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7
 8 **UNITED STATES BANKRUPTCY COURT**
 9 **FOR THE DISTRICT OF NEVADA**

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

19 ****IF YOU ARE RECEIVING THIS OMNIBUS OBJECTION IN THE MAIL THEN IT APPLIES TO YOU AND YOU SHOULD READ THIS DOCUMENT IN FULL****

20 Front Sight Management LLC, the chapter 11 debtor and debtor in possession herein (the
 21 “Debtor”), hereby submits its first omnibus objection (“Omnibus Objection”) pursuant to Section¹
 22 502 and Bankruptcy Rule 3007, to the proofs of claim identified herein. The Debtor has determined
 23 that the proofs of claim listed in the chart herein (collectively, the “Claims” and each a “Claim”) are
 24 subject to reduction and/or disallowance because the amount of each of the Claims far exceeds the

25
 26
 27 ¹ Unless otherwise stated, all references to “Section” herein shall be to the Bankruptcy Code
 28 appearing in Title 11 of the U.S. Code; all references to a “Bankruptcy Rule” shall refer to the
 Federal Rules of Bankruptcy Procedure; and all references to a “Local Rule” shall refer to the Local
 Rules of Bankruptcy Practice of the U.S. District Court for the District of Nevada.

1 amount paid by the claimants (collectively, the “Claimants” and each a “Claimant”)² to the Debtor.
2 Each of the Claimants appears to be a member or former member of the Debtor (and not a creditor)
3 who is asserting a Claim or Claims against the estate based either on nothing or based on account of
4 member benefits or member rewards. Each Claimant apparently purchased or was given
5 memberships to the Debtor and subsequently purchased or was given membership rewards. These
6 rewards have no value outside of the Debtor’s business. While the Debtor believes that most, if not
7 all, of the Claimants received services from the Debtor at least equal to what was paid, the Debtor
8 does not object to the Claimants retaining a claim in this case for the amount each Claimant actually
9 paid. By this Omnibus Objection, the Debtor seeks to (i) disallow certain claims in their entirety and
10 (ii) reduce the amount of certain of the Claims to the amount reflected on the Debtor’s books and
11 records as to what was actually paid by the Claimants to the Debtor for their respective memberships
12 and membership rewards. Accordingly, the Debtor objects to the Claims and respectfully requests
13 entry of an order substantially in the form attached hereto as **Exhibit 2** reducing certain Claims and
14 disallowing certain Claims pursuant to section 502(b) and Bankruptcy Rules 3003 and 3007.

15 **CLAIMANTS RECEIVING THIS OMNIBUS OBJECTION SHOULD LOCATE**
16 **THEIR NAMES AND CLAIMS ON PAGES 5, 8 AND 10 OF THIS OMNIBUS OBJECTION.**

17 This Omnibus Objection is made and based upon the following Memorandum of Points and
18 Authorities, the declaration of Ignatius Piazza (the “Piazza Decl.”) filed in support of the Omnibus
19 Objection, the papers, pleadings, and other documents on file with the clerk of the Court, and
20 judicial notice of which is respectfully requested pursuant to Federal Rule of Evidence 201, and such
21 other and further evidence as may be provided at the hearing on the Omnibus Objection.

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 **I. JURISDICTION AND VENUE**

24 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and
25 1334 and Local Rule 1001(b)(1).

26 2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

27
28 ² As required by Local Rule 3007(a)(4), the first page of each of the Proofs of Claim are attached
hereto as **Exhibit 1**.

1 3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2 4. The statutory predicates for the relief sought herein are Section 11 U.S.C. §§ 105 and
3 502, Bankruptcy Rule 3007, and Local Rule 3007.

4 5. As required by Local Rule 9014.2, the Debtor consents to the entry of final orders or
5 judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter
6 final orders or judgments consistent with Article III of the United States Constitution.

7 **II. STATEMENT OF FACTS**

8 **A. General Case Background**

9 6. On May 24, 2022, the Debtor filed a voluntary petition for relief under chapter 11 of
10 the Bankruptcy Code. The Debtor continues to operate its business and manage its financial affairs
11 as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee
12 or examiner has been appointed in this case.

13 7. On June 9, 2022, United States Trustee for Region 17 filed its *Amended Appointment*
14 *of the Official Committee of Unsecured Creditors* [ECF No. 116].

15 **B. General History of the Debtor**

16 8. The Debtor was founded in 1996 by Ignatius Piazza. Dr. Piazza owns, either directly
17 or indirectly, 100% of the Debtor. The Debtor was originally formed as a California business and
18 operated near Bakersfield, California, from its formation in 1996 until 2002. In 1998, the Debtor
19 purchased 550 acres of raw land 45 minutes from Las Vegas, acquired approximately 500 acre feet
20 of water rights and began building what is now the finest and largest private firearms training facility
21 in the world (the “Front Sight Property”).

22 9. In 2012, the Debtor became a Nevada limited liability company. The Debtor’s
23 primary place of business is the Front Sight Property located at 1 Front Sight Road, Pahrump,
24 Nevada 89061, Nye County Assessor’s Parcel Nos. 045-481-05 and 045-481-06.

