
6	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
7			
8	Ninth Supplemental Disclosure		
9	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
10	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
11	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
12			
13	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
14			
15	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
16			
17	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
18	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
19			
20	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
21			
22	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
23	A-030375	Front Sight Marketing Report	3/29/2016
24	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
25			
26	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
27			
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1	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
2			
3	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
4			
5	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
6			
7	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
8			
9	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
10			
11	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
12			
13	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
14			
15	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
16			
17	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
18			
19	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
20			
21	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
22			
23	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
24			
25	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
26			
27	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
28			
	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014

1	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
2			
3	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015
4			
5	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
6			
7	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
8			
9	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
10			
11	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
12			
13	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
14			
15	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
16			
17	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
18			
19	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
20			
21	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
22			
23	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
24			
25	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
26			
27	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
28			
	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015

1	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
2			
3			
4	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
5			
6	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015
7			
8			
9	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
10			
11			
12	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
13			
14	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
15			
16	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
17			
18	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
19			
20	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
21	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
22			
23	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
24	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
25			
26	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
27			
28	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016

1	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
2			
3	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
4			
5	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
6	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
7	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
8			
9			
10	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
11	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
12	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
13			
14	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
15			
16	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
17	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
18			
19	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
20			
21	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
22	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
23			
24	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
25	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
26			
27	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
28			

1	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
2			
3	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
4			
5	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
6			
7	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
8			
9	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
10			
11	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
12			
13	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
14			
15	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
16			
17	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi’s Visit	7/4/2017
18			
19	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
20			
21	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
22			
23	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
24			
25	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
26			
27	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
28			
	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017

1	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
2			
3	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
4	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
5			
6	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment - [Redacted] Skype Call	1/28/2018
7			
8	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
9			
10	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
11			
12	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
13			
14	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
15			
16	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
17	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
18			
19	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
20			
21	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
22			
23	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
24			
25	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
26			
27	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
28			
	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015

1	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
2			
3			
4	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
5			
6	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
7			
8	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
9			
10	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
11			
12	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
13			
14	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
15			
16	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
17			
18	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
19			
20	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
21			
22	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
23			
24	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
25			
26	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
27			
28	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015

1	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
2			
3	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
4			
5	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
6			
7	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
8			
9	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
10			
11	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
12			
13	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015
14			
15	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
16			
17	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
18			
19	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
20			
21	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
22			
23	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
24			
25	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
26			
27	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
28			

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A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
	Tenth Supplemental Disclosure	
CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020
	Eleventh Supplemental Disclosure	
USCP00001-USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc.³	12/1/2020

DATED this 4th day of December, 2020.

BAILEY ♦ KENNEDY

By: /s/ Andrea M. Champion
 JOHN R. BAILEY
 JOSHUA M. DICKEY
 ANDREA M. CHAMPION

Attorneys for Defendants
 LAS VEGAS DEVELOPMENT FUND
 LLC; EB5 IMPACT CAPITAL
 REGIONAL CENTER LLC; EB5 IMPACT
 ADVISORS LLC; ROBERT W.
 DZIUBLA; JON FLEMING; and LINDA
 STANWOOD

³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver’s license numbers).

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 4th day of December, 2020, service of the foregoing **THE EB5 PARTIES’ ELEVENTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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JENNIFER PIAZZA; VNV
DYNASTY TRUST I; VNV
DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK
BUILDERS INC.; ALL
AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND
EFRAIN RENE MORALES-
MORENO

/s/ Angelique Mattox
Employee of BAILEY ❖ KENNEDY

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Reception

From: efilimgmail@tylerhost.net
Sent: Friday, December 4, 2020 1:57 PM
To: BKfederaldownloads
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 7035996

Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 7035996



This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	12/4/2020 1:56 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Eleventh Supplement to Initial Disclosures
Filed By	Angelique Mattox
Service Contacts	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Joshua Dickey (jdickey@baileykennedy.com) John Bailey (jbailey@baileykennedy.com) Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com) Andrea Champion (achampion@baileykennedy.com)

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EXHIBIT 12

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 2 JOSHUA M. DICKEY
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9 LAS VEGAS DEVELOPMENT FUND LLC;
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 10 LLC; EB5 IMPACT ADVISORS LLC; ROBERT
 W. DZIUBLA; JON FLEMING; and
 11 LINDA STANWOOD

DISTRICT COURT

CLARK COUNTY, NEVADA

14 FRONT SIGHT MANAGEMENT LLC, a
 Nevada Limited Liability Company,

Plaintiff,

vs.

18 LAS VEGAS DEVELOPMENT FUND LLC, a
 Nevada Limited Liability Company; et al,

Defendants.

Case No. A-18-781084-B
 Dept. No. XVI

**THE EB5 PARTIES' TWELFTH
 SUPPLEMENT TO INITIAL
 DISCLOSURES**

21 _____
 22 AND ALL RELATED COUNTERCLAIMS.
 23 _____

24 Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following
 25 Twelfth Supplement to Initial Disclosures. The information added to this disclosure is **bolded** below.

26 ///

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28

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A. The name and, if known, the address and telephone number of each individual likely to have information discoverable under Rule 26(b), including for impeachment or rebuttal, identifying the subjects of the information.

EB5 Parties identify the following individuals as likely to have discoverable information relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure provided herein is based on information reasonably available at this time.

By disclosing the following individuals, EB5 Parties do not waive any objections that they have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Robert Dziubla c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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1 Linda Stanwood c/o Bailey ❖ Kennedy, LLP 2 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
3 Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 4 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

5
 6 **B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.**

7
 8
 9 **Documents bearing Bates Numbers A-030785-A-030977 are being produced through**
 10 **Sharefile.**

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
A-00334-00336	AM response to stay of NOD	9/4/2018
A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
A-00339	Brochure Side 1 final	10/5/2015
A-00340	Brochure Side 2 (final)	10/5/2015
A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
A-00417-00424	Deed of Trust - First Amendment	7/1/2017
A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
A-00462-00465	Email to Meacher re deal restructure	5/12/2016

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1	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
2	A-00474-00482	Executive Summary Front Sight	3/12/2012
3	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
4	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
5	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
6	A-00486	Marketing Report - Front Sight	5/7/2016
7	A-00487	Marketing Report - Front Sight	4/9/2016
8	A-00488	Marketing Report - Front Sight	4/16/2016
9	A-00489-00490	Marketing Report - Front Sight	4/23/2016
10	A-00491-00492	Marketing Report - Front Sight	4/30/2016
11	A-00493	Marketing Report	2/25/2016
12	A-00494	Marketing Report	3/29/2016
13	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
14	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
15	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
16	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
17	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
18	A-00514-00519	Mike Meacher response	3/11/2016
19	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
20	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
21	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
22	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
23	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
24	A-00534-00540	Notice of Default	7/30/2018
25	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
26	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
27	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
28	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
	A-00665-00694	PPT Front Sight - Chinese	7/1/2015

1	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
2	First Supplemental Disclosure		
3	A-000702-000856	Accounting and Fees	Various
4	A-000857	Independent contractor Agreement	5/31/2015
5	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
6	A-000870-000878	Pre-Marketing Agreement	10/16/2015
7	A-000879-000894	Emails	5/2/2018
8	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
9	A-000900-000903	Emails	5/8/2015
10	A-000904-000922	Accounting	Various
11	A-000923-000927	Amendment to Loan Agreement	11/14/2017
12	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
13	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
14	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
15	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
16	A-001214-001243	Current Major Contracts	8/30/2018
17	A-001244-001246	Response to Temporary Stay	9/4/2018
18	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
19	A-001249-001251	Pictures- Exemplar Approval	N/A
20	A-001252-001270	Loan Agreement	10/31/2017
21	A-001271-001372	Construction Loan Agreement	10/6/2016
22	A-001373-001376	Emails	Various
23	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
24	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
25	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
26	A-001407-001417	Emails	Various
27	A-001418-001425	Memo-Marketing Update	11/3/2015
28	A-001426-001431	Emails	Various
	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
	A-001447-001459	Pictures	8/23/2018
	A-001460-001461	Pro Forma Statements of Income	N/A

1	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
2	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
3	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
4	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
5	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
6	A -001764-001765	Receipt of Copy	10/30/18
7	A-001766-001917	Front Sight Documents	Various
8	A-001918-006138	John Fleming Emails	Various
9	A-006139-008763	Robert Dziubla Emails	Various
10	Third Supplemental Disclosure¹		
11	A-008764-008976	EB5IA Cost and Expense Backup	Various
12	A-008977-009925	Dziubla Front Sight File	Various
13	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
14	Fourth Supplemental Disclosure		
15	A-010008-010013	FS Fed Tax Return relevant pages	2016
16	A-010014-010018	FS YE Financial Statements	2017
17	A-010019-010024	FS Tax Return Relevant Pages	2017
18	A-010025-010047	FS Federal Tax Return	2017
19	A-010048	Concourse Photo	N/A
20	A-010049-010096	Construction Timeline	N/A
21	A-010097-010192	Economic Impact Analysis	11/23/13
22	A-010193	Front Entry Looking West Composite	N/A
23	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
24	A-010200-010216	Holecek Loan Agreement	02/07/06
25	A-010217	Hotel for Life Screenshot	N/A
26	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
27	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
28	A-010223-010227	NOD - Formal Notice	09/10/18
	A-010228-010232	Patriot Pavilion renderings	N/A
	A-010233	Patriot Pavilion description in USCIS plan	N/A
	A-010234	Patriot Pavilion Pad	10/11/18
	A-010235-010247	Pictures and renderings	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
2	A-010330-010417	PPM Front Sight 88	07/01/16
3	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
4	A-010455-010616	Project Business Plan	03/17/14
5	A-010617-010619	Renderings - FS	N/A
6	A-010620	Resort Pad	10/11/18
7	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
8	A-010737-010756	Valuation - business enterprise	12/31/14
9	A-010756-010910	Empyrean West Emails	Various
10	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
11	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
12	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
13	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
14	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
15	A-020635 -020816	Flynn Emails	Various
16	Fifth Supplemental Disclosure		
17	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
18	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
19	A-021507-021512	Robert Dziubla Resume	N/A
20	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
21	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
22	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
23	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
24	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
25	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
26	A-021533-021628	Immigration Consultant Agreements	Various
27	Sixth Supplemental Disclosure		
28	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
2	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
3	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
4	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
5	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
6	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
7	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
8	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
9	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
10	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
11	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
12	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
13	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
14	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
15	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
16	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
17	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
18	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
19	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
20	A-021810-021834	Verified Complaint	11/13/2018
21	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
22	Seventh Supplemental Disclosure		
23	A-021845-021852	Default Notices	Various
24	A-021853-021869	Inspection Photos	N/A
25	A-021870-021883	Loan Documents and Demand Letters	Various
26	A-021884-021909	Site Renderings	N/A
27	A-021910-021942	NES Financial Loan Statements & Invoices	Various
28	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
29	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
30	A-021975-021984	Marketing Reports	Various
31	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
32	A-022025-022049	Travel Documentation and Receipts	Various
33	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
34	A-022199-022244	Front Sight Marketing Materials	N/A
35	A-022245-022261	Holocek Loan Agreement	2/7/2006
36	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
37	A-022268	HREC Invoice	9/29/2014
38	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
39	A-022275-022277	Front Sight Marketing Materials	N/A

1	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
2	A-022284-022287	Front Sight Letter to Members	8/1/2014
3	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
4	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
5	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
6	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
7	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
8	A-022296	HREC Invoice for Professional Services	9/29/2014
9	A-022297-022298	Front Sight Competitor Comparison	N/A
10	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
11	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
12	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
13	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
14	A-022313-022325	Front Sight Pro Forma	N/A
15	A-022326	Front Sight Resorts Land Use Plan	N/A
16	A-022327-022386	EB5 Impact Capital Regional Center, LLC Business Plan	March 2017
17	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
18	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
19	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
20	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
21	A-022405-022482	Sinowel Communications and Marketing Materials	Various
22	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
23	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
24	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
25	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015

1	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
2	A-027350-027351	Administrative Fee	N/A
3	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
4	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
5	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
6	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
7	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
8	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
9	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
10	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
11	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
12	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
13	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
14	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
15	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
16	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
17	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
18	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
19	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
20	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
21	A-028771-028839	Email Correspondence with Preston Arza	Various
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1	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
2	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
3	A-029211-029255	Front Sight Email Blasts	Various
4	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
5	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
6	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
7	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
8	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
9	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
10	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
11	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
12	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
13	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
14	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
15	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
16	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
17	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
18	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017

1	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
2			
3	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
4			
5	A-029582	Project Update to EB5 Investors	10/14/2016
6	A-029583-029584	Project Update for Agents	8/27/2019
7	A-029585	Project Update Q1 2017	4/21/2017
8	A-029586-029587	Project Update Q1 2018	7/26/2018
9	A-029588-029589	Project Update Q3 2017	10/21/2017
10	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
11	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
12	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
13	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
14	A-029648-029657	Immigration Consultant Fee Agreement	N/A
15	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
16	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
17			
18			
19	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
20	A-029730-029740	Home Depo Account Statements	Various
21	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
22			
23			
24	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
25	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
26			
27	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
28			

1	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
2	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
3			
4	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
5			
6	A-029761-029763	UCC Financing Statement	10/13/2016
7	A-029764-029767	NES Loan Statements & Invoices	Various
8	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
9	A-029770	NES Loan Advance Form	10/7/2016
10	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
11	A-029773	NES Financial Master Account Statement	8/31/2016
12	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
13	A-029775-029798	Front Sight Email Blasts	Various
14	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
15	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
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18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19			
20	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
21	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
22	Eighth Supplemental Disclosure		
23	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
24	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
25			
26	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
27			
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1	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
2			
3	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
4			
5	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
6	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
7			
8	Ninth Supplemental Disclosure		
9	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
10	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
11	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
12			
13	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
14			
15	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
16			
17	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
18	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
19			
20	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
21			
22	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
23	A-030375	Front Sight Marketing Report	3/29/2016
24	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
25			
26	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
27			
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1	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
2			
3	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
4			
5	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
6			
7	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
8			
9	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
10			
11	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
12			
13	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
14			
15	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
16			
17	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
18			
19	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
20			
21	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
22			
23	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
24			
25	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
26			
27	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
28			
	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014

1	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
2			
3	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015
4			
5	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
6			
7	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
8			
9	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
10			
11	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
12			
13	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
14			
15	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
16			
17	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
18			
19	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
20			
21	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
22			
23	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
24			
25	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
26			
27	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
28			
	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015

1	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
2			
3			
4	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
5			
6	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015
7			
8			
9	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
10			
11			
12	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
13			
14	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
15			
16	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
17			
18	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
19			
20	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
21	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
22			
23	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
24	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
25			
26	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
27			
28	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016

1	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
2			
3	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
4			
5	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
6	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
7	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
8			
9			
10	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
11	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
12	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
13	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
14			
15	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
16	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
17			
18	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
19			
20	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
21	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
22			
23	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
24			
25	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
26			
27	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
28			

1	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
2			
3	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
4			
5	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
6			
7	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
8			
9	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
10			
11	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
12			
13	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
14			
15	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
16			
17	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi’s Visit	7/4/2017
18			
19	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
20			
21	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
22			
23	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
24			
25	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
26			
27	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
28			
	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017

1	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
2			
3	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
4	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
5			
6	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment - [Redacted] Skype Call	1/28/2018
7			
8	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
9			
10	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
11			
12	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
13			
14	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
15			
16	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
17	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
18			
19	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
20			
21	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
22			
23	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
24			
25	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
26			
27	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
28			
	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015

1	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
2			
3			
4	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
5			
6	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
7			
8	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
9			
10	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
11			
12	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
13			
14	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
15			
16	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
17			
18	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
19			
20	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
21			
22	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
23			
24	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
25			
26	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
27			
28	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015

1	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
2			
3	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
4			
5	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
6			
7	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
8			
9	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
10			
11	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
12			
13	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015
14			
15	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
16			
17	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
18			
19	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
20			
21	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
22			
23	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
24			
25	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
26			
27	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
28			

1	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
2			
3	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
4			
5	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
6	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
7			
8	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
9			
10		Tenth Supplemental Disclosure	
11	CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
12	SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020
13		Eleventh Supplemental Disclosure	
14	USCP00001-USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
15		Twelfth Supplemental Disclosure	
16	A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
17	A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
18	A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
19	A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
20	A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
21	A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
22	A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
23	A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
24	A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
25	A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
26	A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
27	A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
28	A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
	A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021

³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver's license numbers).

A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC’s Opposition to the EB-5 Parties’ Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

DATED this 8th day of January, 2021.

BAILEY ❖ KENNEDY

By: /s/ Andrea M. Champion

JOHN R. BAILEY
 JOSHUA M. DICKEY
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 8th day of January, 2021, service of the foregoing **THE EB5 PARTIES’ TWELFTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK
BUILDERS INC.; ALL
AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND
EFRAIN RENE MORALES-
MORENO

/s/ Angelique Mattox
Employee of BAILEY ❖ KENNEDY

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Reception

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Sent: Friday, January 8, 2021 4:54 PM
To: BKfederaldownloads
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 7202647

Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
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Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	1/8/2021 4:53 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Twelfth Supplement to Initial Disclosures
Filed By	Angelique Mattox
Service Contacts	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Joshua Dickey (jdickey@baileykennedy.com) John Bailey (jbailey@baileykennedy.com) Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com) Andrea Champion (achampion@baileykennedy.com)

	Kenneth Hogan (ken@h2legal.com) Jeffrey Hulet (jeff@h2legal.com)
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EXHIBIT 13

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17 STANWOOD

18 DISTRICT COURT

19 CLARK COUNTY, NEVADA

20 FRONT SIGHT MANAGEMENT LLC, a
Nevada Limited Liability Company,
21
Plaintiff,
22
vs.
23
24 LAS VEGAS DEVELOPMENT FUND LLC, a
Nevada Limited Liability Company; et al.,
25
Defendants.

Case No. A-18-781084-B
Dept. No. XVI

**THE EB5 PARTIES' THIRTEENTH
SUPPLEMENT TO INITIAL
DISCLOSURES**

26
27 AND ALL RELATED COUNTERCLAIMS.
28

Pursuant to Nevada Rule of Civil Procedure 16.1(a)(1), the EB5 Parties makes the following Thirteenth Supplement to Initial Disclosures. The information added to this disclosure is **bolded** below.

A. The name and, if known, the address and telephone number of each individual likely to have information discoverable under Rule 26(b), including for impeachment or rebuttal, identifying the subjects of the information.

EB5 Parties identify the following individuals as likely to have discoverable information relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure provided herein is based on information reasonably available at this time.

By disclosing the following individuals, EB5 Parties do not waive any objections that they have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Robert Dziubla c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative

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1		Complaint and Cross Complaints.
2	Sean Flynn c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
3		
4	Linda Stanwood c/o Bailey ❖ Kennedy, LLP 8984 Spanish Ridge Avenue Las Vegas, NV 89148	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
5		
6	Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89177	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
7		

A. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Documents bates numbered A-008950-008971; A-008995-009008; A-009021-009022; A-009074-009083; A-009157; A-009168-009170; A-009203-009211; A-009479-009496; A-009513-009535; A-009751-009756; A-009759-009760; A-009764; A-009766-009767; A-009769-009770; A-009772-009790; A-009792; A-009796-009806; A-009809-009822; A-009825-009828; A-009832-009838; A-009840; A-009841; A-009842; A-009843; A-009844; A-009845; A-009847; A-009848; A-009849; A-009851; A-009853-009862; A-009865; A-009868-009879; A-009880-009889; A-009891-009892; A-009897-009898; A-009900-009919; and A-009921-009925 are previously privileged documents being released, with or without redaction(s). Documents bates numbered A-021533-021628 are being reproduced with redactions consistent with the Court’s June 30, 2020 Findings of Fact, Conclusions of Law and Order. These documents are being produced via secure ShareFile.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018

1	A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
2			
3	A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
4	A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
5	A-00334-00336	AM response to stay of NOD	9/4/2018
6	A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
7	A-00339	Brochure Side 1 final	10/5/2015
8	A-00340	Brochure Side 2 (final)	10/5/2015
9	A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
10	A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
11	A-00417-00424	Deed of Trust - First Amendment	7/1/2017
12	A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
13	A-00462-00465	Email to Meacher re deal restructure	5/12/2016
14	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
15	A-00474-00482	Executive Summary Front Sight	3/12/2012
16	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
17	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
18	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
19	A-00486	Marketing Report - Front Sight	5/7/2016
20	A-00487	Marketing Report - Front Sight	4/9/2016
21	A-00488	Marketing Report - Front Sight	4/16/2016
22	A-00489-00490	Marketing Report - Front Sight	4/23/2016
23	A-00491-00492	Marketing Report - Front Sight	4/30/2016
24	A-00493	Marketing Report	2/25/2016
25	A-00494	Marketing Report	3/29/2016
26	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
27	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
28	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
	A-00514-00519	Mike Meacher response	3/11/2016
	A-00520	Notes of calls with Piazza and Meacher	4/27/2018

1	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
2	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
3	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
4	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
5	A-00534-00540	Notice of Default	7/30/2018
6	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
7	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
8	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
9	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
10	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
11	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
12	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
13	First Supplemental Disclosure		
14	A-000702-000856	Accounting and Fees	Various
15	A-000857	Independent contractor Agreement	5/31/2015
16	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
17	A-000870-000878	Pre-Marketing Agreement	10/16/2015
18	A-000879-000894	Emails	5/2/2018
19	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
20	A-000900-000903	Emails	5/8/2015
21	A-000904-000922	Accounting	Various
22	A-000923-000927	Amendment to Loan Agreement	11/14/2017
23	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
24	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
25	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
26	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
27	A-001214-001243	Current Major Contracts	8/30/2018
28	A-001244-001246	Response to Temporary Stay	9/4/2018
	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018

1	A-001249-001251	Pictures- Exemplar Approval	N/A
2	A-001252-001270	Loan Agreement	10/31/2017
3	A-001271-001372	Construction Loan Agreement	10/6/2016
4	A-001373-001376	Emails	Various
5	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
6	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
7	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
8	A-001407-001417	Emails	Various
9	A-001418-001425	Memo-Marketing Update	11/3/2015
10	A-001426-001431	Emails	Various
11	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
12	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
13	A-001447-001459	Pictures	8/23/2018
14	A-001460-001461	Pro Forma Statements of Income	N/A
15	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
16	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
17	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
18	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
19	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
20	A -001764-001765	Receipt of Copy	10/30/18
21	A-001766-001917	Front Sight Documents	Various
22	A-001918-006138	John Fleming Emails	Various
23	A-006139-008763	Robert Dziubla Emails	Various
24	Third Supplemental Disclosure¹		
25	A-008764-008976	EB5IA Cost and Expense Backup	Various
26	A-008977-009925	Dziubla Front Sight File	Various
27	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
28	Fourth Supplemental Disclosure		
	A-010008-010013	FS Fed Tax Return relevant pages	2016
	A-010014-010018	FS YE Financial Statements	2017
	A-010019-010024	FS Tax Return Relevant Pages	2017

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

1	A-010025-010047	FS Federal Tax Return	2017
2	A-010048	Concourse Photo	N/A
3	A-010049-010096	Construction Timeline	N/A
4	A-010097-010192	Economic Impact Analysis	11/23/13
5	A-010193	Front Entry Looking West Composite	N/A
6	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
7	A-010200-010216	Holecek Loan Agreement	02/07/06
8	A-010217	Hotel for Life Screenshot	N/A
9	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
10	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
11	A-010223-010227	NOD - Formal Notice	09/10/18
12	A-010228-010232	Patriot Pavilion renderings	N/A
13	A-010233	Patriot Pavilion description in USCIS plan	N/A
14	A-010234	Patriot Pavilion Pad	10/11/18
15	A-010235-010247	Pictures and renderings	N/A
16	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
17	A-010330-010417	PPM Front Sight 88	07/01/16
18	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
19	A-010455-010616	Project Business Plan	03/17/14
20	A-010617-010619	Renderings - FS	N/A
21	A-010620	Resort Pad	10/11/18
22	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
23	A-010737-010756	Valuation - business enterprise	12/31/14
24	A-010756-010910	Empyrean West Emails	Various
25	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
26	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
27	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
28	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
	A-020635 -020816	Flynn Emails	Various
	Fifth Supplemental Disclosure		
	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

1	A-021507-021512	Robert Dziubla Resume	N/A
2	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
3	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
4	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
5	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
6	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
7	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
8	A-021533-021628	Immigration Consultant Agreements	Various
9	Sixth Supplemental Disclosure		
10	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
11	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
12	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
13	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
14	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
15	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
16	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
17	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
18	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
19	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
20	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
21	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
22	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
23	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
24	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
25	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
26	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
27	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
28	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
	A-021810-021834	Verified Complaint	11/13/2018
	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
	Seventh Supplemental Disclosure		
	A-021845-021852	Default Notices	Various
	A-021853-021869	Inspection Photos	N/A
	A-021870-021883	Loan Documents and Demand Letters	Various
	A-021884-021909	Site Renderings	N/A
	A-021910-021942	NES Financial Loan Statements & Invoices	Various

1	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
2	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
3	A-021975-021984	Marketing Reports	Various
4	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
5	A-022025-022049	Travel Documentation and Receipts	Various
6	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
7	A-022199-022244	Front Sight Marketing Materials	N/A
8	A-022245-022261	Holocek Loan Agreement	2/7/2006
9	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
10	A-022268	HREC Invoice	9/29/2014
11	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
12	A-022275-022277	Front Sight Marketing Materials	N/A
13	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
14	A-022284-022287	Front Sight Letter to Members	8/1/2014
15	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
16	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
17	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
18	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
19	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
20	A-022296	HREC Invoice for Professional Services	9/29/2014
21	A-022297-022298	Front Sight Competitor Comparison	N/A
22	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
23	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
24	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
25	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
26	A-022313-022325	Front Sight Pro Forma	N/A
27	A-022326	Front Sight Resorts Land Use Plan	N/A
28	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017

1	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
2			
3	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
4	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
5	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
6			
7	A-022405-022482	Sinowel Communications and Marketing Materials	Various
8	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
9	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
10	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
11	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
12	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
13	A-027350-027351	Administrative Fee	N/A
14	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
15	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
16	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
17	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
18			
19	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
20	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
21	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
22			
23	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
24	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
25			
26	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
27			
28	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A

1	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
2	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
3	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
4	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
5	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
6	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
7	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
8	A-028771-028839	Email Correspondence with Preston Arza	Various
9	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
10	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
11	A-029211-029255	Front Sight Email Blasts	Various
12	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
13	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
14	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
15	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
16	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
17	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
18	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
19	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
20	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
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1	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
2			
3	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
4			
5	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
6			
7	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
8			
9	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
10			
11	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
12			
13	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
14			
15	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
16			
17	A-029582	Project Update to EB5 Investors	10/14/2016
18	A-029583-029584	Project Update for Agents	8/27/2019
19	A-029585	Project Update Q1 2017	4/21/2017
20	A-029586-029587	Project Update Q1 2018	7/26/2018
21	A-029588-029589	Project Update Q3 2017	10/21/2017
22	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
23			
24	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
25			
26	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
27			
28	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
	A-029648-029657	Immigration Consultant Fee Agreement	N/A
	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017

1	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
2	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
3	A-029730-029740	Home Depo Account Statements	Various
4	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
5	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
6	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
7	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
8	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
9	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
10	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
11	A-029761-029763	UCC Financing Statement	10/13/2016
12	A-029764-029767	NES Loan Statements & Invoices	Various
13	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
14	A-029770	NES Loan Advance Form	10/7/2016
15	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
16	A-029773	NES Financial Master Account Statement	8/31/2016
17	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
18	A-029775-029798	Front Sight Email Blasts	Various
19	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
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1	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
2			
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6	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
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11	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
12			
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15	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
16			
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19	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
20			
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24	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
25			
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1	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
2			
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5	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
6			
7			
8	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
9	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
10	Eighth Supplemental Disclosure		
11	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
12			
13	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
14			
15	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
16			
17	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
18			
19	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
20			
21	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
22			
23	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
24	Ninth Supplemental Disclosure		
25	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
26			
27	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
28			
	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015

1	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
2			
3	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
4			
5	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
6	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
7			
8	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
9			
10	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
11	A-030375	Front Sight Marketing Report	3/29/2016
12	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
13			
14	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
15			
16	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
17			
18	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
19			
20	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
21	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
22			
23	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
24	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
25			
26	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
27			
28			

1	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared "Front Sight – Sinowel" with you	7/7/2014
2			
3	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
4			
5	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
6			
7	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
8			
9	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
10			
11	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
12			
13	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
14			
15	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
16			
17	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
18			
19	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
20			
21	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015
22			
23	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
24			
25	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
26			
27	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
28			
	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015

1	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
2			
3	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
4			
5	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
6			
7	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
8			
9	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
10			
11	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
12			
13	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
14			
15	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
16			
17	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
18			
19	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
20			
21	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
22			
23	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015
24			
25	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
26			
27	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
28			

1	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin's Economic Might is Withering Away	10/2/2015
2			
3	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
4			
5	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
6			
7	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
8			
9	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
10			
11	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
12			
13	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
14			
15	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
16			
17	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
18			
19	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
20			
21	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
22			
23	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
24			
25	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
26			
27	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
28			
	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016

1	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
2			
3	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
4	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
5			
6	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
7			
8	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
9	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
10			
11	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
12	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
13			
14	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
15	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
16			
17	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
18			
19	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
20			
21	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
22			
23	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
24	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
25			
26	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
27	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
28			

1	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi's Visit	7/4/2017
2			
3	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
4	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
5	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
6			
7	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
8			
9	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
10			
11	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
12			
13	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
14	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
15			
16	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
17	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
18			
19	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment - [Redacted] Skype Call	1/28/2018
20			
21	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
22			
23	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
24			
25	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
26			
27	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
28			

1	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
2	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
3	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
4	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
5	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
6	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
7	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
8	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
9	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
10	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
11	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
12	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
13	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
14	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
15	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
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1	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
2			
3	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
4			
5	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
6			
7	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
8			
9	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
10			
11	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
12	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
13	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
14			
15	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
16			
17	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
18			
19	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
20			
21	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
22			
23	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
24			
25	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
26			
27	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015
28			

1	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
2			
3	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
4			
5	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
6			
7	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
8			
9			
10	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
11			
12	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
13			
14	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
15			
16	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
17			
18	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
19			
20	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
21	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
22			
23	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
24			
	Tenth Supplemental Disclosure		
25	CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
26	SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020
27			
28			

Eleventh Supplemental Disclosure		
USCP00001-USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
Twelfth Supplemental Disclosure		
A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021
A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC’s Opposition to the EB-5 Parties’ Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver’s license numbers).

