

Honorable Christopher M. Alston
Chapter 11
Date of Hearing: January 04, 2018
Time of Hearing: 9:30 a.m.
Response Due: December 28, 2017

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

No. 16-11767-CMA

DECLARATION OF DIANE ERDMANN
IN SUPPORT OF MOTION TO COMPEL
ABANDONMENT

Diane Erdmann, being first duly sworn upon oath deposes and states:

1. I am over eighteen years old and state the following based upon my personal knowledge and in support of my motion to compel abandonment. I have filed a creditor's claim herein; and, am otherwise an interested party in these proceedings.
2. Attached hereto as Exhibit "A" is a copy of the King County Sherriff's inventory of seized personal property and assets secondary to a writ of execution in *Bradley Stephen Cohen vs. Ross Hansen, et. al*, King County Superior Court case number 16-2-05611-3 KNT. I have noted the individual items on said inventory that were my personal property. The Sheriff's inventory places a value of approximately \$95,000.00 on the personal property items which I claim are mine.

DECLARATION OF DIANE ERDMANN– Page 1

SMITH | ALLING PS
ATTORNEYS AT LAW

1501 Dock Street
Tacoma, Washington 98402
Telephone: (253) 627-1091
Facsimile: (253) 627-0123

1 3. The Sheriff seized the items identified on the inventory on April 27, 2016, and took
2 those items belonging to me over my objection.

3 4. The Trustee has had possession of the seized property, including those items I own,
4 since Ordered by the Bankruptcy Court to turn over those items on June 22, 2016 (DKT#
5 435).

6 5. I have previously sought relief from stay to seek judicial instruction and clarification
7 as to the efficacy of summary state law proceedings grounded in the writ statute to determine
8 the items are my personal property (DKT #337). The Bankruptcy Court determined the
9 automatic stay applied and noted the issue of title to the assets are a matter within the
10 jurisdiction of the Bankruptcy Court (DKT#435).

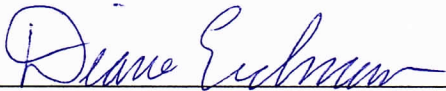
11 6. To date, no action has been commenced by the Trustee to quiet title in my assets,
12 which I have consistently claimed ownership.

13 7. I have prevailed in a separate action to confirm my ownership of monies and funds
14 then held in attorney Todd Tracy's trust account. As I understand it from reports filed in this
15 proceeding, the Trustee incurred over one hundred thousand dollars in legal fees litigating the
16 same. Thus, a reasonable forecast of litigation expense to prosecute and adversary action to
17 quiet title to the assets would exceed the value of those assets.

18 8. I am seeking this relief requested so that I may (a) initiate an action under state law for
19 the release and return of my property under the Writ statutes (against Cohen and the King
20 County Sheriff); or, (b) if not granted the relief, to initiate an adversary proceeding to quiet
21 title in those assets and compel their turn over and repatriation to me as the owner.
22
23

1 9. I have personal knowledge of the above facts, except to the extent the context
2 indicates otherwise, and if called upon as a witness, I could and would competently testify
3 thereto. I declare under penalty of perjury under the laws of the United States of America that
4 the aforementioned is true and correct.

5
6 Executed this 7th day of December, 2017 at Tacoma, Washington.

7 
8 _____
Diane Erdmann

INVENTORY OF ROSS HANSEN SEIZED PROPERTY

Reference Information

Gold is worth \$1,265.00 per ounce
Silver is worth \$17.0 per ounce
480 grains in a troy ounce
12 troy ounces in a pound
Sterling grade is .925 pure

Carton 1 and 2

Molly T. Silver Bar 50 Kilo
\$850.00 estimated value *Diane*

Small bag silver bullion
7.1 lbs
(some copper)
\$800 estimated value

Bag wheat pennies
Worth about 2-1/2 cents each *Diane*
34 pounds
\$50 estimated value

iPad pro (used by Ross Hansen)
2.78 lbs.
(Expert did not attempt to value)

Sterling Silver ingots or bars
Private mint
2012 Medallion Art
70 pieces
50 grams
\$1,700.00 estimated value

Cartons 3 and 4

Pure silver ruler
1 pound troy
\$190.00 estimated value

World War II Commemorative coins
5.64 pounds
Pure silver

not listed

1 silver bowl - Diane

\$6,530 cash - Diane

.999 purity
30 medals
\$900.00 estimated value

Bound notebook of 1 ounce silver bars/ingots
Hamilton Mint
World of Flight Commemorative
5550 ingots
\$835.00 estimated value

History of Fight collection bound
17 pounds
Franklin Mint
1.2 ounces each
100 medallions
\$1,800.00 estimated value

Small box of miscellaneous items
4.06 pounds
\$260.00 estimated value

Plastic bag of paper money and mostly coins
\$100.00 estimated value

Diane

Red box of medallions and token
Limited precious metals
\$1150.00 estimated value

Cartons 5 and 6

British cap badges WWI (copper)