25 10. The Front Sight Property is accessed by a four-mile, two lane paved road, and is
26 currently comprised of 50 outdoor firearms training ranges, live fire tactical training simulators, an
27 8,000 square foot classroom and pro shop, and assorted accessory buildings, bathrooms, three water
28

1 wells and thousands of square yards of completed grading for future development (the “Front Sight
2 Property Facility”).

3 11. The Debtor provides firearms training courses which promote the defensive use of
4 various firearms. Courses are offered to the general public, members of law enforcement and
5 military members.

6 12. The Front Sight Firearms Facility is the most successful firearms training facility of
7 its type in the United States. The Debtor provides classes and instruction annually to upward of
8 40,000 gun and weapons enthusiasts. The Debtor is considered the leader in its field, and provides
9 additional training and instruction for numerous city and state agencies seeking to improve
10 performance of their respective law enforcement departments.

11 13. Over the last 25 years, the Debtor has trained a million students and as of the Petition
12 Date, the Debtor had over 261,000 members.

13 14. Historically, the Debtor operated its business by selling “lifetime” memberships and
14 promotional benefits such as “Front Sight Bucks,” TBD memberships, and certificates to use for
15 training courses, plus the Debtor sells ancillary products. Pre-petition, to take its business “to the
16 next level,” the Debtor developed a major expansion plan that contemplated the construction of a
17 vacation and resort development to be known as the “Front Sight Vacation Club & Resort,” to
18 include vacation residences, an RV park and related facilities, a retail area, and a pavilion. The
19 Debtor envisioned creating a self-fulfilling ecosystem, involving memberships and promotional
20 benefits, that would lead to an incentivized customer base that would take advantage of the club and
21 resort and other offerings to redound to the Debtor’s benefit.

22 15. Ultimately, due to facts not relevant to this Omnibus Objection, the Debtor was
23 unable to expand its business, was facing a wrongful foreclosure of the Front Sight Property, and
24 sought protection under chapter 11 of the Bankruptcy Code to restructure its business.

25 **III. RELIEF REQUESTED**

26 16. The Debtor has reviewed the proofs of claim filed in this case and has determined that
27 the following Claims are subject to reduction and/or disallowance because the amount of each of the
28

1 Claims far exceeds the amount the Claimants paid to the Debtor for their respective membership(s)
 2 and membership rewards and, in one instance, the Debtor has no record of the alleged member:

Claimant	Claim No.	Claim Amount
Dr. Gary P. Miller	12-1	\$21,471,000.00
David Clyde Lewis	20-1	\$2,991,000.00
William Sheeder	95-1	\$3,536,400.00
Francis Van Landingham	138-1	\$600,000.00
Robert A. Morrison	183-1	\$13,309,899.05
Birdie Carol Morrison	184-1	\$13,110,084.05
John M. Castagno	190-1	\$27,301,777.00
Eric H. Sampson	199-1	\$1,912,573.07
James Harriss	217-1	\$360,691.00
Mark Giblin	222-1	\$18,831,863.28
Kenneth E. Johnson III	238-1	\$1,121,435,079.00
Lance F. Wood	248-1	\$4,227,400.04
Amelia Fan	256-1	\$737,000.00
Sebastian Fan	257-1	\$737,000.00
Michael Steel	271-1	\$1,350,781.00
Mike Montesano	275-1	\$1,614,500.00
Stacey A. Edwards	311-1	\$650,000.00
Robert Ianucci	314-1	\$622,994.00
Kenneth D. Roberts	323-1	\$6,000
Kenneth D. Roberts	324-1	\$72,854,224,500.00
Kenneth D. Roberts	325-1	\$23,256.00
Kenneth D. Roberts	326-1	\$250,000,000
Kenneth D. Roberts	327-1	\$42,700
Kenneth D. Roberts	328-1	\$527,000

1 17. Each of the Claimants appears to be a member or former member of the Debtor who
2 is asserting a Claim or Claims against the estate based either on nothing or based on account of
3 member benefits or member rewards. Each Claimant apparently purchased or was given
4 memberships to the Debtor and subsequently purchased or was given membership rewards. These
5 rewards have no value outside of the Debtor's business. While the Debtor believes that most, if not
6 all, of the Claimants received services from the Debtor at least equal to what was paid, the Debtor
7 does not object to the Claimants retaining a claim in this case for the amount each Claimant actually
8 paid for their respective memberships and membership rewards.

9 18. The Debtor seeks entry of an order, pursuant to section 502 of the Bankruptcy Code
10 and Bankruptcy Rule 3007, (i) disallowing certain claims in their entirety and (ii) reducing the
11 amount of certain of the Claims to the amount reflected on the Debtor's books and records as to what
12 was actually paid by the Claimants to the Debtor for their respective memberships and membership
13 rewards, for the reasons set forth below.

14 **IV. BASIS FOR RELIEF**

15 19. Bankruptcy Rule 3001(f) provides that a "proof of claim executed and filed in
16 accordance with these rules shall constitute prima facie evidence of the validity and amount of the
17 claim." It is well established in the Ninth Circuit that the initial burden of persuasion for
18 establishing the validity and amount of a proof of claim is upon the claimant. *Ashford v.*
19 *Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage)*, 178 B.R. 222 (9th Cir.
20 BAP 1995), *aff'd*, 91 F.3d 151 (9th Cir. 1996) (a proof of claim must have a writing attached and
21 include supporting documentation to qualify for presumptive validity). However, the prima facie
22 validity of a claim does not attach unless the claim sets forth the facts necessary to support the claim.
23 *Id.* at 226.

24 20. Bankruptcy Code section 502 authorizes a "party in interest," such as the Debtor, to
25 object to claims. 11 U.S.C. § 502(a). Once the objector raises "facts tending to defeat the claim by
26 probative force equal to that of the allegations of the proofs of claim themselves," then the burden
27 reverts to the claimant to prove the validity of the claim by a preponderance of evidence. *Wright v.*
28 *Holm (In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991); *In re Consolidated Pioneer Mortgage*, 178

1 B.R. at 226. Indeed, the ultimate burden of persuasion is always on the claimant. *In re Holm*, 931
2 F.2d at 623; *see also In re Heath*, 331 B.R. 424 (9th Cir. BAP 2005) (explaining that a claim that
3 fails to attach supporting documentation is not entitled to be considered as prima facie evidence of
4 validity and amount of claim).

5 21. “If the creditor does not provide information or is unable to support its claim, then
6 that in itself may raise an evidentiary basis to object to the unsupported aspects of the claim, or even
7 a basis for evidentiary sanctions, thereby coming within Section 502(b)’s grounds to disallow the
8 claim.” *In re Heath*, 331 B.R. 424, 437 (B.A.P. 9th Cir. 2005).

9 22. Section 502(b)(1) requires disallowance of a claim if “such claim is unenforceable
10 against the debtor and property of the debtor, under any agreement or applicable law for a reason
11 other than because such claim is contingent or unmatured. . .” 11 U.S.C. § 502(b)(1). The
12 “applicable law” referenced in Section 502(b)(1) includes bankruptcy law as well as other federal
13 and state laws. *See Cavaliere v. Sapir*, 208 B.R. 784, 786-787 (D. Conn. 1997) (providing that
14 “applicable law” includes bankruptcy law). A debtor is therefore allowed to raise any federal or
15 state law defenses to a claim. *See In re G.I. Industries, Inc.*, 204 F.3d 1276, 1281 (9th Cir. 2000)
16 (stating that a claim cannot be allowed under Section 502(b)(1) if it is unenforceable under
17 nonbankruptcy law); *Johnson v. Righetti*, 756 F.2d 738, 741 (9th Cir. 1985) (finding that the validity
18 of the claim may be determined under state law); *In re Eastview Estates II*, 713 F.2d 443, 447 (9th
19 Cir. 1983) (applying California law).

20 **V. OBJECTIONS TO CLAIMS**

21 23. First, the Claims are not entitled to prima facie validity because each Claim does not
22 contain sufficient evidence to support the amount of the Claim. The Claims are essentially “face
23 page” proofs of claim that do not set forth the facts necessary to support the amount of the Claims.
24 Indeed, none of the Claims include an accounting of the amounts paid by Claimants to the Debtor for
25 their memberships and membership rewards. The burden of persuasion for establishing the validity
26 and amount of a Claim is on the Claimant, and the Claimants have failed to meet his burden.
27 Consequently, the Court should sustain the Omnibus Objection.
28

24. Second, the Claims should be reduced to the amount that the respective Claimant paid to the Debtor for their membership and membership rewards. Specifically, the Debtor's books and records show that the Claimant's paid the following amounts to Debtor for their membership and membership rewards:

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Dr. Gary P. Miller	12-1	\$21,471,000.00	\$13,869.00
David Clyde Lewis	20-1	\$2,991,000.00	\$7,020.00
William Sheeder	95-1	\$3,536,400.00	\$34,128.00
Francis Van Landingham	138-1	\$600,000.00	\$200.00
Robert A. Morrison	183-1	\$13,309,899.05	\$794.00
Birdie Carol Morrison	184-1	\$13,110,084.05	\$794.00
John M. Castagno	190-1	\$27,301,777.00	\$10,050.00
Eric H. Sampson	199-1	\$1,912,573.07	\$11,477.00
James Harriss	217-1	\$360,691.00	\$1,250.00
Mark Giblin	222-1	\$18,831,863.28	\$6,880.00
Kenneth E. Johnson III	238-1	\$1,121,435,079.00	\$14,860.00
Lance F. Wood	248-1	\$4,227,400.04	\$1,149.00
Amelia Fan	256-1	\$737,000.00	\$499.00
Sebastian Fan	257-1	\$737,000.00	\$499.00
Michael Steel	271-1	\$1,350,781.00	\$1,247.00
Mike Montesano	275-1	\$1,614,500.00	\$499.00
Stacey A. Edwards	311-1	\$650,000.00	\$0.00
Robert Ianucci	314-1	\$622,994.00	\$1,643.00
Kenneth D. Roberts	323-1, 324-1, 325-1, 326-1, 327-1, 328-1	\$73,104,823,456.00	\$32,134.80

1 25. Accordingly, the Debtor objects to the Claims because the Claims far exceed the
2 amount the Claimants paid to the Debtor and requests that the Court reduce the Claims to the amount
3 each Claimant paid to the Debtor for their membership and membership rewards.

