

The Honorable Christopher M. Alston
Chapter 11
Hearing Date: October 18, 2019
Hearing Time: 9:30 a.m.
Location: Courtroom 7206

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

No. 16-11767-CMA

OBJECTION ON BEHALF OF ROSS
HANSEN TO MOTION TO APPROVE
SETTLEMENT

This memorandum is submitted on behalf of Ross Hansen in opposition to the Trustee's Motion To Approve Settlement With Bradley Stephen Cohen And Cohen Asset Management And Kathryn A. Ellis And To Authorize Sale Of Seized Property. ECF 2108.

This objection is limited to the Trustee's effort to sell Mr. Hansen's personal property. In response to a previous motion to sell property (ECF 2044 and 2045), Mr. Hansen submitted a declaration identifying certain items of his personal property on the Trustee's inventory of seized items. ECF 2074. A copy of the earlier declaration is attached for the Court's convenience.

The Trustee's counsel has indicated that the Trustee has returned all records to Mr. Hansen (Item 78 on the Trustee's list) and that Mr. Hansen's iPad (Item 4) and personal computer (Item 57) are in the possession of the FBI. According to the valuations included in the Trustee's list, the remaining items identified by Mr. Hansen are worth less than \$3,500. Given that valuation, the property is exempt from execution by Mr. Cohen under RCW 6.15.010.

OBJECTION TO MOTION TO APPROVE
SETTLEMENT - 1

4838-1067-4602v.1 0106937-000001

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

1 As the Court has indicated on prior occasions, a trustee does not have the authority to
2 sell property that is not property of the estate. Mr. Hansen objects to any disposition of his
3 personal property by the Trustee or Ms. Ellis. The Court should either direct the Trustee to
4 return the remaining items to Mr. Hansen or direct the Trustee to return them to the King
5 County Sheriff for handling. Given the limited value of the items at issue, the sensible approach
6 would be to enter an order directing the Trustee to return them to Mr. Hansen. A form of order is
7 attached.

8 DATED this 16th day of October, 2019 at Seattle, Washington.

9 Davis Wright Tremaine LLP
10 Attorneys for Ross Hansen

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12 By /s/ Ragan L. Powers
Ragan L. Powers, WSBA #11935

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OBJECTION TO MOTION TO APPROVE
SETTLEMENT - 2

4838-1067-4602v.1 0106937-000001

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1 **PROOF OF SERVICE**

2 I certify that on October 16, 2019, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system, which will send notification of such filing to those
4 attorneys of record registered on the CM/ECF system:

5
6 DATED this 16th day of October, 2019.

7 By: /s/ Ragan L. Powers
8 Ragan L. Powers, WSBA #11935
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HANSEN DECLARATION

FILED

19 APR 12 PM 2:53

M. L. HATCHER, CLK
U.S. BANKRUPTCY COURT
W.D. OF WA AT SEATTLE

BY _____ DEP. CLK.

The Honorable Christopher M. Alston
Chapter 11

Hearing Date: Friday, April 19, 2019

Hearing Time: 9:30 a.m.

Location: Courtroom 7206

Response Date: April 12, 2019

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

No. 16-11767-CMA

DECLARATION OF ROSS HANSEN IN
SUPPORT OF LIMITED OBJECTION
TO TRUSTEE'S MOTION TO
LIQUIDATE ASSETS

I Ross Hansen declare as follows:

1. I am filing this declaration opposition to the Trustee's motion to liquidate assets (ECF 2044 and 2045).

2. Attached hereto as Exhibit A is a copy of the list of items the Trustee proposes to liquidate. I have put checkmarks next to certain items that are my personal property.

3. Included in the list of property that Mr. Calvert claims belongs to NWTM are three boxes of documents taken from my home. They contain personal records, including certain private medical records related to my child.

