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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

Case No. 16-11767-CMA

DECLARATION OF MARK CALVERT
IN SUPPORT OF MOTION FOR
ORDER GRANTING AUTHORITY TO
RETURN STORED INVENTORY,
OTHER CUSTOMER OWNED
INVENTORY, AND COINING DIES

I, Mark Calvert, hereby declare as follows:

1. I am the Chapter 11 Trustee ("Trustee") of the Debtor, Northwest Territorial Mint, LLC ("Debtor" or "NWTM"). I submit this Declaration in support of my Motion for Order Granting Authority to Return Stored Inventory, Other Customer Owned Inventory, and Coining Dies (the "Motion"). I am over eighteen (18) years of age, and I am competent in all ways to testify.

2. On April 11, 2016, the Court entered an order appointing me as chapter 11 trustee in this case. Immediately upon my appointment I took control over the business operations of the Debtor and initiated an investigation of the financial affairs of the bankruptcy estate. At the time of my appointment, the Debtor's business was in precarious condition due in large part to fact that the cash resources of the business had been dissipated prior to my appointment. I have been engaged in

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1 efforts to stabilize the business in order to preserve an ability to restructure the financial affairs of
2 the estate and bring a return to creditors.

3 3. The Debtor's business is primarily comprised of (a) the sale of precious metals, such
4 as gold, silver and platinum; and (b) the minting of medallions, coins and other awards. I have
5 learned that certain customers of the Debtor (the "Storage Customers") stored gold, silver or other
6 precious metals at the Debtor's facilities. Storage Customers have demanded that I return the goods
7 they claim that they own but much of the inventory that Storage Customers claim is missing.
8 Because the Debtor's records of stored inventory are extremely poor and unreliable I have
9 constructed records from claims made by storage customers and the Debtor's files.

10 4. Upon my appointment, I conducted a detailed inventory of stored gold, silver and
11 precious metals in the Debtor's possession. I located approximately \$1.1 million in gold and
12 precious metals that are segregated and specifically identified as property of particular Storage
13 Customers. There are approximately 32 Storage Customers identified by the Trustee whose stored
14 metals remain in the possession of the Debtor. The property owned by the Storage Customers was
15 segregated inventory that was not commingled with gold or other precious metals owned by the
16 Debtor. A list of the identified property and identified Storage Customers is attached hereto as
17 Exhibit A. I have received demands for return of stored inventory from many other storage
18 customers and I have reviewed the records of storage agreements indicating that customers paid
19 storage charges on stored inventory that were not in the possession of the Debtor at the time the
20 Trustee took control over the business. Based upon my review of these documents, I believe that the
21 total amount of missing stored inventory is worth millions of dollars.

22 5. In addition to the Storage Customers identified in Exhibit A, I have learned that
23 Rodger Overson owns two gun safes that are located on the Debtor's property. Mr. Overson paid
24 for the delivery and installation of the safes at the Debtor's Auburn premises. I wish to return the
25 safes and their contents to Mr. Overson, as it appears that he is the owner of that property. I have

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1 also learned that Mr. Hui Zhang is the owner of certain custom-made precious metal products with
2 his logo that are stored at the Debtor's premises. I wish to return the custom product to Mr. Zhang,
3 as it appears that he is the owner of such property.

4 6. The Debtor owns and possesses thousands of dies used by NWTM to produce
5 custom-made products (the "Coining Dies"). I have learned that pursuant to agreements with
6 customers, certain Coining Dies were purchased by individual customers, while some Coining Dies
7 are owned by the Debtor and used to make custom product for certain customers. I have received
8 numerous requests for the return of Coining Dies from customers. Because the Debtor's records of
9 ownership of dies are inadequate, the Trustee has not been able to fully evaluate the ownership of
10 all of the dies, but I have confirmed that certain of the Coining Dies in the possession of the Debtor
11 were purchased, and are owned by, Mr. Rayburn D. Pollard. Because Mr. Pollard's Coining Dies
12 are not property of the bankruptcy estate, I wish to return them to him.

13 7. Finally, during my initial investigation of the affairs of the bankruptcy estate, I
14 learned that customer orders were filled and sent out for delivery to the customer but the product
15 was erroneously returned to NWTM by the delivery service. In particular, purchased goods were
16 shipped to Rizwan Ghumman but were returned to the Debtor as undeliverable. A copy of the
17 invoice for Mr. Ghumman's order is attached hereto as Exhibit B.