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Thirteenth Supplemental Disclosure⁴		
A-008950-008953	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	6/10/2015
A-008954	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/14/2015
A-008955-0008958	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	10/15/2015
A-008959-008961	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/2015
A-008962	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
A-008963-008966	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/15
A-008967	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
A-008968	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	11/18/2015
A-008969-008971	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	11/18/2015
A-008995-009008	Front Sight Project Investor Tracking List	12/22/2015
A-009021-009022	Front Sight Project Investor Tracking List	12/22/2015
A-009074-009083	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	6/14/2016
A-009157	Dziubla Notes Re: Front Sight – Telephone Call with Raj	7/2/2018
A-009168	Dziubla Notes Re: Front Sight – Telephone Call with Michael Roga	12/8/2015
A-009203-009204	Independent Contractor Agreement with Guyuan Yu	11/26/2016
A-009205-009206	Independent Contractor Agreement with Chi Gao	11/26/2016
A-009207-009208	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016

⁴ All documents produced in this Thirteenth Supplemental Disclosure were either previously withheld by the EB5 Parties or were previously produced with redaction(s). The EB5 Parties now produce, or re-produce, these documents, with or without redaction, as reflected in the updated and amended redaction log served herewith.

1	A-009209-009210	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
2			
3			
4	A-009211	Letter to [Redacted Potential EB-5 Investor] Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
5			
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7	A-009479-009480	Escondido Police Department Report	11/13/2018
8	A-009481-009482	Penal Code 653.2	N/A
9	A-009483	Email Correspondence to Robert Dziubla Re: A Situation that you should be aware of	12/10/2018
10	A-009484-009486	Email Correspondence between Robert Dziubla and Craig Carter Re: We need your help, please stochastic terrorism	12/27/2018; 12/12/2018
11	A-009487	Dziubla Notes Re: Piazza Emails	N/A
12	A-009488-009495	Email Correspondence to Robert Dziubla Re: Pyramid Gun Sight	11/22/2018
13	A-009496	Dziubla Notes Re: Front Sight Piazza’s Hit Piece	10/22/2018
14	A-009513-009521	Email Correspondence Re: Enemy Update #4	7/8/2019
15	A-009522-009535	Webpage: “Extremely Confidential – Front Sight Members Only. Dr. Piazza’s Personal Video Message to YOU from the top of Front Sight’s SWAT Tower”	7/12/2019
16			
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18	A-009751-009752	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/27/2018
19	A-009753--009754	Dziubla Notes Re: Front Sight Telephone Call With Ignatius Piazza, Michael Meacher and Mike Brand	6/14/2018
20			
21	A-009755-009756	Email Correspondence Re: Commitment Letter – Friday Conference Call	6/14/2018
22	A-009759	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/1/2018
23			
24	A-009760	Dziubla Notes Re: Front Sight – Telephone Call with Frank Jansen	8/14/2018
25	A-009764	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	8/26/2018
26	A-009766	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultant	8/28/2018
27	A-009767	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Bill Cockston, Bill Capeles, and Bob Lauder	10/11/2018
28			

1	A-009769	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2017; 1/31/17
2	A-009770	Dziubla Notes Re: Front Sight	1/19/2017
3	A-009772	Email correspondence Re: Updated xls - LVDF	2/3/2017
4	A-009773	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/15/2017
5	A-009774	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his calls with Mike Meacher	2/18/2017
6	A-009775	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/20/2017
7	A-009776	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his call with Mike Meacher	2/22/2017
8	A-009777	Dziubla Notes Re: Front Sight – Telephone Call with NES	2/24/2017
9	A-009778	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	3/1/2017
10	A-009779	Dziubla Notes Re: Front Sight – Telephone Call with Kyle Thomas at Congressman Amodei’s office.	3/2/2017
11	A-009780	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	4/5/2017
12	A-009781-009782	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/20/2017
13	A-009783	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/25/2017
14	A-009784	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/1/2017
15	A-009785-009786	Dziubla Notes Re: Front Sight –Telephone Call with Kyle Scott, Ignatius Piazza, Mike Meacher, and Jon Fleming	5/17/2017
16	A-009787	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/29/2017
17	A-009788	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/17/2017
18	A-009789	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	6/5/2017
19	A-009790	Dziubla Notes Re: Front Sight	6/6/2017
20	A-009792	Dziubla Notes Re: Front Sight –Telephone Call with Foreign Consultant	6/7/2017
21	A-009796	Dziubla Notes Re: Front Sight – Voicemail from Ignatius Piazza	7/16/2017
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1	A-009797	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	7/20/2017
2	A-009798	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/6/2017
3	A-009799	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/25/2017
4	A-009800	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/2/2017
5	A-009801	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/19/2017
6	A-009802-009803	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/12/2017
7	A-009805-009806	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/6/2017
8	A-009808	Dziubla Notes Re: Front Sight – Telephone Call with Matt Schulz and Jon Fleming	11/30/2017
9	A-009809	Dziubla Notes Re: Front Sight – Consultant Update	12/4/2017
10	A-009810-009811	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	12/5/2017
11	A-009812	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	12/12/2017
12	A-009813	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	12/18/2017
13	A-009814	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	12/26/2017
14	A-009815	Dziubla Notes Re: Front Sight - Telephone Call with Foreign Consultant and Jon Fleming	1/4/2016
15	A-009816	Dziubla Notes Re: Front Sight – Telephone call with Foreign Consultant	1/6/2016
16	A-009817	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	1/11/2016
17	A-009818	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultants	1/11/2016
18	A-009819	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/13/2016
19	A-009820	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2016
20	A-009821	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
21	A-009822	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/0216
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1	A-009825	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza, Mike Meacher, and Jon Fleming	5/18/2016
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3	A-009826	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	6/14/2016
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5	A-009827	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/6/2016
6	A-009828	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Ignatius Piazza, and Jon Fleming	9/26/2016
7			
8	A-009832	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Mike Meacher	10/25/2016
9	A-009833	Correspondence Re: Interest Payment Due	11/1/2016
10	A-009834	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	11/15/2016
11	A-009835-009837	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/15/2016
12	A-009838	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	12/2/2016
13	A-009840	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	N/A
14	A-009841	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/13/2015
15	A-009842	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/17/2015
16	A-009843	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	1/28/2015
17			
18	A-009844	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	2/4/2015
19	A-009845	Dziubla Notes Re: Front Sight – Telephone Call with John Small	2/23/2015
20			
21	A-009847	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	Undated
22			
23	A-009848	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/12/2015
24	A-009849	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/2015
25	A-009851	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/12/2015
26	A-009853-009854	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/2/2015
27			
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1	A-009856	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
2	A-009857	Dziubla Notes Re: Front Sight – Telephone Call with NES	10/15/2015
3	A-009858	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	12/21/2015
4	A-009859	Dziubla Notes Re: Front Sight – Telephone Call with Mr. Piazza, Meacher, and Jon Fleming	12/22/2015
5	A-009860	Dziubla Notes Re: Front Sight – Telephone Call with Robin Bernhard	1/6/2014
6	A-009861	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
7	A-009862	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	10/15/2015
8	A-009865	Email Correspondence with Meacher Re: USCIS Business Plan	3/5/2014
9	A-009866	Dziubla Notes Re: Front Sight	
10	A-009868	Dziubla Notes Re: Front Sight – Telephone Call with Jon Small and Jon Fleming	5/20/2014
11	A-009869	Dziubla Notes Re: Front Sight – Telephone Call with Sarah Paul	6/22/2014
12	A-009870-009871	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	7/6/2014
13	A-009872	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/21/2014
14	A-009873	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/26/2014
15	A-009874-009877	Front Sight Firearms Training Institute Newsletter	8/1/2014
16	A-009878	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	1/30/2013
17	A-009879	Dziubla Notes Re: Front Sight – Telephone Call with Phil Cohen, Jon Fleming, and Sean Flynn	2/22/13
18	A-009880	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Phil Cohen, and Jon Fleming	2/22/13
19	A-009881	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/8/2013
20	A-009882	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/18/2013
21	A-009883	Dziubla Notes Re: Front Sight – Telephone Call with Tom LaTour, John Small, Mike Meacher, and Jon Fleming	4/2/2013
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1	A-009884	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/4/2013
2	A-009885	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jay Wu, Jon Fleming, and Tom LaTour.	4/19/2013
3			
4	A-009886	Dziubla Notes Re: Front Sight – Telephone Call with Kathy Conroy and Jim Whitteron	5/6/2013
5	A-009887	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	5/23/2013
6			
7	A-009888	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jim Whitteron, Jay Wu, Peter Geist, Jon Fleming	5/28/2013
8			
9	A-009889	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	6/14/2013
10	A-009891	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/2/2013
11	A-009892	Dziubla Notes Re: Front Sight – Piazza Video	8/23/2013
12	A-009897	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/10/2013
13	A-009898	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	9/16/2013
14	A-009900	Dziubla Notes Re: Front Sight	10/4/2013
15	A-009901	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/11/2013
16	A-009902	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	12/15/2013
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18	A-009903	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming	12/17/2013
19	A-009904	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Jon Fleming	12/21/2013
20	A-009905	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour and Jon Fleming	12/23/2013
21			
22	A-009906-009907	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour, Ignatius Piazza, Mike Meacher, Jon Fleming, and Frank Ingrande	12/24/2013
23			
24	A-009908	Dziubla Notes Re: Front Sight – Telephone Call with Nevada Department of Employee Training and Rehabilitation	4/9/2011
25			
26	A-009909-009910	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/16/2012
27	A-009911	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/6/2012
28			

1	A-009912	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/27/2012
2	A-009913-009914	Dziubla Notes Re: Front Sight Background	10/15/2012
3	A-009915	Dziubla Notes Re: Front Sight – Telephone calls with Mike Meacher and Rod Oshita	10/24/2012
4	A-009916	Dziubla Notes Re: Front Sight –Telephone Call with Gonzalo Lopez-Jordan, Santiago Steed, and Alexandra Leon.	10/25/2012
5	A-009917	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	10/26/2012
6	A-009918	Dziubla Notes Re: Front Sight	12/19/2012
7	A-009919	Dziubla Notes re: FS docs	Undated
8	A-009921-009922	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	11/9/2018
9	A-009924-009925	Dziubla Notes Re: Front Sight	
10	A-021533-021541	Immigration Consultant Agreement with Dr. Sudhir Shah	9/21/2015
11	A-021542-021551	Immigration Consultant Agreement with Narendra B. Rajput	Undated
12	A-021552-021560	Immigration Consultant Agreement with Sunnyway International	10/4/2015
13	A-021561-021568	Immigration Consultant Agreement with Jin Shah Law Firm	4/29/2016
14	A-021569-021587	Foreign Placement Consultant Agreement with Beijing Sinowel Wealth Management Co. Ltd.	9/21/2015
15	A-021588-021597	Service Agreement with Mayflower Business Consulting Co. Ltd.	10/13/2015
16	A-021598-021611	Master Foreign Placement Consultant Agreement with Abhinav Outsourcing Pvt. Ltd	Undated
17	A-021612-021620	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	12/18/2016
18	A-021621-21628	Finder’s Fee Agreement with Zhao Johnson	2/29/2016
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1 The EB5 Parties Updated and Amended Privilege Log, and Redaction Log are also being
2 provided herewith.

3 DATED this 22nd day of January, 2021.

4 BAILEY ❖ KENNEDY

6 By: /s/ Andrea M. Champion

7 JOHN R. BAILEY
8 JOSHUA M. DICKEY
9 ANDREA M. CHAMPION

10 *Attorneys for Defendants*
11 LAS VEGAS DEVELOPMENT FUND
12 LLC; EB5 IMPACT CAPITAL
13 REGIONAL CENTER LLC; EB5 IMPACT
14 ADVISORS LLC; ROBERT W.
15 DZIUBLA; JON FLEMING; and LINDA
16 STANWOOD

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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 22nd day of January, 2021, service of the foregoing **THE EB5 PARTIES’ THIRTEENTH SUPPLEMENT TO INITIAL DISCLOSURES** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

JOHN P. ALDRICH
CATHERINE HERNANDEZ
ALDRICH LAW FIRM, LTD.
7866 West Sahara Avenue
Las Vegas, Nevada 89117

Email: jaldrich@johnaldrichlawfirm.com

Attorneys for Plaintiff/Counterdefendants
FRONT SIGHT MANAGEMENT, LLC;
IGNATIUS A. PIAZZA II; JENNIFER
PIAZZA; VNV DYNASTY TRUST I;
VNV DYNASTY TRUST II; MICHAEL
MEACHER; TOP RANK BUILDERS
INC.; ALL AMERICAN CONCRETE &
MASONRY INC.; MORALES
CONSTRUCTION, INC.; AND EFRAIN
RENE MORALES-MORENO

/s/ Angelique Mattox
Employee of BAILEY ❖ KENNEDY

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Archived: Friday, January 22, 2021 3:19:33 PM
From: efilimgmail@tylerhost.net
Sent: Friday, January 22, 2021 3:18:40 PM
To: BKfederaldownloads
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 7275158
Importance: Normal



Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 7275158

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	1/22/2021 3:18 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Thirteenth Supplement to Initial Disclosures
Filed By	Angelique Mattox
Service Contacts	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Joshua Dickey (jdickey@baileykennedy.com) John Bailey (jbailey@baileykennedy.com)

	Bailey Kennedy, LLP (bkfederaldownloads@baileykennedy.com) Andrea Champion (achampion@baileykennedy.com) Kenneth Hogan (ken@h2legal.com) Jeffrey Hulet (jeff@h2legal.com)
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Document Details	
Served Document	Download Document
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EXHIBIT 14

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Las Vegas, Nevada 89119

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LTWT

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ken@h2legal.com

*Attorneys for Las Vegas Development
Fund, LLC, EB5 Impact Capital Regional
Center, LLC, EB5 Impact Advisors, LLC,
Robert W. Dziubla, Jon Fleming and Linda Stanwood*

DISTRICT COURT**CLARK COUNTY, NEVADA**

FRONT SIGHT MANAGEMENT LLC, a
Nevada Limited Liability Company,

Plaintiff,

vs.

LAS VEGAS DEVELOPMENT FUND LLC,
a Nevada Limited Liability Company; et al.,

Defendants.

CASE NO.: A-18-781084-B
DEPT NO.: XVI

**THE EB5 PARTIES' FOURTEENTH
SUPPLEMENT TO INITIAL
DISCLOSURES**

AND ALL RELATED COUNTERCLAIMS.

Defendant/Counterclaimants Las Vegas Development Fund, LLC ("LVDF"), EB5 Impact Capital Regional Center, LLC ("EB5 Impact CRC"), EB5 Impact Advisors, LLC ("EB5 Impact"), Robert W. Dziubla ("Dziubla"), Jon Fleming ("Fleming"), and Linda Stanwood ("Stanwood") (collectively as "EB5 Parties"), by and through its attorneys of the law firm of JONES LOVELOCK and

JONES LOVELOCK
 6600 Amelia Earhart Ct., Suite C
 Las Vegas, Nevada 89119

1 HOGAN HULET PLLC, hereby provides the following information in accordance with NRC 16.1.
 2 These disclosures are based upon information reasonably available to the EB5 Parties at this time,
 3 recognizing that discovery in this matter is continuing. The EB5 Parties reserve the right to
 4 supplement or modify these disclosures at any time as additional information becomes available
 5 during the course of discovery. **(All newly supplemented information is contained herein in**
 6 **bold.)**

DISCLOSURES PURSUANT TO N.R.C.P. 16.1(a)(1)

8 **A. The name and, if known, the address and telephone number of each**
 9 **individual likely to have information discoverable under Rule 26(b),**
 10 **including for impeachment or rebuttal, identifying the subjects of the**
 11 **information.**

12 EB5 Parties identify the following individuals as likely to have discoverable information
 13 relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure
 14 provided herein is based on information reasonably available at this time.

15 By disclosing the following individuals, EB5 Parties do not waive any objections that they
 16 have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify
 17 additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses
 18 identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

JONES LOVELOCK
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Robert Dziubla c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn 95 Broken Rock Drive Henderson, Nevada 89074	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Linda Stanwood c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018

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1	A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
2	A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
3			
4	A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
5	A-00334-00336	AM response to stay of NOD	9/4/2018
6	A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
7	A-00339	Brochure Side 1 final	10/5/2015
8	A-00340	Brochure Side 2 (final)	10/5/2015
9	A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
10	A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
11	A-00417-00424	Deed of Trust - First Amendment	7/1/2017
12	A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
13	A-00462-00465	Email to Meacher re deal restructure	5/12/2016
14	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
15	A-00474-00482	Executive Summary Front Sight	3/12/2012
16	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
17	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
18	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
19	A-00486	Marketing Report - Front Sight	5/7/2016
20	A-00487	Marketing Report - Front Sight	4/9/2016
21	A-00488	Marketing Report - Front Sight	4/16/2016
22	A-00489-00490	Marketing Report - Front Sight	4/23/2016
23	A-00491-00492	Marketing Report - Front Sight	4/30/2016
24	A-00493	Marketing Report	2/25/2016
25	A-00494	Marketing Report	3/29/2016
26	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
27	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
28	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
	A-00514-00519	Mike Meacher response	3/11/2016
	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
	A-00521	Notes of calls with Piazza and Meacher	6/14/2018

1	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
2	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
3	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
4	A-00534-00540	Notice of Default	7/30/2018
5	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
6	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
7	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
8	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
9	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
10	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
11	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
	First Supplemental Disclosure		
12	A-000702-000856	Accounting and Fees	Various
13	A-000857	Independent contractor Agreement	5/31/2015
14	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
15	A-000870-000878	Pre-Marketing Agreement	10/16/2015
16	A-000879-000894	Emails	5/2/2018
17	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
18	A-000900-000903	Emails	5/8/2015
19	A-000904-000922	Accounting	Various
20	A-000923-000927	Amendment to Loan Agreement	11/14/2017
21	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
22	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
23	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
24	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
25	A-001214-001243	Current Major Contracts	8/30/2018
26	A-001244-001246	Response to Temporary Stay	9/4/2018
27	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
28	A-001249-001251	Pictures- Exemplar Approval	N/A
	A-001252-001270	Loan Agreement	10/31/2017
	A-001271-001372	Construction Loan Agreement	10/6/2016

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1	A-001373-001376	Emails	Various
2	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
3	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
4	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
5	A-001407-001417	Emails	Various
6	A-001418-001425	Memo-Marketing Update	11/3/2015
7	A-001426-001431	Emails	Various
8	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
9	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
10	A-001447-001459	Pictures	8/23/2018
11	A-001460-001461	Pro Forma Statements of Income	N/A
12	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
13	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
14	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
15	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
16	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
17	A -001764-001765	Receipt of Copy	10/30/18
18	A-001766-001917	Front Sight Documents	Various
19	A-001918-006138	John Fleming Emails	Various
20	A-006139-008763	Robert Dziubla Emails	Various
21	Third Supplemental Disclosure¹		
22	A-008764-008976	EB5IA Cost and Expense Backup	Various
23	A-008977-009925	Dziubla Front Sight File	Various
24	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
25	Fourth Supplemental Disclosure		
26	A-010008-010013	FS Fed Tax Return relevant pages	2016
27	A-010014-010018	FS YE Financial Statements	2017
28	A-010019-010024	FS Tax Return Relevant Pages	2017
	A-010025-010047	FS Federal Tax Return	2017
	A-010048	Concourse Photo	N/A
	A-010049-010096	Construction Timeline	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

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1	A-010097-010192	Economic Impact Analysis	11/23/13
2	A-010193	Front Entry Looking West Composite	N/A
3	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
4	A-010200-010216	Holecek Loan Agreement	02/07/06
5	A-010217	Hotel for Life Screenshot	N/A
6	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
7	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
8	A-010223-010227	NOD - Formal Notice	09/10/18
9	A-010228-010232	Patriot Pavilion renderings	N/A
10	A-010233	Patriot Pavilion description in USCIS plan	N/A
11	A-010234	Patriot Pavilion Pad	10/11/18
12	A-010235-010247	Pictures and renderings	N/A
13	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
14	A-010330-010417	PPM Front Sight 88	07/01/16
15	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
16	A-010455-010616	Project Business Plan	03/17/14
17	A-010617-010619	Renderings - FS	N/A
18	A-010620	Resort Pad	10/11/18
19	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
20	A-010737-010756	Valuation - business enterprise	12/31/14
21	A-010756-010910	Empyrean West Emails	Various
22	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
23	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
24	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
25	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
26	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
27	A-020635 -020816	Flynn Emails	Various
28	Fifth Supplemental Disclosure		
	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
	A-021507-021512	Robert Dziubla Resume	N/A
	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

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1	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
2	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
3	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
4	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
5	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
6	A-021533-021628	Immigration Consultant Agreements	Various
7	Sixth Supplemental Disclosure		
8	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
9	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
10	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
11	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
12	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
13	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
14	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
15	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
16	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
17	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
18	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
19	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
20	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
21	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
22	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
23	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
24	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
25	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
26	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
27	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
28	A-021810-021834	Verified Complaint	11/13/2018
	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
	Seventh Supplemental Disclosure		
	A-021845-021852	Default Notices	Various
	A-021853-021869	Inspection Photos	N/A
	A-021870-021883	Loan Documents and Demand Letters	Various
	A-021884-021909	Site Renderings	N/A
	A-021910-021942	NES Financial Loan Statements & Invoices	Various
	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
	A-021975-021984	Marketing Reports	Various
	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
	A-022025-022049	Travel Documentation and Receipts	Various

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1	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
2	A-022199-022244	Front Sight Marketing Materials	N/A
3	A-022245-022261	Holocek Loan Agreement	2/7/2006
4	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
5	A-022268	HREC Invoice	9/29/2014
6	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
7	A-022275-022277	Front Sight Marketing Materials	N/A
8	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
9	A-022284-022287	Front Sight Letter to Members	8/1/2014
10	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
11	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
12	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
13	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
14	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
15	A-022296	HREC Invoice for Professional Services	9/29/2014
16	A-022297-022298	Front Sight Competitor Comparison	N/A
17	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
18	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
19	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
20	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
21	A-022313-022325	Front Sight Pro Forma	N/A
22	A-022326	Front Sight Resorts Land Use Plan	N/A
23	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017
24	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
25	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
26	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
27	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
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1	A-022405-022482	Sinowel Communications and Marketing Materials	Various
2	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
3	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
4	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
5	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
6	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
7	A-027350-027351	Administrative Fee	N/A
8	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
9	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
10	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
11	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
12	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
13	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
14	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
15	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
16	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
17	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
18	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
19	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
20	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
21	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
22	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
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1	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
2	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
3	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
4	A-028771-028839	Email Correspondence with Preston Arza	Various
5	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
6	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
7	A-029211-029255	Front Sight Email Blasts	Various
8	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
9	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
10	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
11	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
12	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
13	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
14	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
15	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
16	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
17	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
18	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
19	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
20	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
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1	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
2			
3	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
4			
5	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
6	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
7	A-029582	Project Update to EB5 Investors	10/14/2016
8	A-029583-029584	Project Update for Agents	8/27/2019
9	A-029585	Project Update Q1 2017	4/21/2017
10	A-029586-029587	Project Update Q1 2018	7/26/2018
11	A-029588-029589	Project Update Q3 2017	10/21/2017
12	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
13	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
14	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
15			
16	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
17	A-029648-029657	Immigration Consultant Fee Agreement	N/A
18	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
19	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
20			
21	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
22	A-029730-029740	Home Depo Account Statements	Various
23	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
24			
25			
26	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
27	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
28			

1	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
2	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
3	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
4			
5	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
6			
7	A-029761-029763	UCC Financing Statement	10/13/2016
8	A-029764-029767	NES Loan Statements & Invoices	Various
9	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
10	A-029770	NES Loan Advance Form	10/7/2016
11	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
12	A-029773	NES Financial Master Account Statement	8/31/2016
13	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
14	A-029775-029798	Front Sight Email Blasts	Various
15	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
16	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
2			
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
20	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
21	Eighth Supplemental Disclosure		
22	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
23	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
24			
25	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
26			
27	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
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1	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
2	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
3	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
4	Ninth Supplemental Disclosure		
5	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
6	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
7	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
8	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
9	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
10	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
11	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
12	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
13	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
14	A-030375	Front Sight Marketing Report	3/29/2016
15	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
16	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
17	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
18	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
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JONES LOVELOCK
 6600 Amelia Earhart Ct., Suite C
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1	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
2	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
3			
4	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
5	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
6			
7	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
8			
9	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
10			
11	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
12	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
13			
14	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
15			
16	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
17			
18	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
19			
20	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
21			
22	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
23			
24	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
25			
26	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
27			
28	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015

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1	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
2	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
3	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
4	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
5	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
6	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
7	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
8	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
9	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
10	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
11	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
12	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
13	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
14	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
15	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
16	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015

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1	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
2			
3	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
4			
5	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
6			
7	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
8			
9	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
10			
11	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
12	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
13			
14	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
15	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
16			
17	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
18			
19	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
20			
21	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
22			
23	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
24			
25	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
26			
27	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
28			
	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016

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1	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
2	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
3	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
4	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
5	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
6	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
7	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
8	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
9	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
10	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
11	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
12	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
13	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
14	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
15	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
16	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
17	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017

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1	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
2	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
3	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
4	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi's Visit	7/4/2017
5	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
6	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
7	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
8	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
9	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
10	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
11	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
12	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
13	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
14	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
15	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment -[Redacted] Skype Call	1/28/2018
16	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
17	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
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1	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
2			
3	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
4			
5	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
6	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
7	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
8	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
9			
10	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
11			
12	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
13			
14	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
15	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
16			
17	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
18			
19	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
20			
21	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
22			
23	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
24			
25	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
26			
27	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
28			

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1	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
2			
3	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
4			
5	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
6			
7	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
8			
9	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
10			
11	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
12			
13	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
14			
15	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
16			
17	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
18			
19	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
20			
21	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
22			
23	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
24			
25	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
26			
27	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
28			
	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015

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1	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
2			
3	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
4			
5	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
6			
7	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
8			
9			
10	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
11			
12	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
13			
14	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
15			
16	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
17			
18	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
19			
20	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
21			
22	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
23			
24	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
25			
26	Tenth Supplemental Disclosure		
27	CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
28	SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020

Eleventh Supplemental Disclosure

USCP00001- USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
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Twelfth Supplemental Disclosure

A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021
A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC's Opposition to the EB-5 Parties' Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

Thirteenth Supplemental Disclosure⁴

A-008950-008953	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	6/10/2015
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³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver's license numbers).

⁴ All documents produced in this Thirteenth Supplemental Disclosure were either previously withheld by the EB5 Parties or were previously produced with redaction(s). The EB5 Parties now produce, or re-produce, these documents, with or without redaction, as reflected in the updated and amended redaction log served herewith.

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1	A-008954	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/14/2015
2	A-008955-0008958	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	10/15/2015
3			
4	A-008959-008961	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/2015
5			
6	A-008962	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
7	A-008963-008966	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/15
8			
9	A-008967	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
10	A-008968	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	11/18/2015
11	A-008969-008971	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	11/18/2015
12			
13	A-008995-009008	Front Sight Project Investor Tracking List	12/22/2015
14	A-009021-009022	Front Sight Project Investor Tracking List	12/22/2015
15	A-009074-009083	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	6/14/2016
16	A-009157	Dziubla Notes Re: Front Sight – Telephone Call with Raj	7/2/2018
17	A-009168	Dziubla Notes Re: Front Sight – Telephone Call with Michael Roga	12/8/2015
18	A-009203-009204	Independent Contractor Agreement with Guyuan Yu	11/26/2016
19	A-009205-009206	Independent Contractor Agreement with Chi Gao	11/26/2016
20	A-009207-009208	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
21	A-009209-009210	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
22			
23			
24	A-009211	Letter to [Redacted Potential EB-5 Investor] Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
25			
26			
27	A-009479-009480	Escondido Police Department Report	11/13/2018
28	A-009481-009482	Penal Code 653.2	N/A

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1	A-009483	Email Correspondence to Robert Dziubla Re: A Situation that you should be aware of	12/10/2018
2	A-009484-009486	Email Correspondence between Robert Dziubla and Craig Carter Re: We need your help, please stochastic terrorism	12/27/2018; 12/12/2018
3	A-009487	Dziubla Notes Re: Piazza Emails	N/A
4	A-009488-009495	Email Correspondence to Robert Dziubla Re: Pyramid Gun Sight	11/22/2018
5	A-009496	Dziubla Notes Re: Front Sight Piazza's Hit Piece	10/22/2018
6	A-009513-009521	Email Correspondence Re: Enemy Update #4	7/8/2019
7	A-009522-009535	Webpage: "Extremely Confidential – Front Sight Members Only. Dr. Piazza's Personal Video Message to YOU from the top of Front Sight's SWAT Tower"	7/12/2019
8	A-009751-009752	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/27/2018
9	A-009753--009754	Dziubla Notes Re: Front Sight Telephone Call With Ignatius Piazza, Michael Meacher and Mike Brand	6/14/2018
10	A-009755-009756	Email Correspondence Re: Commitment Letter – Friday Conference Call	6/14/2018
11	A-009759	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/1/2018
12	A-009760	Dziubla Notes Re: Front Sight – Telephone Call with Frank Jansen	8/14/2018
13	A-009764	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	8/26/2018
14	A-009766	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultant	8/28/2018
15	A-009767	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Bill Cockston, Bill Capeles, and Bob Lauder	10/11/2018
16	A-009769	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2017; 1/31/17
17	A-009770	Dziubla Notes Re: Front Sight	1/19/2017
18	A-009772	Email correspondence Re: Updated xls - LVDF	2/3/2017
19	A-009773	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/15/2017
20	A-009774	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his calls with Mike Meacher	2/18/2017
21	A-009775	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/20/2017
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JONES LOVELOCK
 6600 Amelia Earhart Ct., Suite C
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1	A-009776	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his call with Mike Meacher	2/22/2017
2	A-009777	Dziubla Notes Re: Front Sight – Telephone Call with NES	2/24/2017
3	A-009778	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	3/1/2017
4	A-009779	Dziubla Notes Re: Front Sight – Telephone Call with Kyle Thomas at Congressman Amodei’s office.	3/2/2017
5	A-009780	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	4/5/2017
6	A-009781-009782	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/20/2017
7	A-009783	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/25/2017
8	A-009784	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/1/2017
9	A-009785-009786	Dziubla Notes Re: Front Sight –Telephone Call with Kyle Scott, Ignatius Piazza, Mike Meacher, and Jon Fleming	5/17/2017
10	A-009787	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/29/2017
11	A-009788	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/17/2017
12	A-009789	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	6/5/2017
13	A-009790	Dziubla Notes Re: Front Sight	6/6/2017
14	A-009792	Dziubla Notes Re: Front Sight –Telephone Call with Foreign Consultant	6/7/2017
15	A-009796	Dziubla Notes Re: Front Sight – Voicemail from Ignatius Piazza	7/16/2017
16	A-009797	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	7/20/2017
17	A-009798	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/6/2017
18	A-009799	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/25/2017
19	A-009800	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/2/2017
20	A-009801	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/19/2017
21	A-009802-009803	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/12/2017
22	A-009805-009806	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/6/2017
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1	A-009808	Dziubla Notes Re: Front Sight – Telephone Call with Matt Schulz and Jon Fleming	11/30/2017
2	A-009809	Dziubla Notes Re: Front Sight – Consultant Update	12/4/2017
3	A-009810-009811	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	12/5/2017
4	A-009812	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	12/12/2017
5	A-009813	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	12/18/2017
6	A-009814	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	12/26/2017
7	A-009815	Dziubla Notes Re: Front Sight - Telephone Call with Foreign Consultant and Jon Fleming	1/4/2016
8	A-009816	Dziubla Notes Re: Front Sight – Telephone call with Foreign Consultant	1/6/2016
9	A-009817	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	1/11/2016
10	A-009818	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultants	1/11/2016
11	A-009819	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/13/2016
12	A-009820	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2016
13	A-009821	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
14	A-009822	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
15	A-009825	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza, Mike Meacher, and Jon Fleming	5/18/2016
16	A-009826	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	6/14/2016
17	A-009827	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/6/2016
18	A-009828	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Ignatius Piazza, and Jon Fleming	9/26/2016
19	A-009832	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Mike Meacher	10/25/2016
20	A-009833	Correspondence Re: Interest Payment Due	11/1/2016
21	A-009834	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	11/15/2016
22	A-009835-009837	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/15/2016
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1	A-009838	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	12/2/2016
2	A-009840	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	N/A
3	A-009841	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/13/2015
4	A-009842	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/17/2015
5	A-009843	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	1/28/2015
6	A-009844	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	2/4/2015
7	A-009845	Dziubla Notes Re: Front Sight – Telephone Call with John Small	2/23/2015
8	A-009847	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	Undated
9	A-009848	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/12/2015
10	A-009849	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/2015
11	A-009851	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/12/2015
12	A-009853-009854	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/2/2015
13	A-009856	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
14	A-009857	Dziubla Notes Re: Front Sight – Telephone Call with NES	10/15/2015
15	A-009858	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	12/21/2015
16	A-009859	Dziubla Notes Re: Front Sight – Telephone Call with Mr. Piazza, Meacher, and Jon Fleming	12/22/2015
17	A-009860	Dziubla Notes Re: Front Sight – Telephone Call with Robin Bernhard	1/6/2014
18	A-009861	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
19	A-009862	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	10/15/2015
20	A-009865	Email Correspondence with Meacher Re: USCIS Business Plan	3/5/2014
21	A-009866	Dziubla Notes Re: Front Sight	
22	A-009868	Dziubla Notes Re: Front Sight – Telephone Call with Jon Small and Jon Fleming	5/20/2014
23	A-009869	Dziubla Notes Re: Front Sight – Telephone Call with Sarah Paul	6/22/2014
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1	A-009870-009871	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	7/6/2014
2	A-009872	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/21/2014
3	A-009873	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/26/2014
4	A-009874-009877	Front Sight Firearms Training Institute Newsletter	8/1/2014
5	A-009878	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	1/30/2013
6	A-009879	Dziubla Notes Re: Front Sight – Telephone Call with Phil Cohen, Jon Fleming, and Sean Flynn	2/22/13
7	A-009880	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Phil Cohen, and Jon Fleming	2/22/13
8	A-009881	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/8/2013
9	A-009882	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/18/2013
10	A-009883	Dziubla Notes Re: Front Sight – Telephone Call with Tom LaTour, John Small, Mike Meacher, and Jon Fleming	4/2/2013
11	A-009884	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/4/2013
12	A-009885	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jay Wu, Jon Fleming, and Tom LaTour.	4/19/2013
13	A-009886	Dziubla Notes Re: Front Sight – Telephone Call with Kathy Conroy and Jim Whitteron	5/6/2013
14	A-009887	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	5/23/2013
15	A-009888	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jim Whitteron, Jay Wu, Peter Geist, Jon Fleming	5/28/2013
16	A-009889	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	6/14/2013
17	A-009891	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/2/2013
18	A-009892	Dziubla Notes Re: Front Sight – Piazza Video	8/23/2013
19	A-009897	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/10/2013
20	A-009898	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	9/16/2013
21	A-009900	Dziubla Notes Re: Front Sight	10/4/2013
22	A-009901	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/11/2013

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1	A-009902	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	12/15/2013
2	A-009903	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming	12/17/2013
3	A-009904	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Jon Fleming	12/21/2013
4	A-009905	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour and Jon Fleming	12/23/2013
5	A-009906-009907	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour, Ignatius Piazza, Mike Meacher, Jon Fleming, and Frank Ingrande	12/24/2013
6	A-009908	Dziubla Notes Re: Front Sight – Telephone Call with Nevada Department of Employee Training and Rehabilitation	4/9/2011
7	A-009909-009910	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/16/2012
8	A-009911	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/6/2012
9	A-009912	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/27/2012
10	A-009913-009914	Dziubla Notes Re: Front Sight Background	10/15/2012
11	A-009915	Dziubla Notes Re: Front Sight – Telephone calls with Mike Meacher and Rod Oshita	10/24/2012
12	A-009916	Dziubla Notes Re: Front Sight – Telephone Call with Gonzalo Lopez-Jordan, Santiago Steed, and Alexandra Leon.	10/25/2012
13	A-009917	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	10/26/2012
14	A-009918	Dziubla Notes Re: Front Sight	12/19/2012
15	A-009919	Dziubla Notes re: FS docs	Undated
16	A-009921-009922	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	11/9/2018
17	A-009924-009925	Dziubla Notes Re: Front Sight	
18	A-021533-021541	Immigration Consultant Agreement with Dr. Sudhir Shah	9/21/2015
19	A-021542-021551	Immigration Consultant Agreement with Narendra B. Rajput	Undated
20	A-021552-021560	Immigration Consultant Agreement with Sunnyway International	10/4/2015
21	A-021561-021568	Immigration Consultant Agreement with Jin Shah Law Firm	4/29/2016
22	A-021569-021587	Foreign Placement Consultant Agreement with Beijing Sinowel Wealth Management Co. Ltd.	9/21/2015
23	A-021588-021597	Service Agreement with Mayflower Business Consulting Co. Ltd.	10/13/2015
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A-021598-021611	Master Foreign Placement Consultant Agreement with Abhinav Outsourcing Pvt. Ltd	Undated
A-021612-021620	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	12/18/2016
A-021621-021628	Finder’s Fee Agreement with Zhao Johnson	2/29/2016
Fourteenth Supplemental Disclosure		
A-021629-021635	Promissory Note	10/6/2016
A-021636-021637	Audio Recordings from Front Sight Seminar on July 4, 2021	07/04/2021
A-021638-021646	Transcript of the July 4, 2021 audio recordings from Front Sight Seminar on July 4, 2021	07/04/2021
A-021647-021650	Los Angeles Times article	12/13/2000
A-021651-021652	Legal Fight Donation Form	N/A
A-021653-021658	Front Sight Newsletter (redacted)	11/07/2021
A-021659-021664	Front Sight Newsletter (redacted)	11/08/2021
A-021665-021670	Front Sight Newsletter (redacted)	11/09/2021
A-021671	Notice of Default and Demand for Payment letter	10/06/2021

The EB5 Parties Updated and Amended Privilege Log, and Redaction Log was provided with the Thirteenth Supplement.

DATED this 6th day of January 2022.

JONES LOVELOCK

/s/ Nicole E. Lovelock, Esq. _____
 Nicole E. Lovelock, Esq.
 Nevada State Bar No. 11187
 Sue Trazig Cavaco, Esq.
 Nevada State Bar No. 6150
 6600 Amelia Earhart Court, Suite C
 Las Vegas, Nevada 89119
Attorneys for Las Vegas Development Fund, LLC, EB5 Impact Capital Regional Center, LLC, EB5 Impact Advisors, LLC, Robert W. Dziubla, Jon Fleming and Linda Stanwood

///
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 ///

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of January 2022, a true and correct copy of the foregoing **THE EB5 PARTIES' FOURTEENTH SUPPLEMENT TO INITIAL DISCLOSURES** was served by electronically submitting with the Clerk of the Court using electronic system and serving all parties with an email on record.

/s/ Julie Linton
An employee of JONES LOVELOCK

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From: no-reply@efilingmail.tylertech.cloud
To: [Lorie Januskevicius](#)
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 9141489
Date: Thursday, January 6, 2022 4:57:05 PM

Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 9141489



This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	1/6/2022 4:56 PM PST
Filing Type	Service Only
Filing Description	THE EB5 PARTIES' FOURTEENTH SUPPLEMENT TO INITIAL DISCLOSURES
Filed By	Nicole Lovelock
Service Contacts	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Nicole Lovelock (nlovelock@joneslovelock.com) Kathryn Holbert (kholbert@farmercase.com) Lorie Januskevicius (ljanuskevicius@joneslovelock.com)

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Document Details	
Served Document	Download Document
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EXHIBIT 15

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17 *Attorneys for Las Vegas Development*
18 *Fund, LLC, EB5 Impact Capital Regional*
19 *Center, LLC, EB5 Impact Advisors, LLC,*
20 *Robert W. Dziubla, Jon Fleming and Linda Stanwood*

21 **DISTRICT COURT**

22 **CLARK COUNTY, NEVADA**

23 FRONT SIGHT MANAGEMENT LLC, a
24 Nevada Limited Liability Company,

25 Plaintiff,

26 vs.

27 LAS VEGAS DEVELOPMENT FUND LLC,
28 a Nevada Limited Liability Company; et al.,

Defendants.

CASE NO.: A-18-781084-B
DEPT NO.: XVI

**THE EB5 PARTIES' FIFTEENTH
SUPPLEMENT TO INITIAL
DISCLOSURES**

AND ALL RELATED COUNTERCLAIMS.

29 Defendant/Counterclaimants Las Vegas Development Fund, LLC ("LVDF"), EB5 Impact
30 Capital Regional Center, LLC ("EB5 Impact CRC"), EB5 Impact Advisors, LLC ("EB5 Impact"),
31 Robert W. Dziubla ("Dziubla"), Jon Fleming ("Fleming"), and Linda Stanwood ("Stanwood")

JONES LOVELOCK
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1 (collectively as “EB5 Parties”), by and through its attorneys of the law firm of JONES LOVELOCK and
 2 HOGAN HULET PLLC, hereby provides the following information in accordance with NRC 16.1.
 3 These disclosures are based upon information reasonably available to the EB5 Parties at this time,
 4 recognizing that discovery in this matter is continuing. The EB5 Parties reserve the right to
 5 supplement or modify these disclosures at any time as additional information becomes available
 6 during the course of discovery. **(All newly supplemented information is contained herein in**
 7 **bold.)**

DISCLOSURES PURSUANT TO N.R.C.P. 16.1(a)(1)

9 **A. The name and, if known, the address and telephone number of each**
 10 **individual likely to have information discoverable under Rule 26(b),**
 11 **including for impeachment or rebuttal, identifying the subjects of the**
 12 **information.**

13 EB5 Parties identify the following individuals as likely to have discoverable information
 14 relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure
 15 provided herein is based on information reasonably available at this time.

16 By disclosing the following individuals, EB5 Parties do not waive any objections that they
 17 have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify
 18 additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses
 19 identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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Robert Dziubla c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn 95 Broken Rock Drive Henderson, Nevada 89074	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Linda Stanwood c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018

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1	A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
2	A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
3			
4	A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
5	A-00334-00336	AM response to stay of NOD	9/4/2018
6	A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
7	A-00339	Brochure Side 1 final	10/5/2015
8	A-00340	Brochure Side 2 (final)	10/5/2015
9	A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
10	A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
11	A-00417-00424	Deed of Trust - First Amendment	7/1/2017
12	A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
13	A-00462-00465	Email to Meacher re deal restructure	5/12/2016
14	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
15	A-00474-00482	Executive Summary Front Sight	3/12/2012
16	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
17	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
18	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
19	A-00486	Marketing Report - Front Sight	5/7/2016
20	A-00487	Marketing Report - Front Sight	4/9/2016
21	A-00488	Marketing Report - Front Sight	4/16/2016
22	A-00489-00490	Marketing Report - Front Sight	4/23/2016
23	A-00491-00492	Marketing Report - Front Sight	4/30/2016
24	A-00493	Marketing Report	2/25/2016
25	A-00494	Marketing Report	3/29/2016
26	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
27	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
28	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
	A-00514-00519	Mike Meacher response	3/11/2016
	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
	A-00521	Notes of calls with Piazza and Meacher	6/14/2018

1	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
2	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
3	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
4	A-00534-00540	Notice of Default	7/30/2018
5	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
6	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
7	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
8	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
9	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
10	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
11	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
	First Supplemental Disclosure		
12	A-000702-000856	Accounting and Fees	Various
13	A-000857	Independent contractor Agreement	5/31/2015
14	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
15	A-000870-000878	Pre-Marketing Agreement	10/16/2015
16	A-000879-000894	Emails	5/2/2018
17	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
18	A-000900-000903	Emails	5/8/2015
19	A-000904-000922	Accounting	Various
20	A-000923-000927	Amendment to Loan Agreement	11/14/2017
21	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
22	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
23	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
24	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
25	A-001214-001243	Current Major Contracts	8/30/2018
26	A-001244-001246	Response to Temporary Stay	9/4/2018
27	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
28	A-001249-001251	Pictures- Exemplar Approval	N/A
	A-001252-001270	Loan Agreement	10/31/2017
	A-001271-001372	Construction Loan Agreement	10/6/2016

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1	A-001373-001376	Emails	Various
2	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
3	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
4	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
5	A-001407-001417	Emails	Various
6	A-001418-001425	Memo-Marketing Update	11/3/2015
7	A-001426-001431	Emails	Various
8	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
9	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
10	A-001447-001459	Pictures	8/23/2018
11	A-001460-001461	Pro Forma Statements of Income	N/A
12	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
13	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
14	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
15	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
16	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
17	A -001764-001765	Receipt of Copy	10/30/18
18	A-001766-001917	Front Sight Documents	Various
19	A-001918-006138	John Fleming Emails	Various
20	A-006139-008763	Robert Dziubla Emails	Various
21	Third Supplemental Disclosure¹		
22	A-008764-008976	EB5IA Cost and Expense Backup	Various
23	A-008977-009925	Dziubla Front Sight File	Various
24	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
25	Fourth Supplemental Disclosure		
26	A-010008-010013	FS Fed Tax Return relevant pages	2016
27	A-010014-010018	FS YE Financial Statements	2017
28	A-010019-010024	FS Tax Return Relevant Pages	2017
	A-010025-010047	FS Federal Tax Return	2017
	A-010048	Concourse Photo	N/A
	A-010049-010096	Construction Timeline	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

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1	A-010097-010192	Economic Impact Analysis	11/23/13
2	A-010193	Front Entry Looking West Composite	N/A
3	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
4	A-010200-010216	Holecek Loan Agreement	02/07/06
5	A-010217	Hotel for Life Screenshot	N/A
6	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
7	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
8	A-010223-010227	NOD - Formal Notice	09/10/18
9	A-010228-010232	Patriot Pavilion renderings	N/A
10	A-010233	Patriot Pavilion description in USCIS plan	N/A
11	A-010234	Patriot Pavilion Pad	10/11/18
12	A-010235-010247	Pictures and renderings	N/A
13	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
14	A-010330-010417	PPM Front Sight 88	07/01/16
15	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
16	A-010455-010616	Project Business Plan	03/17/14
17	A-010617-010619	Renderings - FS	N/A
18	A-010620	Resort Pad	10/11/18
19	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
20	A-010737-010756	Valuation - business enterprise	12/31/14
21	A-010756-010910	Empyrean West Emails	Various
22	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
23	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
24	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
25	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
26	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
27	A-020635 -020816	Flynn Emails	Various
28	Fifth Supplemental Disclosure		
	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
	A-021507-021512	Robert Dziubla Resume	N/A
	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

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1	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
2	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
3	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
4	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
5	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
6	A-021533-021628	Immigration Consultant Agreements	Various
7	Sixth Supplemental Disclosure		
8	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
9	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
10	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
11	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
12	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
13	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
14	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
15	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
16	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
17	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
18	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
19	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
20	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
21	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
22	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
23	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
24	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
25	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
26	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
27	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
28	A-021810-021834	Verified Complaint	11/13/2018
	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
	Seventh Supplemental Disclosure		
	A-021845-021852	Default Notices	Various
	A-021853-021869	Inspection Photos	N/A
	A-021870-021883	Loan Documents and Demand Letters	Various
	A-021884-021909	Site Renderings	N/A
	A-021910-021942	NES Financial Loan Statements & Invoices	Various
	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
	A-021975-021984	Marketing Reports	Various
	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
	A-022025-022049	Travel Documentation and Receipts	Various

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1	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
2	A-022199-022244	Front Sight Marketing Materials	N/A
3	A-022245-022261	Holocek Loan Agreement	2/7/2006
4	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
5	A-022268	HREC Invoice	9/29/2014
6	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
7	A-022275-022277	Front Sight Marketing Materials	N/A
8	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
9	A-022284-022287	Front Sight Letter to Members	8/1/2014
10	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
11	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
12	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
13	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
14	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
15	A-022296	HREC Invoice for Professional Services	9/29/2014
16	A-022297-022298	Front Sight Competitor Comparison	N/A
17	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
18	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
19	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
20	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
21	A-022313-022325	Front Sight Pro Forma	N/A
22	A-022326	Front Sight Resorts Land Use Plan	N/A
23	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017
24	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
25	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
26	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
27	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
28			

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1	A-022405-022482	Sinowel Communications and Marketing Materials	Various
2	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
3	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
4	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
5	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
6	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
7	A-027350-027351	Administrative Fee	N/A
8	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
9	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
10	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
11	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
12	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
13	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
14	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
15	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
16	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
17	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
18	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
19	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
20	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
21	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
22	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
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1	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
2	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
3	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
4	A-028771-028839	Email Correspondence with Preston Arza	Various
5	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
6	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
7	A-029211-029255	Front Sight Email Blasts	Various
8	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
9	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
10	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
11	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
12	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
13	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
14	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
15	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
16	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
17	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
18	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
19	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
20	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
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1	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
2			
3	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
4			
5	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
6	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
7	A-029582	Project Update to EB5 Investors	10/14/2016
8	A-029583-029584	Project Update for Agents	8/27/2019
9	A-029585	Project Update Q1 2017	4/21/2017
10	A-029586-029587	Project Update Q1 2018	7/26/2018
11	A-029588-029589	Project Update Q3 2017	10/21/2017
12	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
13	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
14	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
15			
16	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
17	A-029648-029657	Immigration Consultant Fee Agreement	N/A
18	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
19	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
20			
21	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
22	A-029730-029740	Home Depo Account Statements	Various
23	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
24			
25			
26	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
27	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
28			

1	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
2	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
3	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
4			
5	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
6			
7	A-029761-029763	UCC Financing Statement	10/13/2016
8	A-029764-029767	NES Loan Statements & Invoices	Various
9	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
10	A-029770	NES Loan Advance Form	10/7/2016
11	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
12	A-029773	NES Financial Master Account Statement	8/31/2016
13	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
14	A-029775-029798	Front Sight Email Blasts	Various
15	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
16	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
2			
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
20	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
21	Eighth Supplemental Disclosure		
22	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
23	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
24			
25	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
26			
27	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
28			

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1	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
2	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
3	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
4	Ninth Supplemental Disclosure		
5	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
6	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
7	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
8	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
9	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
10	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
11	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
12	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
13	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
14	A-030375	Front Sight Marketing Report	3/29/2016
15	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
16	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
17	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
18	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
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1	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
2	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
3			
4	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
5	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
6			
7	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
8			
9	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
10			
11	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
12	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
13			
14	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
15			
16	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
17			
18	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
19			
20	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
21			
22	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
23			
24	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
25			
26	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
27			
28	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015

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1	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
2	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
3	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
4	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
5	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
6	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
7	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
8	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
9	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
10	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
11	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
12	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
13	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
14	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
15	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
16	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015

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1	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
2			
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4	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
5	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
6			
7	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
8			
9	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
10			
11	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
12	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
13			
14	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
15	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
16			
17	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
18	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
19			
20	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
21			
22	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
23			
24	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
25	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
26	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
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1	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
2	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
3	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
4	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
5	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
6	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
7	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
8	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
9	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
10	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
11	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
12	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
13	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
14	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
15	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
16	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
17	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017

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1	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
2	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
3	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
4	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi's Visit	7/4/2017
5	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
6	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
7	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
8	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
9	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
10	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
11	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
12	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
13	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
14	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
15	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment -[Redacted] Skype Call	1/28/2018
16	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
17	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
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1	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
2	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
3	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
4	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
5	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
6	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
7	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
8	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
9	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
10	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
11	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
12	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
13	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
14	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
15	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
16	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015

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1	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
2			
3	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
4			
5	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
6			
7	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
8			
9	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
10			
11	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
12			
13	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
14			
15	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
16			
17	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
18			
19	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
20			
21	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
22			
23	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
24			
25	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
26			
27	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
28			
	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015

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1	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
2			
3	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
4			
5	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
6			
7	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
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9			
10	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
11			
12	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
13			
14	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
15			
16	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
17			
18	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
19			
20	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
21			
22	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
23			
24	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
25			
26	Tenth Supplemental Disclosure		
27	CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
28	SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020

Eleventh Supplemental Disclosure

USCP00001- USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
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Twelfth Supplemental Disclosure

A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021
A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC's Opposition to the EB-5 Parties' Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

Thirteenth Supplemental Disclosure⁴

A-008950-008953	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	6/10/2015
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³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver's license numbers).

⁴ All documents produced in this Thirteenth Supplemental Disclosure were either previously withheld by the EB5 Parties or were previously produced with redaction(s). The EB5 Parties now produce, or re-produce, these documents, with or without redaction, as reflected in the updated and amended redaction log served herewith.

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 6600 Amelia Earhart Ct., Suite C
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1	A-008954	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/14/2015
2	A-008955-0008958	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	10/15/2015
3			
4	A-008959-008961	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/2015
5			
6	A-008962	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
7	A-008963-008966	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/15
8			
9	A-008967	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
10	A-008968	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	11/18/2015
11	A-008969-008971	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	11/18/2015
12			
13	A-008995-009008	Front Sight Project Investor Tracking List	12/22/2015
14	A-009021-009022	Front Sight Project Investor Tracking List	12/22/2015
15	A-009074-009083	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	6/14/2016
16	A-009157	Dziubla Notes Re: Front Sight – Telephone Call with Raj	7/2/2018
17	A-009168	Dziubla Notes Re: Front Sight – Telephone Call with Michael Roga	12/8/2015
18	A-009203-009204	Independent Contractor Agreement with Guyuan Yu	11/26/2016
19	A-009205-009206	Independent Contractor Agreement with Chi Gao	11/26/2016
20	A-009207-009208	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
21	A-009209-009210	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
22			
23			
24	A-009211	Letter to [Redacted Potential EB-5 Investor] Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
25			
26			
27	A-009479-009480	Escondido Police Department Report	11/13/2018
28	A-009481-009482	Penal Code 653.2	N/A

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1	A-009483	Email Correspondence to Robert Dziubla Re: A Situation that you should be aware of	12/10/2018
2	A-009484-009486	Email Correspondence between Robert Dziubla and Craig Carter Re: We need your help, please stochastic terrorism	12/27/2018; 12/12/2018
3	A-009487	Dziubla Notes Re: Piazza Emails	N/A
4	A-009488-009495	Email Correspondence to Robert Dziubla Re: Pyramid Gun Sight	11/22/2018
5	A-009496	Dziubla Notes Re: Front Sight Piazza's Hit Piece	10/22/2018
6	A-009513-009521	Email Correspondence Re: Enemy Update #4	7/8/2019
7	A-009522-009535	Webpage: "Extremely Confidential – Front Sight Members Only. Dr. Piazza's Personal Video Message to YOU from the top of Front Sight's SWAT Tower"	7/12/2019
8	A-009751-009752	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/27/2018
9	A-009753--009754	Dziubla Notes Re: Front Sight Telephone Call With Ignatius Piazza, Michael Meacher and Mike Brand	6/14/2018
10	A-009755-009756	Email Correspondence Re: Commitment Letter – Friday Conference Call	6/14/2018
11	A-009759	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/1/2018
12	A-009760	Dziubla Notes Re: Front Sight – Telephone Call with Frank Jansen	8/14/2018
13	A-009764	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	8/26/2018
14	A-009766	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultant	8/28/2018
15	A-009767	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Bill Cockston, Bill Capeles, and Bob Lauder	10/11/2018
16	A-009769	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2017; 1/31/17
17	A-009770	Dziubla Notes Re: Front Sight	1/19/2017
18	A-009772	Email correspondence Re: Updated xls - LVDF	2/3/2017
19	A-009773	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/15/2017
20	A-009774	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his calls with Mike Meacher	2/18/2017
21	A-009775	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/20/2017
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1	A-009776	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his call with Mike Meacher	2/22/2017
2	A-009777	Dziubla Notes Re: Front Sight – Telephone Call with NES	2/24/2017
3	A-009778	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	3/1/2017
4	A-009779	Dziubla Notes Re: Front Sight – Telephone Call with Kyle Thomas at Congressman Amodei’s office.	3/2/2017
5	A-009780	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	4/5/2017
6	A-009781-009782	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/20/2017
7	A-009783	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/25/2017
8	A-009784	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/1/2017
9	A-009785-009786	Dziubla Notes Re: Front Sight –Telephone Call with Kyle Scott, Ignatius Piazza, Mike Meacher, and Jon Fleming	5/17/2017
10	A-009787	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/29/2017
11	A-009788	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/17/2017
12	A-009789	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	6/5/2017
13	A-009790	Dziubla Notes Re: Front Sight	6/6/2017
14	A-009792	Dziubla Notes Re: Front Sight –Telephone Call with Foreign Consultant	6/7/2017
15	A-009796	Dziubla Notes Re: Front Sight – Voicemail from Ignatius Piazza	7/16/2017
16	A-009797	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	7/20/2017
17	A-009798	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/6/2017
18	A-009799	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/25/2017
19	A-009800	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/2/2017
20	A-009801	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/19/2017
21	A-009802-009803	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/12/2017
22	A-009805-009806	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/6/2017
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1	A-009808	Dziubla Notes Re: Front Sight – Telephone Call with Matt Schulz and Jon Fleming	11/30/2017
2	A-009809	Dziubla Notes Re: Front Sight – Consultant Update	12/4/2017
3	A-009810-009811	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	12/5/2017
4	A-009812	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	12/12/2017
5	A-009813	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	12/18/2017
6	A-009814	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	12/26/2017
7	A-009815	Dziubla Notes Re: Front Sight - Telephone Call with Foreign Consultant and Jon Fleming	1/4/2016
8	A-009816	Dziubla Notes Re: Front Sight – Telephone call with Foreign Consultant	1/6/2016
9	A-009817	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	1/11/2016
10	A-009818	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultants	1/11/2016
11	A-009819	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/13/2016
12	A-009820	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2016
13	A-009821	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
14	A-009822	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
15	A-009825	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza, Mike Meacher, and Jon Fleming	5/18/2016
16	A-009826	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	6/14/2016
17	A-009827	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/6/2016
18	A-009828	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Ignatius Piazza, and Jon Fleming	9/26/2016
19	A-009832	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Mike Meacher	10/25/2016
20	A-009833	Correspondence Re: Interest Payment Due	11/1/2016
21	A-009834	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	11/15/2016
22	A-009835-009837	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/15/2016
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1	A-009838	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	12/2/2016
2	A-009840	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	N/A
3	A-009841	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/13/2015
4	A-009842	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/17/2015
5	A-009843	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	1/28/2015
6	A-009844	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	2/4/2015
7	A-009845	Dziubla Notes Re: Front Sight – Telephone Call with John Small	2/23/2015
8	A-009847	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	Undated
9	A-009848	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/12/2015
10	A-009849	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/2015
11	A-009851	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/12/2015
12	A-009853-009854	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/2/2015
13	A-009856	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
14	A-009857	Dziubla Notes Re: Front Sight – Telephone Call with NES	10/15/2015
15	A-009858	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	12/21/2015
16	A-009859	Dziubla Notes Re: Front Sight – Telephone Call with Mr. Piazza, Meacher, and Jon Fleming	12/22/2015
17	A-009860	Dziubla Notes Re: Front Sight – Telephone Call with Robin Bernhard	1/6/2014
18	A-009861	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
19	A-009862	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	10/15/2015
20	A-009865	Email Correspondence with Meacher Re: USCIS Business Plan	3/5/2014
21	A-009866	Dziubla Notes Re: Front Sight	
22	A-009868	Dziubla Notes Re: Front Sight – Telephone Call with Jon Small and Jon Fleming	5/20/2014
23	A-009869	Dziubla Notes Re: Front Sight – Telephone Call with Sarah Paul	6/22/2014
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1	A-009870-009871	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	7/6/2014
2	A-009872	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/21/2014
3	A-009873	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/26/2014
4	A-009874-009877	Front Sight Firearms Training Institute Newsletter	8/1/2014
5	A-009878	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	1/30/2013
6	A-009879	Dziubla Notes Re: Front Sight – Telephone Call with Phil Cohen, Jon Fleming, and Sean Flynn	2/22/13
7	A-009880	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Phil Cohen, and Jon Fleming	2/22/13
8	A-009881	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/8/2013
9	A-009882	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/18/2013
10	A-009883	Dziubla Notes Re: Front Sight – Telephone Call with Tom LaTour, John Small, Mike Meacher, and Jon Fleming	4/2/2013
11	A-009884	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/4/2013
12	A-009885	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jay Wu, Jon Fleming, and Tom LaTour.	4/19/2013
13	A-009886	Dziubla Notes Re: Front Sight – Telephone Call with Kathy Conroy and Jim Whitteron	5/6/2013
14	A-009887	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	5/23/2013
15	A-009888	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jim Whitteron, Jay Wu, Peter Geist, Jon Fleming	5/28/2013
16	A-009889	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	6/14/2013
17	A-009891	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/2/2013
18	A-009892	Dziubla Notes Re: Front Sight – Piazza Video	8/23/2013
19	A-009897	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/10/2013
20	A-009898	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	9/16/2013
21	A-009900	Dziubla Notes Re: Front Sight	10/4/2013
22	A-009901	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/11/2013
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1	A-009902	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	12/15/2013
2	A-009903	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming	12/17/2013
3	A-009904	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Jon Fleming	12/21/2013
4	A-009905	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour and Jon Fleming	12/23/2013
5	A-009906-009907	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour, Ignatius Piazza, Mike Meacher, Jon Fleming, and Frank Ingrande	12/24/2013
6	A-009908	Dziubla Notes Re: Front Sight – Telephone Call with Nevada Department of Employee Training and Rehabilitation	4/9/2011
7	A-009909-009910	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/16/2012
8	A-009911	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/6/2012
9	A-009912	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/27/2012
10	A-009913-009914	Dziubla Notes Re: Front Sight Background	10/15/2012
11	A-009915	Dziubla Notes Re: Front Sight – Telephone calls with Mike Meacher and Rod Oshita	10/24/2012
12	A-009916	Dziubla Notes Re: Front Sight – Telephone Call with Gonzalo Lopez-Jordan, Santiago Steed, and Alexandra Leon.	10/25/2012
13	A-009917	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	10/26/2012
14	A-009918	Dziubla Notes Re: Front Sight	12/19/2012
15	A-009919	Dziubla Notes re: FS docs	Undated
16	A-009921-009922	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	11/9/2018
17	A-009924-009925	Dziubla Notes Re: Front Sight	
18	A-021533-021541	Immigration Consultant Agreement with Dr. Sudhir Shah	9/21/2015
19	A-021542-021551	Immigration Consultant Agreement with Narendra B. Rajput	Undated
20	A-021552-021560	Immigration Consultant Agreement with Sunnyway International	10/4/2015
21	A-021561-021568	Immigration Consultant Agreement with Jin Shah Law Firm	4/29/2016
22	A-021569-021587	Foreign Placement Consultant Agreement with Beijing Sinowel Wealth Management Co. Ltd.	9/21/2015
23	A-021588-021597	Service Agreement with Mayflower Business Consulting Co. Ltd.	10/13/2015
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A-021598-021611		Master Foreign Placement Consultant Agreement with Abhinav Outsourcing Pvt. Ltd	Undated
A-021612-021620		Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	12/18/2016
A-021621-021628		Finder's Fee Agreement with Zhao Johnson	2/29/2016
Fourteenth Supplemental Disclosure			
Corrected⁵ Bates Nos.	Old Bates Nos.		
A-030978-030984	A-021629-021635	Promissory Note	10/6/2016
A-030985-030986	A-021636-021637	Audio Recordings from Front Sight Seminar on July 4, 2021 ⁶	07/04/2021
A-030987-030995	A-021638-021646	Transcript of the July 4, 2021 audio recordings from Front Sight Seminar on July 4, 2021	07/04/2021
A-030996-030999	A-021647-021650	Los Angeles Times article	12/13/2000
A-031000-031001	A-021651-021652	Legal Fight Donation Form	N/A
A-031002-031007	A-021653-021658	Front Sight Newsletter (redacted)	11/07/2021
A-031008-031013	A-021659-021664	Front Sight Newsletter (redacted)	11/08/2021
A-031014-031019	A-021665-021670	Front Sight Newsletter (redacted)	11/09/2021
A-031020	A-021671	Notice of Default and Demand for Payment letter	10/06/2021
Fifteenth Supplemental Disclosure			
A-031021		JTC Americas Invoice Loan Statement & Invoice	01/25/2022
A-031022-031025		JTC Americas, Las Vegas Development Fund Detail	01/25/2022
A-031026-031032		Bailey Kennedy, Statement No. 39232	02/02/2021
A-031033-031034		Hogan Hulet PLLC Invoice # 2131	02/01/2021
A-031035-031036		Hogan Hulet PLLC Invoice # 2153	03/01/2021
A-031037-031039		Hogan Hulet PLLC Invoice # 2164	03/31/2021
A-031040-031042		Hogan Hulet PPLC Invoice # 2193	04/30/2021
A-031043-031046		Hogan Hulet PLLC Invoice # 2233	06/01/2021
A-031047-031052		Hogan Hulet PLLC Invoice # 2237	06/30/2021
A-031053-031057		Hogan Hulet PLLC Invoice # 2263	07/30/2021
A-031058-031063		Hogan Hulet PPLC Invoice # 2283	08/31/2021

⁵ The documents produced in the Fourteenth Supplemental Disclosure, e-served on January 6, 2022, were inadvertently bates stamped with bates numbers that were already utilized in prior disclosure. Therefore, they are being re-produced in this Fifteenth Supplemental Disclosure with corrected bates numbers in bold.

⁶ The audio recording was previously provided to Front Sight through Dropbox. The EB5 Parties will not be providing an additional audio file to Front Sight and therefore requests that Front Sight merely rename the audio to its new bates number, A-030985-030986.

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A-031064-031067	Hogan Hulet PLLC Invoice # 2304	09/30/2021
A-031068-031073	Hogan Hulet PLLC Invoice # 2322	10/31/2021
A-031074-031077	Hogan Hulet PLLC Invoice # 2347	11/30/2021
A-031078-031080	Hogan Hulet PLLC Invoice # 2364	12/31/2021
A-031081-031083	Jones Lovelock Invoice #1645	12/01/2021
A-031084-031088	Jones Lovelock Invoice # 1680	12/29/2021
A-031089-031096	Jones Lovelock Invoice # 1712	01/19/2022
A-031097	Michael Brand, Invoice FS009	11/04/2018
A-031098	Michael Brand, Invoice FS010	01/04/2019

The EB5 Parties Updated and Amended Privilege Log, and Redaction Log was provided with the Thirteenth Supplement.

DATED this 26th day of January 2022.

JONES LOVELOCK

/s/ Andrea M. Champion, Esq.
 Nicole E. Lovelock, Esq.
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 Sue Trazig Cavaco, Esq.
 Nevada State Bar No. 6150
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Attorneys for Las Vegas Development Fund, LLC, EB5 Impact Capital Regional Center, LLC, EB5 Impact Advisors, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26th day of January 2022, a true and correct copy of the foregoing **THE EB5 PARTIES’ FIFTEENTH SUPPLEMENT TO INITIAL DISCLOSURES** was served by electronically submitting with the Clerk of the Court using electronic system and serving all parties with an email on record.

/s/ Julie Linton
 An employee of JONES LOVELOCK

From: no-reply@efilingmail.tylertech.cloud
To: [Lorie Januskevicius](#)
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 9246125
Date: Wednesday, January 26, 2022 2:39:44 PM

Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 9246125



This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	1/26/2022 2:38 PM PST
Filing Type	Service Only
Filing Description	THE EB5 PARTIES' FIFTEENTH SUPPLEMENT TO INITIAL DISCLOSURES
Filed By	Andrea Champion
	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Nicole Lovelock (nlovelock@joneslovelock.com) Kathryn Holbert (kholbert@farmercase.com) Lorie Januskevicius (ljanuskevicius@joneslovelock.com)

Service Contacts	Keith Greer (keith.greer@greerlaw.biz) Dianne Lyman (dianne.lyman@greerlaw.biz) Mona Gantos (mona.gantos@greerlaw.biz) Stephen Davis (sdavis@joneslovelock.com) Kenneth Hogan (ken@h2legal.com) Jeffrey Hulet (jeff@h2legal.com) Julie Linton (jlinton@joneslovelock.com) Georlen Spangler (jspangler@joneslovelock.com) Andrea Champion (achampion@joneslovelock.com)
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Document Details	
Served Document	Download Document
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EXHIBIT 16

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17 *Attorneys for Las Vegas Development*
18 *Fund, LLC, EB5 Impact Capital Regional*
19 *Center, LLC, EB5 Impact Advisors, LLC,*
20 *Robert W. Dziubla, Jon Fleming and Linda Stanwood*

21 **DISTRICT COURT**

22 **CLARK COUNTY, NEVADA**

23 FRONT SIGHT MANAGEMENT LLC, a
24 Nevada Limited Liability Company,

25 Plaintiff,

26 vs.

27 LAS VEGAS DEVELOPMENT FUND LLC,
28 a Nevada Limited Liability Company; et al.,

Defendants.

CASE NO.: A-18-781084-B
DEPT NO.: XVI

**THE EB5 PARTIES' SIXTEENTH
SUPPLEMENT TO INITIAL
DISCLOSURES**

AND ALL RELATED COUNTERCLAIMS.

Defendant/Counterclaimants Las Vegas Development Fund, LLC ("LVDF"), EB5 Impact Capital Regional Center, LLC ("EB5 Impact CRC"), EB5 Impact Advisors, LLC ("EB5 Impact"), Robert W. Dziubla ("Dziubla"), Jon Fleming ("Fleming"), and Linda Stanwood ("Stanwood")

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1 (collectively as “EB5 Parties”), by and through its attorneys of the law firm of JONES LOVELOCK and
 2 HOGAN HULET PLLC, hereby provides the following information in accordance with NRC 16.1.
 3 These disclosures are based upon information reasonably available to the EB5 Parties at this time,
 4 recognizing that discovery in this matter is continuing. The EB5 Parties reserve the right to
 5 supplement or modify these disclosures at any time as additional information becomes available
 6 during the course of discovery. **(All newly supplemented information is contained herein in**
 7 **bold.)**

DISCLOSURES PURSUANT TO N.R.C.P. 16.1(a)(1)

9 **A. The name and, if known, the address and telephone number of each**
 10 **individual likely to have information discoverable under Rule 26(b),**
 11 **including for impeachment or rebuttal, identifying the subjects of the**
 12 **information.**

12 EB5 Parties identify the following individuals as likely to have discoverable information
 13 relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure
 14 provided herein is based on information reasonably available at this time.

15 By disclosing the following individuals, EB5 Parties do not waive any objections that they
 16 have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify
 17 additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses
 18 identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
20 Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
24 Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
27 Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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Robert Dziubla c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn 95 Broken Rock Drive Henderson, Nevada 89074	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Linda Stanwood c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018

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1	A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
2	A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
3			
4	A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
5	A-00334-00336	AM response to stay of NOD	9/4/2018
6	A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
7	A-00339	Brochure Side 1 final	10/5/2015
8	A-00340	Brochure Side 2 (final)	10/5/2015
9	A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
10	A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
11	A-00417-00424	Deed of Trust - First Amendment	7/1/2017
12	A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
13	A-00462-00465	Email to Meacher re deal restructure	5/12/2016
14	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
15	A-00474-00482	Executive Summary Front Sight	3/12/2012
16	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
17	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
18	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
19	A-00486	Marketing Report - Front Sight	5/7/2016
20	A-00487	Marketing Report - Front Sight	4/9/2016
21	A-00488	Marketing Report - Front Sight	4/16/2016
22	A-00489-00490	Marketing Report - Front Sight	4/23/2016
23	A-00491-00492	Marketing Report - Front Sight	4/30/2016
24	A-00493	Marketing Report	2/25/2016
25	A-00494	Marketing Report	3/29/2016
26	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
27	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
28	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
	A-00514-00519	Mike Meacher response	3/11/2016
	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
	A-00521	Notes of calls with Piazza and Meacher	6/14/2018

1	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
2	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
3	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
4	A-00534-00540	Notice of Default	7/30/2018
5	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
6	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
7	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
8	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
9	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
10	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
11	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
	First Supplemental Disclosure		
12	A-000702-000856	Accounting and Fees	Various
13	A-000857	Independent contractor Agreement	5/31/2015
14	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
15	A-000870-000878	Pre-Marketing Agreement	10/16/2015
16	A-000879-000894	Emails	5/2/2018
17	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
18	A-000900-000903	Emails	5/8/2015
19	A-000904-000922	Accounting	Various
20	A-000923-000927	Amendment to Loan Agreement	11/14/2017
21	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
22	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
23	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
24	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
25	A-001214-001243	Current Major Contracts	8/30/2018
26	A-001244-001246	Response to Temporary Stay	9/4/2018
27	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
28	A-001249-001251	Pictures- Exemplar Approval	N/A
	A-001252-001270	Loan Agreement	10/31/2017
	A-001271-001372	Construction Loan Agreement	10/6/2016

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1	A-001373-001376	Emails	Various
2	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
3	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
4	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
5	A-001407-001417	Emails	Various
6	A-001418-001425	Memo-Marketing Update	11/3/2015
7	A-001426-001431	Emails	Various
8	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
9	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
10	A-001447-001459	Pictures	8/23/2018
11	A-001460-001461	Pro Forma Statements of Income	N/A
12	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
13	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
14	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
15	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
16	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
17	A -001764-001765	Receipt of Copy	10/30/18
18	A-001766-001917	Front Sight Documents	Various
19	A-001918-006138	John Fleming Emails	Various
20	A-006139-008763	Robert Dziubla Emails	Various
21	Third Supplemental Disclosure¹		
22	A-008764-008976	EB5IA Cost and Expense Backup	Various
23	A-008977-009925	Dziubla Front Sight File	Various
24	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
25	Fourth Supplemental Disclosure		
26	A-010008-010013	FS Fed Tax Return relevant pages	2016
27	A-010014-010018	FS YE Financial Statements	2017
28	A-010019-010024	FS Tax Return Relevant Pages	2017
	A-010025-010047	FS Federal Tax Return	2017
	A-010048	Concourse Photo	N/A
	A-010049-010096	Construction Timeline	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

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1	A-010097-010192	Economic Impact Analysis	11/23/13
2	A-010193	Front Entry Looking West Composite	N/A
3	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
4	A-010200-010216	Holecek Loan Agreement	02/07/06
5	A-010217	Hotel for Life Screenshot	N/A
6	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
7	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
8	A-010223-010227	NOD - Formal Notice	09/10/18
9	A-010228-010232	Patriot Pavilion renderings	N/A
10	A-010233	Patriot Pavilion description in USCIS plan	N/A
11	A-010234	Patriot Pavilion Pad	10/11/18
12	A-010235-010247	Pictures and renderings	N/A
13	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
14	A-010330-010417	PPM Front Sight 88	07/01/16
15	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
16	A-010455-010616	Project Business Plan	03/17/14
17	A-010617-010619	Renderings - FS	N/A
18	A-010620	Resort Pad	10/11/18
19	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
20	A-010737-010756	Valuation - business enterprise	12/31/14
21	A-010756-010910	Empyrean West Emails	Various
22	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
23	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
24	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
25	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
26	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
27	A-020635 -020816	Flynn Emails	Various
28	Fifth Supplemental Disclosure		
	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
	A-021507-021512	Robert Dziubla Resume	N/A
	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

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1	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
2	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
3	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
4	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
5	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
6	A-021533-021628	Immigration Consultant Agreements	Various
7	Sixth Supplemental Disclosure		
8	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
9	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
10	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
11	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
12	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
13	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
14	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
15	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
16	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
17	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
18	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
19	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
20	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
21	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
22	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
23	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
24	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
25	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
26	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
27	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
28	A-021810-021834	Verified Complaint	11/13/2018
	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
	Seventh Supplemental Disclosure		
	A-021845-021852	Default Notices	Various
	A-021853-021869	Inspection Photos	N/A
	A-021870-021883	Loan Documents and Demand Letters	Various
	A-021884-021909	Site Renderings	N/A
	A-021910-021942	NES Financial Loan Statements & Invoices	Various
	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
	A-021975-021984	Marketing Reports	Various
	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
	A-022025-022049	Travel Documentation and Receipts	Various

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1	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
2	A-022199-022244	Front Sight Marketing Materials	N/A
3	A-022245-022261	Holocek Loan Agreement	2/7/2006
4	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
5	A-022268	HREC Invoice	9/29/2014
6	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
7	A-022275-022277	Front Sight Marketing Materials	N/A
8	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
9	A-022284-022287	Front Sight Letter to Members	8/1/2014
10	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
11	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
12	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
13	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
14	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
15	A-022296	HREC Invoice for Professional Services	9/29/2014
16	A-022297-022298	Front Sight Competitor Comparison	N/A
17	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
18	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
19	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
20	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
21	A-022313-022325	Front Sight Pro Forma	N/A
22	A-022326	Front Sight Resorts Land Use Plan	N/A
23	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017
24	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
25	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
26	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
27	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
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1	A-022405-022482	Sinowel Communications and Marketing Materials	Various
2	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
3	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
4	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
5	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
6	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
7	A-027350-027351	Administrative Fee	N/A
8	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
9	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
10	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
11	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
12	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
13	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
14	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
15	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
16	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
17	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
18	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
19	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
20	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
21	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
22	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
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1	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
2	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
3	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
4	A-028771-028839	Email Correspondence with Preston Arza	Various
5	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
6	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
7	A-029211-029255	Front Sight Email Blasts	Various
8	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
9	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
10	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
11	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
12	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
13	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
14	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
15	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
16	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
17	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
18	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
19	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
20	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
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1	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
2			
3	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
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5	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
6	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
7	A-029582	Project Update to EB5 Investors	10/14/2016
8	A-029583-029584	Project Update for Agents	8/27/2019
9	A-029585	Project Update Q1 2017	4/21/2017
10	A-029586-029587	Project Update Q1 2018	7/26/2018
11	A-029588-029589	Project Update Q3 2017	10/21/2017
12	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
13	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
14	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
15			
16	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
17	A-029648-029657	Immigration Consultant Fee Agreement	N/A
18	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
19	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
20			
21	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
22	A-029730-029740	Home Depo Account Statements	Various
23	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
24			
25			
26	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
27	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
28			

1	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
2	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
3	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
4			
5	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
6			
7	A-029761-029763	UCC Financing Statement	10/13/2016
8	A-029764-029767	NES Loan Statements & Invoices	Various
9	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
10	A-029770	NES Loan Advance Form	10/7/2016
11	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
12	A-029773	NES Financial Master Account Statement	8/31/2016
13	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
14	A-029775-029798	Front Sight Email Blasts	Various
15	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
16	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
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13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
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16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
20	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
21	Eighth Supplemental Disclosure		
22	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
23	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
24			
25	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
26			
27	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
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1	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
2	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
3	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
4	Ninth Supplemental Disclosure		
5	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
6	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
7	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
8	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
9	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
10	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
11	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
12	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
13	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
14	A-030375	Front Sight Marketing Report	3/29/2016
15	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
16	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
17	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
18	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
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1	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
2	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
3			
4	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
5	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
6			
7	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
8			
9	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
10			
11	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
12	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
13			
14	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
15			
16	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
17			
18	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
19			
20	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
21			
22	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
23			
24	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
25			
26	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
27			
28	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015

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1	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
2	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
3	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
4	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
5	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
6	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
7	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
8	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
9	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
10	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
11	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
12	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
13	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
14	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
15	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
16	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015

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1	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
2			
3	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
4			
5	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
6			
7	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
8			
9	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
10			
11	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
12	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
13			
14	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
15	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
16			
17	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
18			
19	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
20			
21	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
22			
23	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
24			
25	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
26			
27	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
28			
	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016

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1	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
2	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
3	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
4	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
5	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
6	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
7	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
8	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
9	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
10	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
11	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
12	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
13	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
14	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
15	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
16	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
17	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
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1	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
2	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
3	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
4	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi's Visit	7/4/2017
5	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
6	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
7	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
8	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
9	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
10	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
11	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
12	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
13	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
14	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
15	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment -[Redacted] Skype Call	1/28/2018
16	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
17	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
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1	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
2	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
3	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
4	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
5	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
6	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
7	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
8	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
9	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
10	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
11	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
12	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
13	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
14	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
15	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
16	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015

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1	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
2			
3	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
4			
5	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
6			
7	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
8			
9	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
10			
11	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
12			
13	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
14			
15	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
16			
17	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
18			
19	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
20			
21	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
22			
23	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
24			
25	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
26			
27	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
28			
	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015

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1	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
2			
3	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
4			
5	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
6			
7	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
8			
9			
10	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
11			
12	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
13			
14	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
15			
16	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
17			
18	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
19			
20	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
21			
22	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
23			
24	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
25			
26	Tenth Supplemental Disclosure		
27	CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
28	SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020

Eleventh Supplemental Disclosure

USCP00001- USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
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Twelfth Supplemental Disclosure

A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021
A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC's Opposition to the EB-5 Parties' Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

Thirteenth Supplemental Disclosure⁴

A-008950-008953	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	6/10/2015
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³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver's license numbers).

⁴ All documents produced in this Thirteenth Supplemental Disclosure were either previously withheld by the EB5 Parties or were previously produced with redaction(s). The EB5 Parties now produce, or re-produce, these documents, with or without redaction, as reflected in the updated and amended redaction log served herewith.

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1	A-008954	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/14/2015
2	A-008955-0008958	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	10/15/2015
3			
4	A-008959-008961	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/2015
5			
6	A-008962	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
7	A-008963-008966	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/15
8			
9	A-008967	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
10	A-008968	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	11/18/2015
11	A-008969-008971	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	11/18/2015
12			
13	A-008995-009008	Front Sight Project Investor Tracking List	12/22/2015
14	A-009021-009022	Front Sight Project Investor Tracking List	12/22/2015
15	A-009074-009083	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	6/14/2016
16	A-009157	Dziubla Notes Re: Front Sight – Telephone Call with Raj	7/2/2018
17	A-009168	Dziubla Notes Re: Front Sight – Telephone Call with Michael Roga	12/8/2015
18	A-009203-009204	Independent Contractor Agreement with Guyuan Yu	11/26/2016
19	A-009205-009206	Independent Contractor Agreement with Chi Gao	11/26/2016
20	A-009207-009208	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
21	A-009209-009210	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
22			
23			
24	A-009211	Letter to [Redacted Potential EB-5 Investor] Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
25			
26			
27	A-009479-009480	Escondido Police Department Report	11/13/2018
28	A-009481-009482	Penal Code 653.2	N/A

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1	A-009483	Email Correspondence to Robert Dziubla Re: A Situation that you should be aware of	12/10/2018
2	A-009484-009486	Email Correspondence between Robert Dziubla and Craig Carter Re: We need your help, please stochastic terrorism	12/27/2018; 12/12/2018
3	A-009487	Dziubla Notes Re: Piazza Emails	N/A
4	A-009488-009495	Email Correspondence to Robert Dziubla Re: Pyramid Gun Sight	11/22/2018
5	A-009496	Dziubla Notes Re: Front Sight Piazza's Hit Piece	10/22/2018
6	A-009513-009521	Email Correspondence Re: Enemy Update #4	7/8/2019
7	A-009522-009535	Webpage: "Extremely Confidential – Front Sight Members Only. Dr. Piazza's Personal Video Message to YOU from the top of Front Sight's SWAT Tower"	7/12/2019
8	A-009751-009752	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/27/2018
9	A-009753--009754	Dziubla Notes Re: Front Sight Telephone Call With Ignatius Piazza, Michael Meacher and Mike Brand	6/14/2018
10	A-009755-009756	Email Correspondence Re: Commitment Letter – Friday Conference Call	6/14/2018
11	A-009759	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/1/2018
12	A-009760	Dziubla Notes Re: Front Sight – Telephone Call with Frank Jansen	8/14/2018
13	A-009764	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	8/26/2018
14	A-009766	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultant	8/28/2018
15	A-009767	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Bill Cockston, Bill Capeles, and Bob Lauder	10/11/2018
16	A-009769	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2017; 1/31/17
17	A-009770	Dziubla Notes Re: Front Sight	1/19/2017
18	A-009772	Email correspondence Re: Updated xls - LVDF	2/3/2017
19	A-009773	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/15/2017
20	A-009774	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his calls with Mike Meacher	2/18/2017
21	A-009775	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/20/2017
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1	A-009776	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his call with Mike Meacher	2/22/2017
2	A-009777	Dziubla Notes Re: Front Sight – Telephone Call with NES	2/24/2017
3	A-009778	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	3/1/2017
4	A-009779	Dziubla Notes Re: Front Sight – Telephone Call with Kyle Thomas at Congressman Amodei’s office.	3/2/2017
5	A-009780	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	4/5/2017
6	A-009781-009782	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/20/2017
7	A-009783	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/25/2017
8	A-009784	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/1/2017
9	A-009785-009786	Dziubla Notes Re: Front Sight –Telephone Call with Kyle Scott, Ignatius Piazza, Mike Meacher, and Jon Fleming	5/17/2017
10	A-009787	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/29/2017
11	A-009788	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/17/2017
12	A-009789	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	6/5/2017
13	A-009790	Dziubla Notes Re: Front Sight	6/6/2017
14	A-009792	Dziubla Notes Re: Front Sight –Telephone Call with Foreign Consultant	6/7/2017
15	A-009796	Dziubla Notes Re: Front Sight – Voicemail from Ignatius Piazza	7/16/2017
16	A-009797	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	7/20/2017
17	A-009798	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/6/2017
18	A-009799	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/25/2017
19	A-009800	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/2/2017
20	A-009801	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/19/2017
21	A-009802-009803	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/12/2017
22	A-009805-009806	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/6/2017
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1	A-009808	Dziubla Notes Re: Front Sight – Telephone Call with Matt Schulz and Jon Fleming	11/30/2017
2	A-009809	Dziubla Notes Re: Front Sight – Consultant Update	12/4/2017
3	A-009810-009811	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	12/5/2017
4	A-009812	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	12/12/2017
5	A-009813	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	12/18/2017
6	A-009814	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	12/26/2017
7	A-009815	Dziubla Notes Re: Front Sight - Telephone Call with Foreign Consultant and Jon Fleming	1/4/2016
8	A-009816	Dziubla Notes Re: Front Sight – Telephone call with Foreign Consultant	1/6/2016
9	A-009817	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	1/11/2016
10	A-009818	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultants	1/11/2016
11	A-009819	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/13/2016
12	A-009820	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2016
13	A-009821	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
14	A-009822	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
15	A-009825	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza, Mike Meacher, and Jon Fleming	5/18/2016
16	A-009826	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	6/14/2016
17	A-009827	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/6/2016
18	A-009828	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Ignatius Piazza, and Jon Fleming	9/26/2016
19	A-009832	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Mike Meacher	10/25/2016
20	A-009833	Correspondence Re: Interest Payment Due	11/1/2016
21	A-009834	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	11/15/2016
22	A-009835-009837	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/15/2016
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1	A-009838	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	12/2/2016
2	A-009840	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	N/A
3	A-009841	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/13/2015
4	A-009842	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/17/2015
5	A-009843	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	1/28/2015
6	A-009844	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	2/4/2015
7	A-009845	Dziubla Notes Re: Front Sight – Telephone Call with John Small	2/23/2015
8	A-009847	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	Undated
9	A-009848	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/12/2015
10	A-009849	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/2015
11	A-009851	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/12/2015
12	A-009853-009854	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/2/2015
13	A-009856	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
14	A-009857	Dziubla Notes Re: Front Sight – Telephone Call with NES	10/15/2015
15	A-009858	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	12/21/2015
16	A-009859	Dziubla Notes Re: Front Sight – Telephone Call with Mr. Piazza, Meacher, and Jon Fleming	12/22/2015
17	A-009860	Dziubla Notes Re: Front Sight – Telephone Call with Robin Bernhard	1/6/2014
18	A-009861	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
19	A-009862	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	10/15/2015
20	A-009865	Email Correspondence with Meacher Re: USCIS Business Plan	3/5/2014
21	A-009866	Dziubla Notes Re: Front Sight	
22	A-009868	Dziubla Notes Re: Front Sight – Telephone Call with Jon Small and Jon Fleming	5/20/2014
23	A-009869	Dziubla Notes Re: Front Sight – Telephone Call with Sarah Paul	6/22/2014
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1	A-009870-009871	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	7/6/2014
2	A-009872	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/21/2014
3	A-009873	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/26/2014
4	A-009874-009877	Front Sight Firearms Training Institute Newsletter	8/1/2014
5	A-009878	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	1/30/2013
6	A-009879	Dziubla Notes Re: Front Sight – Telephone Call with Phil Cohen, Jon Fleming, and Sean Flynn	2/22/13
7	A-009880	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Phil Cohen, and Jon Fleming	2/22/13
8	A-009881	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/8/2013
9	A-009882	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/18/2013
10	A-009883	Dziubla Notes Re: Front Sight – Telephone Call with Tom LaTour, John Small, Mike Meacher, and Jon Fleming	4/2/2013
11	A-009884	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/4/2013
12	A-009885	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jay Wu, Jon Fleming, and Tom LaTour.	4/19/2013
13	A-009886	Dziubla Notes Re: Front Sight – Telephone Call with Kathy Conroy and Jim Whitteron	5/6/2013
14	A-009887	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	5/23/2013
15	A-009888	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jim Whitteron, Jay Wu, Peter Geist, Jon Fleming	5/28/2013
16	A-009889	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	6/14/2013
17	A-009891	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/2/2013
18	A-009892	Dziubla Notes Re: Front Sight – Piazza Video	8/23/2013
19	A-009897	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/10/2013
20	A-009898	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	9/16/2013
21	A-009900	Dziubla Notes Re: Front Sight	10/4/2013
22	A-009901	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/11/2013
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1	A-009902	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	12/15/2013
2	A-009903	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming	12/17/2013
3	A-009904	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Jon Fleming	12/21/2013
4	A-009905	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour and Jon Fleming	12/23/2013
5	A-009906-009907	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour, Ignatius Piazza, Mike Meacher, Jon Fleming, and Frank Ingrande	12/24/2013
6	A-009908	Dziubla Notes Re: Front Sight – Telephone Call with Nevada Department of Employee Training and Rehabilitation	4/9/2011
7	A-009909-009910	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/16/2012
8	A-009911	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/6/2012
9	A-009912	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/27/2012
10	A-009913-009914	Dziubla Notes Re: Front Sight Background	10/15/2012
11	A-009915	Dziubla Notes Re: Front Sight – Telephone calls with Mike Meacher and Rod Oshita	10/24/2012
12	A-009916	Dziubla Notes Re: Front Sight – Telephone Call with Gonzalo Lopez-Jordan, Santiago Steed, and Alexandra Leon.	10/25/2012
13	A-009917	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	10/26/2012
14	A-009918	Dziubla Notes Re: Front Sight	12/19/2012
15	A-009919	Dziubla Notes re: FS docs	Undated
16	A-009921-009922	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	11/9/2018
17	A-009924-009925	Dziubla Notes Re: Front Sight	
18	A-021533-021541	Immigration Consultant Agreement with Dr. Sudhir Shah	9/21/2015
19	A-021542-021551	Immigration Consultant Agreement with Narendra B. Rajput	Undated
20	A-021552-021560	Immigration Consultant Agreement with Sunnyway International	10/4/2015
21	A-021561-021568	Immigration Consultant Agreement with Jin Shah Law Firm	4/29/2016
22	A-021569-021587	Foreign Placement Consultant Agreement with Beijing Sinowel Wealth Management Co. Ltd.	9/21/2015
23	A-021588-021597	Service Agreement with Mayflower Business Consulting Co. Ltd.	10/13/2015
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1	A-021598-021611	Master Foreign Placement Consultant Agreement with Abhinav Outsourcing Pvt. Ltd	Undated
2	A-021612-021620	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	12/18/2016
3	A-021621-021628	Finder's Fee Agreement with Zhao Johnson	2/29/2016
4	Fourteenth Supplemental Disclosure		
5	Corrected ⁵ Bates Nos.	Old Bates Nos.	
6	A-030978-030984	A-021629-021635	Promissory Note
7	A-030985-030986	A-021636-021637	Audio Recordings from Front Sight Seminar on July 4, 2021 ⁶
8	A-030987-030995	A-021638-021646	Transcript of the July 4, 2021 audio recordings from Front Sight Seminar on July 4, 2021
9	A-030996-030999	A-021647-021650	Los Angeles Times article
10	A-031000-031001	A-021651-021652	Legal Fight Donation Form
11	A-031002-031007	A-021653-021658	Front Sight Newsletter (redacted)
12	A-031008-031013	A-021659-021664	Front Sight Newsletter (redacted)
13	A-031014-031019	A-021665-021670	Front Sight Newsletter (redacted)
14	A-031020	A-021671	Notice of Default and Demand for Payment letter
15	Fifteenth Supplemental Disclosure		
16	A-031021	JTC Americas Invoice Loan Statement & Invoice	01/25/2022
17	A-031022-031025	JTC Americas, Las Vegas Development Fund Detail	01/25/2022
18	A-031026-031032	Bailey Kennedy, Statement No. 39232	02/02/2021
19	A-031033-031034	Hogan Hulet PLLC Invoice # 2131	02/01/2021
20	A-031035-031036	Hogan Hulet PLLC Invoice # 2153	03/01/2021
21	A-031037-031039	Hogan Hulet PLLC Invoice # 2164	03/31/2021
22	A-031040-031042	Hogan Hulet PPLC Invoice # 2193	04/30/2021
23	A-031043-031046	Hogan Hulet PLLC Invoice # 2233	06/01/2021
24	A-031047-031052	Hogan Hulet PLLC Invoice # 2237	06/30/2021
25	A-031053-031057	Hogan Hulet PLLC Invoice # 2263	07/30/2021
26	A-031058-031063	Hogan Hulet PPLC Invoice # 2283	08/31/2021