DECLARATION OF ROSS HANSEN IN OPPOSITION TO TRUSTEE'S
MOTION TO LIQUIDATE ASSETS - 1

EXHIBIT A

Inventory of Ross Hansen Seized Property

May 10th, 2016

Based on \$1265 Gold and 17.05 Silver

#	Lot	DT*	Description	Weight	Quantity	Price	Total
1	1&2		Molly-T 50 Oz 999 Fine Silver Bar	3.78 LBS	1	\$850.00	\$850.00
✓2	1&2		Bag Silver Bars/Copper Rounds	7.1 LBS	1	\$800.00	\$800.00
✓3	1&2		Bag Wheat Pennies 50 Face worth 2.5 Cents Each	34 LBS	1	\$112.50	\$112.50
✓4	1&2		Apple Ipad Pro	2.78 LBS	1	N/A	N/A
5	1&2		Set of 70 Sterling Bicentennial Council Bars	50 G/Each	1	\$1,700.00	\$1,700.00
6	3&4	2	Pure Silver Ruler	12 Oz	1	\$190.00	\$190.00
7	3&4		Set of 30 WWII Medals 999 Fine Silver	5.64 Lbs	1	\$900.00	\$900.00
8	3&4		Set of 50 1 Oz 999 Fine Silver Bars - World of Flight	50 Oz	1	\$835.00	\$835.00
9	3&4		Set of 100 Sterling Rounds - Hisotry of Flight - 1.2 oz each	17 LBS	1	\$1,800.00	\$1,800.00
✓10	3&4		Small Cardboard Box of Misc Coins, Bars and Knives	4.06 LBS	1	\$260.00	\$260.00
11	3&4		Plastic Bag of Misc. US Currency - Coins and 1's	12.92LBS	1	\$100.00	\$100.00
✓12	3&4		Red Box with Misc Medals and Tokens	8.87 LBS	1	\$1,150.00	\$1,150.00
13	5&6		Geneve 14 K Wrist Watch	.51 LBS	1	\$1,000.00	\$1,000.00
14	5&6		2009 High Relief Gold Coin	1 Oz	1	\$1,850.00	\$1,850.00
15	5&6	4	\$20 Liberty Gold Coins		20	\$1,150.00	\$23,000.00
16	5&6	4	1855 S \$20Gold Coin		1	\$1,500.00	\$1,500.00
17	5&6	4	\$20 SG Gold Coins		8	\$1,150.00	\$9,200.00
18	5&6	4	1900 \$20 Gold MS 61		1	\$1,250.00	\$1,250.00
19	5&6	4	NGC & PCGS \$20 Liberty Gold Coin MS 62		11	\$1,268.00	\$13,948.00
20	5&6	4	NGC & PCGS \$20 Liberty Gold Coin MS 63		7	\$1,350.00	\$9,450.00
21	5&6	4	PCGS \$20 Liberty Gold Coin MS 64		2	\$1,800.00	\$3,600.00
22	5&6	4	1914 S \$20 SG NGC MS 64		1	\$1,380.00	\$1,380.00
23	5&6	4	PCGS \$20 SG MS 65		3	\$1,650.00	\$4,950.00
24	5&6	4	\$10 Liberty Gold		4	\$593.75	\$2,375.00
25	5&6	4	\$10 1926 Indian		1	\$650.00	\$650.00
26	5&6	4	\$10 1893 PCGS MS 61		1	\$615.00	\$615.00
27	5&6	4	\$10 Liberty Gold Coin PCGS & NGC MS 62		6	\$335.00	\$2,010.00
28	5&6	4	\$10 Liberty Gold Coin PCGS & NGC MS 63		6	\$415.00	\$2,490.00
29	5&6	3	PAMP Suisse 100 Gram Gold Bars		11	\$4,048.00	\$44,528.00
30	5&6		1893 Carson City \$1 PCGS XF 40		1	\$750.00	\$750.00
31	5&6		1894 P Morgan \$1 NGC F 12		1	\$625.00	\$625.00
32	5&6		1894 O \$1 Raw		1	\$75.00	\$75.00
33	5&6		1895 O Silver \$1		1	\$200.00	\$200.00
34	5&6		1935 S San Siego Half Dollar PCGS MS 65		1	\$110.00	\$110.00
35	5&6		1936 York Half Dollar PCGS 67		1	\$425.00	\$425.00
36	5&6		1936 Wisconsin Half Dollar NGC 66		1	\$230.00	\$230.00
37	5&6		1937 Roanoke Half Dollar NGC 66		1	\$280.00	\$280.00
38	5&6		1921 Alabama Half Dollar NGC 64		1	\$250.00	\$250.00
39	5&6		Roll 20 Coins 1878 CC Dollars		1	\$4,700.00	\$4,700.00
40	5&6		1947 Panama Balboa		81	\$12.00	\$972.00
41	5&6	1	2015 Australian 1 Oz Silver Coins		3	\$20.00	\$60.00
42	5&6		Hawaiian Centennial 1 Oz Silver		1	\$20.00	\$20.00
43	5&6		1930's Vatican Set of 9		1	\$40.00	\$40.00
44	5&6		.999 Fine Silver Medals 1-10 Oz		5	\$86.00	\$430.00
45	5&6		Bag small silver .925 Ingots 292 Grains		1	\$126.00	\$126.00
46	5&6		First Day Issue Franklin Mint Medal		1	\$10.00	\$10.00
47	5&6		10 Piece 1991 Canadian \$20 Silver Coins		1	\$160.00	\$160.00
✓48	5&6		Bag of Misc Token Medals - Mostly Non Precious		1	\$235.00	\$235.00
✓49	5&6		Box Lot Misc Medals, Belt Buckle, Hobo Nickel		1	\$75.00	\$75.00
✓50	5&6		Box Lot British Cap Insignia, Military & School Medals		1	\$300.00	\$300.00
✓51	5&6		Assortment of Spoons Medals, Money Clips, ID Tags	4.05 LBS	1	\$75.00	\$75.00

