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Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@houmandlaw.com
Bradley G. Sims, Esq. (NV Bar No. 11713)
Email: bsims@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

Counsel for Shelley D. Krohn, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

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

**DECLARATION OF SHELLEY D.
KROHN IN SUPPORT OF TRUSTEE'S
NINTH OMNIBUS OBJECTION TO
PROOFS OF CLAIM PURSUANT TO 11
U.S.C. § 502(b)(1) AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 6-1, 7-1, 15-1, 18-1, 32-
1, 34-1, 40-1, 41-1, 49-1, 59-1, 60-1, 72-1, 83-
1, 86-1, 87-1, 97-1, 113-1, 115-1, 118-1, 119-
1, 123-1, 128-1, 163-1, 231-1, 292-1, 293-1,
296-1, 338-1, 527-1, 612-1, 704-1, 813-1,
815-1, 833-1, 834-1, 914-1, 921-1, 924-1, 929-
1, AND 930-1 BASED ON DUPLICATE
CLAIMS FILED BY BOTH A
LANDLORD AND A TENANT 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

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

1 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I
2 could and would testify as to the matters set forth below based upon my personal knowledge.¹

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

4 3. I make this declaration to support the *Trustee's Ninth Omnibus Objection To*
5 *Proofs Of Claim Pursuant To 11 U.S.C. § 502(b)(1) and Federal Rule of Bankruptcy Procedure*
6 *3007—Claim 6-1, 7-1, 15-1, 18-1, 32-1, 34-1, 40-1, 41-1, 49-1, 59-1, 60-1, 72-1, 83-1, 86-1, 87-1,*
7 *97-1, 113-1, 115-1, 118-1, 119-1, 123-1, 128-1, 163-1, 231-1, 292-1, 293-1, 296-1, 338-1, 527-1,*
8 *612-1, 704-1, 813-1, 815-1, 833-1, 834-1, 914-1, 921-1, 924-1, 929-1, and 930-1 Based on*
9 *Duplicate Claims Filed by Both a Landlord and a Tenant for A Security Deposit (the*
10 *“Objection”).*²

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

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

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

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

20 8. On February 27, 2015, the Court entered an *Order Granting Application for Order*
21 *Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No.

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

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

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

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

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

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

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

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

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

17. On February 2, 2015, Sandra A. Hall filed a claim asserting an unsecured claim in the amount of \$1,425.00 based on a security deposit for rental of real property described as 5042 Vista Loma Way, North Las Vegas, NV 89031. The attached lease agreement identifies Sandra A. Hall as the tenant, and Zhuging Ren and Jingyuan Luo as the landlords. On February 17, 2015, Shawn Kreutzman and Rhonda Van Anrtwerp filed a claim which did not specify the secured

1 status of the claim, but did check the box indicating priority was sought for the claim up to
2 \$2,775.00 under 11 U.S.C. § 507(a)(7). The proof of claim lists the basis of the claim as a security
3 deposit for real property described as 5029 Bayberry Crest St., North Las Vegas, NV 89031. An
4 attached lease agreement lists Zhu Qing Ren and Jing Yuan Luo as landlords and Shawn Michael
5 Kreutzman and Rhonda S. Vanantwerp as tenants. On May 8, 2015, Zhuqing Ren and Jingyuan
6 Luo filed a claim in the amount of \$3,890.00 arising out of two security deposits for rental of real
7 property described as 5029 Bayberry Crest St., North Las Vegas, NV 89031 and 5042 Vista Loma
8 Way, North Las Vegas, NV 89031. The attached lease agreements identify Zhuging Ren and Jing
9 Yuan Luo as the landlords and Sandra A. Hall, Rhonda S. Vanantwerp, and Shawn Michael
10 Kreutzman and as the Tenants. True and correct copies of Claims 6-1, 32-1, and 401-1 are
11 attached to the Trustee Declaration as **Exhibit "1"**, **Exhibit "2"**, and **Exhibit "3"**, respectively.

12 18. On February 2, 2015, Chad and Debbie King filed a claim claiming priority under
13 11 U.S.C. § 507(a)(7) in the amount of \$3,818.00 based on deposit toward purchase, lease or
14 rental of real property described as 6840 Pacific Echo Court. On March 17, 2015, Annette Jian
15 Zheng filed a separate claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of
16 \$1,900.00 based on deposit toward purchase, lease or rental of real property described as 6840
17 Pacific Echo Court. On March 17, 2015. An attached lease agreement identifies the tenants as
18 Chad and Debbie King, and the landlord as Annette Jian Zheng. True and correct copies of
19 Claims 7-1 and 90-1 are attached to the Trustee Declaration as **Exhibit "4"** and **Exhibit "5"**,
20 respectively.

