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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:** August 21, 2023

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

23 **OMNIBUS DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF THE**
 24 **LIQUIDATING TRUSTEE’S: (A) FOURTEENTH OMNIBUS OBJECTION TO LATE-**
 25 **FILED PROOFS OF CLAIM; (B) FIFTEENTH OMNIBUS OBJECTION TO CERTAIN**
 26 **MEMBER CLAIMS; AND (C) SIXTEENTH OMNIBUS OBJECTION TO DUPLICATE**
 27 **CLAIMS**

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

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.

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. I am authorized to
6 submit this Declaration on the Liquidating Trustee’s behalf.

7 3. I make this declaration in support of the *Fourteenth Omnibus Objection to Late-Filed*
8 *Proofs of Claim* (the “Fourteenth Objection”), the *Fifteenth Omnibus Objection (1) Liquidating and*
9 *Allowing Certain Member Claims and (2) Disallowing and Expunging Certain Other Member*
10 *Claims* (the “Fifteenth Objection”), and the *Sixteenth Omnibus Objection to Duplicate Claims* (the
11 “Sixteenth Objection”) filed herewith. Any capitalized term not defined in this Declaration has the
12 same meaning ascribed to it in the applicable claim objection.

13 4. The Liquidating Trustee and its professionals are in possession of the Debtor’s books
14 and records including those records relating to amounts paid to the Debtor by its pre-petition
15 members.

16 5. After careful review, the Liquidating Trustee has determined that the Late-Filed
17 Claims in the Fourteenth Objection were filed after the deadline of January 3, 2023, for the pre-
18 petition members of the Debtor to file proof of claims for claims arising out of rejection of their
19 memberships.

20 6. After reviewing the proofs of claims filed in the Debtor’s case and in consultation
21 with the Trust’s professionals, the Liquidating Trustee has determined that the Claims in the
22 Fifteenth Objection are subject to liquidation and/or disallowance. Each of the Claimants appears to
23 be a former member of the Debtor who is asserting a Claim or Claims against the estate.

24 7. Except for Claim 163-2, the Claims in the Fifteenth Objection do not list the amount
25 of the claim. The Trust and its professionals have reviewed the Claims and determined that many of
26 the Claims are not entitled to prima facie validity because the Claims do not provide a sufficient
27 accounting of the amounts paid by Claimants to the Debtor for their memberships and membership
28 rewards. Specifically, Claims 7-1, 232-1, 310-1, 379-1, 427-1, 428-1, 489-1, 490-1, 492-1, 518-1,

1 587-1, 604-1, 714-1, 834-1, 881-1, 910-1, 911-1, 951-1, 1025-1, 1038-1, 1045-1, and 1058-1 are
2 “face page” proofs of claim that do not set forth the facts necessary to support the amount of the
3 Claims. Although Claims 77-1, 237-1, 306-1, 309-1, 527-1, 598-1, 600-1, 650-1, 652-1, 871-1, 896-
4 1, 897-1, and 964-1, do have attachments to the Claims, the attachments do not provide a sufficient
5 accounting of the amounts paid by Claimants to the Debtor for their memberships and membership
6 rewards.

7 8. However, some of the Claims set forth in the Fifteenth Objection, specifically, Claims
8 260-1, 984-1, 954-1, 307-1, 191-1, and 225-1, do contain a sufficient accounting of the amounts paid
9 by Claimants to the Debtor, and therefore, the Liquidating Trustee respectfully requests that those
10 Claims be liquidated and allowed as general unsecured claims based on the evidence attached to
11 each Claim.

12 9. Additionally, Claim 163-2 filed by Claimant Christopher Douty was filed after the
13 Debtor filed an objection to Claim 163-1 [ECF No. 426], which objection was sustained by the Court
14 [ECF No. 577]. Pursuant to the Court’s order sustaining the Debtor’s Second Omnibus Objection
15 [ECF No. 577], Mr. Douty holds a general unsecured claim in the amount of \$12,178.00, which is
16 based on the amounts Mr. Douty paid to the Debtor for his membership and membership
17 upgrades/rewards. Accordingly, the Liquidating Trustee respectfully requests that the Court
18 disallow Claim 163-2 in its entirety.

19 10. Further, Claimant James A. Richardson has filed two claims against the Debtor,
20 Claim 798-1 and 799-1. Claim 799-1 has not been objected to because it accurately reflects the
21 amount that Mr. Richardson paid to the Debtor for his membership and membership
22 rewards/upgrades. Mr. Richardson is only entitled to one claim against the estate. Accordingly, the
23 Liquidating Trustee respectfully requests that Claim 798-1 be disallowed in its entirety.

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