52	7&8	Dell Desktop Computer and Monitor		1	N/A	N/A
53	9	Stacks of US Pennies (33.23, 38.89, 32.34 LBS)	104 LBS	3	\$50.00	\$150.00
54	10	Bag Face Value Halves	14.24 LBS	1	\$260.00	\$260.00
55	10	Bags Wheat Cents	24.93 LBS	2	\$50.00	\$100.00
56	10	Mt Rushmore Silver Plaque		1	\$345.00	\$345.00
57	10	Small Box Medals - Lapel Pins		1	\$75.00	\$75.00
58	10	2004 Australian Proof Set		1	\$20.00	\$20.00
59	10	Plastic Tub of Face Value Coinage		1	\$200.00	\$200.00
60	11	Bag Misc. US Coins Face Value	7.07 LBS	1	\$50.00	\$50.00
61	11	Bag Face Value Dimes	36.60 LBS	1	\$663.80	\$663.80
62	11	Bag Face Value Nickels		1	\$110.00	\$110.00
63	11	Bag Face Value Nickels		1	\$50.00	\$50.00
64	12	Bags \$100 Face 1979 S Susan B Anthony Dollars		2	\$105.00	\$210.00
65	12	Bag \$100 Face 1979 P Susan B Anthony Dollars		1	\$105.00	\$105.00
66	12	Bag \$100 Face 1980 P Susan B Anthony Dollars		1	\$110.00	\$110.00
67	12	Bag \$100 Face 1980 S Susan B Anthony Dollars		1	\$110.00	\$110.00
68	12	Plastic Bag Face Value Half Dollars and Ike Dollars		1	\$65.00	\$65.00
69	12	Bag Misc Lincoln Cents	4.7 LBS	1	\$20.00	\$20.00
70	12	Bag Face Value Quarters	25.45 LBS	1	\$509.00	\$509.00
71	13	Bag Face Nickels Nickels	22.14 LBS	1	\$100.00	\$100.00
72	13	Bag Face Value Quarters	38.33 LBS	1	\$750.00	\$750.00
73	13	Bag Face Value Quarters	37.14 LBS	1	\$750.00	\$750.00
74	13	Bag Face Value Half Dollars	10.67 LBS	1	\$256.00	\$256.00
75	13	Roll 20 Coins Ike Dollars		1	\$20.00	\$20.00
76	13	1936 Cleveland Half Dollars		5	\$65.00	\$325.00
77	13	Lot Misc Coins, Medals and Tokens		1	\$210.00	\$210.00
78	14-16	Files and Papers - N/A for evaluation			N/A	N/A
79	17	19.2 Oz of 999 Fine Silver Bars and Rounds	1.62 LBS	1	\$320.00	\$320.00
80	17	Small Yellow Plastic Tub Misc US Face Value	10.45 LBS	1	\$110.00	\$110.00
81	17	Small Box of Misc Face Value US and Canadian Coins	14.78 LBS	1	\$150.00	\$150.00
82	17	Plastic Jar Misc US Coins Face Value	14.02 LBS	1	\$100.00	\$100.00
83	17	Misc Medals		4	\$1.25	\$5.00
		Sub Total				\$148,890.30
		Cash				\$6,000.00
		Estimated Total				\$154,890.30

Summary

1	Extremely high degree of certainty were in the vault approximately 30-45 days ago	\$60.00
2	High degree of certainty was in Ross's office	\$900.00
3	Belief these items were in the vault around February or March, 2016	\$625.00
4	Probability that they could have been in the vault, specific quantity undetermined.	\$88,621.00
		\$90,206.00

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8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON

10 In re

11 NORTHWEST TERRITORIAL MINT, LLC,

12 Debtor.

No. 16-11767-CMA

13 ORDER REGARDING HANSEN
14 OBJECTION TO SETTLEMENT

15 THIS MATTER comes before the Court on the Trustee's Motion To Approve
16 Settlement With Bradley Stephen Cohen And Cohen Asset Management And Kathryn A. Ellis
17 And To Authorize Sale Of Seized Property. (ECF 2108). The Court has considered the motion
18 and related filings, and with respect to objection filed on behalf of Mr. Hansen (ECF ____), the
19 Court hereby authorizes and directs the Trustee to return all items identified in Mr. Hansen's
20 declaration (ECF 2074) to Mr. Hansen (excluding any items that are in the possession of the
21 FBI).

22 /// End of Order ///

23 Presented by:

24 Davis Wright Tremaine LLP
25 Attorney for Ross Hansen

26 By /s/ Ragan L. Powers
27 Ragan L. Powers, WSBA #11935