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

**OMNIBUS DECLARATION OF IGNATIUS PIAZZA IN SUPPORT OF: (1) DEBTOR’S
 SIXTH OMNIBUS OBJECTION TO DUPLICATE CLAIMS; AND (2) DEBTOR’S
 SEVENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM THAT ASSERT
AN INCORRECT PRIORITY**

I, Ignatius Piazza, hereby declare as follows:

1. I am the manager of Front Sight Management LLC, the chapter 11 debtor herein (the “Debtor”). The facts stated herein are within my personal knowledge unless otherwise indicated. Unless stated on information and belief, I have personal knowledge of the facts set forth herein and,

1 if called upon to testify, could and would do so. For those items stated on information and belief, I
2 believe them to be true.

3 2. I make this declaration in support of the *Debtor's Sixth Omnibus Objection to*
4 *Duplicate Claims* (the "Sixth Omnibus Objection") and the *Debtor's Seventh Omnibus Objection to*
5 *Proofs of Claim that Assert an Incorrect Priority*¹ (the "Seventh Omnibus Objection and
6 collectively, with the Sixth Omnibus Objection, the "Omnibus Objections") filed herewith. I am
7 authorized to submit this Declaration on the Debtor's behalf.

8 3. After careful review, the Debtor has determined that that the duplicate claims
9 ("Duplicate Claims") set forth in the Sixth Omnibus Objection are duplicative of the Second Claims
10 filed in the Debtor's chapter 11 case. The Debtor objects to the Duplicate Claims because they
11 duplicate other claims filed by the respective claimants against the Debtor and each claimant is
12 entitled to only one claim against the Debtor.

13 4. After careful review, the Debtor has determined that the Incorrect Priority Claims in
14 the Seventh Omnibus Objection are not entitled to priority.

15 5. Each of the Incorrect Priority Claims was filed by a Claimant that appears to be a
16 member or former member of the Debtor who is asserting a claim against the estate based on
17 account of amounts paid by the Claimants for their memberships and member rewards. Each
18 Claimant apparently purchased or was given memberships to the Debtor and subsequently purchased
19 or was given membership rewards. These rewards have no value outside of the Debtor's business.
20 While the Debtor believes that most, if not all, of the Claimants received services from the Debtor at
21 least equal to what was paid, the Debtor does not object to the Claimants retaining a claim in this
22 case for the amount each Claimant actually paid.

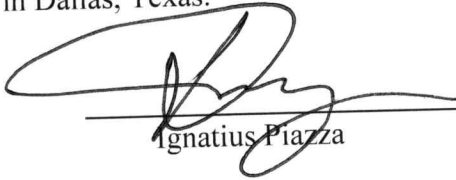
23 6. With the payment of the membership fee, each Claimant was immediately a member
24 of the Debtor and was entitled to immediate use of the Debtor's facilities. The up-front payments
25 provided by the Claimants were for an immediate service, which was provided to the Claimants, i.e.,
26 to become members of the Debtor, and not for a future right to buy, lease or rent any property.

27 _____
28 ¹ All capitalized terms used herein but not defined shall have the same meaning ascribed to them in
the applicable claim objection.

1 Accordingly, the up-front payments made by the Claimants for their memberships and member
2 rewards were not deposits and it is my understanding that they are therefore not entitled to priority.

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

5 Executed on this 29th day of November, 2022 in Dallas, Texas.

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7 Ignatius Piazza

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