4 26. Third, Claim No. 238 states that \$3,350 of the Claim is entitled to priority status
5 under Section 507(a)(7). However, deposits for memberships are not entitled to priority status under
6 Section 507(a)(7). *In re Palmas del Mar Country Club, Inc.*, 443 B.R. 569, 575 (Bankr. D.P.R.
7 2010) (disallowing priority claims filed by the country club’s members for refund of the membership
8 deposit and allowing the claims as general unsecured claims). Accordingly, the Debtor specifically
9 objects to the priority of Claim No. 238. Claim No. 328 should be reduced to \$14,860 (the amount
10 reflected in the Debtor’s books and records) and be allowed as a general unsecured claim.

11 27. Fourth, the Debtor’s books and records reflect that Claimant Dr. Gary Miller was
12 refunded \$13,869.00, i.e., after Mr. Miller’s membership was terminated, the Debtor refunded Mr.
13 Miller the total amount of money that Mr. Miller paid the Debtor for his membership and
14 membership benefits. I.e., Mr. Miller is not entitled to any claim against the Debtor or its estate and
15 Claim No. 12-1 should be disallowed in its entirety.

16 28. Fifth, the Debtor’s books and records that claimant Francis Van Landingham was
17 refunded in full for all amounts paid by him on account of his membership and membership benefits
18 (i.e., \$200.00) after his membership was terminated. Accordingly, the Debtor respectfully requests
19 that Claim No. 138- be disallowed in its entirety.

20 29. Sixth, the Debtor was unable to find a record of Stacey A. Edwards with respect to
21 Claim No. 311-1, and Claim No. 311-1 had insufficient evidence to assist the Debtor in locating this
22 membership. As such, the Debtor respectfully requests that Claim No. 311-1 be disallowed in its
23 entirety.

24 30. Accordingly, the Debtor respectfully requests that the Court reduce the following
25 Claims and allow the Claims as general unsecured claims as set forth below:

26 ///

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Claimant	Claim No.	Asserted Claim Amount	Amount of Reduced Allowed General Unsecured Claim
David Clyde Lewis	20-1	\$2,991,000.00	\$7,020.00
William Sheeder	95-1	\$3,536,400.00	\$34,128.00
Robert A. Morrison	183-1	\$13,309,899.05	\$794.00
Birdie Carol Morrison	184-1	\$13,110,084.05	\$794.00
John M. Castagno	190-1	\$27,301,777.00	\$10,050.00
Eric H. Sampson	199-1	\$1,912,573.07	\$11,477.00
James Harriss	217-1	\$360,691.00	\$1,250.00
Mark Giblin	222-1	\$18,831,863.28	\$6,880.00
Kenneth E. Johnson III	238-1	\$1,121,435,079.00	\$14,860.00
Lance F. Wood	248-1	\$4,227,400.04	\$1,149.00
Amelia Fan	256-1	\$737,000.00	\$499.00
Sebastian Fan	257-1	\$737,000.00	\$499.00
Michael Steel	271-1	\$1,350,781.00	\$1,247.00
Mike Montesano	275-1	\$1,614,500.00	\$499.00
Robert Ianucci	314-1	\$622,994.00	\$1,643.00
Kenneth D. Roberts	324-1	\$72,854,224,500.00	\$32,134.80

31. The Debtor requests that the Court disallow the following Claims in their entirety:

Claimant	Claim No.	Asserted Claim Amount	Treatment
Dr. Gary P. Miller	12-1	\$21,471,000.00	Disallowed
Francis Van Landingham	138-1	\$600,000.00	Disallowed
Kenneth D. Roberts	323-1	\$6,000	Disallowed
Kenneth D. Roberts	325-1	\$23,256.00	Disallowed
Kenneth D. Roberts	326-1	\$250,000,000	Disallowed
Kenneth D. Roberts	327-1	\$42,700	Disallowed
Kenneth D. Roberts	328-1	\$527,000	Disallowed
Stacey A. Edwards	311-1	\$650,000.00	Disallowed

1 **VI. RESERVATION OF RIGHTS**

2 32. The Debtor specifically reserves the right to amend this Omnibus Objection, file
3 additional papers in support of this Omnibus Objection or take other appropriate actions, including,
4 *inter alia*, to: (a) respond to any allegation or defense that may be raised in a response filed by or on
5 behalf of any of the Claimants or other interested parties; (b) object further to any Claim for which a
6 Claimant provides (or attempts to provide) additional documentation or substantiation; and (c) object
7 further to any of the Claims addressed herein based on additional information that may be
8 discovered upon further review by the Debtor or through discovery pursuant to the Bankruptcy
9 Rules.

10 **VII. SEPARATE CONTESTED MATTERS**

11 33. Each of the Claims and the Debtor's objections thereto constitute a separate contested
12 matter as contemplated by Bankruptcy Rules 3007 and 9014 and Local Rule 3007. The Debtor
13 requests that any order entered by the Court with respect to a particular Claim objected to in this
14 Omnibus Objection be deemed a separate order with respect to each Claim in accordance with
15 Bankruptcy Rule 3007(1).

16 **VIII. NOTICE**

17 34. The Debtor will serve copies of this Omnibus Objection upon each of the Claimants
18 identified in the chart contained herein at the addresses listed on the disputed Claims, as filed.

