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*Electronically Filed On: February 17, 2015*

5 *[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee*

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8 **UNITED STATES BANKRUPTCY COURT**  
9 **DISTRICT OF NEVADA**

10 In re:  
11 AMERI-DREAM REALTY, LLC,

Case No. BK-S-15-10110-LED  
Chapter 7

12 Debtor.

**DECLARATION OF VICTORIA L. NELSON IN SUPPORT OF EX PARTE APPLICATION TO (1) EMPLOY ASSURED DOCUMENT DESTRUCTION INC. FOR THE DESTRUCTION OF CONFIDENTIAL DOCUMENTS AND HARD DRIVES PURSUANT TO 11 U.S.C. § 105(a); AND (2) PAY ASSURED DOCUMENT DESTRUCTION INC. AN AMOUNT NOT TO EXCEED ONE THOUSAND DOLLARS (\$1,000)**

Date of Hearing: N/A  
Time of Hearing: N/A

Judge: Honorable Laurel E. Davis

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21 I, Victoria L. Nelson, declare as follows:

22 1. I am over the age of 18 years and I am competent to make this declaration. I have  
23 personal knowledge of the facts set forth herein, except for those facts stated on information and  
24 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I  
25 could and would testify as to the matters set forth below based upon my personal knowledge.

26 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

27 3. I make this declaration in support of the Ex Parte Application to (1) Employ  
28 Assured Document Destruction, Inc. for the Destruction of Confidential Documents and Hard

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1 Drives Pursuant to 11 U.S.C. § 105(a) and (2) Pay Assured Document Destruction, Inc. an  
2 Amount Not to Exceed One Thousand Dollars (\$1,000) (the "Application").<sup>1</sup>

3 4. On January 9, 2015, Ameri-Dream Realty LLC. (the "Debtor") filed a voluntary  
4 bankruptcy pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1]<sup>2</sup>.

5 5. On January 9, 2015, I was appointed as the Chapter 7 Trustee in the Debtor's  
6 bankruptcy case [ECF No. 4].

7 6. Prior to the Debtor filing bankruptcy, the principal of the Debtor vacated the leased  
8 premises located at 4875 Nevso Drive, Las Vegas, Nevada (the "Property").

9 7. When the principals of the Debtor vacated the Property, personal property was left  
10 behind including files, documents and computers belonging to the Debtor (the "Personal  
11 Property") remaining in or on the Property.

12 8. There are thousands of files and documents and many computers containing  
13 confidential information.

14 9. It is now necessary for me to employ Assured Document Destruction, Inc.  
15 ("Assured") to destroy the files, documents and computer hard drives containing the confidential  
16 information.

17 10. Assured has provided me with an estimated amount of the services after inspecting  
18 the Debtor's office. Assured has estimated the amount that should not exceed One Thousand  
19 Dollars (\$1,000), depending on the amount of files that need to be destroyed and the time spent at  
20 the premises.

21 ...

22 ...

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24 <sup>1</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11  
25 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The  
26 Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of  
27 Bankruptcy Procedure will be referred to as "FRBP." Unless otherwise expressly stated herein,  
28 all undefined, capitalized terms shall have the meaning ascribed to them in the Application.

<sup>2</sup> All references to "ECF No." are to the numbers assigned to the documents filed in the case as  
they appear on the docket maintained by the clerk of the court.

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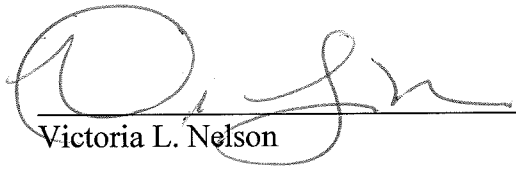
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11. Accordingly, I request authority to employ Assured and pay it an amount not to exceed One Thousand Dollars (\$1,000) in order to ensure that the confidential information of the Debtor's former clients are protected.

12. The issuance of a court order permitting me to employ and pay Assured an amount not to exceed One Thousand Dollars (\$1,000) is appropriate under Section 105(a) because it would allow me to expeditiously administer the Debtor's bankruptcy estate and fulfill my obligations under Section 704(a)(2) by being "accountable for all property received" in the context of the bankruptcy case. See 11 U.S.C. § 704(a)(2).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 17th day of February, 2015.

  
Victoria L. Nelson

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