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7 Attorneys for Chapter 11 Debtor

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

11 In re:  
 12  
 13 Front Sight Management LLC,  
 14  
 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 FIFTH OMNIBUS**  
 21 **OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2)**  
 22 **DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

23 I, Ignatius Piazza, hereby declare as follows:

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

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

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

4. The Debtor's books and records show that the Claimants paid the following amounts 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
Kenneth Shockley	21-1	\$18,500.00	\$7,847.00
Kimberly Klein Dickerson	195-2	\$12,150.00	\$4,196.00
David Webb	283-1	\$33,595.00	\$495.00
Adalberto Espinosa	334-1	\$36,471.00	\$15,300.00
Francis Christopher Van Landingham	335-1	\$60,000.00	\$200.00
Richard Allington	353-1	\$33,350.00	\$3,296.00
Employees of Front Sight Management (Douglas Olivier)	442-1	\$1,200.00	\$0.00

<sup>1</sup> All capitalized terms used herein but not defined shall have the same meaning ascribed to them in the Omnibus Objection.

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Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Kevin G Miller	461-2	\$17,400.00	\$1,500.00
Trifone Whitmer	686-1	\$94,613.00	\$91,679.00
District of Nevada (Russell Turrefiel Reston)	706-1	\$20,000.00	\$5,186.00
524 Mia Isabella Ct (Bret Freeman)	764-1	\$7,199.00	\$646.00
Robert William Bruderman	817-1	\$3,500.00	\$0.00
Steve and Kerri Surface	850-1	\$2,012.00	\$0.00
Joseph Paul Woodcock	853-1	\$65,000.00	\$3,833.90
Roy Smith	869-1	\$19,500.00	\$0.00
Glenn Brahin	870-1	\$30,000.00	\$2,794.00
Andrew John Piziali	879-1	\$15,000.00	\$100.00
James M. Dutton	884-1	\$638,400.00	\$1,097.00
John H. Moselage III	886-1	\$87,316.00	\$56,427.00
Alvin Christian Miller	888-2	\$19,200.50	\$11,895.00
Peter Kalenack	889-1	\$1,973,900.00	\$3,344.00
F. Scott Sorensen	907-1	\$7,262,900.00	\$5,484.00
John T. Snively	908-1	\$810,157.50	\$15,143.00
Kenith Foley	909-1	\$231,000.00	\$1,993.00
Debra J. Foley	912-1	\$105,000.00	\$500.00
William Morris	917-1	\$10,840,974.00	\$4,046.00
Luis Jaramillo	918-1	\$479,681.55	\$1,796.00
Rick Grant	919-1	\$426,766.23	\$2,095.00
Rick Grant	922-1	\$425,766.23	Duplicate of 919-1
Luis Jaramillo	924-1	\$479,681.55	Duplicate of 918-1
Vaughan Dabbs	925-1	\$48,000.00	\$24,000.00
Keith Koch	929-1	\$4,705.00	\$795.00
Kevin McLaughlin	930-1	\$25,000.00	\$14,222.00
Glenn Roberts	931-1	\$49,500.00	\$395.00
Kevin L. Keyes	936-1	\$65,043.00	\$796.00