19 **IX. CONCLUSION**

20 The Debtor respectfully request that the Court enter an order, substantially in the form
21 attached hereto as **Exhibit 2** reducing and/or disallowing the Claims, and granting such other and
22 further relief as the Court may deem proper and just under the circumstances.

23 DATED: October 6, 2022

BG Law LLP

24
25 By: /s/ Susan K. Seflin
Susan K. Seflin
26 Jessica S. Wellington
27 Attorneys for Chapter 11 Debtor in Possession
28

EXHIBIT 1

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 5/27/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	Dr. Gary P. Miller Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor Gary Miller	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Dr. Gary P. Miller Name	_____ Name
	8120 Tuckaway Court 8120 Tuckaway Court, Crown Point, IN 46307-9391	_____ Name
	Contact phone 2196888276	Contact phone _____
	Contact email guns-ammo@att.net	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim					
1. Who is the current creditor?	David Clyde Lewis _____ Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____				
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____				
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th style="background-color: #cccccc;">Where should notices to the creditor be sent?</th> <th style="background-color: #cccccc;">Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td> David Clyde Lewis _____ Name 19739 Burton DR Clatskanie, OR 97016 Contact phone <u>503-739-5174</u> Contact email <u>Lewisdam91@yahoo.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____ </td> <td> _____ Name Contact phone _____ Contact email _____ </td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	David Clyde Lewis _____ Name 19739 Burton DR Clatskanie, OR 97016 Contact phone <u>503-739-5174</u> Contact email <u>Lewisdam91@yahoo.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	_____ Name Contact phone _____ Contact email _____
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)				
David Clyde Lewis _____ Name 19739 Burton DR Clatskanie, OR 97016 Contact phone <u>503-739-5174</u> Contact email <u>Lewisdam91@yahoo.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	_____ Name Contact phone _____ Contact email _____				
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY				
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____				

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 6/3/2022
 Mary A. Schott, Clerk

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 Proof of Claim**

04/22

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Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim					
1. Who is the current creditor?	William Sheeder Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor				
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?				
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td> William Sheeder Name 120 W Church St Panora, IA 50216-50216 Contact phone 6417571002 Contact email msheeder@struvelabs.com Uniform claim identifier for electronic payments in chapter 13 (if you use one): </td> <td> Name Contact phone Contact email </td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	William Sheeder Name 120 W Church St Panora, IA 50216-50216 Contact phone 6417571002 Contact email msheeder@struvelabs.com Uniform claim identifier for electronic payments in chapter 13 (if you use one):	 Name Contact phone Contact email
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)				
William Sheeder Name 120 W Church St Panora, IA 50216-50216 Contact phone 6417571002 Contact email msheeder@struvelabs.com Uniform claim identifier for electronic payments in chapter 13 (if you use one):	 Name Contact phone Contact email				
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY				
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?				

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 7/12/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim															
1. Who is the current creditor?	Robert A Morrison Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor: Bob Morrison														
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____														
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Robert A Morrison</td> <td>_____</td> </tr> <tr> <td>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</td> <td>Name</td> </tr> <tr> <td>1501 FAIRHAVEN DR MANSFIELD, TX 76063</td> <td>Name</td> </tr> <tr> <td>Contact phone: 18179331968</td> <td>Contact phone: _____</td> </tr> <tr> <td>Contact email: bobmorrison@swbell.net</td> <td>Contact email: _____</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Robert A Morrison	_____	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name	1501 FAIRHAVEN DR MANSFIELD, TX 76063	Name	Contact phone: 18179331968	Contact phone: _____	Contact email: bobmorrison@swbell.net	Contact email: _____	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)														
Robert A Morrison	_____														
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name														
1501 FAIRHAVEN DR MANSFIELD, TX 76063	Name														
Contact phone: 18179331968	Contact phone: _____														
Contact email: bobmorrison@swbell.net	Contact email: _____														
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____															
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY														
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____														

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 7/26/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim																			
1. Who is the current creditor?	Eric H Sampson Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor																		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?																		
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Eric H Sampson</td> <td></td> </tr> <tr> <td>Name</td> <td>Name</td> </tr> <tr> <td>932 Mokapu Blvd</td> <td></td> </tr> <tr> <td>932 Mokapu Blvd</td> <td></td> </tr> <tr> <td>Kailua, HI 96734</td> <td></td> </tr> <tr> <td>Contact phone 8083886927</td> <td>Contact phone</td> </tr> <tr> <td>Contact email heavymetalsampson@yahoo.com</td> <td>Contact email</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Eric H Sampson		Name	Name	932 Mokapu Blvd		932 Mokapu Blvd		Kailua, HI 96734		Contact phone 8083886927	Contact phone	Contact email heavymetalsampson@yahoo.com	Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)																		
Eric H Sampson																			
Name	Name																		
932 Mokapu Blvd																			
932 Mokapu Blvd																			
Kailua, HI 96734																			
Contact phone 8083886927	Contact phone																		
Contact email heavymetalsampson@yahoo.com	Contact email																		
Uniform claim identifier for electronic payments in chapter 13 (if you use one):																			
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY																		
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?																		