⁵ The documents produced in the Fourteenth Supplemental Disclosure, e-served on January 6, 2022, were inadvertently bates stamped with bates numbers that were already utilized in prior disclosure. Therefore, they are being re-produced in this Fifteenth Supplemental Disclosure with corrected bates numbers in bold.

⁶ The audio recording was previously provided to Front Sight through Dropbox. The EB5 Parties will not be providing an additional audio file to Front Sight and therefore requests that Front Sight merely rename the audio to its new bates number, A-030985-030986.

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A-031064-031067	Hogan Hulet PPLC Invoice # 2304	09/30/2021
A-031068-031073	Hogan Hulet PLLC Invoice # 2322	10/31/2021
A-031074-031077	Hogan Hulet PLLC Invoice # 2347	11/30/2021
A-031078-031080	Hogan Hulet PLLC Invoice # 2364	12/31/2021
A-031081-031083	Jones Lovelock Invoice #1645	12/01/2021
A-031084-031088	Jones Lovelock Invoice # 1680	12/29/2021
A-031089-031096	Jones Lovelock Invoice # 1712	01/19/2022
A-031097	Michael Brand, Invoice FS009	11/04/2018
A-031098	Michael Brand, Invoice FS010	01/04/2019
Sixteenth Supplemental Disclosure		
A-031099-031446	Front Sight Newsletters	10/14/2021 – 02/01/2021

The EB5 Parties Updated and Amended Privilege Log, and Redaction Log was provided with the Thirteenth Supplement.

DATED this 11th day of February 2022.

JONES LOVELOCK

/s/ Andrea M. Champion, Esq.
 Nicole E. Lovelock, Esq.
 Nevada State Bar No. 11187
 Sue Trazig Cavaco, Esq.
 Nevada State Bar No. 6150
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 6600 Amelia Earhart Court, Suite C
 Las Vegas, Nevada 89119

*Attorneys for Las Vegas Development
 Fund, LLC, EB5 Impact Capital Regional
 Center, LLC, EB5 Impact Advisors, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of February 2022, a true and correct copy of the foregoing **THE EB5 PARTIES’ SIXTEENTH SUPPLEMENT TO INITIAL DISCLOSURES** was served by electronically submitting with the Clerk of the Court using electronic system and serving all parties with an email on record.

/s/ Julie Linton
 An employee of JONES LOVELOCK

From: no-reply@efilingmail.tylertech.cloud
To: [Lorie Januskevicius](#)
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 9349132
Date: Friday, February 11, 2022 1:26:01 PM

Notification of Service

Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 9349132



This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	2/11/2022 1:25 PM PST
Filing Type	Service Only
Filing Description	THE EB5 PARTIES' SIXTEENTH SUPPLEMENT TO INITIAL DISCLOSURES
Filed By	Andrea Champion
	Front Sight Management LLC: John Aldrich (jaldrich@johnaldrichlawfirm.com) Traci Bixenmann (traci@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Kathryn Holbert (kholbert@farmercase.com) Lorie Januskevicius (ljanuskevicius@joneslovelock.com) Keith Greer (keith.greer@greerlaw.biz)

Service Contacts	Dianne Lyman (dianne.lyman@greerlaw.biz) Mona Gantos (mona.gantos@greerlaw.biz) Stephen Davis (sdavis@joneslovelock.com) Kenneth Hogan (ken@h2legal.com) Jeffrey Hulet (jeff@h2legal.com) Julie Linton (jlinton@joneslovelock.com) Georlen Spangler (jspangler@joneslovelock.com) Andrea Champion (achampion@joneslovelock.com) Nicole Lovelock (nlovelock@joneslovelock.com)
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EXHIBIT 17

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Fund, LLC, EB5 Impact Capital Regional
Center, LLC, EB5 Impact Advisors, LLC,
Robert W. Dziubla, Jon Fleming and Linda Stanwood*

DISTRICT COURT

CLARK COUNTY, NEVADA

19 FRONT SIGHT MANAGEMENT LLC, a
Nevada Limited Liability Company,

20 Plaintiff,

21 vs.

22 LAS VEGAS DEVELOPMENT FUND LLC,
a Nevada Limited Liability Company; et al.,

23 Defendants.

CASE NO.: A-18-781084-B
DEPT NO.: XVI

**THE EB5 PARTIES' SEVENTEENTH
SUPPLEMENT TO INITIAL
DISCLOSURES**

24 AND ALL RELATED COUNTERCLAIMS.
25

26 Defendant/Counterclaimants Las Vegas Development Fund, LLC ("LVDF"), EB5 Impact
27 Capital Regional Center, LLC ("EB5 Impact CRC"), EB5 Impact Advisors, LLC ("EB5 Impact"),
28 Robert W. Dziubla ("Dziubla"), Jon Fleming ("Fleming"), and Linda Stanwood ("Stanwood")

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1 (collectively as “EB5 Parties”), by and through its attorneys of the law firm of JONES LOVELOCK and
 2 HOGAN HULET PLLC, hereby provides the following information in accordance with NRC.P. 16.1.
 3 These disclosures are based upon information reasonably available to the EB5 Parties at this time,
 4 recognizing that discovery in this matter is continuing. The EB5 Parties reserve the right to
 5 supplement or modify these disclosures at any time as additional information becomes available
 6 during the course of discovery. **(All newly supplemented information is contained herein in**
 7 **bold.)**

DISCLOSURES PURSUANT TO N.R.C.P. 16.1(a)(1)

9 **A. The name and, if known, the address and telephone number of each**
 10 **individual likely to have information discoverable under Rule 26(b),**
 11 **including for impeachment or rebuttal, identifying the subjects of the**
 12 **information.**

13 EB5 Parties identify the following individuals as likely to have discoverable information
 14 relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure
 15 provided herein is based on information reasonably available at this time.

16 By disclosing the following individuals, EB5 Parties do not waive any objections that they
 17 have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify
 18 additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses
 19 identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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Robert Dziubla c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Jon Fleming c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn 95 Broken Rock Drive Henderson, Nevada 89074	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Linda Stanwood c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

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B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

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Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018

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1	A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
2	A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
3			
4	A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018
5	A-00334-00336	AM response to stay of NOD	9/4/2018
6	A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
7	A-00339	Brochure Side 1 final	10/5/2015
8	A-00340	Brochure Side 2 (final)	10/5/2015
9	A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
10	A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
11	A-00417-00424	Deed of Trust - First Amendment	7/1/2017
12	A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
13	A-00462-00465	Email to Meacher re deal restructure	5/12/2016
14	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
15	A-00474-00482	Executive Summary Front Sight	3/12/2012
16	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
17	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
18	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
19	A-00486	Marketing Report - Front Sight	5/7/2016
20	A-00487	Marketing Report - Front Sight	4/9/2016
21	A-00488	Marketing Report - Front Sight	4/16/2016
22	A-00489-00490	Marketing Report - Front Sight	4/23/2016
23	A-00491-00492	Marketing Report - Front Sight	4/30/2016
24	A-00493	Marketing Report	2/25/2016
25	A-00494	Marketing Report	3/29/2016
26	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
27	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
28	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
	A-00514-00519	Mike Meacher response	3/11/2016
	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
	A-00521	Notes of calls with Piazza and Meacher	6/14/2018

1	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
2	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
3	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
4	A-00534-00540	Notice of Default	7/30/2018
5	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
6	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
7	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
8	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
9	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
10	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
11	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
	First Supplemental Disclosure		
12	A-000702-000856	Accounting and Fees	Various
13	A-000857	Independent contractor Agreement	5/31/2015
14	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
15	A-000870-000878	Pre-Marketing Agreement	10/16/2015
16	A-000879-000894	Emails	5/2/2018
17	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
18	A-000900-000903	Emails	5/8/2015
19	A-000904-000922	Accounting	Various
20	A-000923-000927	Amendment to Loan Agreement	11/14/2017
21	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
22	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
23	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
24	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
25	A-001214-001243	Current Major Contracts	8/30/2018
26	A-001244-001246	Response to Temporary Stay	9/4/2018
27	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
28	A-001249-001251	Pictures- Exemplar Approval	N/A
	A-001252-001270	Loan Agreement	10/31/2017
	A-001271-001372	Construction Loan Agreement	10/6/2016

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1	A-001373-001376	Emails	Various
2	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
3	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
4	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
5	A-001407-001417	Emails	Various
6	A-001418-001425	Memo-Marketing Update	11/3/2015
7	A-001426-001431	Emails	Various
8	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
9	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
10	A-001447-001459	Pictures	8/23/2018
11	A-001460-001461	Pro Forma Statements of Income	N/A
12	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
13	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
14	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
15	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
16	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
17	A -001764-001765	Receipt of Copy	10/30/18
18	A-001766-001917	Front Sight Documents	Various
19	A-001918-006138	John Fleming Emails	Various
20	A-006139-008763	Robert Dziubla Emails	Various
21	Third Supplemental Disclosure¹		
22	A-008764-008976	EB5IA Cost and Expense Backup	Various
23	A-008977-009925	Dziubla Front Sight File	Various
24	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
25	Fourth Supplemental Disclosure		
26	A-010008-010013	FS Fed Tax Return relevant pages	2016
27	A-010014-010018	FS YE Financial Statements	2017
28	A-010019-010024	FS Tax Return Relevant Pages	2017
	A-010025-010047	FS Federal Tax Return	2017
	A-010048	Concourse Photo	N/A
	A-010049-010096	Construction Timeline	N/A

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

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1	A-010097-010192	Economic Impact Analysis	11/23/13
2	A-010193	Front Entry Looking West Composite	N/A
3	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
4	A-010200-010216	Holecek Loan Agreement	02/07/06
5	A-010217	Hotel for Life Screenshot	N/A
6	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
7	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
8	A-010223-010227	NOD - Formal Notice	09/10/18
9	A-010228-010232	Patriot Pavilion renderings	N/A
10	A-010233	Patriot Pavilion description in USCIS plan	N/A
11	A-010234	Patriot Pavilion Pad	10/11/18
12	A-010235-010247	Pictures and renderings	N/A
13	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
14	A-010330-010417	PPM Front Sight 88	07/01/16
15	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
16	A-010455-010616	Project Business Plan	03/17/14
17	A-010617-010619	Renderings - FS	N/A
18	A-010620	Resort Pad	10/11/18
19	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
20	A-010737-010756	Valuation - business enterprise	12/31/14
21	A-010756-010910	Empyrean West Emails	Various
22	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
23	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
24	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
25	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
26	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
27	A-020635 -020816	Flynn Emails	Various
28	Fifth Supplemental Disclosure		
	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
	A-021507-021512	Robert Dziubla Resume	N/A
	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

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1	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11
2	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
3	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
4	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
5	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
6	A-021533-021628	Immigration Consultant Agreements	Various
7	Sixth Supplemental Disclosure		
8	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
9	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
10	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
11	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
12	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
13	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
14	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
15	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
16	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
17	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
18	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
19	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
20	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
21	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
22	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
23	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
24	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
25	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
26	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
27	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
28	A-021810-021834	Verified Complaint	11/13/2018
	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
	Seventh Supplemental Disclosure		
	A-021845-021852	Default Notices	Various
	A-021853-021869	Inspection Photos	N/A
	A-021870-021883	Loan Documents and Demand Letters	Various
	A-021884-021909	Site Renderings	N/A
	A-021910-021942	NES Financial Loan Statements & Invoices	Various
	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
	A-021975-021984	Marketing Reports	Various
	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
	A-022025-022049	Travel Documentation and Receipts	Various

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1	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
2	A-022199-022244	Front Sight Marketing Materials	N/A
3	A-022245-022261	Holocek Loan Agreement	2/7/2006
4	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
5	A-022268	HREC Invoice	9/29/2014
6	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
7	A-022275-022277	Front Sight Marketing Materials	N/A
8	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
9	A-022284-022287	Front Sight Letter to Members	8/1/2014
10	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
11	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
12	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
13	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
14	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
15	A-022296	HREC Invoice for Professional Services	9/29/2014
16	A-022297-022298	Front Sight Competitor Comparison	N/A
17	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
18	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
19	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
20	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
21	A-022313-022325	Front Sight Pro Forma	N/A
22	A-022326	Front Sight Resorts Land Use Plan	N/A
23	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017
24	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
25	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
26	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
27	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
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1	A-022405-022482	Sinowel Communications and Marketing Materials	Various
2	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
3	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
4	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
5	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
6	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
7	A-027350-027351	Administrative Fee	N/A
8	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
9	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
10	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
11	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
12	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
13	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
14	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
15	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
16	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
17	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
18	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
19	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
20	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
21	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
22	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
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1	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
2	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
3	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
4	A-028771-028839	Email Correspondence with Preston Arza	Various
5	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
6	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
7	A-029211-029255	Front Sight Email Blasts	Various
8	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
9	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
10	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
11	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
12	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
13	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
14	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
15	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
16	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
17	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
18	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
19	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
20	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
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1	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
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3	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
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5	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
6	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
7	A-029582	Project Update to EB5 Investors	10/14/2016
8	A-029583-029584	Project Update for Agents	8/27/2019
9	A-029585	Project Update Q1 2017	4/21/2017
10	A-029586-029587	Project Update Q1 2018	7/26/2018
11	A-029588-029589	Project Update Q3 2017	10/21/2017
12	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
13	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
14	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
15			
16	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
17	A-029648-029657	Immigration Consultant Fee Agreement	N/A
18	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
19	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
20			
21	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
22	A-029730-029740	Home Depo Account Statements	Various
23	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
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25			
26	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
27	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
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1	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
2	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
3	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
4			
5	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
6			
7	A-029761-029763	UCC Financing Statement	10/13/2016
8	A-029764-029767	NES Loan Statements & Invoices	Various
9	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
10	A-029770	NES Loan Advance Form	10/7/2016
11	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
12	A-029773	NES Financial Master Account Statement	8/31/2016
13	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
14	A-029775-029798	Front Sight Email Blasts	Various
15	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
16	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
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16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
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18			
19	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
20	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
21	Eighth Supplemental Disclosure		
22	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
23	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
24			
25	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
26			
27	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
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1	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
2	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
3	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
4	Ninth Supplemental Disclosure		
5	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
6	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
7	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
8	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
9	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
10	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
11	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
12	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
13	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
14	A-030375	Front Sight Marketing Report	3/29/2016
15	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
16	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
17	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
18	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
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1	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
2	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
3			
4	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
5	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
6			
7	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
8			
9	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
10			
11	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
12	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
13			
14	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
15			
16	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
17			
18	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
19			
20	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
21			
22	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
23			
24	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
25			
26	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015
27			
28	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015

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1	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
2	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
3	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
4	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
5	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
6	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
7	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
8	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
9	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
10	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
11	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
12	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
13	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
14	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
15	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
16	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015

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1	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
2			
3	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
4			
5	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
6			
7	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
8			
9	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
10			
11	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
12	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
13			
14	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
15	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
16			
17	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
18			
19	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
20			
21	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
22			
23	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
24			
25	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
26			
27	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016
28			
	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016

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1	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
2	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
3	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
4	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
5	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
6	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
7	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
8	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
9	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
10	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
11	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
12	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
13	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
14	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
15	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
16	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
17	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017

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1	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
2	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
3	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
4	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi's Visit	7/4/2017
5	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
6	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
7	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
8	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
9	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
10	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
11	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
12	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
13	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
14	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
15	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment -[Redacted] Skype Call	1/28/2018
16	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
17	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
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1	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
2			
3	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
4			
5	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
6	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
7	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
8	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
9			
10	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
11			
12	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
13			
14	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
15	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
16			
17	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
18			
19	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
20			
21	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
22			
23	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015
24			
25	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
26			
27	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
28			

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1	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
2			
3	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
4			
5	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
6			
7	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
8			
9	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
10			
11	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
12			
13	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
14			
15	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
16			
17	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
18			
19	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
20			
21	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
22			
23	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
24			
25	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
26			
27	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016
28			
	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015

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1	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
2			
3	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
4			
5	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
6			
7	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
8			
9			
10	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
11			
12	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
13			
14	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
15			
16	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
17			
18	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
19			
20	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
21			
22	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
23			
24	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
25			
26	Tenth Supplemental Disclosure		
27	CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
28	SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020

Eleventh Supplemental Disclosure

USCP00001- USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
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Twelfth Supplemental Disclosure

A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021
A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC's Opposition to the EB-5 Parties' Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

Thirteenth Supplemental Disclosure⁴

A-008950-008953	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	6/10/2015
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³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver's license numbers).

⁴ All documents produced in this Thirteenth Supplemental Disclosure were either previously withheld by the EB5 Parties or were previously produced with redaction(s). The EB5 Parties now produce, or re-produce, these documents, with or without redaction, as reflected in the updated and amended redaction log served herewith.

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1	A-008954	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/14/2015
2	A-008955-0008958	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	10/15/2015
3			
4	A-008959-008961	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/2015
5			
6	A-008962	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
7	A-008963-008966	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/15
8			
9	A-008967	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
10	A-008968	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	11/18/2015
11	A-008969-008971	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	11/18/2015
12			
13	A-008995-009008	Front Sight Project Investor Tracking List	12/22/2015
14	A-009021-009022	Front Sight Project Investor Tracking List	12/22/2015
15	A-009074-009083	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	6/14/2016
16	A-009157	Dziubla Notes Re: Front Sight – Telephone Call with Raj	7/2/2018
17	A-009168	Dziubla Notes Re: Front Sight – Telephone Call with Michael Roga	12/8/2015
18	A-009203-009204	Independent Contractor Agreement with Guyuan Yu	11/26/2016
19	A-009205-009206	Independent Contractor Agreement with Chi Gao	11/26/2016
20	A-009207-009208	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
21	A-009209-009210	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
22			
23			
24	A-009211	Letter to [Redacted Potential EB-5 Investor] Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
25			
26			
27	A-009479-009480	Escondido Police Department Report	11/13/2018
28	A-009481-009482	Penal Code 653.2	N/A

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1	A-009483	Email Correspondence to Robert Dziubla Re: A Situation that you should be aware of	12/10/2018
2	A-009484-009486	Email Correspondence between Robert Dziubla and Craig Carter Re: We need your help, please stochastic terrorism	12/27/2018; 12/12/2018
3	A-009487	Dziubla Notes Re: Piazza Emails	N/A
4	A-009488-009495	Email Correspondence to Robert Dziubla Re: Pyramid Gun Sight	11/22/2018
5	A-009496	Dziubla Notes Re: Front Sight Piazza's Hit Piece	10/22/2018
6	A-009513-009521	Email Correspondence Re: Enemy Update #4	7/8/2019
7	A-009522-009535	Webpage: "Extremely Confidential – Front Sight Members Only. Dr. Piazza's Personal Video Message to YOU from the top of Front Sight's SWAT Tower"	7/12/2019
8	A-009751-009752	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/27/2018
9	A-009753--009754	Dziubla Notes Re: Front Sight Telephone Call With Ignatius Piazza, Michael Meacher and Mike Brand	6/14/2018
10	A-009755-009756	Email Correspondence Re: Commitment Letter – Friday Conference Call	6/14/2018
11	A-009759	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/1/2018
12	A-009760	Dziubla Notes Re: Front Sight – Telephone Call with Frank Jansen	8/14/2018
13	A-009764	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	8/26/2018
14	A-009766	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultant	8/28/2018
15	A-009767	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Bill Cockston, Bill Capeles, and Bob Lauder	10/11/2018
16	A-009769	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2017; 1/31/17
17	A-009770	Dziubla Notes Re: Front Sight	1/19/2017
18	A-009772	Email correspondence Re: Updated xls - LVDF	2/3/2017
19	A-009773	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/15/2017
20	A-009774	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his calls with Mike Meacher	2/18/2017
21	A-009775	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/20/2017
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1	A-009776	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his call with Mike Meacher	2/22/2017
2	A-009777	Dziubla Notes Re: Front Sight – Telephone Call with NES	2/24/2017
3	A-009778	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	3/1/2017
4	A-009779	Dziubla Notes Re: Front Sight – Telephone Call with Kyle Thomas at Congressman Amodei’s office.	3/2/2017
5	A-009780	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	4/5/2017
6	A-009781-009782	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/20/2017
7	A-009783	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/25/2017
8	A-009784	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/1/2017
9	A-009785-009786	Dziubla Notes Re: Front Sight –Telephone Call with Kyle Scott, Ignatius Piazza, Mike Meacher, and Jon Fleming	5/17/2017
10	A-009787	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/29/2017
11	A-009788	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/17/2017
12	A-009789	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	6/5/2017
13	A-009790	Dziubla Notes Re: Front Sight	6/6/2017
14	A-009792	Dziubla Notes Re: Front Sight –Telephone Call with Foreign Consultant	6/7/2017
15	A-009796	Dziubla Notes Re: Front Sight – Voicemail from Ignatius Piazza	7/16/2017
16	A-009797	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	7/20/2017
17	A-009798	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/6/2017
18	A-009799	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/25/2017
19	A-009800	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/2/2017
20	A-009801	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/19/2017
21	A-009802-009803	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/12/2017
22	A-009805-009806	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/6/2017
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1	A-009808	Dziubla Notes Re: Front Sight – Telephone Call with Matt Schulz and Jon Fleming	11/30/2017
2	A-009809	Dziubla Notes Re: Front Sight – Consultant Update	12/4/2017
3	A-009810-009811	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	12/5/2017
4	A-009812	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	12/12/2017
5	A-009813	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	12/18/2017
6	A-009814	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	12/26/2017
7	A-009815	Dziubla Notes Re: Front Sight - Telephone Call with Foreign Consultant and Jon Fleming	1/4/2016
8	A-009816	Dziubla Notes Re: Front Sight – Telephone call with Foreign Consultant	1/6/2016
9	A-009817	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	1/11/2016
10	A-009818	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultants	1/11/2016
11	A-009819	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/13/2016
12	A-009820	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2016
13	A-009821	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
14	A-009822	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/0216
15	A-009825	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza, Mike Meacher, and Jon Fleming	5/18/2016
16	A-009826	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	6/14/2016
17	A-009827	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/6/2016
18	A-009828	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Ignatius Piazza, and Jon Fleming	9/26/2016
19	A-009832	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Mike Meacher	10/25/2016
20	A-009833	Correspondence Re: Interest Payment Due	11/1/2016
21	A-009834	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	11/15/2016
22	A-009835-009837	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/15/2016
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1	A-009838	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	12/2/2016
2	A-009840	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	N/A
3	A-009841	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/13/2015
4	A-009842	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/17/2015
5	A-009843	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	1/28/2015
6	A-009844	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	2/4/2015
7	A-009845	Dziubla Notes Re: Front Sight – Telephone Call with John Small	2/23/2015
8	A-009847	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	Undated
9	A-009848	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/12/2015
10	A-009849	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/2015
11	A-009851	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/12/2015
12	A-009853-009854	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/2/2015
13	A-009856	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
14	A-009857	Dziubla Notes Re: Front Sight – Telephone Call with NES	10/15/2015
15	A-009858	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	12/21/2015
16	A-009859	Dziubla Notes Re: Front Sight – Telephone Call with Mr. Piazza, Meacher, and Jon Fleming	12/22/2015
17	A-009860	Dziubla Notes Re: Front Sight – Telephone Call with Robin Bernhard	1/6/2014
18	A-009861	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
19	A-009862	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	10/15/2015
20	A-009865	Email Correspondence with Meacher Re: USCIS Business Plan	3/5/2014
21	A-009866	Dziubla Notes Re: Front Sight	
22	A-009868	Dziubla Notes Re: Front Sight – Telephone Call with Jon Small and Jon Fleming	5/20/2014
23	A-009869	Dziubla Notes Re: Front Sight – Telephone Call with Sarah Paul	6/22/2014
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1	A-009870-009871	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	7/6/2014
2	A-009872	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/21/2014
3	A-009873	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/26/2014
4	A-009874-009877	Front Sight Firearms Training Institute Newsletter	8/1/2014
5	A-009878	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	1/30/2013
6	A-009879	Dziubla Notes Re: Front Sight – Telephone Call with Phil Cohen, Jon Fleming, and Sean Flynn	2/22/13
7	A-009880	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Phil Cohen, and Jon Fleming	2/22/13
8	A-009881	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/8/2013
9	A-009882	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/18/2013
10	A-009883	Dziubla Notes Re: Front Sight – Telephone Call with Tom LaTour, John Small, Mike Meacher, and Jon Fleming	4/2/2013
11	A-009884	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/4/2013
12	A-009885	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jay Wu, Jon Fleming, and Tom LaTour.	4/19/2013
13	A-009886	Dziubla Notes Re: Front Sight – Telephone Call with Kathy Conroy and Jim Whitteron	5/6/2013
14	A-009887	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	5/23/2013
15	A-009888	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jim Whitteron, Jay Wu, Peter Geist, Jon Fleming	5/28/2013
16	A-009889	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	6/14/2013
17	A-009891	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/2/2013
18	A-009892	Dziubla Notes Re: Front Sight – Piazza Video	8/23/2013
19	A-009897	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/10/2013
20	A-009898	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	9/16/2013
21	A-009900	Dziubla Notes Re: Front Sight	10/4/2013
22	A-009901	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/11/2013
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1	A-009902	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	12/15/2013
2	A-009903	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming	12/17/2013
3	A-009904	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Jon Fleming	12/21/2013
4	A-009905	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour and Jon Fleming	12/23/2013
5	A-009906-009907	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour, Ignatius Piazza, Mike Meacher, Jon Fleming, and Frank Ingrande	12/24/2013
6	A-009908	Dziubla Notes Re: Front Sight – Telephone Call with Nevada Department of Employee Training and Rehabilitation	4/9/2011
7	A-009909-009910	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/16/2012
8	A-009911	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/6/2012
9	A-009912	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/27/2012
10	A-009913-009914	Dziubla Notes Re: Front Sight Background	10/15/2012
11	A-009915	Dziubla Notes Re: Front Sight – Telephone calls with Mike Meacher and Rod Oshita	10/24/2012
12	A-009916	Dziubla Notes Re: Front Sight – Telephone Call with Gonzalo Lopez-Jordan, Santiago Steed, and Alexandra Leon.	10/25/2012
13	A-009917	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	10/26/2012
14	A-009918	Dziubla Notes Re: Front Sight	12/19/2012
15	A-009919	Dziubla Notes re: FS docs	Undated
16	A-009921-009922	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	11/9/2018
17	A-009924-009925	Dziubla Notes Re: Front Sight	
18	A-021533-021541	Immigration Consultant Agreement with Dr. Sudhir Shah	9/21/2015
19	A-021542-021551	Immigration Consultant Agreement with Narendra B. Rajput	Undated
20	A-021552-021560	Immigration Consultant Agreement with Sunnyway International	10/4/2015
21	A-021561-021568	Immigration Consultant Agreement with Jin Shah Law Firm	4/29/2016
22	A-021569-021587	Foreign Placement Consultant Agreement with Beijing Sinowel Wealth Management Co. Ltd.	9/21/2015
23	A-021588-021597	Service Agreement with Mayflower Business Consulting Co. Ltd.	10/13/2015
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1	A-021598-021611	Master Foreign Placement Consultant Agreement with Abhinav Outsourcing Pvt. Ltd	Undated
2	A-021612-021620	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	12/18/2016
3	A-021621-021628	Finder's Fee Agreement with Zhao Johnson	2/29/2016
4	Fourteenth Supplemental Disclosure		
5	Corrected ⁵ Bates Nos.	Old Bates Nos.	
6	A-030978-030984	A-021629-021635	Promissory Note
7	A-030985-030986	A-021636-021637	Audio Recordings from Front Sight Seminar on July 4, 2021 ⁶
8	A-030987-030995	A-021638-021646	Transcript of the July 4, 2021 audio recordings from Front Sight Seminar on July 4, 2021
9	A-030996-030999	A-021647-021650	Los Angeles Times article
10	A-031000-031001	A-021651-021652	Legal Fight Donation Form
11	A-031002-031007	A-021653-021658	Front Sight Newsletter (redacted)
12	A-031008-031013	A-021659-021664	Front Sight Newsletter (redacted)
13	A-031014-031019	A-021665-021670	Front Sight Newsletter (redacted)
14	A-031020	A-021671	Notice of Default and Demand for Payment letter
15	Fifteenth Supplemental Disclosure		
16	A-031021	JTC Americas Invoice Loan Statement & Invoice	01/25/2022
17	A-031022-031025	JTC Americas, Las Vegas Development Fund Detail	01/25/2022
18	A-031026-031032	Bailey Kennedy, Statement No. 39232	02/02/2021
19	A-031033-031034	Hogan Hulet PLLC Invoice # 2131	02/01/2021
20	A-031035-031036	Hogan Hulet PLLC Invoice # 2153	03/01/2021
21	A-031037-031039	Hogan Hulet PLLC Invoice # 2164	03/31/2021
22	A-031040-031042	Hogan Hulet PPLC Invoice # 2193	04/30/2021
23	A-031043-031046	Hogan Hulet PLLC Invoice # 2233	06/01/2021
24	A-031047-031052	Hogan Hulet PLLC Invoice # 2237	06/30/2021
25	A-031053-031057	Hogan Hulet PLLC Invoice # 2263	07/30/2021
26	A-031058-031063	Hogan Hulet PPLC Invoice # 2283	08/31/2021

