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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:
AMERI-DREAM REALTY LLC,

Debtor.

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

DECLARATION OF VICTORIA L. NELSON IN SUPPORT OF FIRST INTERIM APPLICATION OF PAUL M. HEALEY & SONS CPAS, LTD. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED DURING THE PERIOD FROM FEBRUARY 13, 2015 THROUGH FEBRUARY 20, 2017 AND FOR REIMBURSEMENT OF EXPENSES PURSUANT TO 11 U.S.C. §§ 330 AND 331 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2016

Date of Hearing: March 28, 2017
Time of Hearing: 10: 30 a.m.
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

I, VICTORIA L. NELSON, declare as follows:

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

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- 1 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.
- 2 3. I make this declaration to support the *First Interim Application of Paul M. Healey*
- 3 *& Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered During the Period*
- 4 *From February 13, 2015 Through February 20, 2017 and For Reimbursement of Expenses*
- 5 *Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016 (the “Fee*
- 6 *Application”).*¹
- 7 4. On January 9, 2015 (the “Petition Date”), AMERI-DREAM REALTY LLC (the
- 8 “Debtor”) filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code [ECF
- 9 No. 1]².
- 10 5. On January 9, 2015, I was appointed as the Chapter 7 Trustee in the Debtor’s
- 11 bankruptcy case.
- 12 6. Following my appointment as Chapter 7 Trustee in the Debtor’s bankruptcy case, I
- 13 determined that I would require the assistance of an accountant to prepare tax returns on behalf of
- 14 the Debtor’s bankruptcy estate and otherwise assist me in fulfilling my statutory obligations under
- 15 Section 704.
- 16 7. On February 10, 2015, I filed an *Ex Parte Application for Order Authorizing*
- 17 *Employment of Accountant* [ECF No. 91].
- 18 8. On February 13, 2015, the Court entered an *Order Granting Ex Parte Application*
- 19 *for Order Authorizing Employment of Accountant* [ECF No. 99].
- 20 9. Pursuant to Guideline 2.2.2 of the Region 17 United States Trustee Guidelines, I
- 21 have been provided a copy of the billing entries and itemization of expenses that are attached as

22 _____

23 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11

24 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The

25 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of

26 Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United

27 States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.
Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to them
in the Fee Application.

28 ² 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.

1 **Exhibit “1”** to the *Declaration of Paul M. Healey, CPA In Support of First Interim Application of*
2 *Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered During*
3 *the Period From February 13, 2015 Through February 20, 2017 and For Reimbursement of*
4 *Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016*
5 and approve the same.

6 10. The balance of the trust account in the Debtors bankruptcy case is \$633,535.31.

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 21st day of February, 2017.

11 /s/ Victoria L. Nelson

12 Victoria L. Nelson, Chapter 7 Trustee