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 8/1/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	James Harriss _____ Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	James Harriss _____ Name	_____ Name
	1513 Line Avenue Unit 345 Shreveport, LA 71101	
	Contact phone <u>225-755-8475</u>	Contact phone _____
	Contact email <u>jharriss@hotmail.com</u>	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the District of Nevada

Case number 22-11824-abl

RECEIVED
AND FILED

EGP

2022 JUL 25 P 4: 00

U.S. BANKRUPTCY COURT
MARY A. SCHOTT, CLERK

**Official Form 410
Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor? Mark Giblin
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?
 No
 Yes From whom? _____

3. Where should notices and payments to the creditor be sent?
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

<p>Where should notices to the creditor be sent?</p> <p><u>Mark Giblin</u> Name</p> <p><u>19 Prospect Ave</u> Number Street</p> <p><u>Mt. Herman CA 95041</u> City State ZIP Code</p> <p>Contact phone <u>831-335-4870</u></p> <p>Contact email <u>MLHuseHold@aol.com</u></p>	<p>Where should payments to the creditor be sent? (if different)</p> <p><u>Mark Giblin</u> Name</p> <p><u>P.O. Box 324</u> Number Street</p> <p><u>Mt Herman, CA 95041</u> City State ZIP Code</p> <p>Contact phone _____</p> <p>Contact email _____</p>
--	---

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?
 No
 Yes Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes Who made the earlier filing? _____

STRETTO
AUG 01 2022
Received

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 8/5/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim															
1. Who is the current creditor?	Kenneth E. Johnson III Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor														
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?														
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Kenneth E. Johnson III</td> <td></td> </tr> <tr> <td>Name</td> <td>Name</td> </tr> <tr> <td>2051 East Glencove Circle Mesa, AZ 85213</td> <td></td> </tr> <tr> <td>Contact phone 6023153219</td> <td>Contact phone</td> </tr> <tr> <td>Contact email kennethjohnson3@cox.net</td> <td>Contact email</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Kenneth E. Johnson III		Name	Name	2051 East Glencove Circle Mesa, AZ 85213		Contact phone 6023153219	Contact phone	Contact email kennethjohnson3@cox.net	Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)														
Kenneth E. Johnson III															
Name	Name														
2051 East Glencove Circle Mesa, AZ 85213															
Contact phone 6023153219	Contact phone														
Contact email kennethjohnson3@cox.net	Contact email														
Uniform claim identifier for electronic payments in chapter 13 (if you use one):															
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY														
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?														

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 8/7/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim															
1. Who is the current creditor?	Lance F. Wood Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor														
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?														
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Lance F. Wood</td> <td></td> </tr> <tr> <td>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</td> <td></td> </tr> <tr> <td>Name 5869 Gold Inlet Dr las vegas, NV 89130-1953</td> <td>Name</td> </tr> <tr> <td>Contact phone 702-308-8647</td> <td>Contact phone</td> </tr> <tr> <td>Contact email Nvfiredog@gmail.com</td> <td>Contact email</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Lance F. Wood		Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)		Name 5869 Gold Inlet Dr las vegas, NV 89130-1953	Name	Contact phone 702-308-8647	Contact phone	Contact email Nvfiredog@gmail.com	Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)														
Lance F. Wood															
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)															
Name 5869 Gold Inlet Dr las vegas, NV 89130-1953	Name														
Contact phone 702-308-8647	Contact phone														
Contact email Nvfiredog@gmail.com	Contact email														
Uniform claim identifier for electronic payments in chapter 13 (if you use one):															
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY														
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____														

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 8/8/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim																	
1. Who is the current creditor?	Amelia Fan Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor																
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?																
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Amelia Fan</td> <td></td> </tr> <tr> <td>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</td> <td></td> </tr> <tr> <td>Name</td> <td>Name</td> </tr> <tr> <td>3009 Oregon Knolls Dr. NW Washington, DC. 20015-2211</td> <td></td> </tr> <tr> <td>Contact phone</td> <td>Contact phone</td> </tr> <tr> <td>Contact email</td> <td>Contact email</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Amelia Fan		Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)		Name	Name	3009 Oregon Knolls Dr. NW Washington, DC. 20015-2211		Contact phone	Contact phone	Contact email	Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)																
Amelia Fan																	
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)																	
Name	Name																
3009 Oregon Knolls Dr. NW Washington, DC. 20015-2211																	
Contact phone	Contact phone																
Contact email	Contact email																
Uniform claim identifier for electronic payments in chapter 13 (if you use one):																	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY																
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____																

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 8/8/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	Michael D Montesano _____ Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor Mike Montesano _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Michael D Montesano _____ Name 3319 Shepherd Road Williamson New York 14589 , Contact phone 585-625-2158 Contact email mike1mo@yahoo.com _____ Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	_____ Name Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED
 U.S. Bankruptcy Court
 District of Nevada
 8/22/2022
 Mary A. Schott, Clerk

**Official Form 410
 Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim											
1. Who is the current creditor?	Robert Ianucci Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor										
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?										
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Robert Ianucci Name 1305 Willowood Lane Virginia Beach, VA 23454</td> <td> Name</td> </tr> <tr> <td>Contact phone 7572871663</td> <td>Contact phone</td> </tr> <tr> <td>Contact email rianucci@gmail.com</td> <td>Contact email</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Robert Ianucci Name 1305 Willowood Lane Virginia Beach, VA 23454	 Name	Contact phone 7572871663	Contact phone	Contact email rianucci@gmail.com	Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)										
Robert Ianucci Name 1305 Willowood Lane Virginia Beach, VA 23454	 Name										
Contact phone 7572871663	Contact phone										
Contact email rianucci@gmail.com	Contact email										
Uniform claim identifier for electronic payments in chapter 13 (if you use one):											
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY										
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?										