Geneva men's watch (gold)
\$1,000 estimated value

Diane

#1 1 ounce gold coin in wood box
\$1,850.00 estimated value

Diane

#20 \$20.00 Liberty gold coins
\$23,000.00 estimated value

Diane

#1 1855 S \$20.00 coin
\$1,500.00 est. value

Diane

#8 SG \$20 coins
\$9,200.00 estimated value

Diane

#1 1900 \$20 coins
PCGS MS61 Diane
\$1,250.00 estimated value

#11 NGC and PCGS \$20 Liberty coins
PCGS MS62 Diane
\$13,950.00 estimated value

#7 NGC and PCGS MS 63
\$20 coins Diane
\$9,450.00 estimated value

#2 PCGS \$20 Liberty coins
MS64 Diane
\$3,600.00 estimated value

#1 1914 S \$20 coins
SG
NGC MS64 Diane
\$1,380 estimated value

#3 PCGS \$20 gold coin
SG Diane
MS 65
\$4,950.00 estimated value

#4 \$10 Liberty gold
\$2,375.00 estimated value Diane

#1 \$10 gold coin
1926 Indian Diane
\$650.00 estimated value

#1 \$10 gold coin 1893
PCGS 61 Diane
\$615.00 estimated value

#6 \$10 Liberty
PCGS NGC MS62 Diane
\$2,010.00 estimated value

#6 \$10 Liberty
PCGS NGC
MS 63 Diane
\$2,490.00 estimated value

\$4,700.00

#81 1947 Panama 1 balboa
\$972.00 estimated value

Diane

#3 Australian

1 ounce

Silver coins

\$60.00 estimated value

Diane

#1 Hawaiian centennial

1 ounce

Commemorative dollar

\$20.00 estimated value

Diane

9 piece Vatican set

1930's

\$40.00 estimated value

#5 .999 fine silver medals

1 ounce to 10 ounce

\$430.00 estimated value

Diane

Private mint

1 bag small .925 ingots

292 grains

\$126.00 estimated value

Diane

#1 first date of issue

Franklin Mint

\$10.00 estimated value

10 piece 1991 Canadian Silver \$20 coins

.925

\$160.00 estimated value

Diane

Plastic Bag of Miscellaneous coins and medallions

Mostly non-precious metals

\$235.00 estimated value

1 box lot miscellaneous medals, belt buckle, fake gold bar, hobo nickel

\$75.00 estimated value

Miscellaneous medals (military, school, church medals, and British cap insignias)

\$300.00

Assortment of spoons, medals, money clips, id tags
4.05 pounds
\$75.00 estimated value

Diane

Carton 7 and 8

Dell desktop computer and monitor

Diane

Carton 9

3 sacks of pennies (US)

\$150.00 estimated value

33.23 pounds

38.89 pounds

32.34 pounds

Diane

Carton 10

1 bag base value ½ dollars (face value)

14.24 pounds

\$260.00 est. value

Diane

2 bags of wheat pennies

24.93 pounds

\$100.00 estimated value

Diane

Mount Rushmore silver plaque

\$345.00 estimated value

1 small box of medals, etc. lapel pins

\$75.00 estimated value

2004 Australian proof set

\$20.00 estimated value

Diane

#1 plastic tub of face value coinage

\$200.00 estimated value

Diane

Carton 11

1 bag US misc. coins face value

7.07 pounds

\$50.00 estimated value

Diane

1 bag face value dimes
36.60 pounds
\$663.80 estimated value Diane

1 bag nickels face value
\$110.00 estimated value Diane

1 bag nickels face value
\$50.00 estimated value Diane

Carton 12

2 bags 100 face 1970 S Susan B. Anthony dollars
\$210.00 estimated value Diane

1 bag 100 face 1979 P Susan B. Anthony dollars
\$105.00 estimated value Diane

1 bag 100 face 1980 P Susan B. Anthony dollars
\$110.00 Diane

1 bag 100 face 1980 S Susan B. Anthony dollars
\$110.00 estimated value Diane

1 plastic bag half dollars and Ike dollars
\$65.00 estimated value Diane

1 bag miscellaneous Lincoln cents
4.7 pounds
\$20.00 estimated value Diane

1 bag face value quarters
25.45 pounds
\$509.00 Diane

Carton 13

1 bag nickels face value
22.14 pounds
\$100.00 estimated value Diane

1 bag quarters face value
38.33 pounds
\$750.00 estimated value Diane

1 bag quarters
37.14 pounds
\$750.00 estimated value

Diane

1 bag face value half dollars
10.67 pounds
\$256.00 estimated value

Diane

1 roll (20 coins) Ike dollars
\$20.00 estimated value

Diane

5 1936 Cleveland Half Dollars
\$325.00 estimated value

Diane

1 lot miscellaneous coins, medals, and tokens
\$210.00 estimated value

Carton 14 - 16

Files and papers
(not present for review)

Carton 17

19.2 ounce of 999
Fine silver bars and rounds
1.62 pounds
\$320.00 estimated value

Diane

1 small yellow plastic tub of miscellaneous US face value
10.45 pounds
\$110.00 estimated value

Diane

1 small box of miscellaneous of US and Canadian coins (face value)
14.78 pounds
\$150.00 estimated value

Diane

1 plastic jar miscellaneous US coins (face value)
14.02 pounds
\$100.00 estimated value

Diane

4 miscellaneous medals
\$5.00