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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 TRUSTEE'S SEVENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM PURSUANT TO 11 U.S.C. § 502(b)(1) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 3007—CLAIM NUMBERS 65-2, 195-1, 214-1, 240-1, 307-1, 335-1, 594-1, 597-1, 659-1, 694-1, 717-1, 736-1, 868-1, 869-1, 870-1, 871-1, 872-1, 873-1, 874-1, 875-1, 876-1, 877-1, 878-1, 879-1, 880-1, 881-1, 882-1, 883-1, 884-1, 885-1, 886-1, 887-1, 888-1, 889-1, 890-1, 891-1, 892-1, 893-1, 894-1, 899-1, 903-1, 905-1, 906-1, 908-1, 909-1, 915-1, AND 916-1, BASED ON IMPROPER ASSERTION OF A PRIORITY CLAIM BY A LANDLORD FOR A SECURITY DEPOSIT**

Date of Hearing: September 15, 2020  
Time of Hearing: 9:30 a.m.  
Place: Courtroom No. To Be Determined  
Foley Federal Building  
300 Las Vegas Blvd., S.  
Las Vegas, NV 89101

Judge: Honorable Gary Spraker

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27 I, Shelley D. Krohn, declare as follows:

28 1. I am over the age of 18 years and I am competent to make this declaration. I have

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1 personal knowledge of the facts set forth herein, except for those facts stated on information and  
2 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I  
3 could and would testify as to the matters set forth below based upon my personal knowledge.<sup>1</sup>

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

5 3. I make this declaration to support the *Trustee's Seventh Omnibus Objection To*  
6 *Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure*  
7 *3007—Claim Numbers 65-2, 195-1, 214-1, 240-1, 307-1, 335-1, 594-1, 597-1, 659-1, 694-1, 717-*  
8 *1, 736-1, 868-1, 869-1, 870-1, 871-1, 872-1, 873-1, 874-1, 875-1, 876-1, 877-1, 878-1, 879-1,*  
9 *880-1, 881-1, 882-1, 883-1, 884-1, 885-1, 886-1, 887-1, 888-1, 889-1, 890-1, 891-1, 892-1, 893-*  
10 *1, 894-1, 899-1, 903-1, 905-1, 906-1, 908-1, 909-1, 915-1, and 916-1, Based On Improper*  
11 *Assertion Of A Priority Claim by a Landlord For a Security Deposit (the “Objection”).*<sup>2</sup>

12 4. On January 9, 2015 (the “Petition Date”), the Debtor filed a voluntary bankruptcy  
13 pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1]<sup>3</sup>.

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

16 6. On January 28, 2015, the Court entered an *Amended Notice of Chapter 7*  
17 *Bankruptcy Case* [ECF No. 12] that established May 14, 2015, as the deadline for creditors to file  
18 proofs of claim.

19 7. On February 9, 2015, Trustee Nelson filed an *Application for Order Authorizing*  
20 *Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 88].

21 ...

22 \_\_\_\_\_  
23 <sup>1</sup> 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  
Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United  
States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

26 <sup>2</sup> Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to  
27 them in the Objection.

28 <sup>3</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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1           8.       On February 27, 2015, the Court entered an *Order Granting Application for Order*  
2 *Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No.  
3 128].

4           9.       Since its employment, GCG has been maintaining the Proofs of Claim that have  
5 been submitted by creditors.

6           10.      On September 30, 2015, Trustee Nelson filed a *Motion for (1) Turnover of Security*  
7 *Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11 U.S.C. § 542 and (2)*  
8 *Authority to Administer Security Deposits Through the Debtor's Bankruptcy Estate Pursuant to*  
9 *11 U.S.C. § 105(a)* [ECF No. 181] (the "Turnover Motion").

10          11.      The Turnover Motion sought authority for approximately \$707,567.29 – the  
11 balance of the Security Deposits that were in the Debtor's possession as of the Petition Date –  
12 held in the IOLTA Account of counsel for the Debtor to be transferred to Trustee Nelson so that  
13 the funds could be administered for the benefit of creditors.

14          12.      The Turnover Motion was supported by counsel for the Debtor, an accountant  
15 employed by the Debtor prior to the Petition Date, and the Nevada Real Estate Division.

16          13.      On November 6, 2015, the Court entered an *Order Granting Motion for (1)*  
17 *Turnover of Security Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11*  
18 *U.S.C. § 542 and (2) Authority to Administer Security Deposits Through the Debtor's Bankruptcy*  
19 *Estate Pursuant to 11 U.S.C. § 105(a)* [ECF No. 196] (the "Turnover Order").

20          14.      The Turnover Order provided that the security deposits held in the IOLTA  
21 Account of counsel for the Debtor would be transferred to the Debtor's bankruptcy estate and  
22 administered pursuant to Section 726.

23          15.      On January 13, 2018, Trustee Nelson died.

24          16.      On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in the  
25 Debtor's bankruptcy case.

26          17.      On April 20, 2015, Bo Tang filed a claim claiming priority under 11 U.S.C. §  
27 507(a)(7) in the amount of \$1,595.00 based on deposit toward purchase, lease or rental of  
28 property. A true and correct copy of Claim 195-is attached hereto as **Exhibit "1"**.

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1           18.     On April 23, 2015, Jocelyn Lo filed a claim claiming priority under 11 U.S.C. §  
2 507(a)(7) in the amount of \$950.00 based on deposit toward purchase, lease or rental of property.  
3 A true and correct copy of Claim 214-1 is attached hereto as **Exhibit “2”**.

4           19.     On April 29, 2015, Richard Chaskin filed a claim claiming priority under 11  
5 U.S.C. § 507(a)(7) in the amount of \$2,250.00 based on deposit toward purchase, lease or rental  
6 of property. A true and correct copy of Claim 240-1 is attached hereto as **Exhibit “3”**.

7           20.     On May 6, 2015, Alexandra Assets, LLC filed a claim claiming priority under 11  
8 U.S.C. § 507(a)(7) in the amount of \$2,025.00 based on deposit toward purchase, lease or rental  
9 of property. A true and correct copy of Claim 307-1 is attached hereto as **Exhibit “4”**.

10          21.     On May 7, 2015, Winston V. Weng and Dao To Trieu filed a claim claiming  
11 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,050.00 based on deposit toward  
12 purchase, lease or rental of property. A true and correct copy of Claim 335-1 is attached hereto as  
13 **Exhibit “5”**.

14          22.     On May 11, 2015, Yao Chi He and Rui Yan Guo filed a claim claiming priority  
15 under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease  
16 or rental of property. A true and correct copy of Claim 659-1 is attached hereto as **Exhibit “6”**.

17          23.     On May 11, 2015, Richard Peter Bailey and Jingru Luo filed a claim claiming  
18 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward  
19 purchase, lease or rental of property. A true and correct copy of Claim 594-1 is attached hereto as  
20 **Exhibit “7”**.

21          24.     On May 11, 2015, Hong Feng Hu filed a claim claiming priority under 11 U.S.C. §  
22 507(a)(7) in the amount of \$1,875.00 based on deposit toward purchase, lease or rental of  
23 property. A true and correct copy of Claim 597-1 is attached hereto as **Exhibit “8”**.

24          25.     On May 12, 2015, Dekang Deng filed a claim claiming priority under 11 U.S.C. §  
25 507(a)(7) in the amount of \$1,525.00 based on deposit toward purchase, lease or rental of  
26 property. A true and correct copy of Claim 694-1 is attached hereto as **Exhibit “9”**.

27          26.     On May 12, 2015, Fanny Li filed a claim claiming priority under 11 U.S.C. §  
28 507(a)(7) in the amount of \$2,050.00 based on deposit toward purchase, lease or rental of

1 property. A true and correct copy of Claim 717-1 is attached hereto as **Exhibit "10"**.

2 27. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.  
3 § 507(a)(7) in the amount of \$1,770.00 based on deposit toward purchase, lease or rental of  
4 property. A true and correct copy of Claim 736-1 is attached hereto as **Exhibit "11"**.

5 28. On May 14, 2015, Pearson Huang filed a claim claiming priority under 11 U.S.C. §  
6 507(a)(7) in the amount of \$3,200.00 based on deposit toward purchase, lease or rental of  
7 property. A true and correct copy of Claim 65-2 is attached hereto as **Exhibit "12"**.

8 29. On May 14, 2015, Jimmy Huynh filed a claim claiming priority under 11 U.S.C. §  
9 507(a)(7) in the amount of \$1,950.00 based on deposit toward purchase, lease or rental of  
10 property. A true and correct copy of Claim 868-1 is attached hereto as **Exhibit "13"**.

11 30. On May 14, 2015, Victor and Adriana Cardenas filed a claim claiming priority  
12 under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease  
13 or rental of property. A true and correct copy of Claim 869-1 is attached hereto as **Exhibit "14"**.

14 31. On May 14, 2015, Vinca Family Limited Partnership filed a claim claiming  
15 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward  
16 purchase, lease or rental of property. A true and correct copy of Claim 870-1 is attached hereto as  
17 **Exhibit "15"**.

18 32. On May 14, 2015, Six Sigma Management, LLC filed a claim claiming priority  
19 under 11 U.S.C. § 507(a)(7) in the amount of \$1,395.00 based on deposit toward purchase, lease  
20 or rental of property. A true and correct copy of Claim 871-1 is attached hereto as **Exhibit "16"**.

21 33. On May 14, 2015, Allen Wei-Lun Huang and Wei-Tze Chen filed a claim claiming  
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,350.00 based on deposit toward  
23 purchase, lease or rental of property. A true and correct copy of Claim 872-1 is attached hereto as  
24 **Exhibit "17"**.

25 34. On May 14, 2015, Six Sigma, LLC filed a claim claiming priority under 11 U.S.C.  
26 § 507(a)(7) in the amount of \$2,815.00 based on deposit toward purchase, lease or rental of  
27 property. A true and correct copy of Claim 873-1 is attached hereto as **Exhibit "18"**.

28 35. On May 14, 2015, Qian Yan Li filed a claim for \$3,156.00, claiming a secured

1 claim of \$1,906.00 and claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,250.00  
2 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim  
3 874-1 is attached hereto as **Exhibit "19"**.

4 36. On May 14, 2015, Louis Young and Cory Young filed a claim claiming priority  
5 under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease  
6 or rental of property. A true and correct copy of Claim 875-1 is attached hereto as **Exhibit "20"**.

7 37. On May 14, 2015, Jimmy Zhang filed a claim claiming priority under 11 U.S.C. §  
8 507(a)(7) in the amount of \$1,605.00 based on deposit toward purchase, lease or rental of  
9 property. A true and correct copy of Claim 876-1 is attached hereto as **Exhibit "21"**.

10 38. On May 14, 2015, Jimmy Zhang filed a claim claiming priority under 11 U.S.C. §  
11 507(a)(7) in the amount of \$1,975.00 based on deposit toward purchase, lease or rental of  
12 property. A true and correct copy of Claim 877-1 is attached hereto as **Exhibit "22"**.

13 39. On May 14, 2015, Lei Zhang filed a claim claiming priority under 11 U.S.C. §  
14 507(a)(7) in the amount of \$1,950.00 based on deposit toward purchase, lease or rental of  
15 property. A true and correct copy of Claim 878-1 is attached hereto as **Exhibit "23"**.

16 40. On May 14, 2015, Xia Zhong filed a claim claiming priority under 11 U.S.C. §  
17 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of  
18 property. A true and correct copy of Claim 879-1 is attached hereto as **Exhibit "24"**.

19 41. On May 14, 2015, Howard Quach and Mai Tran filed a claim claiming priority  
20 under 11 U.S.C. § 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease  
21 or rental of property. A true and correct copy of Claim 880-1 is attached hereto as **Exhibit "25"**.

22 42. On May 14, 2015, Howard Quach and Mai Tran filed a claim claiming priority  
23 under 11 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease  
24 or rental of property. A true and correct copy of Claim 881-1 is attached hereto as **Exhibit "26"**.

25 43. On May 14, 2015, Evergreen 99, LLC filed a claim claiming priority under 11  
26 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental  
27 of property. A true and correct copy of Claim 882-1 is attached hereto as **Exhibit "27"**.

28 44. On May 14, 2015, Chia Tsung Yu filed a claim claiming priority under 11 U.S.C.

1 § 507(a)(7) in the amount of \$600.00 based on deposit toward purchase, lease or rental of  
2 property. A true and correct copy of Claim 883-1 is attached hereto as **Exhibit "28"**.

3 45. On May 14, 2015, Fortune 77, LLC filed a claim claiming priority under 11 U.S.C.  
4 § 507(a)(7) in the amount of \$2,700.00 based on deposit toward purchase, lease or rental of  
5 property. A true and correct copy of Claim 884-1 is attached hereto as **Exhibit "29"**.

6 46. On May 14, 2015, Yawen Li filed a claim claiming priority under 11 U.S.C. §  
7 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of  
8 property. A true and correct copy of Claim 885-1 is attached hereto as **Exhibit "30"**.

9 47. On May 14, 2015, Yan Rong Tang filed a claim claiming priority under 11 U.S.C.  
10 § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or rental of  
11 property. A true and correct copy of Claim 886-1 is attached hereto as **Exhibit "31"**.

12 48. On May 14, 2015, Binh Lu and Minh Ly filed a claim claiming priority under 11  
13 U.S.C. § 507(a)(7) in the amount of \$2,400.00 based on deposit toward purchase, lease or rental  
14 of property. A true and correct copy of Claim 887-1 is attached hereto as **Exhibit "32"**.

15 49. On May 14, 2015, Binh Lu and Minh Ly filed a claim claiming priority under 11  
16 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental  
17 of property. A true and correct copy of Claim 888-1 is attached hereto as **Exhibit "33"**.

18 50. On May 14, 2015, Binh Lu and Minh Ly filed a claim claiming priority under 11  
19 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental  
20 of property. A true and correct copy of Claim 889-1 is attached hereto as **Exhibit "34"**.

21 51. On May 14, 2015, Binh Lu and Minh Ly filed a claim claiming priority under 11  
22 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental  
23 of property. A true and correct copy of Claim 890-1 is attached hereto as **Exhibit "35"**.

24 52. On May 14, 2015, Binh Lu and Minh Ly filed a claim claiming priority under 11  
25 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental  
26 of property. A true and correct copy of Claim 891-1 is attached hereto as **Exhibit "36"**.

27 53. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under  
28 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or

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1 rental of property. A true and correct copy of Claim 892-1 is attached hereto as **Exhibit “37”**.

2 54. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under  
3 11 U.S.C. § 507(a)(7) in the amount of \$2,200.00 based on deposit toward purchase, lease or  
4 rental of property. A true and correct copy of Claim 893-1 is attached hereto as **Exhibit “38”**.

5 55. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under  
6 11 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or  
7 rental of property. A true and correct copy of Claim 894-1 is attached hereto as **Exhibit “39”**.

8 56. On May 14, 2015, Moshin Hafeez – Plutus Real Estate Investments filed a claim  
9 for \$1588.00 and claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$200.00 based  
10 on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 899-1 is  
11 attached hereto as **Exhibit “40”**.

12 57. On May 14, 2015, Steven Wong and Sonia Chou filed a claim claiming priority  
13 under 11 U.S.C. § 507(a)(7) in the amount of \$2,790.00 based on deposit toward purchase, lease  
14 or rental of property. A true and correct copy of Claim 903-1 is attached hereto as **Exhibit “41”**.

15 58. On May 14, 2015, Hong Cai filed a claim for \$3,719.00 and claiming priority  
16 under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease  
17 or rental of property. A true and correct copy of Claim 905-1 is attached hereto as **Exhibit “42”**.

18 59. On May 14, 2015, Chang Hsiu Kang filed a claim for \$5200.00 and claiming  
19 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward  
20 purchase, lease or rental of property. A true and correct copy of Claim 906-1 is attached hereto as  
21 **Exhibit “43”**.

22 60. On May 14, 2015, Lin and Chen Investment, LLC filed a claim for \$5,236.00 and  
23 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward  
24 purchase, lease or rental of property. A true and correct copy of Claim 908-1 is attached hereto as  
25 **Exhibit “44”**.

26 61. On May 14, 2015, James Lam and Jing Xia Lam filed a claim for \$3,150.00 and  
27 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward  
28 purchase, lease or rental of property. A true and correct copy of Claim 909-1 is attached hereto as

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1 Exhibit "45".

2 62. On May 14, 2015, Chu Hsiao Wen Henry filed a claim claiming priority under 11  
3 U.S.C. § 507(a)(7) in the amount of \$1,307.00 based on deposit toward purchase, lease or rental  
4 of property. A true and correct copy of Claim 915-1 is attached hereto as **Exhibit "46"**.

5 63. On May 14, 2015, Harry Ma filed a claim for \$3,150.00 and claiming priority  
6 under 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease  
7 or rental of property. A true and correct copy of Claim 916-1 is attached hereto as **Exhibit "47"**.

8 64. On February 10, 2020, the Court entered an *Order Granting Ex Parte Motion to*  
9 *Permit the Joinder of Objections to Proofs of Claim Pursuant to Federal Rule of Bankruptcy*  
10 *Procedure 3007(c)* (the "Joinder Order") [ECF No. 306].

11 65. The Joinder Order allows the Trustee to object to multiple proofs of claim in a  
12 single objection when the legal theory underpinning the objection is identical.

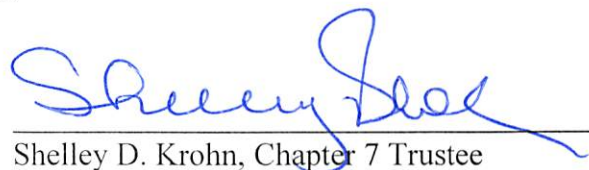
13 66. Each of the above referenced proofs of claim was timely filed.

14 67. Each of the above referenced proofs of claim was filed by a landlord asserting a  
15 priority claim based upon the deposit, before the commencement of the case, by an individual,  
16 of money in connection with the purchase, lease, or rental of property, or the purchase of  
17 services, for the personal, family, or household use of such individual.

18 68. I now seek an order reclassifying the above referenced claims as general unsecured  
19 claims.

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

22 Dated this 13<sup>th</sup> day of August, 2020.

23  
24   
25 \_\_\_\_\_  
26 Shelley D. Krohn, Chapter 7 Trustee

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