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7. Chapter 7 Trustee

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8. UNITED STATES BANKRUPTCY COURT
9. DISTRICT OF NEVADA

10. In re:
11. AMERI-DREAM REALTY, LLC,
12. Debtor.

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

AMENDED DECLARATION OF PAUL M. HEALEY IN SUPPORT OF EX PARTE APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF ACCOUNTANT

13. Judge: Honorable Laurel E. Davis

14. I, Paul M. Healey, hereby declare as follows:

15. 1. I am over the age of 18 and mentally competent. Except where stated on
16. information and belief, I have personal knowledge of the facts in this matter and if called upon to
17. testify, could and would do so. I make this declaration in support of the Trustee's Ex Parte
18. Application for Order Authorizing Employment of Accountant (the "Application").

19. 2. I am a certified public accountant licensed in the State of Nevada and am
20. experienced in bankruptcy estate taxation issues.

21. 3. It is my belief that I have the requisite experience and expertise to competently
22. perform the duties for the Trustee and have represented panel trustees in other matters within the
23. State of Nevada.

24. 4. I have agreed to represent the Trustee and the Debtor's bankruptcy estate as the
25. accountant and to be compensated on an hourly basis with my payment being subject to Court
26. 27. 28.

1 approval. The rates presently charged by my accounting firm are \$185 per hour for my services;
2 \$95 per hour for Christopher Healey; \$85 per hour for Michael Healey; and \$35 per hour for
3 administrative staff, plus costs.

4 5. Following the Trustee's request that my office represent her in this case as
5 accountant, a conflicts check was undertaken, utilizing my firm's client list. Based upon the
6 conflicts check and my information and belief, I believe that the firm and its employees are
7 "disinterested persons" as defined by 11 U.S.C. § 101 and do not hold or represent any interest
8 adverse to the bankruptcy estate.

9 6. The conclusion that my firm is a "disinterested" person within the meaning of 11
10 U.S.C. § 101(14) for purposes of 11 U.S.C. § 327(a) is based upon the fact neither my firm nor
11 any of its employees:

- 12 (a) Are or were a creditor, equity security holder, or insider of
13 the Debtor;
- 14 (b) Are or were, within two (2) years before the date of the
15 filing the bankruptcy petition, a director, officer or
16 employee of Debtor as specified in subparagraph (c) of
17 Section 101(14);
- 18 (c) Hold, or have ever held, an interest materially adverse to
19 the interest of the estate or of any class of creditors, equity
20 holders, or parties in interest, by reason of any direct or
21 indirect relationship to, or interest in, the Debtor or for any
22 other reason except as stated herein;
- 23 (d) Represent, or have ever represented, the Debtor, insiders of
24 the Debtor, creditors of the Debtor, any other party in
25 interest, or their respective attorneys and accountants
26 except as set forth herein; and
- 27 (d) Is a relative or employee of the U.S. Trustee or a
28 Bankruptcy Judge except as stated herein.

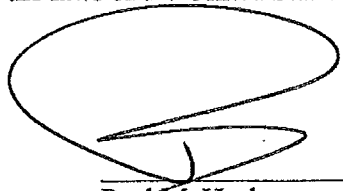
7. To the best of my knowledge, information and belief, I have no connection with
the Debtor, the creditors of Debtor's bankruptcy estate, or any other party in interest, their
respective attorneys and accountants, the United States trustee, or any person employed in the

1 office of the United States trustee. Further, I represent no interest adverse to the Trustee, the
2 bankruptcy estate, or any other party in interest herein, their respective attorneys and
3 accountants, the United States Trustee, or any person employed in the Office of the United States
4 Trustee.

5 8. I do represent the Trustee in other accounting and taxation transactions unrelated
6 to the Debtors' bankruptcy estate.

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

9 Dated this 11th day of February, 2015



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11 Paul M. Healey
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