⁵ The documents produced in the Fourteenth Supplemental Disclosure, e-served on January 6, 2022, were inadvertently bates stamped with bates numbers that were already utilized in prior disclosure. Therefore, they are being re-produced in this Fifteenth Supplemental Disclosure with corrected bates numbers in bold.

⁶ The audio recording was previously provided to Front Sight through Dropbox. The EB5 Parties will not be providing an additional audio file to Front Sight and therefore requests that Front Sight merely rename the audio to its new bates number, A-030985-030986.

1	A-031064-031067	Hogan Hulet PLLC Invoice # 2304	09/30/2021
2	A-031068-031073	Hogan Hulet PLLC Invoice # 2322	10/31/2021
3	A-031074-031077	Hogan Hulet PLLC Invoice # 2347	11/30/2021
4	A-031078-031080	Hogan Hulet PLLC Invoice # 2364	12/31/2021
5	A-031081-031083	Jones Lovelock Invoice #1645	12/01/2021
6	A-031084-031088	Jones Lovelock Invoice # 1680	12/29/2021
7	A-031089-031096	Jones Lovelock Invoice # 1712	01/19/2022
8	A-031097	Michael Brand, Invoice FS009	11/04/2018
9	A-031098	Michael Brand, Invoice FS010	01/04/2019
10	Sixteenth Supplemental Disclosure		
11	A-031099-031446	Front Sight Newsletters	10/14/2021 – 02/01/2021
12	Seventeenth Supplemental Disclosure		
13	BARRETT 000001 – BARRETT 000357	Documents provided by John Barrett in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	
14	HIRSON 000001 – HIRSON 000181	Documents provided by David Hirson in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	
15	PORTER 000001 – PORTER 006410	Documents provided by Jeffrey D. Porter, CPA in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	
16	TEICHNER 000001 – TEICHNER 000295	Documents provided by Richard Teichner in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	
17	ZIMMER 000001 – ZIMMER 001822	Documents provided by Paul A. Zimmer in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	

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The EB5 Parties' Expert Witness Privilege/Redaction Log is served herewith.⁷
DATED this 18th day of February 2022.

JONES LOVELOCK

/s/ Andrea M. Champion, Esq.
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Nevada State Bar No. 11187
Sue Trazig Cavaco, Esq.
Nevada State Bar No. 6150
Andrea M. Champion, Esq.
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*Attorneys for Las Vegas Development
Fund, LLC, EB5 Impact Capital Regional
Center, LLC, EB5 Impact Advisors, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of February 2022, a true and correct copy of the foregoing **THE EB5 PARTIES' SEVENTEENTH SUPPLEMENT TO INITIAL DISCLOSURES** was served by electronically submitting with the Clerk of the Court using electronic system and serving all parties with an email on record.

ALDRICH LAW FIRM, LTD.
John P. Aldrich, Esq.
Catherine Hernandez, Esq.
Jamie S. Hendrickson, Esq.
7866 West Sahara Avenue
Las Vegas, Nevada 89117
Telephone: (702) 853-5490
Facsimile: (702) 227-1975
Attorneys for Plaintiff/Counterdefendants

/s/ Lorraine K. Rillera
An employee of JONES LOVELOCK

⁷ The EB5 Parties' Expert Witness Privilege/Redaction log only identifies documents withheld or redacted by the EB5 Parties' in response to Front Sight Management, LLC's Eighth Set of Requests for Production of Documents. To the extent the documents produced herewith were previously redacted by the parties, those redactions are not listed on the EB5 Parties' Expert Witness Privilege/Redaction log.

Lorraine Rillera

From: Lorraine Rillera
Sent: Friday, February 18, 2022 4:42 PM
To: John Aldrich; Traci Bixenmann; jamie@johnaldrichlawfirm.com
Cc: Andrea Champion; Lorie Januskevicius; Nicole Lovelock; Sue Trazig Cavaco; ken@h2legal.com
Subject: LVDF 17th Supplemental Disclosures; LVDF's Responses to Eighth Set of RFPs and Privilege Log
Attachments: 2022-02-18 LVDF's 17th Supp Disclosure.pdf; 2022-02-18 LVDF's Responses to FSM's 8th Set of RFPs.pdf; 2022-02-18 Privilege Redaction Log.pdf

Attached please find an e-served copy of the EB5 Parties' Seventeenth Supplement to Initial Disclosures, Las Vegas Development Fund LLC's Responses to Front Sight Management LLC's Eighth Set of Requests for Production of Documents and Privilege Log. Below, please find the link to access and download the documents referenced in the 17th Disclosure.

<https://www.dropbox.com/sh/n8rexx199p6cth4/AABTOdlrily-d5RvXleE7sba?dl=0>
PW: v6AkPu?q

Thank you.

PLEASE NOTE OUR NEW ADDRESS

Lorraine K. Rillera

Litigation Paralegal



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From: no-reply@efilingmail.tylertech.cloud
To: [Lorie Januskevicius](mailto:Lorie.Januskevicius)
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 9414812
Date: Thursday, February 24, 2022 11:17:55 AM

Notification of Service



Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 9414812

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	2/24/2022 11:17 AM PST
Filing Type	Service Only
Filing Description	Amended Certificate of Service of: (1) The EB5 Parties' Seventeenth Supplement to Initial Disclosures; (2) Las Vegas Development Fund LLC's Responses to Front Sight Management LLC's Eighth Set of Requests for Production of Documents; and Privilege/Redaction Log
Filed By	Andrea Champion
	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Nicole Lovelock (nlovelock@joneslovelock.com) Kathryn Holbert (kholbert@farmercase.com)

Service Contacts	<p>Lorie Januskevicius (ljanuskevicius@joneslovelock.com)</p> <p>Keith Greer (keith.greer@greerlaw.biz)</p> <p>Dianne Lyman (dianne.lyman@greerlaw.biz)</p> <p>Mona Gantos (mona.gantos@greerlaw.biz)</p> <p>Stephen Davis (sdavis@joneslovelock.com)</p> <p>Kenneth Hogan (ken@h2legal.com)</p> <p>Jeffrey Hulet (jeff@h2legal.com)</p> <p>Julie Linton (jlinton@joneslovelock.com)</p> <p>Georlen Spangler (jspangler@joneslovelock.com)</p> <p>Andrea Champion (achampion@joneslovelock.com)</p>
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Document Details	
Served Document	Download Document
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EXHIBIT 18

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LTWT
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*Attorneys for Las Vegas Development
Fund, LLC, EB5 Impact Capital Regional
Center, LLC, EB5 Impact Advisors, LLC,
Robert W. Dziubla, Jon Fleming and Linda Stanwood*

DISTRICT COURT
CLARK COUNTY, NEVADA

FRONT SIGHT MANAGEMENT LLC, a
Nevada Limited Liability Company,

Plaintiff,

vs.

LAS VEGAS DEVELOPMENT FUND LLC,
a Nevada Limited Liability Company; et al.,

Defendants.

CASE NO.: A-18-781084-B
DEPT NO.: XVI

**THE EB5 PARTIES' EIGHTEENTH
SUPPLEMENT TO INITIAL
DISCLOSURES**

AND ALL RELATED COUNTERCLAIMS.

Defendant/Counterclaimants Las Vegas Development Fund, LLC (“LVDF”), EB5 Impact Capital Regional Center, LLC (“EB5 Impact CRC”), EB5 Impact Advisors, LLC (“EB5 Impact”), Robert W. Dziubla (“Dziubla”), Jon Fleming (“Fleming”), and Linda Stanwood (“Stanwood”) (collectively as “EB5 Parties”), by and through its attorneys of the law firm of JONES LOVELOCK and HOGAN HULET PLLC, hereby provides the following information in accordance with NRCP 16.1. These disclosures are based upon information reasonably available to the EB5 Parties at this time, recognizing that discovery in this matter is continuing. The EB5 Parties reserve the right to

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1 supplement or modify these disclosures at any time as additional information becomes available
 2 during the course of discovery. **(All newly supplemented information is contained herein in**
 3 **bold.)**

4 **DISCLOSURES PURSUANT TO N.R.C.P. 16.1(a)(1)**

5 **A. The name and, if known, the address and telephone number of each**
 6 **individual likely to have information discoverable under Rule 26(b),**
 7 **including for impeachment or rebuttal, identifying the subjects of the**
 8 **information.**

9 EB5 Parties identify the following individuals as likely to have discoverable information
 10 relevant to the facts at issue in this matter, as well as the subjects of such information. The disclosure
 11 provided herein is based on information reasonably available at this time.

12 By disclosing the following individuals, EB5 Parties do not waive any objections that they
 13 have or may have to producing these witnesses. Moreover, EB5 Parties reserve the right to identify
 14 additional witnesses as discovery goes forward, and EB5 Parties reserve the right to rely on witnesses
 15 identified by all other parties during the course of the litigation.

NAME OF WITNESS	SUBJECT OF INFORMATION
16 Dr. Ignatius Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Dr. Piazza is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
20 Mike Meacher c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Meacher is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
23 Jennifer Piazza c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mrs. Piazza is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
25 Robert Dziubla c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Dziubla is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.

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Jon Fleming c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Mr. Fleming is expected to testify concerning the facts and circumstances surrounding the relationship between Front sight and EB5IA, LVD Fund, EB5 Impact Capital Resource Center, and the allegations of the operative Complaint and Cross Complaints.
Sean Flynn 95 Broken Rock Drive Henderson, Nevada 89074	Mr. Flynn is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Linda Stanwood c/o Jones Lovelock 6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119 And c/o Hogan Hulet PLLC 10501 W. Gowan Rd., Suite 260 Las Vegas, Nevada 89129	Ms. Stanwood is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.
Efrain Rene Morales c/o Aldrich Law Firm, Ltd. 7866 West Sahara Avenue Las Vegas, NV 89117	Mr. Morales is expected to testify concerning the facts and circumstances surrounding the allegations of the operative Complaint and Cross Complaints.

B. A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, including for impeachment or rebuttal, and, unless privileged or protected from disclosure, any record, report, or witness statement, in any form, concerning the incident that gives rise to the lawsuit.

Bates Number	Document Description	Date
Initial Disclosure		
A-00001-00005	Front Sight EB-5 letter (final)	9/13/2012
A-00006-00012	LVDF- Amended and Restated Promissory Note - \$50M (signed final)	11/15/2017
A-00013-00017	LVDF - First Amendment to Loan Agreement - (Fully Executed).11	11/15/2017
A-00018-00165	Front Sight Response to Notice of Default	8/20/2018
A-00166-00169	Front Sight Response to Second Notice of Default - Aug 25 2018	8/25/2018
A-00170-00299	Front Sight Follow Up Response to Notices of Default - Cancelled Checks - Aug 29 2018	8/29/2018
A-00300-00333	Front Sight Supplemental Response to Third Notice of Default - Contracts - Aug 30 2018	8/30/2018

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1	A-00334-00336	AM response to stay of NOD	9/4/2018
2	A-00337-00338	Front Sight Response to Pre-Negotiation Letter - Sept 07 2018	9/7/2018
3	A-00339	Brochure Side 1 final	10/5/2015
4	A-00340	Brochure Side 2 (final)	10/5/2015
5	A-00341-00359	Construction Line of Credit Loan Agreement (Morales)	10/31/2017
6	A-00360-00416	Construction Loan Agreement (signed final)	10/7/2016
7	A-00417-00424	Deed of Trust - First Amendment	7/1/2017
8	A-00425-00461	Deed of Trust - Front Sight recorded 10/13/16	10/13/2016
9	A-00462-00465	Email to Meacher re deal restructure	5/12/2016
10	A-00466-00473	Engagement letter - Front Sight - fully signed	2/14/2013
11	A-00474-00482	Executive Summary Front Sight	3/12/2012
12	A-00483	Inspection Notice - Front Sight Books & Records	2/16/2017
13	A-00484	Loan Statement Invoice Las Vegas Development Fund LLC July - August 2018 default rate UPDATED	8/20/2018
14	A-00485	Loan Statement Invoice Las Vegas Development Fund LLC September 2018 default rate	9/20/2018
15	A-00486	Marketing Report - Front Sight	5/7/2016
16	A-00487	Marketing Report - Front Sight	4/9/2016
17	A-00488	Marketing Report - Front Sight	4/16/2016
18	A-00489-00490	Marketing Report - Front Sight	4/23/2016
19	A-00491-00492	Marketing Report - Front Sight	4/30/2016
20	A-00493	Marketing Report	2/25/2016
21	A-00494	Marketing Report	3/29/2016
22	A-00495-00498	Meacher email - Sept. 13, 2018 - in response to NOD recordation	9/13/2018
23	A-00499-00500	Meacher email on July 4, 2018, re senior debt	7/4/2018
24	A-00501-00505	Meacher email re marketing costs (Aug. 2015)	8/11/2015
25	A-00506-00508	Memo - Front Sight marketing update	11/3/2015
26	A-00509-00513	Memo - Front Sight marketing update	10/25/2015
27	A-00514-00519	Mike Meacher response	3/11/2016
28	A-00520	Notes of calls with Piazza and Meacher	4/27/2018
	A-00521	Notes of calls with Piazza and Meacher	6/14/2018
	A-00522-00528	Notice of Default - additional defaults - response to AM's letter of (8-24-2018)	8/24/2018
	A-00529	Notice of Default - stay - workout agreement (8-31- 2018)	8/31/2018
	A-00530-00533	Notice of Default - third NOD and response to AM's second letter (8-28-2018)	8/28/2018
	A-00534-00540	Notice of Default	7/30/2018

1	A-00541-00548	Piazza email 7-16-2018 re spending on whatever	7/16/2018
2	A-00549	Picture of Ignatius Piazza with King Liu and Jay Li of Sinowel	10/7/2014
3	A-00550-00589	PPT - Front Sight - Chinese (Dec. 2016 final)	12/1/2016
4	A-00590-00629	PPT - Front Sight - Vietnamese translation	12/1/2016
5	A-00630-00664	PPT - Front Sight Timeshare Presentation 25August2015	8/25/2015
6	A-00665-00694	PPT Front Sight - Chinese	7/1/2015
7	A-00695-00701	Promissory Note - Amended and Restated (July 1, 2017)	7/1/2017
8	First Supplemental Disclosure		
9	A-000702-000856	Accounting and Fees	Various
10	A-000857	Independent contractor Agreement	5/31/2015
11	A-000858-000869	Nevada Secretary of State Business License & Application	9/3/2014
12	A-000870-000878	Pre-Marketing Agreement	10/16/2015
13	A-000879-000894	Emails	5/2/2018
14	A-000895-000899	Forensic Accounting & Business Valuation	9/23/2015
15	A-000900-000903	Emails	5/8/2015
16	A-000904-000922	Accounting	Various
17	A-000923-000927	Amendment to Loan Agreement	11/14/2017
18	A-000928-001075	Piazza Response to Notice of Default with Exhibits	7/30/2018
19	A-001076-001079	Piazza Response to Notice of Default	8/25/2018
20	A-001080-001209	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Initial Response to Notice of Default dated August 28, 2018.	8/29/2018
21	A-001210-001213	Piazza Additional Response to Notice of Default dated July 31, 2018 and August 24, 2018 and Supplemental Response to Notice of Default dated August 28, 2018.	8/30/2018
22	A-001214-001243	Current Major Contracts	8/30/2018
23	A-001244-001246	Response to Temporary Stay	9/4/2018
24	A-001247-001248	Piazza Construction Loan Agreement	9/7/2018
25	A-001249-001251	Pictures- Exemplar Approval	N/A
26	A-001252-001270	Loan Agreement	10/31/2017
27	A-001271-001372	Construction Loan Agreement	10/6/2016
28	A-001373-001376	Emails	Various
	A-001377-001384	EB-5 Impact Advisors-Dziubla	2/14/2013
	A-001385-001394	Front Sight Management Executive Summary	3/12/2012
	A-001395-001406	Inspection of Front Sight Books and Records	2/16/2017
	A-001407-001417	Emails	Various
	A-001418-001425	Memo-Marketing Update	11/3/2015

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1	A-001426-001431	Emails	Various
2	A-001432-001438	Dziubla Notice of Multiple Defaults, Notice of Inspection, Monthly Proof of Project Costs	8/24/2018
3	A-001439-001446	Piazza Email to Dziubla Re: Investor Update Text and Video	7/16/18
4	A-001447-001459	Pictures	8/23/2018
5	A-001460-001461	Pro Forma Statements of Income	N/A
6	A-001462-001542	Confidential Private Placement Memorandum – Las Vegas Development Fund LLC	N/A
7	A-001543-001619	Front Sight EB-5 Investments Opportunity Presentation	2014
8	A-001620-001635	Chicago Title Company Foreclosure Department Foreclosing Deed of Trust	9/17/2018
9	A-001636-001746	Valuation Source Appraisal Report for Mike Brand	1/9/2019
10	A-001752-001763	Amended & Restated Promissory Note	7/1/2017
11	A -001764-001765	Receipt of Copy	10/30/18
12	A-001766-001917	Front Sight Documents	Various
13	A-001918-006138	John Fleming Emails	Various
14	A-006139-008763	Robert Dziubla Emails	Various
15	Third Supplemental Disclosure¹		
16	A-008764-008976	EB5IA Cost and Expense Backup	Various
17	A-008977-009925	Dziubla Front Sight File	Various
18	A-009926-010007	Dziubla Project Files (Cover Pages Only)	Various
19	Fourth Supplemental Disclosure		
20	A-010008-010013	FS Fed Tax Return relevant pages	2016
21	A-010014-010018	FS YE Financial Statements	2017
22	A-010019-010024	FS Tax Return Relevant Pages	2017
23	A-010025-010047	FS Federal Tax Return	2017
24	A-010048	Concourse Photo	N/A
25	A-010049-010096	Construction Timeline	N/A
26	A-010097-010192	Economic Impact Analysis	11/23/13
27	A-010193	Front Entry Looking West Composite	N/A
28	A-010194-010199	Holecek Mortgage Extension Agreement	05/01/12
	A-010200-010216	Holecek Loan Agreement	02/07/06

¹ The EB5 Parties inadvertently mislabeled this disclosure the Third Supplemental Disclosure instead of the Second Supplemental Disclosure. There is no Second Supplemental Disclosure.

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1	A-010217	Hotel for Life Screenshot	N/A
2	A-010218-010220	Letter from FS re EB5 prove up documents	10/30/18
3	A-010221-010222	Loan Agreement - Second Amendment	02/28/18
4	A-010223-010227	NOD - Formal Notice	09/10/18
5	A-010228-010232	Patriot Pavilion renderings	N/A
6	A-010233	Patriot Pavilion description in USCIS plan	N/A
7	A-010234	Patriot Pavilion Pad	10/11/18
8	A-010235-010247	Pictures and renderings	N/A
9	A-010248-010329	PPM - LVDF & Front Sight (as filed w/ USCIS) 82	N/A
10	A-010330-010417	PPM Front Sight 88	07/01/16
11	A-010418-010454	PPT-Front Sight Timeshare Presentation	11/04/16
12	A-010455-010616	Project Business Plan	03/17/14
13	A-010617-010619	Renderings - FS	N/A
14	A-010620	Resort Pad	10/11/18
15	A-010621-010736	Valuation (as completed Front Sight Timeshare Update) 116	10/08/14
16	A-010737-010756	Valuation - business enterprise	12/31/14
17	A-010756-010910	Empyrean West Emails	Various
18	A-010911-013173	Documents Responsive to Subpoena – Bank of America	12/23/2019
19	A-013174-013351	Documents Responsive to Subpoena – Lucas Horsfall	1/7/2020
20	A-013352-015269	Further Fleming Emails re: Front Sight	2012-2015
21	A-018193-019194 ²	EB5 Impact Capital Regional Center USCIS Filing	N/A
22	A-019195-020634	Emails post deal novation and pre CLA	5/2016-10/2016
23	A-020635 -020816	Flynn Emails	Various
24	Fifth Supplemental Disclosure		
25	A-20817-021499	Documents re: Economic Analysis and EB5 Information	Various
26	A-021500-021506	Email Correspondence Re Timelines for RC and EB5 Raise of \$75M	1/22/13
27	A-021507-021512	Robert Dziubla Resume	N/A
28	A-021513-021514	Email Correspondence Re Front Sight Meeting Outline	12/12/12
	A-021515-021518	USCIS Request for Designation as Regional Center Re: Liberty West Regional Center	3/21/11

² A-015270-018192 are privileged and not subject to disclosure pursuant to the Court's June 30, 2020 Findings of Fact and Conclusions of Law and Order Granting in Part and Denying in Part Defendants' Motion for Protective Order Regarding Discovery of Consultants' and Individual investors' Confidential Information.

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1	A-021519-021525	EB5 Impact Capital: Front Sight Marketing Reports	4/8/16- 5/7/16
2	A-021526-021527	Miscellaneous Flow Charts Re: Corporate Organization	N/A
3	A-021528-021530	San Diego Hyatt Project Investor Tracking List	5/22/14
4	A-021531-021532	Dissolution of Limited-Liability Company – EB5 Impact Advisors LLC	8/6/18
5	A-021533-021628	Immigration Consultant Agreements	Various
6	Sixth Supplemental Disclosure		
7	A-021629-021663	Greer and Associates Invoice #26195	5/31/2019
8	A-021664-021670	Greer and Associates Invoice #26196	5/31/2019
9	A-021671-021679	Greer and Associates Invoice #26276	8/19/2019
10	A-021680-021690	Greer and Associates Invoice #26301	10/28/2019
11	A-021691-021695	Greer and Associates Invoice #26318	11/15/2019
12	A-021696-021711	Greer and Associates Invoice #26384	1/16/2020
13	A-021712-021720	Greer and Associates Invoice #26429	3/13/2020
14	A-021721-021729	Farmer Case & Fedor Invoice #61683	11/30/2018
15	A-021730-021738	Farmer Case & Fedor Invoice #62929	12/31/2018
16	A-021739-021746	Farmer Case & Fedor Invoice #62930	1/31/2019
17	A-021747-021761	Farmer Case & Fedor Invoice #63956	6/30/2019
18	A-021762-021766	Farmer Case & Fedor Invoice #64127	7/31/2019
19	A-021767-021770	Farmer Case & Fedor Invoice #64373	8/31/2019
20	A-021771-021777	Farmer Case & Fedor Invoice #64976	9/30/2019
21	A-021778-021782	Farmer Case & Fedor Invoice #65194	10/31/2019
22	A-021783-021787	Farmer Case & Fedor Invoice #65408	11/30/2019
23	A-021788-021794	Farmer Case & Fedor Invoice #65619	12/31/2019
24	A-021795-021799	Farmer Case & Fedor Invoice #66033	1/31/2020
25	A-021800-021804	Farmer Case & Fedor Invoice #66505	2/29/2020
26	A-021805-021809	Farmer Case & Fedor Invoice #66780	3/31/2020
27	A-021810-021834	Verified Complaint	11/13/2018
28	A-021835-021844	Front Sight Emergency Action Alert	1/28/2019
	Seventh Supplemental Disclosure		
	A-021845-021852	Default Notices	Various
	A-021853-021869	Inspection Photos	N/A
	A-021870-021883	Loan Documents and Demand Letters	Various
	A-021884-021909	Site Renderings	N/A
	A-021910-021942	NES Financial Loan Statements & Invoices	Various
	A-021943-021966	Marketing PowerPoint Draft – Chinese Language	N/A
	A-021967-021974	Immigration Consultant Fee Agreement	4/29/2016
	A-021975-021984	Marketing Reports	Various
	A-021985-022024	Marketing PowerPoint Final – Chinese Language	N/A
	A-022025-022049	Travel Documentation and Receipts	Various