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

Official Form 410
Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim \$6,000 Six thousand dollar loan

1. Who is the current creditor?
Kenneth D Roberts / Jesaraca LP
 Name of the current creditor (the person or entity to be paid for this claim)
 Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?
 No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?
 Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Name <u>Kenneth D Roberts</u>	Name _____
Number Street <u>5411 69th St CT NW</u>	Number Street _____
City State ZIP Code <u>Gig Harbor WA 98335</u>	City State ZIP Code _____
Contact phone <u>253 851 0480</u>	Contact phone _____
Contact email <u>robertsresearch@msn.com</u>	Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?
 No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes. Who made the earlier filing? _____

STRETTO
SEP 06 2022
Received

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC
 Debtor 2 _____
 (Spouse, if filing)
 United States Bankruptcy Court for the: District of Nevada
 Case number 22-11824-abl

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim \$72,854,224,500 value of Knight memberships

1. Who is the current creditor?
 Name of the current creditor (the person or entity to be paid for this claim) Kenneth Roberts
 Other names the creditor used with the debtor JUSARACA LP

2. Has this claim been acquired from someone else?
 No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?
 Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Name <u>Kenneth D Roberts</u>	Name _____
Number <u>5411</u> Street <u>169th St NW</u>	Number _____ Street _____
City <u>Everett</u> State <u>WA</u> ZIP Code <u>98335</u>	City _____ State _____ ZIP Code _____
Contact phone <u>253 851 0480</u>	Contact phone _____
Contact email <u>robertsresearch@msn.com</u>	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	

STRETTO
SEP 06 2022
Received

4. Does this claim amend one already filed?
 No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes. Who made the earlier filing? _____

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2 _____
Spouse, if filing

United States Bankruptcy Court for the District of Nevada

Case number 22-11824-abl

Official Form 410
Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim \$23,256 Front Sight Buks

1. Who is the current creditor? Kenneth Roberts
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor Jesavaca LP

2. Has this claim been acquired from someone else?
 No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Name <u>Kenneth D Roberts</u>	Name _____
Number Street <u>5411 69th St Ct NW</u>	Number Street _____
City State ZIP Code <u>Cap Harbor WA 98335</u>	City State ZIP Code _____
Contact phone <u>253 851 0480</u>	Contact phone _____
Contact email <u>vrobertsresearch@msn.com</u>	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one) _____	

STRETTO
SEP 06 2022
Received

4. Does this claim amend one already filed?
 No
 Yes. Claim number on court claims registry (if known) _____ Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes. Who made the earlier filing? _____

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

Official Form 410
Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim \$ 250,000,000 Foundation Membershpy

1. Who is the current creditor?
Kenneth Roberts
 Name of the current creditor (the person or entity to be paid for this claim)
 Other names the creditor used with the debtor Jesaraca LP

2. Has this claim been acquired from someone else?
 No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?
 Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

<p>Where should notices to the creditor be sent?</p> <p><u>Kenneth D Roberts</u> Name <u>5411 69th St Ct NW</u> Number Street <u>Big Harbor WA 98335</u> City State ZIP Code Contact phone <u>253 851 6480</u> Contact email <u>robertsresearch@msn.com</u></p>	<p>Where should payments to the creditor be sent? (if different)</p> <p>_____ Name _____ Number Street _____ City State ZIP Code _____ Contact phone _____ _____ Contact email _____</p>
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Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?
 No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____ / ____ / ____

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes. Who made the earlier filing? _____

STRETTO
SEP 06 2022
Received

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2 _____
 (Spouse, if filing)

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abi

Official Form 410
Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents: they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim \$42,700 Front Sight coins

1. Who is the current creditor?
Kenneth Roberts
 Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor Jesavaca LP

2. Has this claim been acquired from someone else?
 No
 Yes. From whom? _____

<p>3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</p>	<p>Where should notices to the creditor be sent? <u>Kenneth D Roberts</u> Name <u>5411 69th St Ct NW</u> Number Street <u>Olig Harbor WA 98335</u> City State ZIP Code Contact phone <u>253 851 0480</u> Contact email <u>vobbytsresearch@msn.com</u></p>	<p>Where should payments to the creditor be sent? (if different)</p> <p>Name _____ Number Street _____ City State ZIP Code _____ Contact phone _____ Contact email _____</p>
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Uniform claim identifier for electronic payments in chapter 13 (if you use one):

SIRETTO
 SEP 06 2022
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4. Does this claim amend one already filed?
 No
 Yes. Claim number or court claims registry (if known): _____ Filed on _____ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes. Who made the earlier filing? _____

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC
 Debtor 2 _____
 (Spouse, if filing)
 United States Bankruptcy Court for the: District of Nevada
 Case number 22-11824-abl

**Official Form 410
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

\$ 522,000 value of 2/4 handover memberships

1. Who is the current creditor?

Kenneth Roberts
 Name of the current creditor (the person or entity to be paid for this claim)
 Other names the creditor used with the debtor Jesavaca LP

2. Has this claim been acquired from someone else?

No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Kenneth D Roberts
 Name
5411 69th St Ct NW
 Number Street
Gig Harbor WA 98335
 City State ZIP Code
 Contact phone 2538510480
 Contact email robertsresearch@msn.com

 Name

 Number Street

 City State ZIP Code

 Contact phone

 Contact email

SIRETTO
SEP 06 2022
Received

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?

