

1 STEVEN T. GUBNER – NV Bar No. 4624
 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*
 2 JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*
 BG LAW LLP
 3 300 S. 4th Street, Suite 1550
 Las Vegas, NV 89101
 4 Telephone: (702) 835-0800
 Facsimile: (866) 995-0215
 5 Email: ssubner@bg.law
 sseflin@bg.law
 6 jwellington@bg.law

7 Attorneys for Chapter 11 Debtor
 and Debtor in Possession

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

<p>12 In re:</p> <p>13 Front Sight Management LLC,</p> <p>14</p> <p>15 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p>Hearing Date: January 9, 2023 Hearing Time: 9:30 a.m.</p>
--	--

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

20 I, Ignatius Piazza, hereby declare as follows:

21 1. I am the manager of Front Sight Management LLC, the chapter 11 debtor in
 22 possession herein (the “Debtor”). The facts stated herein are within my personal knowledge unless
 23 otherwise indicated. Unless stated on information and belief, I have personal knowledge of the facts
 24 set forth herein and, if called upon to testify, could and would do so. For those items stated on
 information and belief, I believe them to be true.

25 2. I make this declaration in support of the *Debtor’s Third Omnibus Objection (1)*
 26 *Reducing and Allowing Certain Member Claims and (2) Disallowing and Expunging Certain Other*
 27
 28

1 *Member Claims* (the “Omnibus Objection”)¹ filed herewith. If called upon to testify, I would testify
2 competently to the facts set forth in this Declaration and the Omnibus Objection. I am authorized to
3 submit this Declaration on the Debtor’s behalf.

4 3. After reviewing the Claims, the Debtor has determined that the Claims are subject to
5 reduction and/or disallowance because the amount of each of the Claims far exceeds the amount paid
6 by the Claimants to the Debtor. Each of the Claimants is a member or former member of the Debtor
7 who is asserting a Claim or Claims against the estate based either on nothing or based on account of
8 member benefits or member rewards. Each Claimant purchased or was given memberships to the
9 Debtor and subsequently purchased or was given membership rewards. These rewards have no
10 value outside of the Debtor’s business. While I believe that most, if not all, of the Claimants
11 received services from the Debtor at least equal to what was paid, the Debtor does not object to the
12 Claimants retaining a claim in this case for the amount each Claimant actually paid.

13 4. The Debtor’s books and records show that the Claimants paid the following amounts
14 to Debtor for their memberships and membership rewards:

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor’s Records as Being Paid by Claimant for Membership and Membership Rewards
Brian Lorenz	3-1	\$12,000.00	\$4,943.00
Brett Swaim	5-1	\$10,000.00	\$5,788.00
Kevin Conway	10-1	\$60,900.00	\$0.00
Andrew Kisse	13-1	\$60,000.00	\$99.00
Richard F. Marz	14-1	\$22,074.00	\$7,387.00
Jennifer Shockley	23-1	\$10,000.00	\$0.00
Elizabeth Shockley	25-1	\$10,000.00	\$0.00
Greg Raven	52-1, 137-1, 200-1	\$35,991.00	\$3,163.00
Victor Reilley	61-1	\$10,000.00	\$896.00
Stan Hilton	69-1	\$10,000.00	\$6,618.00
Paul Davidson	71-1	\$15,000.00	\$10,400.00

27
28 ¹ All capitalized terms used herein but not defined shall have the same meaning ascribed to them in the Omnibus Objection.

	Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
1	Nick Voth	73-1	\$10,000.00	\$1,497.00
2	Brian Levy	75-1	\$53,000.00	\$4,893.00
3	Geoffrey Hicks	79-1	\$10,000.00	\$0.00
4	Maryann Hicks	80-1	\$10,000.00	\$99.00
5	Angela Hicks	81-1	\$10,000.00	\$0.00
6	Michael Langiano	85-1	\$10,000.00	\$0.00
7	Robert Waggoner/ Rob Waggoner	96-1, 171-2	\$43,292.00	\$32,475.00
8	Leman W. Pendley	98-1	\$50,000.00	\$20,041.80
9	Jodie Yelton	99-1	\$12,997.00	\$9,736.00
10	Harry DeWolf	119-1	\$83,892.20	\$4,840.00
11	Matthew Seavey	127-1	\$80,000.00	\$700.00
12	Steven C. Peterson	130-1	\$12,000.00	\$0.00
13	Andi Rausch	132-1	\$68,800.00	\$99.00
14	Jeff Rausch	133-1	\$60,000.00	\$549.00
15	Mark Welitzkin	139-1	\$10,000.00	\$0.00
16	1801 Labrador St (Mary Cutaia)	140-1	\$10,000.00	\$0.00
17	Maraya Tamera Evans	142-1	\$4,800.00	\$0.00
18	Charles Evans	143-1	\$4,800.00	\$399.00
19	Patricia M. Passaretti	153-1	\$60,000.00	\$0.00
20	Steven Carr	156-1	\$16,361.00	\$7,339.00
21	Robert Rosen	159-1	\$77,750.00	\$1,400.00
22	Michael P. Kauffman	160-1	\$25,000.00	\$0.00
23	Kiril P. Boyadjieff	170-1	\$20,000.00	\$0.00
24	Richard Faulk	178-1	\$12,000.00	\$50.00
25	Terry O'Reilly	197-1	\$50,000.00	\$0.00
26	Catherine A. Tardy	204-1	\$82,213.03	\$6,240.00
27	Rick Mantin	212-1	\$34,689.00	\$22,138.00
28	Ward Stringham	220-1	\$50,000.00	\$0.00
	Allyson Harriss	221-1	\$60,800.00	\$0.00
	Jorge Ragde	230-1	\$22,000.00	\$0.00
	Patrick Joseph Hughes	233-1	\$10,000.00	\$999.00

	Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
1				
2				
3	Joshua Morrison			
4	(deceased) & Tacy Morrison	236-1	\$54,910.00	\$47,067.00
5	Valerie Ann Wade	242-1	\$14,940.00	\$8,870.00
6	Matthew Lewis	255-1	\$87,070.00	\$52,932.00
7	Uzzell S. Branson IV	262-1	\$15,000.00	\$448.00
8	Michael G. Jones	263-1	\$43,520.00	\$38,587.00
9	Gary Krystof	265-1	\$12,234.00	\$2,739.00
10	Ronald R. Webb	266-1	\$15,000.00	\$1,347.00
11	Brian Pavey	270-1	\$58,135.00	\$43,098.00
12	Matthew A. Lockitski	272-1	\$10,000.00	\$0.00
13	Anthony Sgarlatti	273-1	\$32,890.32	\$11,692.00
14	Randall R. Webb	285-1	\$50,000.00	\$15,545.00
15	Melissa Ramiso Lewis	288-1	\$15,000.00	\$0.00
16	Kortney Otten	290-1	\$15,000.00	\$0.00
17	Logan Mitchell Lewis	292-1	\$60,000.00	\$548.00
18	Douglas R. Bonney	293-1	\$70,000.00	\$0.00
19	Mark Collins Founding Member	316-1	\$10,000.00	\$1,145.00
20	Raymond W. Connors	322-1	\$60,000.00	\$0.00
21	Leonard Yutaka Ishiguro	364-1	\$18,000.00	\$2,988.00
22	William Turner	394-1	\$74,350.00	\$3,987.00
23	Joseph Van Bruaene	405-1	\$29,297.00	\$15,187.00
24	Jonathan Paul Gunzel	417-1	\$68,500.00	\$6,294.00
25	Life on Your Terms, Inc.	420-1	\$21,235.00	\$4,597.00
26	John C. Lindsey	431-1	\$11,000.00	\$5,786.00
27	Liza Pitch	441-1	\$40,000.00	\$0.00
28	Kevin G. Miller	461-1	\$17,400.00	\$1,500.00
	Cameron Ruppe	464-1	\$86,334.89	\$14,661.00
	Michael H. Cox	475-1	\$10,000.00	\$7,034.00
	Christian Gulde	481-1	\$10,000.00	\$3,642.00
	Bryant Zollinger	486-1	\$26,368.00	\$8,026.00
	John F. Moran	487-1	\$80,000.00	\$549.00