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1	A-022050-022198	Ethan Devine Front Sight Marketing Documents	N/A
2	A-022199-022244	Front Sight Marketing Materials	N/A
3	A-022245-022261	Holocek Loan Agreement	2/7/2006
4	A-022263-022267	HREC Proposal for Appraisal Services	6/20/2013
5	A-022268	HREC Invoice	9/29/2014
6	A-022269-022274	Civilwise Services, Inc. Statement of Qualifications	N/A
7	A-022275-022277	Front Sight Marketing Materials	N/A
8	A-022278-022283	EB5IC letter to USCIS regarding Expedite Request	1/23/2015
9	A-022284-022287	Front Sight Letter to Members	8/1/2014
10	A-022288-022290	Mutual Non-Disclosure and Non-Circumvention Agreement (Draft)	N/A
11	A-022291	USCIS Form I-797C, Notice of Action	4/15/2014
12	A-022292-022293	Front Sight and Kenworth Capital Non-Circumvent Letter Agreement	10/26/2012
13	A-022294	Senator Dean Heller Letter of Support to Front Sight	3/10/2014
14	A-022295	William A. Kohbarger Letter of Support to Front Sight	5/28/2013
15	A-022296	HREC Invoice for Professional Services	9/29/2014
16	A-022297-022298	Front Sight Competitor Comparison	N/A
17	A-022299-022300	Front Sight Resort & Vacation Club & Las Vegas Development fund, LLC – Business Plan Section 3: Business Overview	N/A
18	A-022301-022308	EB5 Impact Advisors LLC Letter to Mike Meacher RE: EB-5 Debt Financing of \$75m for Front Sight	2/14/2013
19	A-022309	EB5 Impact Advisors LLC Letter to Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/15
20	A-022310-022312	Mutual Non-Disclosure and Non-Circumvention Agreement	N/A
21	A-022313-022325	Front Sight Pro Forma	N/A
22	A-022326	Front Sight Resorts Land Use Plan	N/A
23	A-022327-022386	EB5 Impact Capital Reginal Center, LLC Business Plan	March 2017
24	A-022387-022389	Front Sight Firearms Training Institute Memo (\$75m EB-5 construction loan: 5-year term, interest only at 6%)	N/A
25	A-022390	United States Senate Privacy Act Consent Form	10/28/2014
26	A-022391-022402	ResortCom International LaTour Hotels & Resorts Vacation Ownership Proposal	N/A
27	A-022403-022404	Geothermal Regional Center/ Patagonia Financial Holdings LLC Letter to Jon Fleming Re Proposal	10/24/2012
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1	A-022405-022482	Sinowel Communications and Marketing Materials	Various
2	A-022483-022516	Operating Agreement of EB5 Impact Capital Regional Center LLC	3/26/2014
3	A-022517-027308	Email Correspondence with Foreign Agents/Consultants and related documents	Various
4	A-027309-027316	USCIS Notice of Action –Request for Evidence	5/5/2015
5	A-027317-027319	EB5IC Response to Request for Evidence	5/14/2015
6	A-027320-207349	EB5IC Response to Request for Evidence	5/18/2015
7	A-027350-027351	Administrative Fee	N/A
8	A-027352-027358	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
9	A-027359-027521	Confidential Private Placement Memorandum - Draft	N/A
10	A-027522-027523	Email Correspondence with C. Matthew Schulz re: Introduction	8/20/2015
11	A-027524-027533	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Draft	N/A
12	A-027534-027544	Email Correspondence with Foreign Agents/Consultants	9/7/2015
13	A-027545-027585	Subscription and Administrative Fee Escrow Agreement - Draft	N/A
14	A-027586-027668	Confidential Private Placement Memorandum - Draft	N/A
15	A-027669-027688	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
16	A-027689-027691	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
17	A-027692-027711	Las Vegas Development Fund LLC Class B Membership Unit Subscription Agreement - Drafts	N/A
18	A-027712-027803	Confidential Private Placement Memorandum – Draft	N/A
19	A-027804-027892	Confidential Private Placement Memorandum – Draft	N/A
20	A-027893-027898	USCIS Form I-526, Immigrant Petition by Alien Entrepreneur	N/A
21	A-027899-027988	Confidential Private Placement Memorandum – Draft	N/A
22	A-027989	Email Correspondence from Jon Fleming to Robert Dziubla regarding LVDF – Loan Agreement	9/30/2015
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1	A-027990-A-028059	Construction Loan Agreement by and between Front Sight Management, Inc. and Las Vegas Development Fund, LLC - Draft	9/30/2015
2	A-028060-028713	Email Correspondence with Agents and Consultants re Marketing of Project	Various
3	A-028714-028770	Construction Loan Agreement – Fully Executed	10/6/2016
4	A-028771-028839	Email Correspondence with Preston Arza	Various
5	A-028840-029208	Email Correspondence re Loan Amendments in relation to Marketing	Various
6	A-029209-029210	Jon Fleming Email to Bob Dziubla Re: Investor Instructions	9/24/2015
7	A-029211-029255	Front Sight Email Blasts	Various
8	A-029256-029269	Front Sight – Emergency Action Alerts re Dziubla	N/A
9	A-029270-A-029512	Email Correspondence Re Potential Investors and related documents	Various
10	A-029513-029530	Piazza Letter to Special Master Fisher re Holecek Loan	7/24/2007
11	A-029531-029532	Las Vegas Development Fund, LLC Notice of Continuing Payment Default to Front Sight Management, LLC	10/16/2019
12	A-029533-029534	Las Vegas Development Fund, LLC Notice of Three New Defaults to Front Sight Management, LLC	1/10/2020
13	A-029535-029554	Dentons Letter to USCIS Re I-924A Annual Certification of Regional Center	12/19/2019
14	A-029555-029556	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
15	A-029557	Email Correspondence from Bob Dziubla to Ignatius Piazza re: NOD – 2019 Financial Statements	3/24/2020
16	A-029558-029559	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of New Default: 2019 Financial Statement	3/24/2020
17	A-029560-029566	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of Multiple Defaults/ Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
18	A-029567-029568	Email Correspondence with NES re: Default Interest	10/3/2019
19	A-029569-029570	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	4/5/2017
20	A-029571-029572	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	2/6/2017
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1	A-029573-029575	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due (corrected statement)	11/7/2016
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3	A-029576-029577	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Interest Payment Due	7/25/2017
4			
5	A-029578-029579	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Inspection of FS books and records	2/16/2017
6	A-029580-029581	Correspondence with Sudhir Shah re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016
7	A-029582	Project Update to EB5 Investors	10/14/2016
8	A-029583-029584	Project Update for Agents	8/27/2019
9	A-029585	Project Update Q1 2017	4/21/2017
10	A-029586-029587	Project Update Q1 2018	7/26/2018
11	A-029588-029589	Project Update Q3 2017	10/21/2017
12	A-029590-029626	Front Sight Time Share Resort \$75m Senior Construction Loan Marketing PowerPoint	N/A
13	A-029627-029629	EB5 Impact Capital Regional Center Letter to Potential Investors Re: Front Sight Expansion Project- RVA Promotion	11/3/2017
14	A-029630	EB5 Impact Capital Regional Center Letter Re: Exclusivity for Front Sight Resort & Vacation Club Project	1/29/2018
15			
16	A-029631-029647	Front Sight Resort & Vacation Club Eb5 Investment – Business Plan Summary	N/A
17	A-029648-029657	Immigration Consultant Fee Agreement	N/A
18	A-029658-029698	Front Sight Letter to Jon Fleming Re: Reporting Documentation	10/18/2017
19	A-029699-029712	Front Sight Letter to Jon Fleming and Bob Dziubla Re: First Amendment to Loan Agreement, Amended and Restated Promissory Note, and First Amendment to Construction Deed of Trust, Security Agreement and Fixture Filing	10/31/2017
20			
21	A-029713-029729	2018 USCIS I-924A filing	12/4/2018
22	A-029730-029740	Home Depo Account Statements	Various
23	A-029741-029743	Front Sight Letter Bob Dziubla Re: EB-5 Documentation and Additional Information for the Period July 1, 2017, through October 31, 2018 Delivered Pursuant to Section 5.10€ of the Construction Loan Agreement	10/30/2018
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26	A-029744-029747	EB5 Impact Advisors Transaction Detail By Account January 2013 through December 2017	11/11/2018
27	A-029748-029755	Service Agreement Between EB5 Impact Regional Center LLC and Mayflower Business Consulting Co., Ltd.	10/13/2015
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1	A-029756-029757	Front Sight Letter to Jon Fleming re: Reporting Documentation	10/18/2017
2	A-029758	Front Sight Letter to Jon Fleming and Bob Dziubla re: Wiring New Investor Net Proceeds	N/A
3	A-029759	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Notice of 3 rd Payment Default	9/12/2019
4			
5	A-029760	Las Vegas Development Fund, LLC Letter to Front Sight Management LLC Re: Your Refusal to Allow Site Inspection	12/18/2018
6			
7	A-029761-029763	UCC Financing Statement	10/13/2016
8	A-029764-029767	NES Loan Statements & Invoices	Various
9	A-029768-029769	Las Vegas Development Fund Sight Resort & Vacation) List of Investors and Total Investments	N/A
10	A-029770	NES Loan Advance Form	10/7/2016
11	A-029771-029772	NES Loan Statement & Invoice	3/1/2020
12	A-029773	NES Financial Master Account Statement	8/31/2016
13	A-029774	Check No. 1187 to Farmer Case & Fedor	10/24/2019
14	A-029775-029798	Front Sight Email Blasts	Various
15	A-029799	EB5 Impact Capital Regional Center China Travel Plans	N/A
16	A-029800-029970	Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	4/22/2020
17			
18	A-029971-030024	Opposition to Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order on Order Shortening Time	5/4/2020
19			
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23	A-030025-030038	Reply in Support of Defendant Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the construction Loan Agreement and Request for Limited Relief from the Protective Order	5/11/2020
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1	A-030039-030043	Order Granting Las Vegas Development fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief from the Protective Order	5/15/2020
2			
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5	A-030044-030051	Notice of Entry of Order Granting Las Vegas Development Fund, LLC's Motion to Compel Production of Documents or, In the Alternative, Motion for Preliminary Injunction to Address Front Sight's Continuing Violation of Section 5.10 of the Construction Loan Agreement and Request for Limited Relief From The Protective Order	5/18/2020
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10	A-030052-030101	Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions on Order Shortening Time	6/8/2020
11			
12			
13	A-030102-030144	Front Sight Management LLC's Opposition to Las Vegas Development Fund LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors' I-829 Petitions on Order Shortening Time	6/22/2020
14			
15			
16	A-030145-030207	Status Report Related to Las Vegas Development Fund, LLC's Motion for Sanctions for Violation of the Court's Order Regarding the Production of Documents Needed to Support the EB-5 Investors I-829 Petitions	7/14/2020
17			
18			
19	A-030208-030219	Status Report Related to EB-5 Documents	7/14/2020
20	A-030220-030224	Notice of Breach, Default, and Election to Sell Under Deed of Trust	1/18/2019
21	Eighth Supplemental Disclosure		
22	A-030225-030227	Email Correspondence from Mike Brand to Preston Arza Re: UCC Financing Statement and attachments	10/6/2016
23			
24	A-030228-030230	Email Correspondence from Mike Brand to Robert Dziubla Re: UCC Financing Statement and attachments	10/12/16
25			
26	A-030231-030233	Email Correspondence from Mike Brand to Preston Arza Re: Front Sight Document List and attachments	9/28/2016
27			
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1	A-030234-030298	Email Correspondence from Scott Preston to Mike Brand Re: Front Sight/EB-5 Deliverables (Sec. 2.1 of Loan Agreement) and attachments	9/29/2016
2	A-030299-030300	Email Correspondence from Robert Dziubla to Scott Preston Re: Front Sight/EB-5 – Revised Deed of Trust	10/5/2016
3	A-030301-030302	Email Correspondence from Mike Meacher to Robert Dziubla Re: Call Today at 4:30 pm	10/19/2016
4	A-030303-030338	NES Financial Pamphlet– The Changing Tides of EB-5 – 2018 EB-5 Industry Trends and Insight	N/A
5	Ninth Supplemental Disclosure		
6	A-030339-030358	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Fifth Draft – Development Front Sight	8/15/2015
7	A-030359-030360	Email Correspondence from Robert Dziubla to Jon Fleming Re: FS Update	1/15/2016
8	A-030361-030362	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming RE: USCIS Application Update	5/23/2015
9	A-030363-030365	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Great Seeing You and Follow Up	8/5/2015
10	A-030366	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Update	12/24/2015
11	A-030367-030369	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	11/3/2015
12	A-030370	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Video	6/1/2015
13	A-030371-030372	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Another Source of Sales/ 2014 Financials/ Status Update	9/4/2015
14	A-030373-030374	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: April 19 Visit/ Mortgage	3/29/2016
15	A-030375	Front Sight Marketing Report	3/29/2016
16	A-030376-030377	Email Correspondence from David Rockaway to Jon Fleming Re: EB5 Impact Capital/ Rockaway Discussion	8/3/2015
17	A-030378-030379	Email Correspondence from Mike Meacher to Jon Fleming Re: Front Sight EB-5 Status Update	3/31/2017
18	A-030380-030381	Email Correspondence from Miguel Casas to Jim Ellis, Robert Dziubla, Mike Meacher, and Jon Fleming Re: Front Sight Marketing Video	5/23/2015
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1	A-030382-030429	Email Correspondence from Robert Dziubla to David Huang, Simone Williams, Jon Fleming, and Raphael [Redacted] Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	10/24/2015
2			
3	A-030430-030431	Email Correspondence from Robert Dziubla to Jesse Tam and Jon Fleming Re: Jesse Tam	1/25/2016
4			
5	A-030432-030434	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Marketing Report	2/29/2016
6			
7	A-030435-030439	Memorandum from Robert Dziubla to Mike Meacher Re: EB5 Marketing Update	10/28/2015
8			
9	A-030440-030446	Email Correspondence from Jim Ellis to Jon Fleming and Robert Dziubla Re: New Video – Project Bid with Attachment	5/24/2015
10			
11	A-030447-030450	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: Please Update Status on EB-5 Investors	2/1/2016
12			
13	A-030430-030431	Email Correspondence from Eric Yao to Robert Dziubla, Jon Fleming and Jay Li Re: Robert Dziubla shared “Front Sight – Sinowel” with you	7/7/2014
14			
15	A-030454	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update	5/11/2016
16			
17	A-030455-030456	Email Correspondence from Mike Meacher to Robert Dziubla and Jon Fleming Re: USCIS Application Update	5/24/2015
18			
19	A-030457	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Visit to Front Sight – Chinese Travel Channel	5/13/2015
20			
21	A-030458-030459	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Report	3/15/2016
22			
23	A-030460	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Weekly Marketing Update	4/25/2016
24			
25	A-030461-030463	Email Correspondence to Jon Fleming Re: Silverton Reservation Confirmation	9/12/2014
26			
27	A-030464	Email Correspondence from Robert Dziubla to Jon Fleming Re: Brochure Outline	9/12/2014
28			
	A-030465-030466	Email Correspondence from Jay Li to Robert Dziubla Eric Yao, and Jon Fleming Re: Front Sight Firearms Training Institute - \$75m EB5 Raise	6/9/2014
	A-030467	Email Correspondence from Robert Dziubla to Jay Li and Jon Fleming Re: Front Sight – China Travel Channel	5/13/2015

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1	A-030468	Email Correspondence from Jon Fleming to Sean Flynn, Raj Pranav, Samir [Redacted] and Robert Dziubla Re: Approval Letters EB5 Impact Capital RCW1410551734	7/27/2015
2			
3	A-030469-030470	Email Correspondence from David Enterline to Jon Fleming and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/6/2015
4			
5	A-030471	EB5 Impact Capital: Front Sight Marketing Report	N/A
6	A-030472-030473	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: Update from China	11/27/2017
7			
8	A-030474-030476	Email Correspondence from Mike Meacher to Jon Fleming and Robert Dziubla Re: Marketing Video	6/4/2015
9	A-030477	Email Correspondence from Mike Meacher to Robert Dziubla Re: Visit to Front Sight – Chinese Travel Channel	5/12/2015
10			
11	A-030478-030479	Email Correspondence from Robert Dziubla to Rupert Wise Re: Greetings/ US Green Card Program	8/4/2015
12			
13	A-030480-030484	Email Correspondence from Daniel Perron to Jon Fleming, Robert Dziubla and Jon Green Re Henley Partners – J. Green Introduction	8/10/2015
14			
15	A-030485	Email Correspondence from Jon Fleming to Mr. Kang and Robert Dziubla Re: EB5 Investment Marketing	8/5/2015
16			
17	A-030486	Email Correspondence from Jon Fleming to David Enterline and David Trunzo	8/12/2015
18	A-030487-030488	Email Correspondence from Robert Dziubla to Jon Fleming Re: Immigration Capital Introduction	8/14/2015
19	A-030489	Email Correspondence from Robert Dziubla to Michael Rogan Re: Russia/Ukraine	8/15/2015
20	A-030490-030493	Email Correspondence from Robert Dziubla to Cenk Tarhun Re: Greetings/ Potential Deal	8/15/2015
21	A-030494-030496	Email Correspondence from Michael Rogan to Robert Dziubla Re: Itinerary for Rogan Michael Monday 24 August 2015	8/18/2015
22			
23	A-030497-030499	Email Correspondence from Sudhir Shah to Jon Fleming, Sean Flynn, Raj Pranav, Samir Thakkar, and Robert Dziubla Re: Front Sight Resort Project – EB5 Impact Capital Regional Center	8/24/2015
24			
25	A-030500-030502	Email Correspondence from Wonjoon Kang to Jon Fleming and Robert Dziubla Re: EB5 Impact Capital Regional Center – Introduction Call	8/28/2015
26			
27			
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1	A-030503-030504	Email Correspondence from Mike Meacher to Jon Fleming, Robert Dziubla and Ted Carlson R: Front Sight Resort – EB5 Investment Process	9/1/2015
2	A-030505-030506	Email Correspondence from Jon Fleming to David Enterline, Robert Dziubla, and David Trunzo Re: Introducing Asia America Direct Term Sheet – Front Sight Resort – EB5 Impact Capital Regional Center - \$75,000,000	9/10/2015
3	A-030507-030521	Email Correspondence from Eden [Redacted] to Robert Dziubla Re: Greetings/Front Sight Project	9/14/2015
4	A-030522-030523	Email Correspondence from Robert Dziubla to Jon Fleming Re: Bloomberg: Putin’s Economic Might is Withering Away	10/2/2015
5	A-030524-030531	Email Correspondence from Robert Dziubla to Simone Williams and Jon Fleming Re: Front Sight Project – Marketing Plan	11/3/2015
6	A-030532-030537	Email Correspondence from Robert Dziubla to Michael [Redacted] and Jon Fleming Re: Meeting Next Week	11/16/2015
7	A-030538	Email Correspondence from Jon Fleming to Robert Dziubla Re: Michael Rogan	11/19/2015
8	A-030539	Email Correspondence from Jesse Tam to Jon Fleming and Robert Dziubla Re: EB5 – Front Sight Resort Project	12/10/2015
9	A-030540-030545	Email Correspondence from George Ekins to Jon Fleming and Robert Dziubla Re: EB5 Deals	1/4/2016
10	A-030546-030549	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Front Sight EB5 Marketing	12/28/2015
11	A-030550-030552	Email Correspondence from Jon Fleming to Fely Quitevis, Kyle Scott, and Robert Dziubla Re: Front Sight Real Estate Projects	1/13/2016
12	A-030553-030554	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – EB5	2/12/2016
13	A-030555-030556	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, and David Wang Re: Endeavor HK LOI	3/2/2016
14	A-030557-030559	Email Correspondence from Robert Dziubla to Kyle Scott, Jon Fleming, David Wang, and Ethan Devine Re: Endeavor HK LOI	3/21/2016
15	A-030560-030561	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	3/23/2016
16	A-030562-030565	Email Correspondence from Jon Fleming to Sudhir Shah Re: EB-5	4/7/2016

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1	A-030566-030569	Email Correspondence from Fely Quitevis to Jon Fleming, Robert Dziubla, and Mike Meacher Re: Introduction – Front Sight Resort – EB5 Investment	5/27/2016
2			
3	A-030570-030571	Email Correspondence from Robert Dziubla to Jon Fleming Re: Front Sight Resort- EB5 Investment Documents	6/6/2016
4			
5	A-030572-030573	Email Correspondence from Jon Fleming to Robert Dziubla Re: EB-5	5/19/2016
6	A-030574-030577	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	7/11/2016
7			
8	A-030578-030580	Email Correspondence from Jon Fleming to [Redacted], Raj Pranav, and Robert Dziubla Re: Investment Greencard	7/15/2016
9	A-030581	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Meeting on 25	7/22/2016
10			
11	A-030582-030584	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Update of Project – Meeting in Washington DC	10/13/2016
12	A-030585-030586	Email Correspondence from Robert Dziubla to Sudhir Shah and Jon Fleming Re: Your Visit to India	11/11/2016
13			
14	A-030587-030588	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight	11/24/2016
15	A-030589-030590	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Your Visit to India	11/25/2016
16			
17	A-030591-030592	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Please Ignore Previous Email/ New Investor	12/3/2016
18			
19	A-030593-030594	Email Correspondence from Jon Fleming to Kyle Scott and Robert Dziubla Re: Front Sight – Agreement	12/10/2016
20			
21	A-030595	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Hello	11/3/2015
22	A-030596-030597	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	12/20/2016
23			
24	A-030598-030599	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: EB-5 Convention Las Vegas Jan 13-14 2017	1/9/2017
25			
26	A-030600-030603	Email Correspondence from Robert Dziubla to Kyle Scott and Jon Fleming Re: Front Sight – ShareFile Folder – Arch. Drawings	1/17/2017
27			
28			

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1	A-030604-030605	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Eb-5 Road Shows	4/8/2017
2	A-030606-030607	Email Correspondence from Robert Dziubla to Jon Fleming Re: EB5 Visa Investors	4/17/2017
3	A-030608-030609	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: [Redacted] Visit to USA	4/20/2017
4	A-030610	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	5/25/2017
5	A-030611	Email Correspondence from Jon Fleming to Dilip (Danny) Chauhan Re: Front Sight Video Phase III	6/20/2017
6	A-030612	Email Correspondence from Sudhir Shah to Jon Fleming, Robert Dziubla, and Vipul Joshi Re: My Assistant Advocate Mr. Vipul Joshi's Visit	7/4/2017
7	A-030613	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: EB-5	6/9/2017
8	A-030614	Email Correspondence from Jon Fleming to Robert Dziubla Re: Sudhir Call	7/15/2017
9	A-030615	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Furtherance to the Previous Email	7/14/2017
10	A-030616-030617	Email Correspondence from Jon Fleming to Mike Meacher and Robert Dziubla Re: August 2- Front Sight Visit	7/12/2017
11	A-030618-030620	Email Correspondence from Jon Fleming to Bob Dziubla Re: Mutual Introduction of Rich Neumeyer to Robert Dziubla and Jon Fleming	8/23/2017
12	A-030621-030623	Email Correspondence from Sudhir Shah to Jon Fleming and Robert Dziubla Re: Front Sight Resort – Investors in Process	9/21/2017
13	A-030624-030625	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: New Investor	10/17/2017
14	A-030626-030627	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight Marketing – Sudhir Call – A Few Things	11/11/2017
15	A-030628	Email Correspondence from Robert Dziubla to Jon Fleming Re: Plan for Marketing	11/20/2017
16	A-030629-030631	Email Correspondence from Jon Fleming to Sudhir Shah and Robert Dziubla Re: Travel and Wire Transfers	11/23/2017
17	A-030632-030634	Email Correspondence from Sudhir Shah to Robert Dziubla Re: 6-month payment -[Redacted] Skype Call	1/28/2018

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1	A-030635	Email Correspondence from Robert Dziubla to Sudhir Shah and Danny Dilip Chauhan Re: Introduction	1/31/2018
2			
3	A-030636-030637	Email Correspondence from Sudhir Shah to Robert Dziubla Re: I-526 Approval for [Redacted]	2/27/2018
4			
5	A-030638-030642	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: Immigration Alert	3/14/2018
6			
7	A-030643-030644	Email Correspondence from Robert Dziubla to Sudhir Shah and Simone Williams Re: India – EB5	3/21/2018
8			
9	A-030645	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hello/ [Redacted]	4/8/2018
10			
11	A-030646-030647	Email Correspondence from Sudhir Shah to Robert Dziubla Re: Hi Bob –New Matters	4/25/2018
12			
13	A-030648-030649	Email Correspondence from Robert Dziubla to Sudhir Shah and Linda Stanwood Re: New Client	5/16/2018
14			
15	A-030650-030654	Email Correspondence from Robert Dziubla to Sudhir Shah, Linda Stanwood and [Redacted] Re: Visit to Front Sight	7/15/2018
16			
17	A-030655-030657	Email Correspondence from Robert Dziubla to Raphael Lu, Jon Fleming, and David Huang Re: Investor List 12.16 & Recent News	12/7/2015
18			
19	A-030658	Email Correspondence from Robert Dziubla to Raj Pranav, and Linda Stanwood Re: New Investor	6/11/2018
20			
21	A-030659-030663	Email Correspondence from Robert Dziubla to Kyle Scott Re: Reports [Front Sight]	11/25/2017
22			
23	A-030664-030666	Email Correspondence from Robert Dziubla to Mike Meacher and Jon Fleming Re: Update On Your Marketing Trip	9/22/2015
24			
25	A-030667	Email Correspondence from Robert Dziubla to Ignatius Piazza, Mike Meacher, Scott A. Preston, Mike Brand, Matthew Schulz, Mike Madda, Linda Stanwood, and Keith Greer Re: Notice of Default	7/30/2018
26			
27	A-030668	Email Correspondence from Simone Williams to Robert Dziubla and Jon Fleming Re: Investor for Front Sight Project	8/31/2015
28			
	A-030669-030672	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	10/13/2015
	A-030673	Email Correspondence from Jon Fleming to Simone Williams and Robert Dziubla Re: Foreign Student Seminars	11/4/2015

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1	A-030674-030681	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/12/2015
2			
3	A-030682-030685	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Contact in Brazil	12/4/2015
4			
5	A-030686-030693	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Front Sight Project – Marketing Plan	11/17/2015
6			
7	A-030694-030695	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: Dinner Thursday Night?	10/26/2016
8			
9	A-030696	Email Correspondence from Robert Dziubla to Celinka Zhou and Jon Fleming Re: Greetings/ Front Sight Project	9/1/2015
10			
11	A-030697	Email Correspondence from Jon Fleming to Raj Pranav, Sean Flynn, and Robert Dziubla Re: Indian Marketing Agents	9/22/2015
12			
13	A-030698-030705	Email Correspondence from Jesse Tam to Robert Dziubla, Jon Fleming, and Ethan Devine Re: EB5 Impact Capital – New Director of Business Development	3/1/2016
14			
15	A-030706	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Jin Shan Law Firm Agreement Revisions	4/15/2016
16			
17	A-030707-030708	Email Correspondence from Jay Li to Robert Dziubla and Nan Wang Re: Front Sight	5/27/2015
18			
19	A-030709-030712	Front Sight Project Investor Tracking List	11/27/2015
20			
21	A-030713-030717	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	12/21/2015
22			
23	A-030718-030720	Email Correspondence from Li Wenrui to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight	1/5/2016
24			
25	A-030721-030725	Email Correspondence from Li Wenrui to Robert Dziubla Re: Investor Tracking List – Front Sight w/ Attachment	1/29/2016
26			
27	A-030726-030731	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/18/2016
28			
	A-030732-030737	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	3/29/2016
	A-030738-030744	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/12/2016

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1	A-030745-030751	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Investor Tracking List – Front Sight w/ Attachment	4/21/2016
2	A-030752-030754	Email Correspondence from Simone Williams to Jon Fleming and Robert Dziubla Re: EB5 Marketing	9/9/2015
3	A-030755-030759	Email Correspondence from Amy Chen to Robert Dziubla, Jon Fleming, Li Jie, and Jay Li Re: Investor Tracking List – Front Sight w/ Attachment	11/27/2015
4	A-030760-030767	Email Correspondence from Jim Ellis to Robert Dziubla and Jon Fleming Re: Final Outline: Update – Pahrump Development Front Sight	7/29/2015
5	A-030768-030769	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/3/2015
6	A-030770-030772	Email Correspondence from Ajay Sharma to Robert Dziubla, Jon Fleming, Raj Pranav, Sean Flynn, and Samir Thakkar Re: Regional Center & Project Approval	8/4/2015
7	A-030773	Email Correspondence from Jon Fleming to David Enterline and Robert Dziubla Re: EB5 Investment Marketing – Taiwan	8/5/2015
8	A-030774-030776	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Front Sight – Meeting in Shanghai – Business Plan and PPT	2/24/2016
9	A-030777	Email Correspondence from Robert Dziubla to Ethan Devine and Jon Fleming Re: Chinese Migration Agents	3/31/2016
10	A-030778-030779	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Agreement for Jin Shan Law Firm	3/29/2016
11	A-030780-030781	Email Correspondence from Ethan Devine to Robert Dziubla and Jon Fleming Re: Chinese Migration Agents	3/31/2016
12	A-030782	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: EB-5	4/6/2016
13	A-030783	Email Correspondence from Dilip Danny Chauhan to Jon Fleming Re: Front Sight – EB5 Investment	1/6/2016
14	A-030784	Email Correspondence from Dilip Danny Chuahan to Jon Fleming Re: Front Sight Video Phase III	8/4/2017
15	Tenth Supplemental Disclosure		

CW000001-CS008622	Documents Received in Response to Subpoena – Civilwise Services, Inc.	9/11/2020
SF000001-SF001610	Documents Received in Response to Subpoena – Summit Financial and Investment Group, LLC	9/30/2020
Eleventh Supplemental Disclosure		
USCP00001-USCP03918	Documents Received in Response to Subpoena – U.S. Capital Partners, Inc. ³	12/1/2020
Twelfth Supplemental Disclosure		
A-030785-030791	Notice of Multiple Defaults/Notice of Inspection/ Monthly Proof of Project Costs	7/30/2018
A-030792-030798	WeChat Messages with Foreign Placement Agents	Various
A-030799	Email Correspondence from Jon Fleming to Robert Dziubla Re: Front Sight	7/29/2015
A-030800	Email Correspondence from Robert Dziubla to Jon Fleming	7/29/2015
A-030801-030812	Bailey Kennedy, LLP Statement No. 37637	5/4/2020
A-030813-030826	Bailey Kennedy, LLP Statement No. 37873	6/4/2020
A-030827-030843	Bailey Kennedy, LLP Statement No. 30827	7/8/2020
A-030844-030857	Bailey Kennedy, LLP Statement No. 38273	8/5/2020
A-030858-030867	Bailey Kennedy, LLP Statement No. 38450	9/3/2020
A-030868-030877	Bailey Kennedy, LLP Statement No. 38578	10/2/2020
A-030878-030879	Bailey Kennedy, LLP Statement No. 38835	11/3/2020
A-030888-030899	Bailey Kennedy, LLP Statement No. 38994	12/2/2020
A-030900-030905	Bailey Kennedy, LLP Statement No. 39058	12/24/2020
A-030906-030907	Bailey Kennedy, LLP Statement No. 39185	1/5/2021
A-030908-030916	Front Sight Firearms Training Institute Article – Fighting 5 Percent, Spectacular Savings to become a Knight	11/9/2020
A-030917-030973	Front Sight Management, LLC’s Opposition to the EB-5 Parties’ Motion to Compel	11/18/2020
A-030974	Las Vegas Development Fund LLC Transaction List by Vendor – Front Sight, January 2017 through December 2019	1/5/2021
A-030975	NES Loan Statement & Invoice for December 2020	12/25/2020
A-030976	NES Loan Statement & Invoice for November 2020	11/25/2020
A-030977	NES Loan Statement & Invoice for October 2020	10/25/2020

³ The EB5 Parties have redacted personal information from the documents received from US Capital Partners, Inc. (including social security numbers and driver’s license numbers).