No
 Yes. Claim number on court claims registry (if known) _____

Filed on _____
 MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No
 Yes. Who made the earlier filing? _____

EXHIBIT 2

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STEVEN T. GUBNER – NV Bar No. 4624
SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*
JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*
BG LAW LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101
Telephone: (702) 835-0800
Facsimile: (866) 995-0215
Email: ssubner@bg.law
sseflin@bg.law
jwellington@bg.law

Attorneys for Chapter 11 Debtor in Possession

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

In re:

Front Sight Management LLC,

Debtor.

Case No. 22-11824-abl

Chapter 11

Hearing Date: November 18, 2022
Hearing Time: 9:30 a.m.

**ORDER SUSTAINING DEBTOR’S FIRST OMNIBUS OBJECTION AND (1) REDUCING
AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING AND
EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

On November 18, 2022 at 9:30 a.m., a hearing was held before the Honorable August Landis,
Chief United States Bankruptcy Judge for the District of Nevada, for the Court to consider the
Debtor’s Omnibus Objection to Certain Members’ Claims [ECF No. ____] (the “Omnibus

1 Objection”)¹ filed by Front Sight Management LLC, the chapter 11 debtor and debtor in possession
 2 herein (the “Debtor”). Appearances were as duly noted on the record at the hearing.

3 The Court, having read and considered the Omnibus Objection and all evidence filed in
 4 support of the Omnibus Objection; the Court having considered the argument and representations of
 5 counsel at the hearing and other matters which the Court may properly take judicial notice,
 6 including, without limitation, the record in this case as reflected on the docket; the Court having set
 7 forth its findings and conclusions on the record pursuant to Rule 52 of the Federal Rules of Civil
 8 Procedure and Rule 7052 of the Federal Rules of Bankruptcy Procedure; the Court having found that
 9 notice of the Omnibus Objection was sufficient under the circumstances and no other or further
 10 notice is required; the Court having determined that the legal and factual bases set forth in the
 11 Omnibus Objection establish just cause for the relief sought therein; and after due deliberation and
 12 sufficient cause appearing therefor,

13 **IT IS HEREBY ORDERED** that the Omnibus Objection is sustained in its entirety.

14 **IT IS HEREBY FURTHER ORDERED** that the following Proofs of Claim shall be
 15 REDUCED as follows:

Claimant	Claim No.	Asserted Claim Amount	Amount of Reduced Allowed General Unsecured Claim
David Clyde Lewis	20-1	\$2,991,000.00	\$7,020.00
William Sheeder	95-1	\$3,536,400.00	\$34,128.00
Robert A. Morrison	183-1	\$13,309,899.05	\$794.00
Birdie Carol Morrison	184-1	\$13,110,084.05	\$794.00
John M. Castagno	190-1	\$27,301,777.00	\$10,050.00
Eric H. Sampson	199-1	\$1,912,573.07	\$11,477.00
James Harriss	217-1	\$360,691.00	\$1,250.00
Mark Giblin	222-1	\$18,831,863.28	\$6,880.00

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28 ¹ All initial capitalized terms not defined herein shall have the same meaning ascribed to them in the Omnibus Objection.

Claimant	Claim No.	Asserted Claim Amount	Amount of Reduced Allowed General Unsecured Claim
Kenneth E. Johnson III	238-1	\$1,121,435,079.00	\$14,860.00
Lance F. Wood	248-1	\$4,227,400.04	\$1,149.00
Amelia Fan	256-1	\$737,000.00	\$499.00
Sebastian Fan	257-1	\$737,000.00	\$499.00
Michael Steel	271-1	\$1,350,781.00	\$1,247.00
Mike Montesano	275-1	\$1,614,500.00	\$499.00
Robert Ianucci	314-1	\$622,994.00	\$1,643.00
Kenneth D. Roberts	324-1	\$72,854,224,500.00	\$32,134.80

IT IS HEREBY FURTHER ORDERED that the following Proofs of Claim shall be DISALLOWED in their entirety:

Claimant	Claim No.	Asserted Claim Amount	Treatment
Dr. Gary P. Miller	12-1	\$21,471,000.00	Disallowed
Francis Van Landingham	138-1	\$600,000.00	Disallowed
Stacey A. Edwards	311-1	\$650,000.00	Disallowed
Kenneth D. Roberts	323-1	\$6,000	Disallowed
Kenneth D. Roberts	325-1	\$23,256.00	Disallowed
Kenneth D. Roberts	326-1	\$250,000,000	Disallowed
Kenneth D. Roberts	327-1	\$42,700	Disallowed
Kenneth D. Roberts	328-1	\$527,000	Disallowed

IT IS SO ORDERED.

1 Prepared and Submitted By:

2 BG LAW LLP

3 By: /s/ Susan K. Seflin

4 Susan K. Seflin
5 Jessica S. Wellington
6 Attorneys for Chapter 11 Debtor
7 and Debtor in Possession
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