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 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*  
 2 JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*  
 BG LAW LLP  
 3 300 S. 4<sup>th</sup> Street, Suite 1550  
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 5 Email: sgubner@bg.law  
 sseflin@bg.law  
 6 jwellington@bg.law

7 Attorneys for Province, LLC, solely in its capacity as  
 the Liquidating Trustee of the Front Sight Creditors Trust  
 8

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

<p>11 In re:          12 Front Sight Management LLC,          13          14 Debtor.</p>	<p>Case No. 22-11824-abl          Chapter 11  <b>Hearing Date:</b> April 13, 2023  <b>Hearing Time:</b> 9:30 a.m.</p>
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 17 **DECLARATION OF SUSAN K. SEFLIN IN SUPPORT OF LIQUIDATING TRUSTEE’S**  
**REPLY TO THE RESPONSES FILED BY MICHEL DESLAURIERS TO THE NINTH**  
 18 **OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS**  
**AND (2) DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**  
 19

20 I, Susan K. Sefflin, hereby declare as follows:

- 21 1. I am an attorney duly licensed to practice law in the State of California and admitted  
 22 *pro hac vice* in this case by order entered on June 2, 2022 [ECF No. 83].
- 23 2. I am a partner of BG Law LLP (“BG”), counsel to Province, LLC (the “Liquidating  
 24 Trustee”), which is the duly appointed liquidating trustee for the Front Sight Creditors Trust (the  
 25 “Trust”). Except as otherwise indicated, all statements herein are based on my personal knowledge,  
 26 my review of Front Sight Management LLC’s (the “Debtor”) books and records, and/or my opinion  
 27 based upon my experience and knowledge of the matters at issue. If called upon to testify, I could  
 28

1 and would competently testify to each of the facts set forth herein based on my personal knowledge,  
2 review of the documents, or opinion.

3           3. I make this declaration in support of the *Liquidating Trustee's Reply To Michael*  
4 *Deslauriers' Responses To The Ninth Omnibus Objection (1) Reducing And Allowing Certain*  
5 *Member Claims And (2) Disallowing And Expunging Certain Other Member Claims* (the "Reply")  
6 filed concurrently herewith. Any capitalized term not defined in this Declaration has the same  
7 meaning ascribed to it in the Reply.

8           4. The Liquidating Trustee and its professionals, including BG, are in possession of  
9 many of the Debtor's pre-petition books and records including those records relating to amounts paid  
10 to the Debtor by its pre-petition members. The Debtor's books and records reflect that Claimant  
11 paid \$2,891.00 for his membership and membership upgrades. The Debtor's books and records  
12 further reflect that Claimant was banned by the Debtor, his membership was terminated and he was  
13 refunded the full amount he paid to the Debtor pre-petition (even though there was no requirement  
14 that the Debtor refund a banned member).

15           5. After reviewing Claimant's initial response [ECF No. 784] to the Liquidating  
16 Trustee's ninth omnibus objection to claims [ECF No. 695] (the "Objection"), I emailed Claimant,  
17 on behalf of the Liquidating Trustee, and proposed entering into a stipulation resolving the Objection  
18 by allowing Claimant's claim in the amount of a general unsecured claim in the amount of  
19 \$2,891.00, which is the amount Claimant paid to the Debtor. Claimant refused this offer, filed his  
20 second response [ECF No. 789] to the Objection in the middle of our email exchanges where he  
21 attached the settlement proposal, and then proceeded to send me several threatening emails in  
22 response to my emails. Attached hereto as **Exhibit 1** is a true and correct copy of my email  
23 correspondence with Claimant on March 23, 2023. Because of the manner in which Claimant  
24 engaged with me, I ceased all communication with Claimant.

25           6. Subsequently, I contacted counsel for the Reorganized Debtor and requested that the  
26 Reorganized Debtor review the Debtor's banking records to confirm that Claimant was issued a full  
27 refund pre-petition.

28 **[Remainder of Page Intentionally Blank]**



# **EXHIBIT 1**

**Susan K. Seflin**

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**From:** Michel Deslauriers <deslauriermc@me.com>  
**Sent:** Thursday, March 23, 2023 1:25 PM  
**To:** Susan K. Seflin  
**Cc:** Jessica S. Wellington  
**Subject:** Re: objection of M Deslauriers claim 82-1. AMENDMENT

CAUTION: This email originated from an external source.

well everything is in writing all the threats are clearly coming from you as everyone can clearly see .  
hope you have a nice day in Vegas  
regards  
michel deslauriers

On Mar 23, 2023, at 16:11, Susan K. Seflin <sseflin@bg.law> wrote:

Thank you for putting in writing your additional threats to me.



21650 Oxnard St., Suite 500  
Woodland Hills, CA 91367

[www.bg.law](http://www.bg.law)

**Susan K. Seflin**  
Partner

(818) 827-9000 Main  
(818) 827-9210 Direct / Text / Fax

[sseflin@bg.law](mailto:sseflin@bg.law)



Susan K. Seflin

The preceding e-mail message is subject to BG LAW's e-mail policies, which can be found at: <https://www.bg.law/web-disclaimer>

**From:** Michel Deslauriers <deslauriermc@me.com>  
**Sent:** Thursday, March 23, 2023 12:59 PM  
**To:** Susan K. Seflin <sseflin@bg.law>  
**Cc:** Jessica S. Wellington <jwellington@bg.law>  
**Subject:** Re: objection of M Deslauriers claim 82-1. AMENDMENT

CAUTION: This email originated from an external source.

WITHOUT PREJUDICE

Hello

i just presented emails from 2014 that shows that the balance of my account was payed..  
as for you , if i had been refunded what would you then accept the claim in the same amount ..? the  
email copy i had sent then with my claim of proof clearly stated the payment agreement i had with front  
sight to pay off the total of my membership through monthly instalments untill 2016... . the additional  
emails I sent in the amendment that i found shows clearly that the balance was payed off in 2014.

like i've said earlier present proof that i was sent this payment and that i cashed it ... i want to see this proof that doesn't exists ..  
please next time you want to call someone a liar better think twice .. now you've given me a reason to drive this i to court even more  
btw the people at front sight bankruptcy facebook group will be interested in reading our email communication . there's a few lawyers in the group i'll have a discussion with some of them about your emails .

regards  
michel deslauriers

On Mar 23, 2023, at 15:35, Susan K. Seflin <[sseflin@bg.law](mailto:sseflin@bg.law)> wrote:

I did not lie. You lied and we will provide evidence of that to the court. I did not threaten you.

The company's books and records reflect that you were refunded and we will provide that evidence to the court. You were also banned from Front Sight and that ban terminated any right you had with respect to Front Sight.

I am done engaging with you.



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Woodland Hills, CA 91367

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**Susan K. Seflin**  
Partner

(818) 827-9000 Main  
(818) 827-9210 Direct / Text / Fax

[sseflin@bg.law](mailto:sseflin@bg.law)



Susan K. Seflin

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**From:** Michel Deslauriers <[deslauriermc@me.com](mailto:deslauriermc@me.com)>

**Sent:** Thursday, March 23, 2023 12:22 PM

**To:** Susan K. Seflin <[sseflin@bg.law](mailto:sseflin@bg.law)>

**Subject:** Re: objection of M Deslauriers claim 82-1. AMENDMENT

CAUTION: This email originated from an external source.

and by the way  
i'm a LEO here in canada ... so that you know ..

and i will make sure your threats are known...

you tried to disallow my claim by saying i had received a refund

so show me the proof ..  
and we will see who is lying

Michel Deslauriers

On Mar 23, 2023, at 15:19, Michel Deslauriers <[deslauriermc@me.com](mailto:deslauriermc@me.com)> wrote:

go ahead as you want  
i have enough proof that i payed \$4,410\$ and i will go ahead

lolll  
Michel Deslauriers

On Mar 23, 2023, at 15:18, Susan K. Seflin <[sseflin@bg.law](mailto:sseflin@bg.law)> wrote:

Attached are the two claims that you filed – neither of which provide evidence you paid \$4,410. Your amendment therefore contains lies. In fact, both claims provide evidence that you paid \$2,891.00. Attached is also your first response, which does not attach any evidence. If you are going to lie to the court, we are done discussing this with you and will let the court decide. We will move forward to disallow your claim.

**BG LAW**  
YOUR COUNSEL MATTERS®

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[sseflin@bg.law](mailto:sseflin@bg.law)

<image001.png>

Susan K. Seflin

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**From:** Michel Deslauriers <[deslauriermc@me.com](mailto:deslauriermc@me.com)>

**Sent:** Thursday, March 23, 2023 12:01 PM

**To:** Susan K. Seflin <[sseflin@bg.law](mailto:sseflin@bg.law)>  
**Cc:** Jessica S. Wellington <[jwellington@bg.law](mailto:jwellington@bg.law)>  
**Subject:** Re: objection of M Deslauriers claim 82-1.  
AMENDMENT

CAUTION: This email originated from an external source.

hello  
here included is the amended objection sent to the court in order to demonstrate my legitimate unsecure claim of \$4,410.

michel deslauriers

On Mar 23, 2023, at 14:16, Michel Deslauriers <[deslauriermc@me.com](mailto:deslauriermc@me.com)> wrote:



**Susan K. Seflin**

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**From:** Susan K. Seflin  
**Sent:** Thursday, March 23, 2023 10:47 AM  
**To:** Michel Deslauriers  
**Cc:** Jessica S. Wellington  
**Subject:** RE: objection of M Deslauriers claim 82-1

We do not have any records of you paying more than \$2,891. Rather than spend the time and money to get a copy of the refund check, we are offering to agree to a general unsecured claim in the amount of \$2,891. You did not attach any evidence to the proof of claim that you filed in the amount of \$4,410, and you did not attach any evidence to the response you filed to the claim objection. You have no evidence you actually spent \$4,410.

I will take your response as a rejection of our offer to resolve this for an allowed general unsecured claim in the amount of \$2,891.

---

**From:** Michel Deslauriers <deslauriermc@me.com>  
**Sent:** Thursday, March 23, 2023 10:40 AM  
**To:** Susan K. Seflin <sseflin@bg.law>  
**Cc:** Jessica S. Wellington <jwellington@bg.law>  
**Subject:** Re: objection of M Deslauriers claim 82-1

CAUTION: This email originated from an external source.

hello  
well the amount was actually supposedly sent to me BEFORE any of the proceedings ... which means that front sight had agreed to refund me this amount of \$2,891.00 as a refund .  
other than that , as i NEVER received anything , you don't have any other reasons to disqualify me ( Front sight wrongfully stipulating that i had received a refund , because they can't by other means , disqualify my claim )then for the total amount that i paid (\$4,400), so the amount to be put up as an unsecured claim has then to be \$4,4100  
  
ps i still would like to see the « so called proof of payment » that Front sight claims to have in they're books ..

michel deslauriers

On Mar 23, 2023, at 13:23, Susan K. Seflin <[sseflin@bg.law](mailto:sseflin@bg.law)> wrote:

Hi Michael –

The liquidating trustee will agree to a general unsecured claim in the amount of \$2,891. If you agree to this, we will send you a stipulation to sign. As an FYI, this does not mean you will be paid that amount –

only that you will have an allowed claim for that amount. We currently expect the distribution in this case to be between approximately 10 cent and 20 cents on the dollar. Please let us know.



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Woodland Hills, CA 91367

[www.bg.law](http://www.bg.law)

**Susan K. Seflin**  
Partner

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(818) 827-9210 Direct / Text / Fax

[sseflin@bg.law](mailto:sseflin@bg.law)



Susan K. Seflin

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**From:** Michel Deslauriers <[deslauriermc@me.com](mailto:deslauriermc@me.com)>  
**Sent:** Friday, March 17, 2023 1:25 PM  
**To:** Susan K. Seflin <[sseflin@bg.law](mailto:sseflin@bg.law)>  
**Cc:** Steven T. Gubner <[sgubner@bg.law](mailto:sgubner@bg.law)>; Jessica S. Wellington <[jwellington@bg.law](mailto:jwellington@bg.law)>  
**Subject:** Re: objection of M Deslauriers claim 82-1

CAUTION: This email originated from an external source.

this is the tracking number for my objection sent to. the LV bankruptcy court which you received by email a copy

EM0981043325CA

sent through Canada express post

michel deslauriers

> On Mar 17, 2023, at 13:30, Michel Deslauriers <[deslauriermc@me.com](mailto:deslauriermc@me.com)> wrote:  
>  
> re: Case 22-11824-abl  
>  
> Hello you will find a copy of the document sent to the court regarding the FRONT SIGHT chapter 11 bankruptcy  
>  
> this is my objection to your refusal to acknowledge my claim  
>  
> Although, Fs and you , already acknowledged an amount you claim Front sight had to pay me. I then submit that this amount be payed (\$2,891.00)  
>  
> Michel Deslauriers  
>  
>

# **EXHIBIT 2**

**Front Sight Management INC.**

2711.00

Michel Deslauriers

4/14/2022

2,891.00

BOA checking - 681 Full Membership Refund

2,891.00

PRODUCT DL1103

USE WITH 91663 ENVELOPE

Deluxe Corporation 1-800-328-0304 or [www.deluxe.com/shop](http://www.deluxe.com/shop)

54565782001



**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 April 6, 2023, I served the following document:

**DECLARATION OF SUSAN K. SEFLIN IN SUPPORT OF LIQUIDATING TRUSTEE’S REPLY TO MICHAEL DESLAURIERS’ RESPONSES TO THE NINTH OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

**(1) The Court’s CM/ECF List:**

- **JASON BLUMBERG** Jason.blumberg@usdoj.gov
- **CANDACE C CARLYON** ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com;nrodriguez@carlyoncica.com;9232006420@filings.docketbird.com;Dcica@carlyoncica.com
- **CHAPTER 11 - LV** USTPRegion17.lv.ecf@usdoj.gov
- **DAWN M. CICA** dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- **WILLIAM C DEVINE** william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- **THOMAS H. FELL** tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- **PHILIP S. GERSON** Philip@gersonnvlaw.com
- **STEVEN T GUBNER** sgubner@bg.law, ecf@bg.law
- **RAMIR M. HERNANDEZ** rhernandez@wrightlegal.net, jcraig@wrightlegal.net;nvbkfiling@wrightlegal.net
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- **JASON B KOMORSKY** jkomorsky@bg.law
- **BART K. LARSEN** BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
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- **SUSAN K. SEFLIN** sseflin@bg.law
- **BRIAN D. SHAPIRO** brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com;6855036420@filings.docketbird.com
- **STRETTO** ecf@cases-cr.stretto-services.com, aw01@ecfcbis.com,pacerpleadings@stretto.com
- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **JESSICA S. WELLINGTON** jwellington@bg.law, ecf@bg.law

**(2) VIA U.S. FIRST CLASS MAIL:**

1 Claimant:  
2 Michael Deslauriers  
3 11455 Rue Frigon Montreal Quebec  
4 Canada H3M 2R6

**(3) VIA E-Mail:**

5 Michael Deslauriers – deslauriermc@me.com  
6

7 I declare that I am employed in the office of a member of the bar of this Court at whose  
8 direction the service was made. I declare under penalty of perjury under the laws of the United States  
9 of America and the State of California that the foregoing is true and correct.

Executed **April 6, 2023**, at Woodland Hills, California.

10 /s/ Jessica Studley  
11 JESSICA STUDLEY  
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