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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
 19 Debtor.

20 Case No. 22-11824-abl

21 Chapter 11

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

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

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

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

28 1. I am a principal of Province, LLC (the “Liquidating Trustee”), which is the duly
 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.

2. Except as otherwise indicated, all statements herein are based on my personal
 knowledge, my review of Front Sight Management LLC’s (the “Debtor”) books and records, and/or

1 my opinion based upon my experience and knowledge of the matters at issue. I am over 18 years of
 2 age, and if called upon to testify, I could and would competently testify to each of the facts set forth
 3 herein based on my personal knowledge, review of the documents, or opinion.

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

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

20 5. The Debtor’s books and records show that the Claimants paid the following amounts
 21 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
Robert A. Wilcox	541-1	\$8,000.00	\$0.00
Brent Frame	542-1	\$3,049.00	\$299.00
Robert Perez	546-1	\$2,000.00	\$299.00
James Stone, II	553-1	\$1,000.00	\$0.00
Phan Nguyen	554-1	\$1,000.00	\$0.00

	Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
1	Deborah Zugel	555-1	\$1,000.00	\$50.00
2	Hollis K. Fox	562-1	\$3,644.00	\$1,547.00
3	Ronald Hack	571-1	\$1,000.00	\$0.00
4	Walter Fetsch	572-1	\$1,997.00	\$0.00
5	Thomas V. Gentry	573-1	\$1,500.00	\$99.00
6	Frank Chandler Harris	575-1	\$1,500.00	\$301.00
7	W.R. Henderson	583-1	\$4,900.00	\$1,000.00
8	Somboon Sayawat	588-1	\$1,050.00	\$0.00
9	Peter Gibbons	592-1	\$4,450.00	\$0.00
10	Catherine J. Johnson	595-1	\$2,000.00	\$0.00
11	Charlotte C. Wagner	596-1	\$2,000.00	\$0.00
12	Rich Zollinger	603-1	\$1,000.00	\$150.00
13	Marc Kuttner	609-1	\$2,500.00	\$100.00
14	Timothy Mulverhill	617-1	\$3,000.00	\$0.00
15	Ewin Theodore Verdict	620-1	\$3,398.00	\$1,594.00
16	Kason Goodrich	624-1	\$2,100.00	\$751.00
17	John E. McCabe	626-1	\$3,998.00	\$2,000.00
18	Chad Behrend	630-1	\$1,550.00	\$348.00
19	Gregory W. Romaniak	640-1	\$3,000.00	\$1,093.00
20	Eric Fletcher	642-1	\$2,500.00	\$0.00
21	Tammy J. Smith	654-1	\$9,185.00	\$1,046.00
22	Erik Matthew Moll	655-1	\$5,000.00	\$10.00
23	Nicholas McRay	656-1	\$1,800.00	\$400.00
24	Thomas J. Campbell	666-1	\$9,600.00	\$4,391.00
25	Jeffrey Lee Tucker	676-1	\$5,740.00	\$299.00
26	Stuart Butler	680-1	\$8,691.00	\$4,241.00
27	William M. Scruggs	693-1	\$3,767.10	\$2,147.00
28	Scott Sacchi	694-1	\$2,334.00	\$794.00
	Catherine Logie	701-1	\$1,694.00	\$297.00
	Max Kibu	708-1	\$3,200.00	\$1,751.00
	Stephen Wilson	710-1	\$6,000.00	\$0.00
	Dara Grieger	711-1	\$1,500.00	\$500.00

	Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
1				
2				
3	Jim Bradley (Front Sight Management LLC [Short, Gary])	720-1	\$2,496.00	\$596.00
4				
5	Kevrin J. Johnson	722-1	\$2,500.00	\$1,099.00
6	Ron Maddon (Front Sight Management LLC)	724-1	\$3,894.00	\$1,593.00
7	Michael Walstien	725-1	\$5,000.00	\$0.00
8	James J. Wilcox, Jr.	728-1	\$1,250.00	\$397.00
9	Deborah Torrano	734-1	\$1,100.00	\$100.00
10	John P. Panozzo, Jr.	748-1	\$5,000.00	\$748.00
11	Geoffrey Stimack	763-1	\$8,197.00	\$997.00
12	Mitchell Tyler Ryan (Stretto)	771-1	\$1,200.00	\$0.00
13	Joan Modes	788-1	\$2,000.00	\$0.00
14	Colin Camillo	795-1	\$2,000.00	\$997.00
15	Karin Macer	814-1	\$2,000.00	\$0.00
16	Matthew Macer	815-1	\$2,000.00	\$0.00
17	Christina Macer	816-1	\$2,000.00	\$0.00
18	Brian Joseph Simmons	818-1	\$3,500.00	\$0.00
19	Larry Fried	826-1	\$1,000.00	\$0.00
20	Eric R. Fried	829-1	\$1,000.00	\$0.00
21	Kerem Kapkin	831-1	\$3,150.00	\$0.00
22	Melanie L. Fried	833-1	\$1,000.00	\$0.00
23	Robin Withrow Wong	838-1	\$3,000.00	\$549.00
24	Charles Herron	846-1	\$3,545.00	\$0.00
25	Christopher Brown	901-1	\$9,359.00	\$0.00
26	Joseph Ignacio Sandoval	902-1	\$1,000.00	\$0.00
27	Connie Rae Sandoval	903-1	\$1,000.00	\$0.00
28	Rudy Quan	904-1	\$5,810.00	\$1,698.00
	Christopher Kyler	906-1	\$1,000.00	\$0.00
	Faye Johnson	913-1	\$4,500.00	\$2,597.00
	Amanda Todd	920-1	\$1,800.00	\$0.00
	James M. Bledsoe, III	921-1	\$2,000.00	\$0.00
	Gregory P. Smith	935-1	\$1,998.98	\$700.00

Claimant	Claim No.	Claim Amount	Amount Reflected on Debtor's Records as Being Paid by Claimant for Membership and Membership Rewards
Truman D. Fields	947-1	\$5,000.00	\$2,963.00
David Maurin	949-1	\$2,290.02	\$1,297.00
Gregory F. Ariola	987-1	\$2,000.00	\$0.00
David W. Frye	997-1	\$1,849.00	\$299.00
Kathleen M. Hayes	1012-1	\$5,000.00	\$0.00
Jonathan Stern	1031-1	\$1,450.00	\$0.00

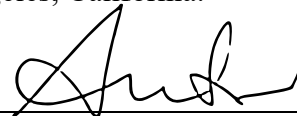
6. Additionally, the Debtor's books and records reflect that the following Claimants were refunded the total amount of money that the Claimants paid to the Debtor for their membership and membership benefits after their memberships were terminated:

- Thomas Amero, Claim 639-1, refunded \$50.00;
- Scott Ingham, Claim 662-1, refunded \$2,499.00;
- Lisa Thomas, Claim 677-1, refunded \$1,995.00;
- Bruce Logie, Claim 702-1, refunded \$1,294.00;
- James E. Larson, Jr., Claim 730-1, refunded \$1,893.00; and
- Jill Adler, Claim 761-1, refunded \$407.00.

7. Accordingly, the Liquidating Trustee respectfully requests that the Court disallow those Claims in their entirety because the Debtor previously refunded Claimants all moneys paid to the Debtor.

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 16th day of February, 2023 in Los Angeles, California.



Amanda Demby Swift