Michael J. Gearin, WSBA # 20982
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 K&L GATES LLP

 925 Fourth Avenue, Suite 2900
 Seattle, WA 98104-1158

 (206) 623-7580

Honorable Christopher M. Alston Chapter 11 Ex Parte

## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

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Case No. 16-11767-CMA

DECLARATION OF MARK CALVERT IN SUPPORT OF *EX PARTE* MOTION FOR EXAMINATION OF RENTON COIN SHOP, INC., BRYAN D. GERAGHTY d/b/a NORTHGATE RARE COIN, THE GOLD CENTER INC., and VICTORIA DIAMONDS, LLC d/b/a CASH 4 GOLD PURSUANT TO RULE 2004 AND SUBPOENAS PURSUANT TO RULE 9016

## Mark Calvert declares as follows:

NORTHWEST TERRITORIAL MINT,

- 1. I am the Chapter 11 Trustee of Northwest Territorial Mint, LLC ("NWTM").
- 2. On May 5, 2017, counsel for Medallic Art Company, LLC ("Medallic") provided me with copies of checks and wire confirmations supporting the source of payment of Medallic's legal fees. Those documents reflect that from September, 2016, through January, 2017, Medallic's legal fees were paid via several checks and wire transfers from various coin dealers, totaling approximately \$280,000, including \$150,000, drawn on the bank account of Renton Coin Shop, Inc., a check drawn on the bank account of Bryan D. Geraghty d/b/a Northgate Rare Coin in the amount of approximately \$57,000, and a wire in the amount of \$75,000 from the Gold Center, Inc.

DECLARATION OF MARK CALVERT IN SUPPORT OF EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 1 500395586 v2 K&L Gates LLP 925 FOURTH AVENUE, SUITE 2900 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022 1

3. In the course of my examination of the assets and liabilities of NWTM, I have determined that there is more than \$5 million of missing precious metal storage inventory, and more than \$12 million of missing inventory which was the property of custom minting customers. In addition, I have determined that at least \$800,000 of gold inventory that should have been on hand was not in the Debtor's vaults when I took control. Some of the missing precious metal inventory is identifiable. I continue to investigate the disposition of the missing precious metal assets of NWTM.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Executed this 12th day of May, 2017, at Seattle, Washington.

<u>/s/ Mark Calvert</u> Mark Calvert

DECLARATION OF MARK CALVERT IN SUPPORT OF EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 2 500395586 v2 K&L Gates LLP 925 FOURTH AVENUE, SUITE 2900 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022

## CERTIFICATE OF SERVICE

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The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on May 12, 2017, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Also on May 12, 2017, she caused to be deposited in the mail of the United States of America, by first class postage prepaid, addressed envelopes containing copies of the foregoing document and mailed to the following addresses:

Northwest Territorial Mint LLC c/o Ross Hansen, Member P.O. Box 2148 Auburn, WA 98071-2148	Renton Coin Shop, Inc. c/o Brian Wichmann, Reg. Agent 15201 Military Road South Seattle, WA 98188
Renton Coin Shop, Inc. c/o Steve Campau 101 Park Avenue North Renton, WA 98057	Victoria Diamonds LLC d/b/a Cash 4 Gold c/o Victor Ivanov 2012 Shattuck Avenue S Renton, WA 98055
Victoria Diamonds LLC d/b/a Cash 4 Gold 32700 Pacific Hwy South, Suite 2 Federal Way, WA 98003	Bryan D. Geraghty d/b/a Northgate Rare Coins & Precious Metals 11319 Pinehurst Way NE Seattle, WA 98125
The Gold Center 3000 W. Lles Avenue Springfield, IL 62704	

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

Executed on the 12th day of May, 2017 at Seattle, Washington.

Denise A. Lentz

DECLARATION OF MARK CALVERT IN SUPPORT OF EX PARTE MOTION FOR SUBPOENA PURSUANT TO RULES 2004 AND 9016 - 3 500395586 v2 K&L Gates LLP 925 FOURTH AVENUE, SUITE 2900 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022