21 19. On February 6, 2015, Dusty and Stacy Cloud filed a claim asserting an unsecured
22 claim in the amount of \$1,750.00 based on a security deposit for rental of real property described
23 as 6886 Treble Clef Ave., Las Vegas, NV 89139. On May 11, 2015, Jie Zhu filed a a separate
24 claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit
25 toward purchase, lease or rental of real property described as 6886 Treble Clef Ave., Las Vegas,
26 NV 89139. An attached lease agreement identifies Jie Zhu as the landlord and Dusty Ray Cloud
27 and Stacy Cloud as the tenants. True and correct copies of Claims 15-1 and 545-1 are attached to
28 the Trustee Declaration as **Exhibit "6"** and **Exhibit "7"**, respectively.

1 20. On February 9, 2015, Leonard Taylor and Anna Shipp filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,970.00 based on deposit toward
3 purchase, lease or rental of real property described as 9469 Forbes Field Ct., Las Vegas, NV
4 89148. On May 13, 2015, Huang Guang Nie filed a separate claim claiming priority under 11
5 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental
6 of real property described as 9469 Forbes Field Ct., Las Vegas, NV 89148. An attached lease
7 agreement identifies the tenants as Leonard Taylor and Anna Shipp, and the landlord as Nie
8 Huang Guang. True and correct copies of Claims 18-1 and 785-1 are attached to the Trustee
9 Declaration as **Exhibit “8”** and **Exhibit “9”**, respectively.

10 21. On February 18, 2015, Lawrence R. Phillips filed a claim claiming priority under
11 11 U.S.C. § 507(a)(7) in the amount of \$1,795.00 based on deposit toward purchase, lease or
12 rental of real property described as 8005 Reale Cir., Las Vegas, NV 89145. An attached lease
13 agreement lists Jing Chou Li and Lucy Xi Luo as landlords and Lawrence R. Phillips as tenant.
14 On May 8, 2015, Jing Chou Li and Lucy Xi Luo filed a separate claim in the amount of
15 \$39,645.67 based on several security deposits toward lease or rental of real property. Included in
16 the attached lease agreements is an agreement for real property described 8005 Reale Cir., Las
17 Vegas, NV 89145 and lists Jing Chou Li and Lucy Xi Luo as landlords and Lawrence Phillips as
18 tenant. True and correct copies of Claims 34-1 and 466-1 are attached to the Trustee Declaration
19 as **Exhibit “10”** and **Exhibit “11”**, respectively.

20 22. On February 25, 2015, Natasha Martell filed a claim claiming priority under 11
21 U.S.C. § 507(a)(7) in the amount of \$1,845.00 based on deposit toward purchase, lease or rental
22 of real property described as 5393 Bristol Bend Ct., Las Vegas, NV 89135. An attached lease
23 agreement lists Ya Qing Zhang as landlord and Chad David Martell and Natasha Martell as
24 tenants. On March 11, 2015, Natasha Martell filed a second claim claiming priority under 11
25 U.S.C. § 507(a)(7) in the amount of \$1,845.00 based on deposit toward purchase, lease or rental
26 of real property described as 5393 Bristol Bend Ct., Las Vegas, NV 89135. An attached lease
27 agreement again lists Ya Qing Zhang as landlord and Chad David Martell and Natasha Martell as
28 tenants. On May 12, 2015, Ya Qing Zhang filed a separate claim claiming priority under 11

1 U.S.C. § 507(a)(7) in the amount of \$1,770.00 based on deposit toward purchase, lease or rental
 2 of real property described as 5393 Bristol Bend Ct., Las Vegas, NV 89135. An attached lease
 3 agreement lists Ya Qing Zhang as landlord and Chad David Martell and Natasha Martell as
 4 tenants. True and correct copies of Claims 40-1, 83-1, and 736-1 are attached to the Trustee
 5 Declaration as **Exhibit "12"**, **Exhibit "13"** and **Exhibit "14"**, respectively.

6 23. On February 26, 2015, Patrick Ganci filed a claim claiming priority under 11
 7 U.S.C. § 507(a)(7) in the amount of \$3,070.00 based on deposit toward purchase, lease or rental
 8 of real property described as 10407 Timber Star Ln., Las Vegas, NV 89135. An attached lease
 9 agreement lists Asrock Pro, LLC as landlord and Patrick Ryan Ganci and Kelly Nicole Kline as
 10 tenants. On May 8, 2015, Asrock Pro, LLC filed a separate claim in the amount of \$36,735.00
 11 based on several security deposits toward lease or rental of real property. Included in the attached
 12 lease agreements was an agreement for real property described as 10407 Timber Star Ln., Las
 13 Vegas, NV 89135 and lists Asrock Pro, LLC as landlord and Patrick Ryan Ganci and Kelly
 14 Nicole Kline as tenants. True and correct copies of Claims 41-1 and 349-1 are attached to the
 15 Trustee Declaration as **Exhibit "15"** and **Exhibit "16"**, respectively.

16 24. On March 6, 2015, Marsalis Brown and Susie Haduca filed a claim asserting a
 17 secured claim in the amount of \$5,355, and claiming priority under 11 U.S.C. § 507(a)(7) in the
 18 amount of \$5,355.00 based on deposit toward purchase, lease or rental of real property described
 19 as 10952 Prairie Grove Rd., Las Vegas NV 89179. The attached lease agreement identified
 20 Marsalis Brown and Susie Haduca as the tenants, and Xiangyu, LLC as the landlord. On May 1,
 21 2015, Xiangyu, LLC filed a separate claim claiming priority under 11 U.S.C. § 507(a)(7) in the
 22 amount of \$1,745.00 based on deposit toward purchase, lease or rental of real property described
 23 as 10952 Prairie Grove Rd., Las Vegas NV 89179. True and correct copies of Claims 72-1 and
 24 252-1 are attached to the Trustee Declaration as **Exhibit "17"** and **Exhibit "18"**, respectively.

25 25. On March 13, 2015, Janet Lawrence filed a claim claiming priority under 11
 26 U.S.C. § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease or rental
 27 of real property described as 5914 Creekside Sands Lane, North Las Vegas, NV, 89011. The
 28 attached lease agreement identified Janet Lawrence as tenant, and Wu Wang as the landlord. On

1 April 29, 2015, Wu Wang filed a separate claim claiming priority under 11 U.S.C. § 507(a)(7) in
2 the amount of \$16,989.50 based on deposit toward purchase, lease or rental of various real
3 properties, including real property described as 5914 Creekside Sands Lane, North Las Vegas,
4 NV, 89011. True and correct copies of Claims 87-1 and 233-1 are attached to the Trustee
5 Declaration as **Exhibit "19"** and **Exhibit "20"**, respectively.

6 26. On March 13, 2015, Edward Davis filed a claim claiming priority under 11 U.S.C.
7 § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of real
8 property described as 62 E. Serene Ave #128., Las Vegas, NV 89123. On May 8, 2015, Tuli
9 Gurvidner filed a separate claim in the amount of \$5,280.00 based on several security deposits
10 toward lease or rental of real property. Included in the attached lease agreements was an
11 agreement for real property described as 62 E. Serene Ave #128., Las Vegas, NV 89123 and lists
12 Gurvinder Tuli as landlord and Eduard Davis as tenant. True and correct copies of Claims 86-1
13 and 463-1 are attached to the Trustee Declaration as **Exhibit "21"** and **Exhibit "22"**,
14 respectively.

15 27. On March 20, 2015, Ludovico L and Hazel S. David filed a claim claiming priority
16 under 11 U.S.C. § 507(a)(7) in the amount of \$4,148.00 based on deposit toward purchase, lease
17 or rental of real property described as 8067 Mesquite Ranch St. Las Vegas, NV 89113. On May 8,
18 2015, Thomas Ting Kwan and Anna L. Kwang filed a separate claim in the amount of \$1,825.00
19 based on a security deposit for rental of real property described as 8067 Mesquite Ranch St. Las
20 Vegas, NV 89113. An attached lease agreement identifies the tenants as Ludovico L David and
21 Hazel S. David, and the landlord as Kwan Family Trust, Thomas Ting and Anna L. Kwan TRS.
22 True and correct copies of Claims 97-1 and 392-1 are attached to the Trustee Declaration as
23 **Exhibit "23"** and **Exhibit "24"**, respectively.

24 28. On March 26, 2015, Kathy Marie Kubik filed a claim claiming priority under 11
25 U.S.C. § 507(a)(7) in the amount of \$3,070.00 based on deposit toward purchase, lease or rental
26 of real property described as 7654 Pioneer Ranch Ave., Las Vegas, NV 89113. An attached lease
27 agreement lists Jin Zhu Huang Mar and Chun Kit Mar as landlord and Kathy Marie Kubik as
28 tenant. On May 11, 2015, Jin Zhu Huang Mar and Chun Kit Mar filed a separate claim in the

1 amount of \$3,275.00 based on a security deposit for rental of real property described as 7654
2 Pioneer Ranch Ave., Las Vegas, NV 89113. An attached lease agreement identifies Jin Zhu
3 Huang Mar and Chun Kit Mar as landlord and Kathy Marie Kubik as tenant. True and correct
4 copies of Claims 113-1 and 585-1 are attached to the Trustee Declaration as **Exhibit "25"** and
5 **Exhibit "26"**, respectively.

6 29. On March 27, 2015, Andrea Coleman filed a claim claiming priority under 11
7 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward purchase, lease or rental
8 of real property described as 4425 Whistling Duck, Las Vegas, NV 89115. An attached lease
9 agreement lists Chuck D. Chiou and Yu S. Chiou as landlord and Andrea Coleman as tenant. On
10 May 11, 2015, Chuck D. Chiou and Yu S. Chiou filed a separate claim in the amount of
11 \$3,075.00 based on a security deposit for rental of real property described as 4425 Whistling
12 Duck, Las Vegas, NV 89115. An attached lease agreement lists Chuck D. Chiou and Yu S. Chiou
13 as landlord and Andrea Coleman as tenant. True and correct copies of Claims 115-1 and 599-1 are
14 attached to the Trustee Declaration as **Exhibit "27"** and **Exhibit "28"**, respectively.