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Gerald Bittner Jr., Paula, Jerry III, Chloe, and Lauren Bittner	494-1	\$25,000.00	\$1,200.00
Mark Woodson	517-1	\$10,000.00	\$448.00
Clark Hatch	534-1	\$17,228.00	\$997.00
Douglas Ralston	543-1	\$50,000.00	\$4,491.00
Nola T. Hatch	566-1	\$71,250.00	\$0.00
James E. Synovec	580-1	\$6,158,697.00	\$1,497.00
Michael Shapiro	593-1	\$56,000.00	\$3,792.00
Brandon Raymond	594-1	\$22,622.00	\$2,441.00
Stephen J. Waltz	597-1	\$94,070.07	\$7,438.00
Eric Stay	608-1	\$50,000.00	\$1,394.00
Robert Foelak	614-1	\$70,700.00	\$210.00

5. Additionally, it appears that Claimant Gary Raven has filed three Claims that are duplicative, Claim Nos. 52-1, 137-1, and 200-1. It also appears that Claimant Robert Waggoner has filed Claim No. 171-2, which appears to be duplicative of Claim No. 96-1. Accordingly, the Debtor respectfully requests that Claim Nos. 137-1, 200-1, and 171-2 be disallowed in their entirety because they are duplicative of other Claims.

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

Executed on this 21st day of October 2022.

/s/ Ignatius Piazza
Ignatius Piazza

CERTIFICATE OF SERVICE

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

On **October 21, 2022**, I served the following document:

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

BY ELECTRONIC MAIL

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

- **JASON BLUMBERG** Jason.blumberg@usdoj.gov
- **CANDACE C CARLYON** ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com;nrodriguez@carlyoncica.com;9232006420@filings.docketbird.com;Dcica@carlyoncica.com
- **CHAPTER 11 - LV** USTPRegion17.lv.ecf@usdoj.gov
- **DAWN M. CICA** dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- **WILLIAM C DEVINE** william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- **THOMAS H. FELL** tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- **PHILIP S. GERSON** Philip@gersonnvlaw.com
- **STEVEN T GUBNER** sgubner@bg.law, ecf@bg.law
- **RAMIR M. HERNANDEZ** rhernandez@wrightlegal.net, jcraig@wrightlegal.net;nvbkfilings@wrightlegal.net
- **MICHAEL R. HOGUE** hoguem@gtlaw.com, LVLitDock@GTLAW.com;bundickj@gtlaw.com;hicksja@gtlaw.com;ferrariom@gtlaw.com;flintza@gtlaw.com;navarrom@gtlaw.com;rosehilla@gtlaw.com
- **JASON B KOMORSKY** jkomorsky@bg.law
- **BART K. LARSEN** BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- **NICOLE E. LOVELOCK** nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com
- **EDWARD M. MCDONALD** edward.m.mcdonald@usdoj.gov
- **TRACY M. O’STEEN** tosteen@carlyoncica.com, crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com
- **TERESA M. PILATOWICZ** tpilatowicz@gtg.legal, bknotices@gtg.legal
- **SAMUEL A. SCHWARTZ** saschwartz@nvfirm.com, ecf@nvfirm.com;schwartzsr45599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com
- **SUSAN K. SEFLIN** sseflin@bg.law
- **BRIAN D. SHAPIRO** brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com;6855036420@filings.docketbird.com
- **STRETTO** ecf@cases-cr.stretto-services.com, aw01@ecfcbis.com,pacerpleadings@stretto.com
- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **JESSICA S. WELLINGTON** jwellington@bg.law

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

Executed October 21, 2022, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY