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12 Attorneys for Province, LLC, solely in its capacity as
 13 the Liquidating Trustee of the Front Sight Creditors Trust

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

16 In re:
 17 Front Sight Management LLC,
 18 Debtor.

19 Case No. 22-11824-abl

20 Chapter 11

21 **Hearing Date:** April 13, 2023

22 **Hearing Time:** 9:30 a.m.

23 **DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF EIGHTH OMNIBUS**
 24 **OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2)**
 25 **DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

26 I, Amanda Demby Swift, hereby declare as follows:

27 1. I am a principal of Province, LLC (the “Liquidating Trustee”), which is the duly
 28 appointed liquidating trustee for the Front Sight Creditors Trust (the “Trust”), and I am the
 individual charged with acting on the Liquidating Trustee’s behalf. In my capacity in serving on
 behalf of the Liquidating Trustee, I am responsible for overseeing and generally managing the
 Trust’s efforts to maximize the value of the estate for distributions to holders of allowed general
 unsecured claims.

1 2. Except as otherwise indicated, all statements herein are based on my personal
2 knowledge, my review of Front Sight Management LLC's (the "Debtor") books and records, and/or
3 my opinion based upon my experience and knowledge of the matters at issue. I am over 18 years of
4 age, and if called upon to testify, I could and would competently testify to each of the facts set forth
5 herein based on my personal knowledge, review of the documents, or opinion.

6 3. I make this declaration in support of the *Eighth Omnibus Objection (1) Reducing and*
7 *Allowing Certain Member Claims and (2) Disallowing and Expunging Certain Other Member*
8 *Claims* (the "Omnibus Objection") filed herewith. If called upon to testify, I would testify
9 competently to the facts set forth in this Declaration and the Omnibus Objection. I am authorized to
10 submit this Declaration on the Liquidating Trustee's behalf. Any capitalized term not defined in this
11 Declaration has the same meaning ascribed to it in the Omnibus Objection.

12 4. The Liquidating Trustee and its professionals are in possession of the Debtor's books
13 and records including those records relating to amounts paid to the Debtor by its pre-petition
14 members. After reviewing the Claims and in consultation with the Trust's professionals, the
15 Liquidating Trustee has determined that the Claims are subject to reduction and/or disallowance
16 because the amount of each of the Claims exceeds the amount paid by the Claimants to the Debtor.
17 To the best of my knowledge and upon information and belief, it appears that each of the Claimants
18 is a former member of the Debtor who is asserting a Claim or Claims against the estate based either
19 on nothing or based on account of member benefits or member rewards. To the best of my
20 knowledge and upon information and belief, it appears that each Claimant purchased or was given
21 memberships to the Debtor and subsequently purchased or was given membership rewards.

22 5. The Debtor's books and records show that the Claimants paid the following amounts
23 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
Steven R. Wooten	49-1	\$13,400.00	\$11,973.00
John G. Lewis	167-1	\$2,500.00	\$0.00

	Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
1	Timothy E. Sherlock	202-1	\$1,997.00	\$100.00
2	Ken Fan	258-2	\$22,617.00	\$18,118.00
3	Michael Tobian	385-1	\$1,997.00	\$51.00
4	Gabriel Bilek	421-1	\$10,958.00	\$9,276.00
5	Denice Flannery	440-1	\$1,000.00	\$1.00
6	Philip M. Edwards	505-1	\$1,997.00	\$0.00
7	David A. O'Connor	514-1	\$40,585.00	\$37,633.00
8	John R. Hawkins	564-1	\$2,000.00	\$0.00
9	Carl Smith	629-1	\$9,497.00	\$5,497.00
10	Gregory P DeSart	638-1	\$11,400.00	\$10,109.00
11	Trevor Nunes	713-1	\$1,000.00	\$0.00
12	Frank Chan	792-1	\$2,100.00	\$0.00
13	Thomas A. Collins	808-2	\$23,500.00	\$0.00
14	Ray Vell	928-1	\$1,997.00	\$150.00
15	Ronald Perry	940-1	\$44,920.00	\$38,978.00
16	Kathleen Hamburg	941-1	\$4,492.00	\$2,544.00
17	Timothy Joseph Harrigan	942-1	\$27,066.00	\$13,533.00
18	Brett Everling	950-1	\$10,000.00	\$0.00
19	Stephen Scolari	955-1	\$25,000.00	\$0.00
20	Brian Carter	959-1	\$5,500.00	\$499.00
21	Andrew Saari	960-1	\$10,000.00	\$0.00
22	Phil McCraw	962-1	\$41,149.00	\$946.00
23	Richard Sotka	966-1	\$10,000.00	\$997.00
24	Stephen G. Floyd	967-1	\$5,000.00	\$1,946.00
25	Michael McGeary	969-1	\$3,000.00	\$0.00
26	Rodney Lee Helsel Jr.	973-1	\$6,000.00	\$0.00
27	Jeffrey Reece	974-1	\$2,829,240.00	\$17,924.00
28	Andrea Goldstein	975-1	\$9,900.00	\$100.00
	Martha Stephens	976-1	\$1,800.00	\$0.00
	Brian McGrane	979-1	\$1,200.00	\$0.00
	Darla Fink	980-1	\$16,800.00	\$50.00
	Craig R. Phillips	985-1	\$8,424.00	\$4,641.00

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Ron Brown Trust	991-1	\$2,000.00	\$1,347.00
Cherless Maree	995-1	\$200,000.00	\$1,200.00
Douglas Summers	998-1	\$1,500.00	\$0.00
Vincent Mayer and Lisa Mayer	1001-1	\$13,741.60	\$1,345.00
Patrick Hamblin	1002-1	\$2,000.00	\$0.00
Charles Frank Pradelt (21475 E Orion Way)	1004-1	\$3,600.00	\$0.00
Kristi Pradelt (Kristi Blumer)	1005-1	\$3,600.00	\$0.00
Sean O. Hitchcock	1014-1	\$11,303.00	\$10,098.00
Daedalian Technologies, Ltd.	1015-1	\$12,451.00	\$9,851.00
John Paul Stalick	1026-1	\$23,381.00	\$9,587.00
Jon D. Halling	1030-1	\$725,797.00	\$1,846.00
Rebecca McGill	1033-1	\$3,000.00	\$2,050.00
Jon McGill	1034-1	\$1,000.00	\$0.00
Brent Bombola	1042-1	\$40,516.00	\$35,712.00
Britt-Marie Lind	1043-1	\$2,000.00	\$99.00
Terry Cooper	1047-1	\$2,000.00	\$189.00
Atwood L. Rice III	1051-1	\$10,000.00	\$0.00
Alia Kim Rice	1052-1	\$10,000.00	\$0.00
Alysia Kristy Rice	1053-1	\$10,000.00	\$0.00
Tiffany Rice	1054-1	\$10,000.00	\$0.00

6. Additionally, it appears that several Claimants have filed duplicate claims. Specifically, Claimants Vincent Mayer and Lisa Mayer filed Claim 992-1, which is duplicative of Proof of Claim No. 1001-1, Claimant Terry Cooper filed Claim 1020-1, which is duplicative of Claim 1047-1, and Claimant Britt-Marie Lind filed Claim 1021-1, which is duplicative of Claim 1043-1. Accordingly, the Liquidating Trustee seeks an order disallowing Claims 992-1, 1020-1, and 1021-1 in their entirety as duplicate claims.