15 30. On March 30, 2015, Reynold & Racquel Ines filed a claim claiming priority under
16 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or
17 rental of real property described as 189 Belmont Canyon Place, Las Vegas, NV 89015. An
18 attached lease agreement lists Yafei Zhu and Gary Hawkins as landlord and Reynold & Racquel
19 Ines as tenants. On March 30, 2015, Reynold & Racquel Ines filed a second claim claiming
20 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward
21 purchase, lease or rental of real property described as 189 Belmont Canyon Place, Las Vegas, NV
22 89015. An attached lease agreement again lists Yafei Zhu and Gary Hawkins as landlord and
23 Reynold & Racquel Ines as tenants. On March 30, 2015, Gary Hawkins filed a claim asserting in
24 the amount of \$1,450.00 based on a security deposit for real property described as 189 Belmont
25 Canyon Place, Las Vegas, NV 89015. An attached lease agreement lists Yafei Zhu and Gary
26 Hawkins as landlord and Reynold & Racquel Ines as tenants. True and correct copies of Claims
27 118-1, 119-1, and 120-1 are attached to the Trustee Declaration as **Exhibit "29"**, **Exhibit "30"**,
28 and **Exhibit "31"**, respectively.

1 31. On March 31, 2015, Christopher and Kristin Ownby filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$1,575.00 based on deposit toward purchase, lease
3 or rental of real property described as 10573 Penns Creek Ct., Las Vegas, NV 89135. An attached
4 lease agreement lists Shui Yu and Bo Tang as landlord and Christopher Stephen Ownby and
5 Kristen David Ownby as tenants. On April 20, 2015, Bo Tang filed a separate claim claiming
6 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,575.00 based on deposit toward
7 purchase, lease or rental of real property described as 10573 Penns Creek Ct., Las Vegas, NV
8 89135. An attached lease agreement lists Shui Yu and Bo Tang as landlord and Christopher
9 Stephen Ownby and Kristen David Ownby as tenants. True and correct copies of Claims 123-1
10 and 194-1 are attached to the Trustee Declaration as **Exhibit “32”** and **Exhibit “33”**,
11 respectively.

12 32. On April 2, 2015, Elizabeth Horn filed a claim claiming priority under 11 U.S.C. §
13 507(a)(7) in the amount of \$1,625.00 based on deposit toward purchase, lease or rental of real
14 property described as 9630 Bighorn Ranch Ave., Las Vegas, NV 89148. An attached lease
15 agreement lists Dongbin Zhang and Ziao Jun Wang as landlord and Elizabeth Horn as tenant. On
16 April 13, 2015, Dongbin Zhang filed an amended claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,675.00 based on deposit toward purchase, lease or rental of real
18 property described as 9630 Bighorn Ranch Ave., Las Vegas, NV 89148. An attached lease
19 agreement lists Dongbin Zhang and Ziao Jun Wang as landlord and Elizabeth Horn as tenant.
20 True and correct copies of Claims 49-1 and 129-2 are attached to the Trustee Declaration as
21 **Exhibit “34”** and **Exhibit “35”**, respectively.

22 33. On April 6, 2015, Willie Winters, Jr. filed a claim claiming priority under 11
23 U.S.C. § 507(a)(7) in the amount of \$2,600.00 based on deposit toward purchase, lease or rental
24 of real property described as 800 Trumpington Ct. On May 8, 2015, Julian Ho Ting Lam filed a
25 separate claim in the amount of \$1,425.00 based on a security deposit for rental of real property
26 described as 800 Trumpington Ct., Las Vegas, NV 89178. An attached lease agreement identifies
27 the tenants as Willie R. Winters, Jr. and Rose S. Nabers, and the landlord as Julian Ho Ting Lam.
28 True and correct copies of Claims 128-1 and 391-1 are attached to the Trustee Declaration as

1 **Exhibit “36”** and **Exhibit “37”**, respectively.

2 34. On April 14, 2015, Nancy Karn filed a claim claiming priority under 11 U.S.C. §
3 507(a)(7) in the amount of \$1,230.00 based on deposit toward purchase, lease or rental of real
4 property described as 7641 Tortolla Bay, Las Vegas, NV 89128. On May 14, 2015, Hsiu Chu
5 Chen filed a separate claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of
6 \$1,500.0 based on deposit toward purchase, lease or rental of real property described as 7641
7 Tortolla Bay, Las Vegas, NV 89128. An attached lease agreement lists Hsiu Chu Chen as
8 landlord and Nancy Karn as tenant. True and correct copies of Claims 163-1 and 817-1 are
9 attached to the Trustee Declaration as **Exhibit “38”** and **Exhibit “39”**, respectively.

