

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

Electronically Filed On: January 9, 2020

Counsel for Shelley D. Krohn, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

ROBERT C. GRAHAM, LTD. fdba ROB
GRAHAM & ASSOCIATES fdba
LAWYERS WEST,

Debtor.

Case No. BK-S-16-16655-BTB
Chapter 7

**DECLARATION OF SHELLEY D.
KROHN IN SUPPORT OF FIRST
INTERIM APPLICATION OF
EISNERAMPER LLP FOR ALLOWANCE
OF COMPENSATION FOR SERVICES
RENDERED DURING THE PERIOD
FROM MARCH 17, 2017 THROUGH
MARCH 6, 2019 AND FOR
REIMBURSEMENT OF EXPENSES
PURSUANT TO 11 U.S.C. §§ 330 AND 331
AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2016**

Date of Hearing: February 12, 2020
Time of Hearing: 1:30 p.m.
Place: Courtroom No. 4, Second Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Bruce T. Beesley

I, Shelley D. Krohn, 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.

HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

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

3. I make this declaration in support of the *First Interim Application of EisnerAmper LLP for Allowance of Compensation for Services Rendered During the Period From March 17, 2017 Through March 6, 2019 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016* (the “Fee Application”).¹

4. Pursuant to Guideline 2.2.2 of the Region 17 United States Trustee Guidelines, I have been provided a copy of the billing entries and itemization of expenses that are attached as **Exhibit “1”** to the *Declaration of Hubert Klein in Support of First Interim Application of EisnerAmper LLP for Allowance of Compensation for Services Rendered During the Period From March 17, 2017 Through March 6, 2019 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016* and approve the same.

5. The balance of the trust account in the Debtors bankruptcy case is \$426,064.50.

6. On December 15, 2016, an *Involuntary Bankruptcy Petition* [ECF No. 1]² (the “Involuntary Petition”) was filed against the Debtor pursuant to 11 U.S.C. § 303.

7. The Involuntary Petition was filed by the Estate of Michael B. Macknin, the Sharona Dagani Trust, and the Margueritte Owens Revocable Trust (collectively, the “Petitioning Creditors”).

8. On December 16, 2016, the Petitioning Creditors filed a *Motion to Appoint Interim Trustee in Involuntary Case* [ECF No. 3] (the “Interim Trustee Motion”), which sought authority to appoint an interim trustee to take possession of property and to manage the business operations and assets of the Debtor.

...

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of Bankruptcy Procedure will be referred to as “FRBP.” Unless otherwise expressly stated herein, all undefined, capitalized terms shall have the meaning ascribed to them in the Fee Application.

² All references to “ECF No.” are to the numbers assigned to the documents filed in the above-referenced case as they appear on the docket maintained by the clerk of the court.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 9. On December 21, 2016, the Bankruptcy Court entered an *Order on Trustee Motion*
2 *and Order for Relief Under Chapter 7* [ECF No. 21] (the “Order for Relief”).

3 10. The Order for Relief provided that the Debtor had consented to the filing of a
4 bankruptcy petition and that the filing of the bankruptcy case was effective as of December 15,
5 2016 (the “Petition Date”).

6 11. The Order for Relief further required that the Office of the United States Trustee
7 (the “U.S. Trustee”) appoint an Interim Chapter 7 Trustee pursuant to 11 U.S.C. § 701.

8 12. On December 22, 2016, Trustee Nelson was appointed as the Chapter 7 Trustee in
9 the Debtor’s bankruptcy case [ECF No. 22].

10 13. On January 13, 2018, Trustee Nelson died.

11 14. On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in the
12 Debtor’s bankruptcy case.

13 15. During the course of the administration of the Debtor’s bankruptcy case, Trustee
14 Nelson and I have served multiple subpoenas issued pursuant to FRBP 2004 (collectively, the
15 “Subpoenas”) seeking the production of financial records related to the Debtor’s financial affairs.

16 16. The Subpoenas have resulted in the production of thousands of financial records
17 that were required to be analyzed to evaluate whether there were pre-petition transfers of estate
18 property that could be avoided for the benefit of creditors.

19 17. The vast majority of the time spent by the Firm related to the analysis of the
20 financial records produced by financial institutions pursuant to the Subpoenas and the Debtor’s
21 books and records.

22 18. The forensic accounting prepared by the Firm has assisted me in recovering
23 approximately \$428,064.50.

24 19. The Firm is also assisting me with the investigation and prosecution of avoidance
25 actions against Bank of America, N.A. and the Mormon Church.

26 ...


27 ...

28 ...

1 20. I believe that the work performed by the Firm benefitted the Debtor's bankruptcy
2 estate.

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

5 Dated this 9 day of January, 2020.

6 
7 _____
8 Shelley D. Krohn, Chapter 7 Trustee

HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371