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7 Attorneys for Chapter 11 Debtor in Possession

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

11 In re:
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 13 Front Sight Management LLC,
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 15 Debtor.

Case No. 22-11824-abl
 Chapter 11

Hearing Date: January 9, 2023
Hearing Time: 9:30 a.m.

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 20 **DECLARATION OF IGNATIUS PIAZZA IN SUPPORT OF DEBTOR’S AMENDED**
 21 **FOURTH OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN**
 22 **MEMBER CLAIMS AND (2) DISALLOWING AND EXPUNGING CERTAIN OTHER**
 23 **MEMBER CLAIMS**

24 I, Ignatius Piazza, hereby declare as follows:

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

3 2. I make this declaration in support of the *Debtor's Amended Fourth Omnibus*
 4 *Objection (1) Reducing and Allowing Certain Member Claims and (2) Disallowing and Expunging*
 5 *Certain Other Member Claims* (the "Omnibus Objection")¹ filed herewith. If called upon to testify, I
 6 would testify competently to the facts set forth in this Declaration and the Omnibus Objection. I am
 7 authorized to submit this Declaration on the Debtor's behalf.

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

17 4. The Debtor's books and records show that the Claimants paid the following amounts
 18 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
Michael E. Edwards Jr.	312-1	\$61,000.00	\$0.00
Douglas B Bruning	549-1	\$7,000.00	\$0.00
David Chasse	618-1	\$35,984.00	\$27,638.00
Raymond & Betty H. Froess	619-1	\$36,615.00	\$24,856.00
Ralf Weber	625-1	\$806,000.00	\$1,842.00

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 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	Marc Risman	631-1	\$7,500	\$0.00
2	James Banks	636-1	\$10,000.00	\$0.00
3	James Yang	637-1	\$10,700.00	\$3,692.00
4	William E. Bookout	646-1	\$10,900.00	\$7,592.00
5	Leo Hamel	671-1	\$40,888.00	\$8,838.00
6	Jerry Harrott	682-1	\$37,140.00	\$23,914.00
7	Terryll Rex	685-1	\$10,000.00	\$0.00
8	Lydia Van Landingham	709-1	\$60,000.00	\$0.00
9	Myron K. Wiley	712-1	\$100,000.00	\$2,534.00
10	Paul Hutchinson	727-1	\$155,000.00	\$1,995.00
11	Front Sight Management LLC (Jayson Hoffer)	729-1	\$55,000.00	\$50,530.00
12	Front Sight Management LLC (Paul Lippitt)	731-1	\$200,000.00	\$151.00
13	Richard Kuan	736-1	\$100,000.00	\$0.00
14	Howard Glassman	740-1	\$11,014.75	\$2,400.90
15	Isaiah Valencia	744-1	\$60,000.00	\$0.00
16	Front Sight Management LLC [Gary Short] (Jeffrey Cooper)	758-1	\$100,000.00	\$299.00
17	Daniel Hambleton	775-1	\$15,200.00	\$9,251.80
18	Kevin Grant	779-1	\$180,000.00	\$0.00
19	Robert John Andrews Jr	783-1	\$12,913.00	\$8,725.00
20	Thomas A. Collins, member no. 105208	808-1	\$15,000.00	\$0.00
21	James A Robertson	809-1	\$87,500.00	\$78,632.00
22	Front Sight Management LLC (Paul Macdonald)	830-1	\$54,811,040.00	\$13,996.00
23	William Birdzell	835-1	\$9,500.00	\$0.00
24	Jeffrey Campbell	837-1	\$10,000.00	\$4,989.00
25	Mark Schwarm	840-1	\$35,048.86	\$4,391.00
26	Christian Jannuzzi	843-1	\$250,000.00	\$5,272.00
27	Matthew Cordell	848-1	\$726,444.00	\$4,844.00
28	Ken R. Greenwood	849-1	\$16,145.00	\$599.00

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5. Additionally, the Debtor's books and records reflect that the Debtor refunded \$2,534.00 to Claimant Myron K. Wiley after his membership was terminated, i.e., the Debtor refunded Mr. Wiley the total amount of money that Mr. Wiley paid to the Debtor for his membership and membership benefits. Accordingly, the Debtor requests that Claim No. 712-1 be disallowed in its entirety.

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 4th day of November 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 **November 4, 2022**, I served the following document:

- **DECLARATION OF IGNATIUS PIAZZA IN SUPPORT OF DEBTOR’S AMENDED FOURTH 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:

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- **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 November 4, 2022, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY