

1 Samuel A. Schwartz, Esq.
2 Nevada Bar No. 10985
3 saschwartz@nvfirm.com
4 SCHWARTZ LAW, PLLC
5 601 E. Bridger Avenue
6 Las Vegas, NV 89101
7 Telephone: 702.385.5544
8 Facsimile: 702.442.9887
9 *Attorneys for the Reorganized Debtor*

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

In re:) Case No.: 22-11824-abl
)
FRONT SIGHT MANAGEMENT,) Chapter 11
LLC,)
)
Debtor.)
)
)
_____)

**NOTICE OF ENTRY OF ORDER ON RENEWED
MOTION TO ENFORCE AND IMPLEMENT THE CONFIRMATION ORDER**

PLEASE TAKE NOTICE that an Order on Renewed Motion to Enforce and Implement the Confirmation Order [ECF No. 857] was entered in the above-captioned case on September 26, 2023, a copy of which is attached as **Exhibit A**.

Dated September 27, 2023.

Respectfully Submitted,

/s/ Samuel A. Schwartz
Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
saschwartz@nvfirm.com
Attorneys for the Reorganized Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF system on September 27, 2023, the following:

JASON BLUMBERG on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11
Jason.blumberg@usdoj.gov

CANDACE C CARLYON on behalf of Cred. Comm. Chair Official Committee of Unsecured Creditors
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 on behalf of Cred. Comm. Chair Official Committee of Unsecured Creditors
dcica@carlyoncica.com; nrodriguez@carlyoncica.com; crobotson@carlyoncica.com; dmcica@gmail.com; dcica@carlyoncica.com; tosteen@carlyoncica.com; 3342887420@filings.docketbird.com

WILLIAM C DEVINE, II on behalf of Creditor KEITH WADE GORMAN
william@devine.legal; courtney@devine.legal; devinewr72773@notify.bestcase.com

THOMAS H. FELL on behalf of Creditors MICHAEL MEACHER, dba BANKGROUP FINANCIAL SERVICES and Dianne Meacher; and Defendants Michael Meacher and Dianne Meacher
tfell@fennemorelaw.com; clandis@fennemorelaw.com; CourtFilings@fennemorelaw.com

PHILIP S. GERSON on behalf of Creditor M2 EPC dba M2 ENGINEERING PROCUREMENT AND CONSTRUCTION
Philip@gersonnvlaw.com

STEVEN T GUBNER on behalf of Debtor and Plaintiff FRONT SIGHT MANAGEMENT LLC, A NEVADA LIMITED LIABILITY COMPANY
sgubner@bg.law; ecf@bg.law

RAMIR M. HERNANDEZ on behalf of Creditor ANDREA N SHUBIN
rhernandez@wrightlegal.net; jcraig@wrightlegal.net; nvbkfiling@wrightlegal.net

MICHAEL R. HOGUE on behalf of Special Counsel GREENBERG TRAURIG, LLP
hoguem@gtlaw.com; michael-hogue-0383@ecf.pacerpro.com; flintza@gtlaw.com; andersonel@gtlaw.com; navarrom@gtlaw.com

JASON B KOMORSKY on behalf of Debtor FRONT SIGHT MANAGEMENT LLC
jkomorsky@bg.law

BART K. LARSEN on behalf of Creditor ARMSCOR PRECISION INTERNATIONAL
BLARSEN@SHEA.LAW; 3542839420@filings.docketbird.com

NICOLE E. LOVELOCK on behalf of Creditors and Defendants EB5 Impact Advisors, LLC, EB5 Impact Capital Regional Center, LLC, LAS VEGAS DEVELOPMENT FUND, LLC, Jon Fleming, Linda Stanwood, and Robert W Dziubla; and Cross-Claimant LAS VEGAS

1 DEVELOPMENT FUND, LLC
nlovelock@joneslovelock.com; ljanuskevicius@joneslovelock.com

2 EDWARD M. MCDONALD on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11
3 edward.m.mcdonald@usdoj.gov

4 DAVID MINCIN on behalf of Creditor DAEDALIAN TECHNOLOGIES, LTD
dmincin@mincinlaw.com; cburke@mincinlaw.com

5 TRACY M. O'STEEN on behalf of Attorneys CARLYON CICA CHTD. and KELLEY DRYE &
6 WARREN LLP; Cred. Comm. Chair Official Committee of Unsecured Creditors; and Financial
Advisor DUNDON ADVISERS, LLC
7 tosteen42@gmail.com; crobertson@carlyoncica.com; nrodriguez@carlyoncica.com;
ccarlyon@carlyoncica.com

8 TERESA M. PILATOWICZ on behalf of Creditors VNV DYNASTY TRUST I, VNV
9 DYNASTY TRUST II, IGNATIUS PIAZZA, and JENNIFER PIAZZA; Debtor FRONT SIGHT
MANAGEMENT LLC; and Plaintiffs FRONT SIGHT MANAGEMENT LLC, A NEVADA
10 LIMITED LIABILITY COMPANY
tpilatowicz@gtg.legal; bknotices@gtg.legal

11 SUSAN K. SEFLIN on behalf of Debtor FRONT SIGHT MANAGEMENT LLC; Interested
12 Party Province, LLC, solely in its capacity as the Liquidating Trustee of the Front Sight Creditors
Trust; and Plaintiff FRONT SIGHT MANAGEMENT LLC, A NEVADA LIMITED LIABILITY
13 COMPANY
sseflin@bg.law

14 BRIAN D. SHAPIRO on behalf of Creditors LAS VEGAS DEVELOPMENT FUND, LLC and
15 Robert W Dziubla; Cross-Claimant LAS VEGAS DEVELOPMENT FUND, LLC; Defendant
LAS VEGAS DEVELOPMENT FUND, LLC, A NEVADA LIMITED LIABILITY COMPANY,
16 ET. AL.; and Interested Parties JONES LOVELOCK, PLLC and LAW OFFICE OF BRIAN D.
SHAPIRO, LLC
17 brian@brianshapirolaw.com; kshapiro@brianshapirolaw.com;
6855036420@filings.docketbird.com

18 STRETTO
19 ecf@cases-cr.stretto-services.com; aw01@ecfcbis.com; pacerpleadings@stretto.com

20 U.S. TRUSTEE - LV - 11
USTPRegion17.lv.ecf@usdoj.gov

21 JESSICA S. WELLINGTON on behalf of Debtor FRONT SIGHT MANAGEMENT LLC;
22 Interested Party Province, LLC, solely in its capacity as the Liquidating Trustee of the Front Sight
Creditors Trust; and Plaintiff Front Sight Management LLC
23 jwellington@bg.law; ecf@bg.law

24 ///

25 ///

26 ///

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1 I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via REGULAR
2 MAIL on September 27, 2023, to the following:

3 Front Sight Management LLC	Front Sight Management II Incorporated
4 c/o BG Law LLP	Attn: Officer or Managing/General Agent
5 Attn: Susan K. Seflin, Esq.	300 South 4th Street, Suite 700
6 300 South 4th Street, Suite 1550	Las Vegas, Nevada 89101-6023
7 Las Vegas, Nevaada 89101-6005	
8 Front Sight Management LLC	Front Sight Management II Incorporated
9 c/o Incline Law Group, LLP (Registered	Attn: Ignatius A. Piazza (Officer)
10 Agent)	1645 Village Center Circle, Suite 170
11 264 Village Boulevard, Suite 104	Las Vegas, Nevada 89134-6371
12 Incline Village, Nevada 89451-7409	
13 Front Sight Management LLC	Front Sight Resort and Vacation Club
14 Attn: Officer or Managing/General Agent	Members Association, Inc.
15 1 Front Sight Road	c/o Simmons Freeman LLC (Registered
16 Pahrump, Nevada 89061-9025	Agent)
	3900 South Hualapai Way, Suite 118
	Las Vegas, Nevada 89147-5725
17 Front Sight Management LLC	Front Sight Resort and Vacation Club
18 Attn: Two Thousand Twenty-Two	Members Association, Inc.
19 Management, LLC (Manager)	Attn: Officer or Managing/General Agent
20 1350 East Flamingo Road, Suite 13B, PMB	1 Front Sight Road
21 767	Pahrump, Nevada 89061-9025
22 Las Vegas, Nevada 89119-5293	
23 Front Sight Management, Inc.	Front Sight Resort and Vacation Club
24 c/o Ignatius A. Piazza II (Registered Agent)	Members Association, Inc.
25 7975 Cameron Drive, Suite 900	Attn: Ignatius Anthony Piazza II (Officer)
26 Windsor, California 95492-8570	3900 South Hualapai Way, Suite 118
	Las Vegas, Nevada 89147-5725
27 Front Sight Management, Inc.	Front Sight Resort and Vacation Club
28 Attn: Officer or Managing/General Agent	Members Association, Inc.
	Attn: John E. Small (Officer)
	6626 East Bent Tree Road
	Scottsdale, Arizona 85266-6752
29 Front Sight Management, Inc.	R. Kirby Reed aka Ronald Kirby Reed
30 Attn: Officer or Managing/General Agent	3843 Feldspar Avenue
31 P.O. Box 2619	Las Vegas, Nevada 89120-3818
32 Aptos, California 95001-2619	
33 Front Sight Management, Inc.	Clark County, a political subdivision of the
34 c/o Newman Morris & Dachelet, Ltd.	State of Nevada
35 Attn: Dana E. Morris, Esq.	c/o Office of the Nevada Attorney General
36 300 South 4th Street, Suite 700	Grant Sawyer Building
37 Las Vegas, Nevada 89101-6023	555 East Washington Avenue, Suite 3900
	Las Vegas, Nevada 89101-1068
38 Front Sight Management II Incorporated	
39 c/o Oshins & Associates, LLC (Registered	
40 Agent)	
41 1645 Village Center Circle, Suite 170	
42 Las Vegas, Nevada 89134-6371	

1	Clark County, a political subdivision of the State of Nevada	Holecek 1996 Irrevocable Trust Dated October 1, 1996
2	c/o Clark County Commissioners Office	c/o Simon & Berman, LLC
3	500 South Grand Central Parkway, Floor 6	Attn: Marc L. Simon, Esq.
	Las Vegas, Nevada 89155-4502	5812 South Pecos Road, Suite A
		Las Vegas, Nevada 89120-5417
4	Clark County, a political subdivision of the State of Nevada	Holecek 1996 Irrevocable Trust Dated October 1, 1996
5	c/o Office of the Clark County District Attorney - Civil Division	c/o Simon Law, LLC
6	500 South Grand Central Parkway, Floor 5	Attn: Marc L. Simon, Esq.
7	Las Vegas, Nevada 89155-4502	11500 South Eastern Avenue, Suite 110
		Henderson, Nevada 89052-5575
8	Clark County Board of Commissioners	Holecek 1996 Irrevocable Trust Dated October 1, 1996
9	c/o Office of the Nevada Attorney General	c/o Simon Law, LLC
	Grant Sawyer Building	Attn: Marc L. Simon, Esq.
	555 East Washington Avenue, Suite 3900	8508 Wyndrush Way
10	Las Vegas, Nevada 89101-1068	El Dorado Hills, California 95762-5012
11	Clark County Board of Commissioners	Holecek 1996 Irrevocable Trust Dated October 1, 1996
12	c/o Clark County Commissioners Office	Attn: Officer or Managing/General Agent
	500 South Grand Central Parkway, Floor 6	425 Ridge Court
	Las Vegas, Nevada 89155-4502	Naples, Florida 34108-2602
13	Clark County Board of Commissioners	Chicago Title of Nevada, Inc.
14	c/o Office of the Clark County District Attorney - Civil Division	c/o C T Corporation System (Registered Agent)
15	500 South Grand Central Parkway, Floor 5	701 South Carson Street, Suite 200
16	Las Vegas, Nevada 89155-4502	Carson City, Nevada 89701-5239
17	Ignatius A. Piazza II	Chicago Title Agency of Nevada, Inc.
18	c/o Garman Turner Gordon LLP	Attn: Officer or Managing/General Agent
	Attn: Teresa M. Pilatowicz, Esq.	2370 Corporate Circle, Suite 100
	7251 Amigo Street, Suite 210	Henderson, Nevada 89074-7760
19	Las Vegas, Nevada 89119-4302	Chicago Title Agency of Nevada, Inc.
20	Jennifer A. Piazza	Attn: Officer or Managing/General Agent
21	c/o Garman Turner Gordon LLP	9075 West Diablo Drive, Suite 100
	Attn: Teresa M. Pilatowicz, Esq.	Las Vegas, Nevada 89148-7702
	7251 Amigo Street, Suite 210	Chicago Title Agency of Nevada, Inc.
22	Las Vegas, Nevada 89119-4302	Attn: Officer or Managing/General Agent
23	Holecek 1996 Irrevocable Trust Dated October 1, 1996	7201 West Lake Mead Boulevard, Suite 101
24	Attn: Jeri Holecek, Trustee	Las Vegas, Nevada 89128-8348
	13101 Bald Cypress Lane	
	Naples, Florida 34119-8528	
25	Holecek 1996 Irrevocable Trust Dated October 1, 1996	Chicago Title Agency of Nevada, Inc. (Commercial Division)
26	c/o Goodman Breen & Gibbs	Attn: Officer or Managing/General Agent
27	Attn: Kenneth D. Goodman, Esq.	3980 Howard Hughes Parkway, Suite 100
	3838 Tamiami Trail North, Suite 300	Las Vegas, Nevada 89169-0977
28	Naples, Florida 34103-3586	

1 Nye County, a political subdivision of the
State of Nevada
2 c/o Office of the Nevada Attorney General
Grant Sawyer Building
3 555 East Washington Avenue, Suite 3900
Las Vegas, Nevada 89101-1068

Nye County, a political subdivision of the
State of Nevada
Attn: Planning Director
250 North Highway 160, Suite 1
Pahrump, Nevada 89060

4 Nye County, a political subdivision of the
State of Nevada
5 c/o Board of County Commissioners
6 P.O. Box 153
101 Radar Road
7 Tonopah, Nevada 89049-0153

Nye County, a political subdivision of the
State of Nevada
c/o Department of Planning and Code
Compliance
Attn: Director of Planning
2041 East Calvada Boulevard North, Suite 1
Pahrump, Nevada 89048-7081

8 Nye County, a political subdivision of the
State of Nevada
9 c/o Board of County Commissioners
2100 East Walt Williams Drive, Suite 100
10 Pahrump, Nevada 89048-1018

Civilwise Services, LLC
Attn: Officer or Managing/General Agent
1240 East State Street, Suite 101
Pahrump, Nevada 89048-2180

11 Nye County, a political subdivision of the
State of Nevada
12 c/o Office of the Nye County District
Attorney (Tonopah Office)
13 P.O. Box 593
101 Radar Road
14 Tonopah, Nevada 89049-0593

Civilwise Services, Inc.
c/o Anderson & Company CPA (Registered
Agent)
P.O. Box 1336
1241 Daytona Street
Pahrump, Nevada 89041-1336

15 Nye County, a political subdivision of the
State of Nevada
16 c/o Office of the Nye County District
Attorney (Pahrump Office)
17 P.O. Box 39
1520 East Basin Avenue
18 Pahrump, Nevada 89041-0039

Civilwise Services, Inc.
Attn: Officer or Managing/General Agent
1240 East State Street, Suite 101
Pahrump, Nevada 89048-2180

Civilwise Services, Inc.
Attn: Officer or Managing/General Agent
1191 West Betty Avenue
Pahrump, Nevada 89060-3977

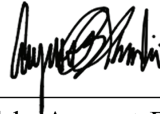
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Deaner, Deaner, Scann, Malan & Larsen
Attn: Douglas R. Malan, Esq.
720 South 4th Street, Suite 300
Las Vegas, Nevada 89101-6743

/s/ Susan Roman
Susan Roman, an Employee of
SCHWARTZ LAW, PLLC

Exhibit A

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Honorable August B. Landis
United States Bankruptcy Judge



Entered on Docket
September 26, 2023

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Samuel A. Schwartz, Esq.
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SCHWARTZ LAW, PLLC
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Telephone: (702) 385-5544
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Attorneys for the Reorganized Debtor

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

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In re:

FRONT SIGHT MANAGEMENT LLC,

Reorganized Debtor.

Case No.: 22-11824-ABL
Chapter 11
Hearing Date: September 26, 2023
Hearing Time: 1:30 PM PDT

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**ORDER ON RENEWED MOTION TO ENFORCE
AND IMPLEMENT THE CONFIRMATION ORDER**

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Upon the renewed motion (“**Motion**”)¹ of Front Sight Management LLC, the reorganized debtor in the above-referenced Chapter 11 case (the “**Reorganized Debtor**”), for the entry of any order to enforce and implement this Court’s *Findings of Fact, Conclusions of Law, and Order Confirming the Debtor’s Second Amended Chapter 11 Plan of Reorganization* [ECF No. 556] (the “**Confirmation Order**”), pursuant to Section 105 of the Bankruptcy Code; and due and sufficient notice of the Motion having been provided by the Reorganized Debtor to all appropriate and affected parties, including due and sufficient notice having been provided to all affected parties to

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¹ Capitalized terms not otherwise defined herein shall have those meanings ascribed to them in the Motion.

1 the Enumerated Encumbrances (defined below); and after considering the Motion and all pleadings
2 and papers filed with this Court in connection with the Motion, including any objections to the
3 Motion, and the argument of counsel at the hearing on the Motion; and upon the record made by
4 the Reorganized Debtor hearing; and the Court having found and determined that the relief sought
5 in the Motion is in the best interests of the Reorganized Debtor, its estate, creditors, and all parties
6 in interest; and after due deliberation and consideration and good and sufficient cause appearing
7 therefor, it is hereby:

8 **ORDERED** that the Motion is **GRANTED**; and it is further

9 **ORDERED** that the Confirmation Order is a final order, not subject to appeal, revocation,
10 or otherwise; and it is further

11 **ORDERED** that the Plan became effective and substantially consummated on December
12 2, 2022, the date Nevada PF funded all required contributions under the Plan and received all of
13 the New Equity Interests in the Reorganized Debtor; and it is further

14 **ORDERED** that the Confirmation Order provided that, in accordance with Section V.C of
15 the Plan, “all property of the Estate shall revert in the Reorganized Debtor, . . . free and clear of all
16 claims, liens, encumbrances or other interests, including the following liens, claims, interests, and
17 encumbrances (collectively, the “**Enumerated Encumbrances**”):

18 i. That certain Memorandum of Use Agreement recorded on September 10, 1999, in
19 Book 19990910 as Instrument No. 477754 of the Official Records of Nye County, Nevada;

20 ii. That certain Off-Site Improvement Agreement recorded on June 28, 2000, in Book
21 20000628 as Instrument No. 02466 of the Official Records of Nye County, Nevada;

22 iii. That certain Deed of Trust, Assignment of Rents, Security Agreement and Fixture
23 Filing, recorded on February 10, 2006, in Book 20060210 as Instrument No. 649038 of the
24 Official Records, Nye County, Nevada, and that certain Notice of Loan Modification
25 recorded on July 6, 2012, in Book 20120706 as Instrument No. 786875 of the Official
26 Records of Nye County, Nevada;

27 iv. That certain Commercial Real Estate Lease, recorded on October 15, 2008, in Book
28 20081015 as Instrument No. 717276 of the Official Records of Nye County, Nevada;

1 v. That certain Development Agreement by and between Nye County, State of Nevada
2 and Front Sight Management, Inc., recorded on August 3, 2009, in Book 20090803 as
3 Instrument No. 731349 of the Official Records of Nye County, Nevada; and

4 vi. That certain Declaration of Conditions, Restrictions and Bylaws for Front Sight
5 Resort and Vacation Club, recorded on October 13, 2016, in Book 20161013 as Instrument
6 No. 860866 of the Official Records of Nye County, Nevada;”

7 and it is further

8 **ORDERED** that all property of the Debtor’s Estate which revested in the Reorganized
9 Debtor, including, but not limited to, the Reorganized Debtor’s real property located at: (i) 12501
10 South Haven Ranch Road, Pahrump, Nevada (Nye County Assessor’s Parcel No. 045-481-05); and
11 (ii) 1 Front Sight Road, Pahrump, Nevada (Nye County Assessor’s Parcel No. 045-481-06)
12 (together, the “**Property**”), revested in the Reorganized Debtor free and clear of all liens, claims,
13 and encumbrances, including revesting free and clear of the Enumerated Encumbrances; and it is
14 further

15 **ORDERED** that any title company, title insurer, insurer, creditor, bank, institution, or any
16 other party is hereby authorized and directed to rely on this Order, Confirmation Order, and/or Plan
17 to conclude that all other claims, liens, and encumbrances against the Reorganized Debtor’s
18 Property or against any other property of the Debtor’s Estate, including, but not limited to, the
19 Enumerated Encumbrances, unless expressly preserved in the Confirmation Order, are hereby
20 stripped and removed against the Reorganized Debtor’s Property and against any other property of
21 the Debtor’s Estate; and it is further

22 **ORDERED** that any title company, title insurer, creditor, bank, institution, or other third
23 party is hereby authorized and directed to rely on the this Order, the Confirmation Order, and/or
24 Plan, and is further authorized and directed to execute, deliver, file, or record any document, or to
25 take any action necessary to implement, consummate, and otherwise effect the terms of this Order,
26 the Confirmation Order, and/or Plan, which authorization includes, but is not limited to, issuing a
27 new title policy for the Reorganized Debtor’s Property which removes the Enumerated
28 Encumbrances as exceptions to title; and it is further

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LR 9021 CERTIFICATION

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court’s ruling and that (check one):

- The court has waived the requirement set forth in LR 9021(b)(1).
- No party appeared at the hearing or filed an objection to the motion.
- I have delivered a copy of this proposed order to all counsel and any unrepresented parties who appeared at the hearing, except those as to whom review was waived on the record at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below:

I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of this order.

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