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1 Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@houmandlaw.com
2 Kyle J. Ortiz, Esq. (NV Bar No. 14252)
Email: kortiz@houmandlaw.com
3 HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240
4 Las Vegas, NV 89148
Telephone: 702/720-3370
5 Facsimile: 702/720-3371

6 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

7
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-GS
Chapter 7

DECLARATION OF SHELLEY D. KROHN IN SUPPORT OF EX PARTE APPLICATION TO EMPLOY HOUMAND LAW FIRM, LTD., NUNC PRO TUNC, AS GENERAL BANKRUPTCY COUNSEL FOR SHELLEY D. KROHN, SUCCESSOR CHAPTER 7 TRUSTEE, PURSUANT TO 11 U.S.C. §§ 327(a) AND 328(a) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014

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

Judge: Honorable Gary Spraker

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21 I, Shelley D. Krohn, hereby declare as follows:

22 1. I am over the age of 18 and mentally competent. Except where stated on
23 information and belief, I have personal knowledge of the facts in this matter and if called upon to
24 testify, could and would do so.

25 2. I make this declaration to support the *Ex Parte Application to Employ Houmand*
26 *Law Firm, Ltd., Nunc Pro Tunc, as General Bankruptcy Counsel for Shelley D. Krohn, Successor*
27 *Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy*
28 *Procedure 2014* (the "Application").

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1 3. I am the appointed successor Chapter 7 Trustee in the above-captioned bankruptcy
2 case.

3 4. On January 9, 2015, AMERI-DREAM REALTY, LLC (the “Debtor”) filed a
4 voluntary bankruptcy pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1]¹.

5 5. On January 9, 2015, Victoria L. Nelson (“Trustee Nelson”) was appointed as the
6 Chapter 7 Trustee in the Debtor’s bankruptcy case [ECF No. 4].

7 6. On February 2, 2015, Trustee Nelson filed an *Application to Employ Nelson &*
8 *Houmand, P.C., Nunc Pro Tunc, As General Bankruptcy Counsel for Victoria L. Nelson, Chapter*
9 *7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy Procedure*
10 *2014* [ECF No. 16] (the “Employment Application”), which sought to employ Nelson &
11 Houmand, P.C. (the “Firm”) as general bankruptcy counsel.

12 7. On April 2, 2015, the Court entered an *Order Granting Application to Employ*
13 *Nelson & Houmand, P.C., Nunc Pro Tunc, As General Bankruptcy Counsel for Victoria L.*
14 *Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of*
15 *Bankruptcy Procedure 2014* [ECF No. 148].

16 8. On October 17, 2017, the Firm filed a *Notice of (1) Change of Firm Name and (2)*
17 *Change of Address* [ECF No. 264], which stated that the name of the Firm had been changed from
18 “Nelson & Houmand, P.C.” to the “Houmand Law Firm, Ltd.”

19 9. On January 13, 2018, Trustee Nelson died. *See Trustee Declaration.*

20 10. On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in the
21 Debtor’s bankruptcy case.

22 11. I desire to continue to have the Firm represent the bankruptcy estate on the same
23 terms as set forth in the Employment Application.

24 12. In order to assist me in administering the Debtor’s bankruptcy case, recovering
25 other assets which may be available for distribution to creditors and fulfilling my statutory
26 _____

27 ¹ All references to “ECF No.” are to the numbers assigned to the documents filed in the case as
28 they appear on the docket maintained by the clerk of the court.

1 obligations under Section 704 of Title 11, including my responsibility to investigate the financial
2 affairs of the Debtor, I now desire to employ the Houmand Law Firm, Ltd. (the "Firm"), as
3 general bankruptcy counsel in the Debtor's bankruptcy case.

4 13. The Application seeks employment of the Firm *nunc pro tunc* effective as of my
5 appointment.

6 14. The Firm is well suited for the type of representation required by me. The Firm
7 specializes in insolvency and reorganization matters, particularly the representation of Chapter 7
8 Trustees in bankruptcy cases. Attorneys associated with the Firm have represented debtors,
9 Chapter 7 Trustees, creditors, and other parties-in-interest, and is qualified to act as counsel for
10 me. Accordingly, I have determined that the Firm has the resources and experience necessary to
11 represent me in this case.

12 15. The attorneys of the Firm that will render services in relation to the above-
13 captioned bankruptcy case are familiar with the United States Bankruptcy Code, the Federal
14 Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Local Rules and
15 will comply with them, as well as the procedures set forth in the "Guide to Applications for
16 Professional Compensation," promulgated by the Office of the United States Trustee (the "U.S.
17 Trustee") with regard to compensation of professionals.

18 16. The attorneys employed by the Firm are duly admitted to practice before this
19 Court.

20 17. I desire to employ the Firm as my general counsel in this bankruptcy case to render
21 the following professional services:

22 (a) To investigate the financial affairs of the Debtor and
23 determine if there are any preferential transfers, fraudulent
24 conveyances, or turnover actions that may be filed on behalf
25 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
26 547, and 548.

26 (b) To prosecute any and all preferential transfers, fraudulent
27 conveyances, or turnover actions that may be filed on behalf
28 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
547, and 548.

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- (c) To advise the Trustee of her rights and obligations and performance of her duties during the administration of this bankruptcy case;
- (d) To represent the Trustee in all proceedings before this Court and any other court which assumes jurisdiction of a matter related to or arising in this bankruptcy case;
- (e) To assist the Trustee in the performance of her duties as set forth in 11 U.S.C. § 704;
- (f) To assist the Trustee in developing legal positions and strategies with respect to all facets of these proceedings; and
- (g) To provide such other counsel and advice as the Trustee may require in connection with this bankruptcy case.

18. I have selected the Firm because its attorneys have experience in matters of this character, are familiar with bankruptcy practice and the administration of the Debtor’s bankruptcy case and are qualified to represent me in this case.

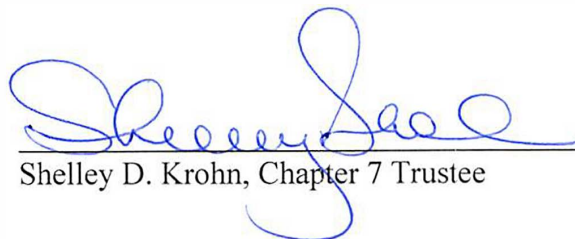
19. I am aware that the Firm was counsel of record for Trustee Nelson, the Chapter 7 Trustee that was initially appointed in the Debtor’s bankruptcy case.

20. I am aware that Trustee Nelson was previously a member of the Firm.

21. I have employed the Firm in other bankruptcy cases unrelated to the above-referenced bankruptcy case.

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

Dated this 13 day of March, 2018.



Shelley D. Krohn, Chapter 7 Trustee