10 35. On April 28, 2015, Karen Elizabeth Johnson filed a claim claiming priority under
11 11 U.S.C. § 507(a)(7) in the amount of \$1,825.00 based on deposit toward purchase, lease or
12 rental of real property described as 7632 Hope Valley St., Las Vegas NV 89139. The attached
13 lease agreement identifies Jeffrey Craig Johnson and Karen Elizabeth Johnson as the tenants, and
14 Lifang Tang as the landlord. On May 8, 2015, Lifang Tang filed a separate claim, claiming an
15 unsecured claim of \$1,825.00. The attached documents indicate the basis of the claim is a security
16 deposit based on a rental agreement for real property described as 7632 Hope Valley St., Las
17 Vegas NV 89139. True and correct copies of Claims 231-1 and 376-1 are attached to the Trustee
18 Declaration as **Exhibit “40”** and **Exhibit “41”**, respectively.

19 36. On May 4, 2015, James A. and Linda L. Morrone filed a claim claiming priority
20 under 11 U.S.C. § 507(a)(7) in the amount of \$2,045.00 based on deposit toward purchase, lease
21 or rental of real property described as 233 Rusty Plank Ave., Las Vegas, NV 89148. An attached
22 lease agreement identifies the tenants as James A. Morrone and Linda L. Morrone as tenants and
23 the landlord as Bei Quan. On April 17, 2015, Bei Quan filed a separate claim asserting a secured
24 claim in the amount of \$4,794.00, and a priority claim under 11 U.S.C. § 507(a)(7) in the amount
25 of \$4,794.00 based on deposit toward purchase, lease or rental of real property described as 233
26 Rusty Plank Ave., Las Vegas, NV 89148.⁴ An attached lease agreement identifies the tenants as
27

28 ⁴ Trustee will be filing a separate objection to the secured claim asserted in Proof of Claim 172-1.

1 James A. Morrone and Linda L. Morrone as tenants and the landlord as Bei Quan. True and
2 correct copies of Claims 292-1 and 172-1 are attached to the Trustee Declaration as **Exhibit "42"**
3 and **Exhibit "43"**, respectively.

4 37. On May 5, 2015, Jeffrey Mathews filed a claim in the amount of \$1,625.00 based
5 on a security deposit for rental of real property described as 8901 Sierra Linda Dr. Las Vegas, NV
6 89147. On May 8, 2015, Mei Fei Cen filed a separate claim in the amount of in the amount of
7 \$1,625.00 based on a security deposit for rental of real property described as 8901 Sierra Linda
8 Dr. Las Vegas, NV 89147. An attached lease agreement lists Chek K. Miu and Mei F. Cen as
9 landlords and Jeffrey W. Mathews and Christopher Williams Keit as tenants. True and correct
10 copies of Claims 293-1 and 394-1 are attached to the Trustee Declaration as **Exhibit "44"** and
11 **Exhibit "45"**, respectively.

12 38. On May 5, 2015, Craig Ronald Regnaert filed a claim claiming priority under 11
13 U.S.C. § 507(a)(7) in the amount of \$2,250.00 based on deposit toward purchase, lease or rental
14 of real property described as 3224 Cheltenham., Las Vegas, NV 89129. An attached lease
15 agreement lists Richard M. Chaskin and Grace Feng as landlord and Craig Regnaert as tenant. On
16 April 29, 2015, Richard M. Chaskin filed a separate claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$2,250.00 based on deposit toward purchase, lease or rental of real
18 property described as 3224 Cheltenham., Las Vegas, NV 89129. An attached lease agreement lists
19 Richard M. Chaskin and Grace Feng as landlord and Craig Regnaert as tenant. True and correct
20 copies of Claims 296-1 and 240-1 are attached to the Trustee Declaration as **Exhibit "46"** and
21 **Exhibit "47"**, respectively.

22 39. On May 7, 2015, Nhi Dang filed a separate claim claiming priority under 11
23 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease or rental
24 of real property described as 8000 W. Badura Ave. Unit 1146, Las Vegas NV 89113. On
25 February 2, 2015, Mimi Wei Lin filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in
26 the amount of \$1,950.00 based on deposit toward purchase, lease or rental of real property
27 described as 8000 W. Badura Ave. Unit 1146, Las Vegas NV 89113. The attached lease
28 agreement identifies Nhi Dang as the tenant. True and correct copies of Claims 338-1 and 9-1 are

1 attached to the Trustee Declaration as **Exhibit “48”** and **Exhibit “49”**, respectively.

2 40. On May 11, 2015, April and Kenneth Bell filed a secured claim in the amount of
3 \$1,925.00 based on a security deposit for rental of real property described as 9539 Colorado Blue
4 St., Las Vegas, NV 89123. An attached lease agreement lists Yu Chan Bi and Jin Hui Xu as
5 landlord and Kenneth and April Bell as tenants. On May 8, 2015, Yu Chan Bi filed a separate
6 claim in the amount of \$1,925.00 based on a security deposit for rental of real property described
7 as 9539 Colorado Blue St., Las Vegas, NV 89123. An attached lease agreement lists Yu Chan Bi
8 and Jin Hui Xu as landlord and Kenneth and April Bell as tenants. True and correct copies of
9 Claims 60-1 and 446-1 are attached to the Trustee Declaration as **Exhibit “50”** and **Exhibit “51”**,
10 respectively.

11 41. On May 11, 2015, Barbara Maeker filed a claim claiming priority under 11 U.S.C.
12 § 507(a)(7) in the amount of \$2,057.00 based on deposit toward purchase, lease or rental of real
13 property described as 5830 Wispy Wind St., Las Vegas, NV 89148. An attached lease agreement
14 lists Alexandra Assets as landlord and Barbara Maeker and Sonya D. Padgett as tenants. On May
15 6, 2015, Alexandra Assets, LLC filed a separate claim claiming priority under 11 U.S.C. §
16 507(a)(7) in the amount of \$2,025.00 based on deposit toward purchase, lease or rental of real
17 property described as 5830 Wispy Wind St., Las Vegas, NV 89148. An attached lease agreement
18 identifies Alexandra Assets as landlord and Barbara Maeker and Sonya D. Padgett as tenants.
19 True and correct copies of Claims 527-1 and 307-1 are attached to the Trustee Declaration as
20 **Exhibit “52”** and **Exhibit “53”**, respectively.

21 42. On May 11, 2015, Joseph Macias filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,525.00 based on deposit toward purchase, lease or rental of real
23 property described as 3778 Narrow Leaf Way., Las Vegas NV 89147. The attached lease
24 agreement identifies Joseph Macias as the tenant, and Dekang Deng as the landlord. On May 12,
25 2015, Dekang Deng filed a separate claim, claiming an unsecured claim of \$1,525.00. The
26 attached documents indicate the basis of the claim is a security deposit based on a rental
27 agreement for real property described as 3778 Narrow Leaf Way., Las Vegas NV 89147, which
28 lists Joseph Macias as tenant and Dekang Deng as the landlord. True and correct copies of

1 Claims 612-1 and 694-1 are attached to the Trustee Declaration as **Exhibit “54”** and **Exhibit**
2 **“55”**, respectively.

3 43. On May 11, 2015, Robert B. McCullough and Joan C. McCullough filed a claim
4 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,445.00 based on deposit toward
5 purchase, lease or rental of real property described as 8740 Cremona Dr., Las Vegas, NV 89117.
6 An attached lease agreement lists Jing Chou Li and Lucy Xi Luo as landlord and Robert
7 McCullough and Joan McCullough as tenants. On May 8, 2015, Jing Chou Li and Lucy Xi Luo
8 filed a separate claim in the amount of \$39,645.67 based on several security deposits toward lease
9 or rental of real property. Included in the attached lease agreements is an agreement for real
10 property described as 8740 Cremona Dr., Las Vegas, NV 89117 and which lists Jing Chou Li and
11 Lucy Xi Luo as landlord and Robert McCullough and Joan McCullough as tenants. True and
12 correct copies of Claims 59-1 and 466-1 are attached to the Trustee Declaration as **Exhibit “56”**
13 and **Exhibit “57”**, respectively.

14 44. On May 12, 2015, Susie M. Harrison Curry filed a claim claiming priority under
15 11 U.S.C. § 507(a)(7) in the amount of \$1,795.00 based on deposit toward purchase, lease or
16 rental of real property described as 10116 Desert Wind Dr., Las Vegas NV 89144. The attached
17 lease agreement identifies Susie M. Harrison Curry and Darrell Bernard Curry as the tenants, and
18 Dengrong Yang as the landlord. On May 12, 2015, Dengrong Yang filed a separate claim,
19 claiming an unsecured claim of \$1,795.00. The attached documents indicate the basis of the claim
20 is a security deposit based on a rental agreement for real property described as 10116 Desert
21 Wind Dr., Las Vegas NV 89144, which lists Susie M. Harrison Curry and Darrell Bernard Curry
22 as tenant and Dengrong Yang as the landlord. True and correct copies of Claims 666-1 and 704-1
23 are attached to the Trustee Declaration as **Exhibit “58”** and **Exhibit “59”**, respectively.