18 8. I believe that the property stored by the Debtor on behalf of the Storage Customers,
19 the identified Coining Dies, and the product that was shipped to customers but erroneously
20 returned, are not property of the bankruptcy estate. I therefore request that the Court authorize me to
21 return such property. In addition, I may identify additional coining dies that are customer owned in
22 the future and I request that the Court grant me the authority to return those dies to customers
23 should they establish their ownership interest.
24
25

DECLARATION OF MARK CALVERT IN
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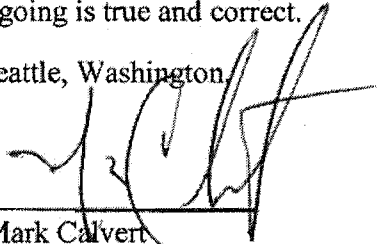
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I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 28th day of June, 2016, at Seattle, Washington


Mark Calvert

DECLARATION OF MARK CALVERT IN
SUPPORT OF MOTION FOR ORDER GRANTING
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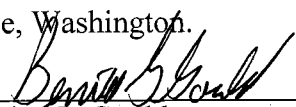
CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a practice assistant in the law firm of K&L Gates LLP, and on June 28, 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 28th day of June, 2016 at Seattle, Washington.



Benita G. Gould

DECLARATION OF MARK CALVERT IN
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EXHIBIT A

Northwest Territorial Mint Customer Owned Inventory to Return June, 2016

Owner	Location	Contents	Qty	Gold oz	Silver oz
Arthur Rickman	Fed Way	199 1oz silver kookaburras	1.0		199.0
		300 1oz Eagles	1.0		300.0
		4 10oz snake lunar	1.0		40.0
		60 1oz silver maple leave	1.0		60.0
		GAE 1 oz	1.0	1.0	
		GCML 1 oz	1.0	1.0	
		GVPPhil - 1 oz	1.0	1.0	
		Krug - 1 oz	1.0	1.0	
Arthur Rickman Total			8.0	4.0	599.0
Betty Lewis	Auburn	1830 1oz Pan American Silver Rounds	1.0		1,830.0
	Fed Way	1 oz CML	1.0	75.0	
		1 oz Krugerrands	1.0	5.0	
Betty Lewis Total			3.0	80.0	1,830.0
Brad Cameron	Fed Way	10 oz - Gold bar	1.0	10.0	
Brad Cameron Total			1.0	10.0	
Daniel J & Mildred Paolucci	Nevada	Johnson Matthey, Silver Bars, 100oz, Qty 7	12.0		8,400.0
		Johnson Matthey, Silver Bars, 100oz, Qty 8	2.0		1,600.0
Daniel J & Mildred Paolucci Total			14.0		10,000.0
Daphne Blanchard	Nevada	Silver Eagle Coins	12.0		5,508.0
		Silver Eagle coins	1.0		500.0
Daphne Blanchard Total			13.0		6,008.0
Fred Mulbauer	Fed Way	100oz pure silver Johnson Matthey Bars	1.0		700.0
		1oz silver rounds	1.0		120.0
	Nevada	PA 100 oz bars, Qty 5	1.0		500.0
		PA 100 oz bars, Qty 6	3.0		1,800.0
Fred Mulbauer Total			6.0		3,120.0
Gary Bushouse	Fed Way	100oz silver bars NTR	1.0		300.0
Gary Bushouse Total			1.0		300.0
Gerald Walken	Auburn	10 - 100oz Pan American Silver Bars	1.0		1,000.0
	Fed Way	1 oz Gold CML	1.0	7.0	
		1/10 oz GCML 10 pieces	1.0	1.0	
		1/2 oz GCML 4 pieces	1.0	2.0	
Gerald Walken Total			4.0	10.0	1,000.0
Greg Difrancesco	Auburn	5 - 100oz Engelhard Silver Bars	1.0		500.0
Greg Difrancesco Total			1.0		500.0
Hui Zhang	Nevada	178 silver medallions	1.0		178.0
Hui Zhang Total			1.0		178.0
James Merlino Estate	Fed Way	100oz Silver bars (5)	1.0		500.0
		100oz Silver bars (6)	2.0		1,200.0
James Merlino Estate Total			3.0		1,700.0
Jeff McMeel	Fed Way	480 US Morgan silver dollars	1.0		371.0
Jeff McMeel Total			1.0		371.0
Jessica Hardy	Fed Way	1 oz Silver rounds .999	1.0		777.0
Jessica Hardy Total			1.0		777.0
John Peterson	Fed Way	1 oz Gold bars	1.0	29.0	
		1 oz Krugerrands - 33 pieces	1.0	33.0	
John Peterson Total			2.0	62.0	
Lisa Vincent	Fed Way	100 - 1 oz NWT bars	1.0		100.0

