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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-LED  
Chapter 7

**DECLARATION OF SHELLEY D. KROHN IN SUPPORT OF THIRD AND FINAL APPLICATION OF PAUL M. HEALEY & SONS CPAS, LTD. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED DURING THE PERIOD FROM FEBRUARY 13, 2015 THROUGH DECEMBER 31, 2020 AND FOR REIMBURSEMENT OF EXPENSES PURSUANT TO 11 U.S.C. §§ 330 AND 331 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2016**

Date of Hearing: November 17, 2020  
Time of Hearing: 9:30 a.m.  
Place: To Be Determined  
Foley Federal Building  
300 Las Vegas Blvd., S.  
Las Vegas, NV 89101

Judge: Honorable Gary Spraker

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

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

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

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1           3.       I make this declaration to support the *Third and Final Application of Paul M.*  
2 *Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered During the*  
3 *Period From February 13, 2015 Through December 31, 2020 and For Reimbursement of*  
4 *Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016*  
5 *(the “Fee Application”).*<sup>1</sup>

6           4.       On January 9, 2015 (the “Petition Date”), Ameri-Dream Realty, LLC (the  
7 “Debtor”) filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code [ECF  
8 No. 1]<sup>2</sup>.

9           5.       On January 9, 2015, Victoria L. Nelson (“Trustee Nelson”) was appointed as the  
10 Chapter 7 Trustee in the Debtor’s bankruptcy case.

11           6.       Following her appointment as Chapter 7 Trustee in the Debtor’s bankruptcy case,  
12 Trustee Nelson determined that she would require the assistance of an accountant to prepare tax  
13 returns on behalf of the Debtor’s bankruptcy estate and otherwise assist her in fulfilling statutory  
14 obligations under Section 704.

15           7.       On February 10, 2015, Trustee Nelson filed an *Ex Parte Application for Order*  
16 *Authorizing Employment of Accountant* [ECF No. 91].

17           8.       On February 13, 2015, the Court entered an *Order Granting Ex Parte Application*  
18 *for Order Authorizing Employment of Accountant* [ECF No. 99].

19           9.       On March 30, 2017, the Court entered an order granting the *First Interim*  
20 *Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services*  
21 *Rendered During the Period From February 13, 2015 Through February 20, 2017 and For*  
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  
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 <sup>2</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.

1 *Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*  
2 *Bankruptcy Procedure 2016*, approving fees in the amount of \$1,025.00 and costs in the amount  
3 of \$605.09. [ECF No. 235].

4 10. On January 13, 2018, Trustee Nelson passed away.

5 11. On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in this  
6 case.

7 12. On May 26, 2020, the Court entered an order granting the *Second Interim*  
8 *Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services*  
9 *Rendered During the Period From February 21, 2017 Through February 20, 2019 and For*  
10 *Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*  
11 *Bankruptcy Procedure 2016*, approving fees in the amount of \$3,000.00 and costs in the amount  
12 of \$0.00. [ECF No. 319].

13 13. Pursuant to Guideline 2.2.2 of the Region 17 United States Trustee Guidelines, I  
14 have been provided a copy of the billing entries and itemization of expenses that are attached as  
15 **Exhibit “1”** to the *Declaration of Paul M. Healey, CPA In Support of Second Interim Application*  
16 *of Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered*  
17 *During the Period From February 21, 2017 Through February 20, 2019 and For Reimbursement*  
18 *of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure*  
19 *2016* and approve the same.

20 14. The balance of the trust account in the Debtors bankruptcy case is \$598,749.58.

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1 15. I believe the services rendered 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 30 day of October, 2020.

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8 Shelley D. Krohn, Chapter 7 Trustee

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