24 45. On May 14, 2015, Clint Ramos filed a claim claiming priority under 11 U.S.C. §
25 507(a)(7) in the amount of \$2,520.00 based on deposit toward purchase, lease or rental of real
26 property described as 5746 Empress Garden Ct., Las Vegas, NV 89148. An attached lease
27 agreement lists Zhenze Lin as landlord and Clint B. Ramos and Ashlie Amanda Ramos as tenants.
28 On May 8 2015, Zhenze Lin filed a a separate claim in the amount of \$2,520.00 based on a

1 security deposit for rental of real property described as 5746 Empress Garden Ct., Las Vegas, NV
2 89148. An attached lease agreement lists Zhenze Lin as landlord and Clint B. Ramos and Ashlie
3 Amanda Ramos as tenants. True and correct copies of Claims 813-1 and 440-1 are attached to the
4 Trustee Declaration as **Exhibit "60"** and **Exhibit "61"**, respectively.

5 46. On May 14, 2015, Patricia McGraw filed a claim in the amount of \$2,400.00 based
6 on a security deposit for rental of real property described as 6328 Miraloma Ct., Las Vegas, NV
7 89108. An attached lease agreement lists Sun Xi as landlord and Patricia McGraw and Jeffrey S.
8 Sprague as tenants. On May 11, 2015, Hua Jun, LLC filed a separate claim in the amount of
9 \$7,340.00 based on several security deposits toward lease or rental of real property. Included in
10 the attached lease agreements was an agreement for real property described 6328 Miraloma Ct.,
11 Las Vegas, NV 89108 and lists Sun Xi as landlord and Patricia McGraw and Jeffrey S. Sprague as
12 tenants. True and correct copies of Claims 815-1 and 579-1 are attached to the Trustee
13 Declaration as **Exhibit "62"** and **Exhibit "63"**, respectively.

14 47. May 14, 2015, Phylus Swayne filed a claim in the amount of \$2,300.00 based on a
15 security deposit for rental of real property described as 9882 Ashton Pines Ct. On February 10,
16 2015, Liyue Yang filed a separate claim in the amount of \$5,297.00 based on several security
17 deposits toward lease or rental of real property. Included in the attached lease agreements is an
18 agreement for real property described 8005 Reale Cir., Las Vegas, NV 89145 and lists Liyue
19 Yang as landlord and Phylus Frazier Swayne and Phylus Inez Swayne as tenants. True and correct
20 copies of Claims 834-1 and 27-1 are attached to the Trustee Declaration as **Exhibit "64"** and
21 **Exhibit "65"**, respectively.

22 48. On May 14, 2015, Carla Zvosec filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$1,295.00 based on deposit toward purchase, lease or rental of real
24 property described as 1628 Remembrance Hill St., Las Vegas, NV 89144. An attached lease
25 agreement lists Qingmeng Liu and Huaying Tong as landlord and Carla Zvosec as tenant. On
26 May 8, 2015, Qingmeng Liu and Huaying Tong filed a a separate claim in the amount of in the
27 amount of \$2,520.00 based on a security deposit for rental of real property described as 1628
28 Remembrance Hill St., Las Vegas, NV 89144. An attached lease agreement lists Qingmeng Liu

1 and Huaying Tong as landlord and Carla Zvosec as tenant. True and correct copies of Claims 816-
2 1 and 377-1 are attached to the Trustee Declaration as **Exhibit "66"** and **Exhibit "67"**,
3 respectively.

4 49. May 14, 2015, Luwona Gonzales and Michael Damm filed a claim in the amount
5 of \$1,825.00 based on a security deposit for rental of real property described as 4560 Flaming
6 Ridge, Las Vegas, NV 89147. An attached lease agreement lists Jun-Fang Zhou as landlord and
7 Luwona R. Gonzales and Michael Anthony SR Damm as tenants. On May 11, 2015, Jun-Fang
8 Zhou filed a separate claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of
9 \$1,825.00 based on deposit toward purchase, lease or rental of real property described as 4560
10 Flaming Ridge, Las Vegas, NV 89147. An attached lease agreement lists Jun-Fang Zhou as
11 landlord and Luwona R. Gonzales and Michael Anthony SR Damm as tenants. True and correct
12 copies of Claims 833-1 and 581-1 are attached to the Trustee Declaration as **Exhibit "68"** and
13 **Exhibit "69"**, respectively.

14 50. On May 14, 2015, Stephanie Shamo filed a claim claiming priority under 11
15 U.S.C. § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental
16 of real property described as 11477 Parkersburg Ave., Las Vegas, NV 89138. An attached lease
17 agreement lists Fanny Li as landlord and Stephanie Shamo as tenant. On May 12, 2015, Fanny Li
18 filed a separate claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,050.00
19 based on deposit toward purchase, lease or rental of real property described as 11477 Parkersburg
20 Ave., Las Vegas, NV 89138. 11477 Parkersburg Ave., Las Vegas, NV 89138. True and correct
21 copies of Claims 914-1 and 717-1 are attached to the Trustee Declaration as **Exhibit "70"** and
22 **Exhibit "71"**, respectively.