Owner	Location	Contents	Qty	Gold oz	Silver oz
Lisa Vincent	Fed Way	1oz gold bars	1.0	6.0	
Lisa Vincent Total			2.0	6.0	100.0
Mary Louise Donovan Trust	Auburn	1000 - 1oz Silver American Eagles	1.0		1,000.0
Mary Louise Donovan Trust Total			1.0		1,000.0
Mary Secaur	Auburn	5 - 1oz Silver American Eagles -Sealed Monster Box	1.0		5.0
Mary Secaur Total			1.0		5.0
Matthew Staley	Fed Way	Krugerrands 12 pieces	1.0	12.0	
Matthew Staley Total			1.0	12.0	
Michael Laurion	Fed Way	Sent to assay	1.0	-	
Michael Laurion Total			1.0	-	
Norman Hauptman	Fed Way	Silver Philharmonics 1 oz coins	1.0		1,500.0
		1 oz Gold VPHIL	1.0	7.0	
		1/10 Gold VPHIL - 33 pieces	1.0	3.3	
		1/10 oz GAE - 33 pieces	1.0	3.3	
		1/10 oz GCML 32 pieces	1.0	3.2	
		GAE 1 oz	1.0	9.0	
		GCML 1 oz	1.0	7.0	
Norman Hauptman Total			7.0	32.8	1,500.0
Norman Liedtke	Auburn	6 - 1000 oz Silver Bars	1.0		6,000.0
Norman Liedtke Total			1.0		6,000.0
Pick up - Scott	Fed Way	1922 St. Gaudens	1.0	0.2	
Pick up - Scott Total			1.0	0.2	
Ralph Fair	Fed Way	22 Certified MS 64 St. Gaudens	1.0	21.3	
Ralph Fair Total			1.0	21.3	
Randy and Diane Wong	Auburn	9 - 100oz Pan American Silver Bars	1.0		900.0
		998 - 1oz silver American Eagles	1.0		998.0
Randy and Diane Wong Total			2.0		1,898.0
Randy Gaines	Fed Way	100 gram gold bars - 2 pieces	1.0	6.4	
Randy Gaines Total			1.0	6.4	
Randy or Diane Wong	Fed Way	100 oz silver bars PA - 21	1.0		2,100.0
Randy or Diane Wong Total			1.0		2,100.0
Rizwan Ghumman	Nevada	97607 returned 100 NWT bars & 1 - 100 oz nwt bar	1.0		200.0
Rizwan Ghumman Total			1.0		200.0
Rosanne Herrin	Fed Way	2 proof silver american eagles and a silver necklace	1.0		0.7
Rosanne Herrin Total			1.0		0.7
Russ & Bonnie Sweeney	Auburn	840 oz Pan American Silver Bars	1.0		840.0
Russ & Bonnie Sweeney Total			1.0		840.0
Yuquin Chen	Fed Way	Krug - 10 pieces	1.0	10.0	
	Fed Way	CML - 10 pieces	1.0	10.0	
Yuquin Chen Total			2.0	20.0	
Grand Total			84.0	264.7	40,026.7

Note: All weights are approximate.



**EXHIBIT B
NORTHWEST TERRITORIAL MINT LLC**

dba Medallie Art Company

Remit To:

P.O. Box 2148

Auburn, WA 98071

Phone: 800-843-9854

Fax: 253-735-2210

INVOICE

Sold To:

Rizwan Ghumman
53 axford rd
Hamilton NJ 08610
UNITED STATES

Ship To:

rizwan ghumman
53 axford rd
Hamilton NJ 08610

Invoice Number:	735397	Sales Person:	Bullion Web Orders
Invoice Date:	2/11/2016	Terms:	Due on receipt of Inv.
Customer ID:	123208	Packing List:	131960
Order Number:	97607	PO Number:	

8 - 10 weeks

Line	Part Number / Part Description	Quantity	Unit Price	Amount
1	B10080 / SILVER 1 OZ. NORTHWEST TERRITORIAL MINT BAR	100	\$15.76	\$1,576.00
2	B10136 / SILVER 100 OZ NWTM BAR	1	\$1560.45	\$1,560.45

Less Deposit 3,136.45

Invoice Total: \$0.00

Paid To Date: \$0.00

Balance Due: \$0.00

Payment not received within the terms as listed on invoice will result in an additional charge of 1.5% per month, 18% per annum. In addition the customer is responsible for costs of collection including reasonable attorneys fees incurred in the collection process.
B-1