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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: Friday, May 6, 2016
Hearing Time: 9:30 a.m.
Response Date: May 2, 2016

7
8 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 In re:

11 NORTHWEST TERRITORIAL MINT, LLC,
12 Debtor.

Case No. 16-11767-CMA

DECLARATION OF DAVE HUFFMAN
IN SUPPORT OF TRUSTEE'S REPLY
TO DIANE ERDMANN'S RESPONSE
TO MOTION FOR AUTHORITY TO
WITHDRAW AS ATTORNEY FOR
DEBTOR

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DECLARATION IN SUPPORT OF TRUSTEE'S REPLY
TO DIANE ERDMANN'S RESPONSE TO MOTION FOR
AUTHORITY TO WITHDRAW AS ATTORNEY - 1

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2 I, Dave Huffman, hereby declare:

3 1. I am employed by Northwest Territorial Mint, LLC ("NWTM"). As Director of
4 Security, my primary office is located at the Federal Way, Washington facility, but I oversee
5 Security Operations for all NWTM. I have personal knowledge of the facts set forth herein, and I am
6 competent to testify to the same.

7 2. As an employee of NWTM, I have had the opportunity to review the security camera
8 positioned on the NWTM vault located at the Federal Way facility. The security camera is situated
9 in the vault and records activity in the vault. The tapes from the security are maintained in the
10 ordinary course of business of NWTM.

11 3. I reviewed the security tapes for Easter Sunday, March 27, 2016 which depict Ross
12 Hansen and Diane Erdmann visiting the vault unaccompanied by any other person. The security tape
13 shows that Mr. Hansen and Ms. Erdmann removed significant quantities of precious coins and
14 metals from the vault and placed them into a box that they then removed from the vault.

15 4. I was acting in the course and scope of my employment on March 31, 2016, when
16 Ross Hansen called me into his office and instructed me to take a medium size bag to the Hallmark
17 Refinery, located at 1016 Dale Lane, Mt. Vernon, WA. Mr. Hansen told me to see John Senff,
18 General Manager, so that Mr. Senff could "cherry-pick" through the bag and select coins that he
19 wanted to buy.

20 5. Mr. Hansen then instructed me to go to the vault where Diane Erdmann would hand
21 me the bag of coins. This medium bag was a pet-carrier type bag, similar to those used to transport a
22 cat to the vet's office. It was dark in color. The zipper ran from lower left to lower right, in a
23 horseshoe type arch. Mr. Hansen said I could use Ms. Erdmann's Cadillac to drive to Mt. Vernon,
24 WA.
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DECLARATION IN SUPPORT OF TRUSTEE'S REPLY
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1 6. When I was about two thirds of the way to see Mr. Senff, I received a call from Mr.
2 Hansen to turn around and drive back to the Seattle Coin Shop, located at 7509 35th Avenue NE,
3 Seattle, WA, to see John Drummey, the owner.

4 7. When I arrived at the Seattle Coin Shop there was another customer Mr. Drummey
5 was involved with, so I waited until he finished. After the other customer left the shop, I placed the
6 bag of gold coins on the glass counter top and opened the bag.

7 8. Mr. Drummey was allowed to look at every coin in the bag and the small gold bars,
8 and he hand selected each coin he wanted to buy. After he made his choices—approximately 73
9 coins or roughly 1/3 of the contents of the bag—I closed the bag and kept it in my possession while
10 we walked approximately two (2) blocks south of his shop to Key Bank. Mr. Drummey instructed
11 the bank's cashier make out a check to Diane Erdmann, in the amount of Ninety-Nine Thousand,
12 Four Hundred Sixty (\$99,460.00) Dollars and 00/100's, and handed the check to me.

13 9. I walked back to the Seattle Coin Shop's parking lot, got into Ms. Erdmann's
14 Cadillac, and drove back to the NWTM facility located in Federal Way, WA. Upon arrival, I went
15 straight to Mr. Hansen's office and spoke with Mr. Hansen and Ms. Erdmann. I gave the bag with
16 the remaining gold coins and the check to Ms. Erdmann, in front of Mr. Hansen. Mr. Hansen told her
17 to sign the check over to J. Todd Tracy ("Tracy"), attorney with the Tracy Law Group in Seattle,
18 Washington located at 720 Olive Way, Seattle, WA 98101.

19 10. After Ms. Erdmann signed the check over to Tracy, I was instructed to take the check
20 downtown and hand it directly to Tracy at the law office. After I gave the check to Tracy, I returned
21 to the NWTM Federal Way location and told Mr. Hansen the check was delivered as requested.

22 11. I did not examine the contents of the bag when it was handed over to me at the vault.
23 I did see inside the bag when I opened it at the Seattle Coin Shop in front of Mr. Drummey.

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I declare under penalty of perjury under the laws of the state of Washington that the foregoing information is true and correct.

DATED: this 3rd day of May, 2016.

By 
Dave Huffman

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on May 4, 2016, 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.

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 4th day of May, 2016 at Seattle, Washington.

/s/ Denise A. Evans
Denise A. Evans

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