23 51. On May 14, 2015, Christopher Rodacker filed a claim claiming priority under 11
24 U.S.C. § 507(a)(7) in the amount of \$1,540.83 based on deposit toward purchase, lease or rental
25 of real property described as 4461 French Landing Rd. North Las Vegas, NV 89031. An attached
26 lease agreement lists Yong Chen and Patty Zheng as landlords and Christopher Edward Rodacker
27 and Brady Ray Warren as tenants. On May 8, 2015, Yong Chen and Patty Zheng filed a separate
28 claim in the amount of in the amount of \$1,850.00 based on a security deposit for rental of real

1 property described as 4461 French Landing Rd. North Las Vegas, NV 89031. An attached lease
2 agreement lists Yong Chen and Patty Zheng as landlords and Christopher Edward Rodacker and
3 Brady Ray Warren as tenants. True and correct copies of Claims 921-1 and 387-1 are attached to
4 the Trustee Declaration as **Exhibit "72"** and **Exhibit "73"**, respectively.

5 52. On May 20, 2015, Deborah Campo filed a claim in the amount of \$3,375.00 based
6 on a security deposit for rental of real property described as 11768 Del Sur, Las Vegas, NV
7 89138. On May 8, 2015, Ji Song Cui & Gaochao Zhou filed a separate claim in the amount of in
8 the amount of \$5,246.00 based on a security deposit for rental of real property described as 11768
9 Del Sur, Las Vegas, NV 89138. An attached lease agreement lists Ji Song Cui & Gaochao Zhou
10 as landlords and Deborah Campo and Mildred DeCarlo as tenants. True and correct copies of
11 Claims 924-1 and 420-1 are attached to the Trustee Declaration as **Exhibit "74"** and **Exhibit**
12 **"75"**, respectively.

13 53. On October 23, 2015, Herman Harper filed a claim claiming priority under an
14 unspecified section of 11 U.S.C. § 507(a) in the amount of \$2,200.00 based on deposit toward
15 purchase, lease or rental of real property described as 2116 Mountain Rock Ct., North Las Vegas,
16 NV 89031. On May 8, 2015, Sherry Yu Wen and Young Wen filed a separate claim in the amount
17 of \$8,770.00 based on several security deposits toward lease or rental of real property. Included in
18 the attached lease agreements was an agreement for real property described as 2116 Mountain
19 Rock Court, N. Las Vegas, NV 89031 and lists Sherry Yu Wen and Young Wen as landlord and
20 Herman Harper and Deborah Ann Stuart as tenants. True and correct copies of Claims 929-1 and
21 464-1 are attached to the Trustee Declaration as **Exhibit "76"** and **Exhibit "77"**, respectively.

22 54. On November 12, 2015, Allen Blankenship filed a claim claiming priority under
23 11 U.S.C. § 507(a)(7) in the amount of \$1,150.00 based on deposit toward purchase, lease or
24 rental of real property described as 3421 Barada Heights Ave., North Las Vegas, NV 89081. An
25 attached lease agreement lists William See as landlord and Allen Blankenship as tenant. On May
26 11, 2015, William See filed a separate claim in the amount of \$7,768.00 based on several security
27 deposits toward lease or rental of real property. Included in the attached lease agreements was an
28 agreement for real property described 3421 Barada Heights Ave., North Las Vegas, NV 89081

1 and lists William See as landlord and Allen Blankenship as tenant. True and correct copies of
2 Claims 930-1 and 607-1 are attached to the Trustee Declaration as **Exhibit “78”** and **Exhibit**
3 **“79”**, respectively.

4 55. On February 10, 2020, the Court entered an *Order Granting Ex Parte Motion to*
5 *Permit the Joinder of Objections to Proofs of Claim Pursuant to Federal Rule of Bankruptcy*
6 *Procedure 3007(c)* (the “Joinder Order”) [ECF No. 306].

7 56. The Joinder Order allows the Trustee to object to multiple proofs of claim in a
8 single objection when the legal theory underpinning the objection is identical.

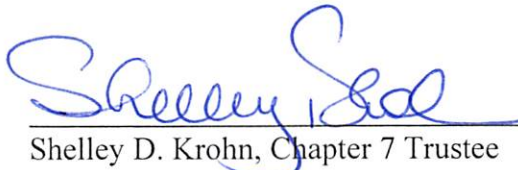
9 57. The above referenced proofs of claim were filed either by a tenant (the “tenant
10 claims”) or a landlord (“landlord claims,”) asserting a claim based on a security deposit for lease
11 or rental of real property.

12 58. I now seek an order disallowing the tenant claims as duplicates of the landlord
13 claims.

14 59. I request that the order disallowing the tenant claims be without prejudice to
15 whatever rights the tenants may assert against their respective landlords under state law.

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

18 Dated this 14th day of August, 2020.

19
20 
21 Shelley D. Krohn, Chapter 7 Trustee