Thirteenth Supplemental Disclosure⁴

A-008950-008953	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	6/10/2015
A-008954	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/14/2015
A-008955-0008958	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	10/15/2015
A-008959-008961	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/2015
A-008962	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
A-008963-008966	Outgoing Wire Transfer Request reflecting payment of Travel and Professional Fees from EB5 Impact Advisors	10/16/15
A-008967	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	10/16/2015
A-008968	Invoice reflecting payment of travel and other fees to Foreign Placement Agent	11/18/2015
A-008969-008971	Outgoing Wire Transfer Request reflecting payment of Professional Fees from EB5 Impact Advisors	11/18/2015
A-008995-009008	Front Sight Project Investor Tracking List	12/22/2015
A-009021-009022	Front Sight Project Investor Tracking List	12/22/2015
A-009074-009083	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	6/14/2016
A-009157	Dziubla Notes Re: Front Sight – Telephone Call with Raj	7/2/2018
A-009168	Dziubla Notes Re: Front Sight – Telephone Call with Michael Roga	12/8/2015
A-009203-009204	Independent Contractor Agreement with Guyuan Yu	11/26/2016
A-009205-009206	Independent Contractor Agreement with Chi Gao	11/26/2016
A-009207-009208	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Senior Construction Loan LOI	10/1/2016

⁴ All documents produced in this Thirteenth Supplemental Disclosure were either previously withheld by the EB5 Parties or were previously produced with redaction(s). The EB5 Parties now produce, or re-produce, these documents, with or without redaction, as reflected in the updated and amended redaction log served herewith.

1	A-009209-009210	Letter to Dr. Sudhir Shah Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
2			
3			
4	A-009211	Letter to [Redacted Potential EB-5 Investor] Re: Front Sight EB-5 Project – Revised Private Placement Memorandum, Escrow Agreement, Subscription Agreement and Related Documents	7/6/2016
5			
6			
7	A-009479-009480	Escondido Police Department Report	11/13/2018
8	A-009481-009482	Penal Code 653.2	N/A
9	A-009483	Email Correspondence to Robert Dziubla Re: A Situation that you should be aware of	12/10/2018
10	A-009484-009486	Email Correspondence between Robert Dziubla and Craig Carter Re: We need your help, please stochastic terrorism	12/27/2018; 12/12/2018
11	A-009487	Dziubla Notes Re: Piazza Emails	N/A
12	A-009488-009495	Email Correspondence to Robert Dziubla Re: Pyramid Gun Sight	11/22/2018
13	A-009496	Dziubla Notes Re: Front Sight Piazza’s Hit Piece	10/22/2018
14	A-009513-009521	Email Correspondence Re: Enemy Update #4	7/8/2019
15	A-009522-009535	Webpage: “Extremely Confidential – Front Sight Members Only. Dr. Piazza’s Personal Video Message to YOU from the top of Front Sight’s SWAT Tower”	7/12/2019
16			
17	A-009751-009752	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/27/2018
18	A-009753--009754	Dziubla Notes Re: Front Sight Telephone Call With Ignatius Piazza, Michael Meacher and Mike Brand	6/14/2018
19			
20	A-009755-009756	Email Correspondence Re: Commitment Letter – Friday Conference Call	6/14/2018
21	A-009759	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/1/2018
22			
23	A-009760	Dziubla Notes Re: Front Sight – Telephone Call with Frank Jansen	8/14/2018
24	A-009764	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	8/26/2018
25	A-009766	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultant	8/28/2018
26	A-009767	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Bill Cockston, Bill Capeles, and Bob Lauder	10/11/2018
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1	A-009769	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2017; 1/31/17
2	A-009770	Dziubla Notes Re: Front Sight	1/19/2017
3	A-009772	Email correspondence Re: Updated xls - LVDF	2/3/2017
4	A-009773	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/15/2017
5	A-009774	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his calls with Mike Meacher	2/18/2017
6	A-009775	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	2/20/2017
7	A-009776	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming regarding his call with Mike Meacher	2/22/2017
8	A-009777	Dziubla Notes Re: Front Sight – Telephone Call with NES	2/24/2017
9	A-009778	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	3/1/2017
10	A-009779	Dziubla Notes Re: Front Sight – Telephone Call with Kyle Thomas at Congressman Amodei’s office.	3/2/2017
11	A-009780	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	4/5/2017
12	A-009781-009782	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/20/2017
13	A-009783	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	4/25/2017
14	A-009784	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/1/2017
15	A-009785-009786	Dziubla Notes Re: Front Sight –Telephone Call with Kyle Scott, Ignatius Piazza, Mike Meacher, and Jon Fleming	5/17/2017
16	A-009787	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/29/2017
17	A-009788	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	5/17/2017
18	A-009789	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	6/5/2017
19	A-009790	Dziubla Notes Re: Front Sight	6/6/2017
20	A-009792	Dziubla Notes Re: Front Sight –Telephone Call with Foreign Consultant	6/7/2017
21	A-009796	Dziubla Notes Re: Front Sight – Voicemail from Ignatius Piazza	7/16/2017
22	A-009797	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	7/20/2017
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1	A-009798	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/6/2017
2	A-009799	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/25/2017
3	A-009800	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/2/2017
4	A-009801	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/19/2017
5	A-009802-009803	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	10/12/2017
6	A-009805-009806	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/6/2017
7	A-009808	Dziubla Notes Re: Front Sight – Telephone Call with Matt Schulz and Jon Fleming	11/30/2017
8	A-009809	Dziubla Notes Re: Front Sight – Consultant Update	12/4/2017
9	A-009810-009811	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	12/5/2017
10	A-009812	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	12/12/2017
11	A-009813	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	12/18/2017
12	A-009814	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	12/26/2017
13	A-009815	Dziubla Notes Re: Front Sight - Telephone Call with Foreign Consultant and Jon Fleming	1/4/2016
14	A-009816	Dziubla Notes Re: Front Sight – Telephone call with Foreign Consultant	1/6/2016
15	A-009817	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	1/11/2016
16	A-009818	Dziubla Notes Re: Front Sight- Telephone Call with Foreign Consultants	1/11/2016
17	A-009819	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/13/2016
18	A-009820	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	1/17/2016
19	A-009821	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
20	A-009822	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	1/25/2016
21	A-009825	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza, Mike Meacher, and Jon Fleming	5/18/2016
22	A-009826	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant and Jon Fleming	6/14/2016
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1	A-009827	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/6/2016
2	A-009828	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Ignatius Piazza, and Jon Fleming	9/26/2016
3			
4	A-009832	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Mike Meacher	10/25/2016
5	A-009833	Correspondence Re: Interest Payment Due	11/1/2016
6	A-009834	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza	11/15/2016
7	A-009835-009837	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/15/2016
8	A-009838	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	12/2/2016
9			
10	A-009840	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	N/A
11	A-009841	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/13/2015
12	A-009842	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	1/17/2015
13	A-009843	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	1/28/2015
14	A-009844	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	2/4/2015
15			
16	A-009845	Dziubla Notes Re: Front Sight – Telephone Call with John Small	2/23/2015
17	A-009847	Dziubla Notes Re: Front Sight – Telephone Call with Rachel Greene of Senator Heller’s Office	Undated
18	A-009848	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/12/2015
19	A-009849	Letter to Dr. Ignatius Piazza Re: EB5 Fundraising/Sinowel	3/13/2015
20	A-009851	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	8/12/2015
21			
22	A-009853-009854	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	9/2/2015
23	A-009856	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
24	A-009857	Dziubla Notes Re: Front Sight – Telephone Call with NES	10/15/2015
25	A-009858	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	12/21/2015
26			
27	A-009859	Dziubla Notes Re: Front Sight – Telephone Call with Mr. Piazza, Meacher, and Jon Fleming	12/22/2015
28	A-009860	Dziubla Notes Re: Front Sight – Telephone Call with Robin Bernhard	1/6/2014

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1	A-009861	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultant	10/15/2015
2	A-009862	Dziubla Notes Re: Front Sight – Telephone Call with Meacher	10/15/2015
3	A-009865	Email Correspondence with Meacher Re: USCIS Business Plan	3/5/2014
4	A-009866	Dziubla Notes Re: Front Sight	
5	A-009868	Dziubla Notes Re: Front Sight – Telephone Call with Jon Small and Jon Fleming	5/20/2014
6	A-009869	Dziubla Notes Re: Front Sight – Telephone Call with Sarah Paul	6/22/2014
7	A-009870-009871	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	7/6/2014
8	A-009872	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/21/2014
9	A-009873	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/26/2014
10	A-009874-009877	Front Sight Firearms Training Institute Newsletter	8/1/2014
11	A-009878	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	1/30/2013
12	A-009879	Dziubla Notes Re: Front Sight – Telephone Call with Phil Cohen, Jon Fleming, and Sean Flynn	2/22/13
13	A-009880	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher, Phil Cohen, and Jon Fleming	2/22/13
14	A-009881	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/8/2013
15	A-009882	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/18/2013
16	A-009883	Dziubla Notes Re: Front Sight – Telephone Call with Tom LaTour, John Small, Mike Meacher, and Jon Fleming	4/2/2013
17	A-009884	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/4/2013
18	A-009885	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jay Wu, Jon Fleming, and Tom LaTour.	4/19/2013
19	A-009886	Dziubla Notes Re: Front Sight – Telephone Call with Kathy Conroy and Jim Whitteron	5/6/2013
20	A-009887	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	5/23/2013
21	A-009888	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Jim Whitteron, Jay Wu, Peter Geist, Jon Fleming	5/28/2013
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1	A-009889	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	6/14/2013
2	A-009891	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/2/2013
3	A-009892	Dziubla Notes Re: Front Sight – Piazza Video	8/23/2013
4	A-009897	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	9/10/2013
5	A-009898	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	9/16/2013
6	A-009900	Dziubla Notes Re: Front Sight	10/4/2013
7	A-009901	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher and Jon Fleming	11/11/2013
8	A-009902	Dziubla Notes Re: Front Sight – Telephone Call with Foreign Consultants	12/15/2013
9	A-009903	Dziubla Notes Re: Front Sight – Telephone Call with Jon Fleming	12/17/2013
10	A-009904	Dziubla Notes Re: Front Sight – Telephone Call with Ignatius Piazza and Jon Fleming	12/21/2013
11	A-009905	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour and Jon Fleming	12/23/2013
12	A-009906-009907	Dziubla Notes Re: Front Sight – Telephone Call with John Small, Tom La Tour, Ignatius Piazza, Mike Meacher, Jon Fleming, and Frank Ingrande	12/24/2013
13	A-009908	Dziubla Notes Re: Front Sight – Telephone Call with Nevada Department of Employee Training and Rehabilitation	4/9/2011
14	A-009909-009910	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	3/16/2012
15	A-009911	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	4/6/2012
16	A-009912	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	8/27/2012
17	A-009913-009914	Dziubla Notes Re: Front Sight Background	10/15/2012
18	A-009915	Dziubla Notes Re: Front Sight – Telephone calls with Mike Meacher and Rod Oshita	10/24/2012
19	A-009916	Dziubla Notes Re: Front Sight – Telephone Call with Gonzalo Lopez-Jordan, Santiago Steed, and Alexandra Leon.	10/25/2012
20	A-009917	Dziubla Notes Re: Front Sight – Telephone Call with Sean Flynn	10/26/2012
21	A-009918	Dziubla Notes Re: Front Sight	12/19/2012
22	A-009919	Dziubla Notes re: FS docs	Undated
23	A-009921-009922	Dziubla Notes Re: Front Sight – Telephone Call with Mike Meacher	11/9/2018
24	A-009924-009925	Dziubla Notes Re: Front Sight	

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1	A-021533-021541	Immigration Consultant Agreement with Dr. Sudhir Shah	9/21/2015
2	A-021542-021551	Immigration Consultant Agreement with Narendra B. Rajput	Undated
3	A-021552-021560	Immigration Consultant Agreement with Sunnyway International	10/4/2015
4	A-021561-021568	Immigration Consultant Agreement with Jin Shah Law Firm	4/29/2016
5	A-021569-021587	Foreign Placement Consultant Agreement with Beijing Sinowel Wealth Management Co. Ltd.	9/21/2015
6	A-021588-021597	Service Agreement with Mayflower Business Consulting Co. Ltd.	10/13/2015
7	A-021598-021611	Master Foreign Placement Consultant Agreement with Abhinav Outsourcing Pvt. Ltd	Undated
8	A-021612-021620	Immigration Consultant Fee Agreement with Endeavor Shanghai Ltd.	12/18/2016
9	A-021621-021628	Finder's Fee Agreement with Zhao Johnson	2/29/2016
10	Fourteenth Supplemental Disclosure		
11			
12	Corrected ⁵ Bates Nos.	Old Bates Nos.	
13	A-030978-030984	A-021629-021635	Promissory Note
14			10/6/2016
15	A-030985-030986	A-021636-021637	Audio Recordings from Front Sight Seminar on July 4, 2021 ⁶
16	A-030987-030995	A-021638-021646	Transcript of the July 4, 2021 audio recordings from Front Sight Seminar on July 4, 2021
17	A-030996-030999	A-021647-021650	Los Angeles Times article
18			12/13/2000
19	A-031000-031001	A-021651-021652	Legal Fight Donation Form
20			N/A
21	A-031002-031007	A-021653-021658	Front Sight Newsletter (redacted)
22			11/07/2021
23	A-031008-031013	A-021659-021664	Front Sight Newsletter (redacted)
24			11/08/2021
25	A-031014-031019	A-021665-021670	Front Sight Newsletter (redacted)
26			11/09/2021
27	A-031020	A-021671	Notice of Default and Demand for Payment letter
28			10/06/2021

⁵ The documents produced in the Fourteenth Supplemental Disclosure, e-served on January 6, 2022, were inadvertently bates stamped with bates numbers that were already utilized in prior disclosure. Therefore, they are being re-produced in this Fifteenth Supplemental Disclosure with corrected bates numbers in bold.

⁶ The audio recording was previously provided to Front Sight through Dropbox. The EB5 Parties will not be providing an additional audio file to Front Sight and therefore requests that Front Sight merely rename the audio to its new bates number, A-030985-030986.

Fifteenth Supplemental Disclosure

A-031021	JTC Americas Invoice Loan Statement & Invoice	01/25/2022
A-031022-031025	JTC Americas, Las Vegas Development Fund Detail	01/25/2022
A-031026-031032	Bailey Kennedy, Statement No. 39232	02/02/2021
A-031033-031034	Hogan Hulet PLLC Invoice # 2131	02/01/2021
A-031035-031036	Hogan Hulet PLLC Invoice # 2153	03/01/2021
A-031037-031039	Hogan Hulet PLLC Invoice # 2164	03/31/2021
A-031040-031042	Hogan Hulet PPLC Invoice # 2193	04/30/2021
A-031043-031046	Hogan Hulet PLLC Invoice # 2233	06/01/2021
A-031047-031052	Hogan Hulet PLLC Invoice # 2237	06/30/2021
A-031053-031057	Hogan Hulet PLLC Invoice # 2263	07/30/2021
A-031058-031063	Hogan Hulet PPLC Invoice # 2283	08/31/2021
A-031064-031067	Hogan Hulet PPLC Invoice # 2304	09/30/2021
A-031068-031073	Hogan Hulet PLLC Invoice # 2322	10/31/2021
A-031074-031077	Hogan Hulet PLLC Invoice # 2347	11/30/2021
A-031078-031080	Hogan Hulet PLLC Invoice # 2364	12/31/2021
A-031081-031083	Jones Lovelock Invoice #1645	12/01/2021
A-031084-031088	Jones Lovelock Invoice # 1680	12/29/2021
A-031089-031096	Jones Lovelock Invoice # 1712	01/19/2022
A-031097	Michael Brand, Invoice FS009	11/04/2018
A-031098	Michael Brand, Invoice FS010	01/04/2019

Sixteenth Supplemental Disclosure

A-031099-031446	Front Sight Newsletters	10/14/2021 – 02/01/2022
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Seventeenth Supplemental Disclosure⁷

BARRETT 000001 – BARRETT 000357	Documents provided by John Barrett in response to Las Vegas Development Fund LLC's Responses to Front Sight Management LLC's Eighth Set of Requests for Production of Documents served concurrently herewith.	
HIRSON 000001 – HIRSON 000181	Documents provided by David Hirson in response to Las Vegas Development Fund LLC's Responses to Front Sight Management LLC's Eighth Set of Requests for Production of Documents served concurrently herewith.	
PORTER 000001 – PORTER 006410	Documents provided by Jeffrey D. Porter, CPA in response to Las Vegas Development Fund LLC's Responses to Front Sight Management LLC's Eighth Set of Requests for Production of Documents served concurrently herewith.	

⁷ The EB5 Parties' Expert Witness Privilege/Redaction log only identifies documents withheld or redacted by the EB5 Parties' in response to Front Sight Management, LLC's Eighth Set of Requests for Production of Documents. To the extent the documents produced herewith were previously redacted by the parties, those redactions are not listed on the EB5 Parties' Expert Witness Privilege/Redaction log.

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1 2 3	TEICHNER 000001 – TEICHNER 000295	Documents provided by Richard Teichner in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	
4 5	ZIMMER 000001 – ZIMMER 001822	Documents provided by Paul A. Zimmer in response to Las Vegas Development Fund LLC’s Responses to Front Sight Management LLC’s Eighth Set of Requests for Production of Documents served concurrently herewith.	
6	Eighteenth Supplemental Disclosure		
7	A-031447-031882	Front Sight Newsletters	02/01/2022 – 04/04/2022
8	A-031883	JTC Americas Loan Statement and Invoice	02/25/2022
9	A-031884	JTC Americas Loan Statement and Invoice	03/25/2022
10	A-031885	JTC Americas Loan Statement and Invoice	04/25/2022
11	A-031886 - 031888	Holo Discovery Invoices	01/25/2022 02/22/2022 04/21/2022
12	A-031889 - 031890	JDP Forensic Accounting Invoice (CONFIDENTIAL)	02/04/2022
13	A-031891 - 031892	Front Sight Postcard	Undated
14	A-031893 - 031922	Jones Lovelock Invoices (CONFIDENTIAL)	02/09/2022 03/08/2022 04/18/2022
15	A-031923 - 032005	Front Sight Newsletters	04/24/2022 - 05/15/2022
16	A-032006 - 032007	Holo Discovery Invoices	03/15/2022 05/18/2022

DATED this 19th day of May 2022.

JONES LOVELOCK

/s/ Andrea M. Champion, Esq.
 Nicole E. Lovelock, Esq.
 Nevada State Bar No. 11187
 Sue Trazig Cavaco, Esq.
 Nevada State Bar No. 6150
 Andrea M. Champion, Esq.
 Nevada State Bar No. 13461
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 Las Vegas, Nevada 89119

*Attorneys for Las Vegas Development
 Fund, LLC, EB5 Impact Capital Regional
 Center, LLC, EB5 Impact Advisors, LLC*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of May 2022, a true and correct copy of the foregoing **THE EB5 PARTIES’ EIGHTEENTH SUPPLEMENT TO INITIAL DISCLOSURES (due to the size of the production, a DropBox link to the documents referenced herein was provided to counsel under separate email)** was served by electronically submitting with the Clerk of the Court using electronic system and serving all parties with an email on record.

ALDRICH LAW FIRM, LTD.
John P. Aldrich, Esq.
Catherine Hernandez, Esq.
Jamie S. Hendrickson, Esq.
7866 West Sahara Avenue
Las Vegas, Nevada 89117
Telephone: (702) 853-5490
Facsimile: (702) 227-1975
Attorneys for Plaintiff/Counterdefendants

/s/ Lorraine Rillera
An employee of JONES LOVELOCK

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Lorraine Rillera

From: Lorraine Rillera
Sent: Thursday, May 19, 2022 4:31 PM
To: jaldrich@johnaldrichlawfirm.com; traci@johnaldrichlawfirm.com
Cc: Andrea Champion; Nicole Lovelock; Sue Trazig Cavaco; Lorie Januskevicius; Julie Linton; Lorraine Rillera
Subject: FSM v. LVDF / LVDF's 18th Supplemental Disclosure Documents

Mr. Aldrich,

In conjunction with the EG5 Parties' Eighteenth Supplement to Initial Disclosures, the following link and password will provide you access to the documents referenced therein. Please note, this link will expire on June 3, 2022.

https://www.dropbox.com/sh/t8jx6vfjn4pe4hu/AABfi0X0wk8uT2y2Z7gtzk_ma?dl=0

Password: wA5RJ\%t2^

Thank you.

Lorraine K. Rillera

Litigation Paralegal



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From: no-reply@efilingmail.tylertech.cloud
To: [Lorie Januskevicius](mailto:Lorie.Januskevicius)
Subject: Notification of Service for Case: A-18-781084-B, Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s) for filing Service Only, Envelope Number: 9899783
Date: Thursday, May 19, 2022 4:29:09 PM

Notification of Service



Case Number: A-18-781084-B
 Case Style: Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
 Envelope Number: 9899783

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	A-18-781084-B
Case Style	Front Sight Management LLC, Plaintiff(s)vs.Las Vegas Development Fund LLC, Defendant(s)
Date/Time Submitted	5/19/2022 4:28 PM PST
Filing Type	Service Only
Filing Description	The EB5 Parties' Eighteenth Supplement to Initial Disclosures
Filed By	Andrea Champion
	Front Sight Management LLC: Traci Bixenmann (traci@johnaldrichlawfirm.com) John Aldrich (jaldrich@johnaldrichlawfirm.com) Las Vegas Development Fund LLC: Nicole Lovelock (nlovelock@joneslovelock.com) Kathryn Holbert (kholbert@farmercase.com) Lorie Januskevicius (ljanuskevicius@joneslovelock.com)

Service Contacts	Keith Greer (keith.greer@greerlaw.biz) Dianne Lyman (dianne.lyman@greerlaw.biz) Mona Gantos (mona.gantos@greerlaw.biz) Stephen Davis (sdavis@joneslovelock.com) Kenneth Hogan (ken@h2legal.com) Jeffrey Hulet (jeff@h2legal.com) Julie Linton (jlinton@joneslovelock.com) Georlen Spangler (jspangler@joneslovelock.com) Andrea Champion (achampion@joneslovelock.com)
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Document Details	
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EXHIBIT 19

From: [Andrea Champion](#)
To: [Susan K. Sefflin](#); [Steven T. Gubner](#)
Cc: [Brian Shapiro](#); [Jessica S. Wellington](#); [Lorie Januskevicius](#); [Julie Linton](#)
Subject: RE: Front Sight
Date: Tuesday, July 19, 2022 8:06:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Susie,

It is our understanding that the Debtor is utilizing the 2004 exam and subpoenas to estimate LVDF's claim for purposes of the Chapter 11 Plan. There is no need to go to any extensive litigation on such issue because the State Court previously made such estimation for purposes of the TRO and either the State Court and/or Bankruptcy Court will make a final determination as to the amount. In addition, all requests are in violation of pending proceeding rule as the amount of the claim is an issue in the adversary case.

In additional, the EB5 Parties (LVDF, Mr. Dziubla, Ms. Stanwood, Mr. Fleming, EB5IA, and EB5IC) have not only produced initial disclosures in the state action but they have also supplemented those disclosures 18 times and produced a total of approximately 32,007 documents. The EB5 Parties do not have any relevant, responsive documents in their possession custody and control that are subject to discovery or that are not already listed on a privilege and/or redaction log with limited exception (there may some additional loan statements that were issued after the Debtor filed for bankruptcy which we have no objection to providing). Debtor's subpoenas call for the re-production of the very same documents that have been produced in the State Action and of which Debtor is already in possession. Why do you need another copy of the documents previously produced? If there is a valid justification for the need for Debtor to receive yet another copy of the documents already in its possession, then we may be able to have our vendor provide the documents to your office so long as the costs to do so are borne by the Debtor.

In addition, because we have not received a copy of the executed Protective Order to date, we cannot have the vendor release any confidential documents to you until it is signed (your office previously agreed to be bound by the protective order and execute the same but to date, we have not received the executed protective order.

Other Issues

- Identification of documents to a specific request – no requirement
- The State Court issued various protective orders that preclude Debtor from obtaining particular information from any of the EB5 Parties. A number of Debtors' document requests are in violation of those protective orders:
 - Dziubla SDT 5, 7, 18, 20, 21, 22, 23, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 53, 54, 57, 58
 - LVDF SDT 6, 9, 10, 24, 25, 26, 27, 28, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 45, 46, 47, 49, 50, 51, 52, 53, 54, 57, 58, 61, 62, 65
- Other requests are potentially not subject to a protective order but are still irrelevant to estimation of the claims and/or vague and ambiguous

- Dziubla SDT 43, 44, 51, 52, 55, 56, 61, 62
- LVDF 21, 66, 67
- LVDF and Mr. Dziubla will dispute the 2004 exam orders because Debtor failed to advise the Court that Mr. Dziubla was fully questioned in his individual capacity and behalf of LVDF and the EB5 entities for a total of 7 days in the State Court Action. Notably, not only did Debtor use of its allowed deposition time with Mr. Dziubla, but it also requested additional time. The State Court granted a limited amount of additional time and then Debtor used that additional time. Debtor has received transcripts of all of that testimony.

If the parties are unable to agree on a resolution, then we should agree to a procedure to resolve any disputed issues with the Court. We propose:

- The parties enter into a Stipulation to stay discovery on 2004 exams and subpoenas pending the outcome of a hearing with the following briefing schedule:
 - Motion to be filed on or before July 29, 2022
 - Opposition Due on or before August 5, 2022
 - Reply Due on or before August 12, 2022
 - Potential Hearing Date – August 19, 2022

Andrea M. Champion, Esq.



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From: Susan K. Seflin <sseflin@bg.law>

Sent: Tuesday, July 19, 2022 12:08 PM

To: Steven T. Gubner <sgubner@bg.law>

Cc: Brian Shapiro <brian@brianshapirolaw.com>; Andrea Champion <achampion@joneslovelock.com>; Jessica S. Wellington <jwellington@bg.law>

Subject: Re: Front Sight

Brian - will you be sending an agenda in advance of the call so that we have some direction on what you have an issue with? Also, can you give us some idea of what documents you think can't be produced because of the state court protective order? Thank you. Susie

21650 Oxnard St., Suite 500
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Partner

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[Susan K. Seflin](#)

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On Jul 18, 2022, at 7:02 PM, Steven T. Gubner <sgubner@bg.law> wrote:

Ok

From: Brian Shapiro <brian@brianshapirolaw.com>
Sent: Monday, July 18, 2022 7:02 PM
To: Steven T. Gubner <sgubner@bg.law>; Susan K. Seflin <sseflin@bg.law>
Cc: Andrea Champion <achampion@joneslovelock.com>
Subject: RE: Front Sight

CAUTION: This email originated from an external source.

We just crossed emails, I will let Andi respond but 8-9 a.m wed works for me.

Brian D. Shapiro, Esq.
510 S. 8th Street
Las Vegas, NV 89101
(t) [702-386-8600](tel:702-386-8600); (f) [702-383-0994](tel:702-383-0994)
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From: Steven T. Gubner <sgubner@bg.law>
Sent: Monday, July 18, 2022 7:01 PM
To: Brian Shapiro <brian@brianshapirolaw.com>; Susan K. Seflin <sseflin@bg.law>
Cc: Andrea Champion <achampion@joneslovelock.com>
Subject: RE: Front Sight

How about 8 – 9 am wed I get on a plane to NY

Steven T. Gubner, Esq.
Managing Partner

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— Steven T. Gubner

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From: Brian Shapiro <brian@brianshapirolaw.com>
Sent: Monday, July 18, 2022 5:49 PM
To: Steven T. Gubner <sgubner@bg.law>; Susan K. Seflin <sseflin@bg.law>
Cc: Andrea Champion <achampion@joneslovelock.com>
Subject: RE: Front Sight

CAUTION: This email originated from an external source.

Dear Steve:

Thank you for chatting this afternoon. I just head from Andi and she has an appointment at 2:00 p.m. that may last all afternoon and I have an appointment at noon. I am unsure if tomorrow will work based upon your availability only tomorrow afternoon and Andi's conflict.

Did you say you are available Wednesday or were you heading to New York?

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From: Brian Shapiro <brian@brianshapirolaw.com>
Sent: Monday, July 18, 2022 5:14 PM
To: Steven T. Gubner <sgubner@bg.law>; Susan K. Sefflin <ssefflin@bg.law>
Cc: Andrea Champion <achampion@joneslovelock.com>; Brian Shapiro <brian@brianshapirolaw.com>
Subject: Front Sight

Dear Steve and Susie:

Please note that earlier today I left Steve a voicemail to discuss your recent subpoenas and 2004 exams. I understand the Court entered the ex parte request for an order for 2004 exams and you recently issued subpoenas. Please note that it is likely that all of the documents you have requested were provided to Front Sight within the State Court/Adversary Case and the principals have been previously deposed. Moreover, there are court orders preventing the disclosure of certain documents. As such, we would like to discuss this with you to see if we can reach an amicable resolution and/or agree to some procedure to address any disputes with the Court.

I am generally available tomorrow after 2:00 p.m. but unsure when Andi is available. Can you let me know if either of you are available to discuss tomorrow afternoon and if so, a convenient time?

I await your response.

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