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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 PAUL WAGNER
IN SUPPORT OF TRUSTEE'S
MOTION FOR ORDER HOLDING
ROSS HANSEN IN CONTEMPT FOR
VIOLATION OF THE AUTOMATIC
STAY

I, Paul Wagner, hereby declare:

1. I am the President of Northwest Territorial Mint, LLC ("NWTM" or "Debtor"). I have been employed by the Debtor for three and one-half (3 ½) years and work at its facility in Federal Way, Washington.

2. On Friday, June 3, 2016, I attended the status conference hearing in this matter at the United States Bankruptcy Court in Seattle. When I arrived, the Debtor's former principal, Ross Hansen, was outside of the courtroom. Ross asked me whether I had spoken with the FBI. He told me that he hopes I know that "we are on the same side," and that he wanted to meet with me to talk to me about his plans to "save the company." He handed me what appeared to be a business proposal. Mr. Hansen asked whether I understood that I would "have a lot of key people leaving very soon." Mr. Hansen attempted to speak with me after the hearing as well.

DECLARATION OF PAUL WAGNER IN SUPPORT OF
TRUSTEE'S MOTION FOR ORDER HOLDING ROSS
HANSEN IN CONTEMPT FOR VIOLATION OF THE
AUTOMATIC STAY - 1

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SEATTLE, WASHINGTON 98104-1158
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1 3. During the weekend after the hearing, Mr. Hansen attempted to call me. I neither
2 answered nor returned his phone call.

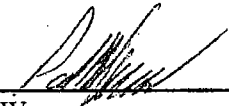
3 4. I am aware that Mr. Hansen has attempted to contact numerous other employees of
4 the Debtor, and that he has used Diane's cell phone number, and his housekeeper's phone to do so in
5 order to disguise the fact that he is the one trying to contact them. I have been informed that Mr.
6 Hansen got through to one of NWTM's employees on the telephone by claiming to be a customer.

7 5. In my opinion, Mr. Hansen's appearance at the Debtor's Federal Way facility, and his
8 repeated attempts to contact the Debtor's employees are toxic to employee morale and the operation
9 of the business. During the time that Mr. Hansen operated NWTM, he bullied employees. He would
10 yell, scream, say inappropriate things, and throw tantrums. On one occasion, I witnessed him throw a
11 box of coins in the presence of employees. Many of the Debtor's employees are intimidated by Mr.
12 Hansen. Employees in the Dayton, Nevada, and Federal Way facilities are fearful that Mr. Hansen
13 will appear at the facility unannounced.

14 6. I believe that Mr. Hansen's contacts with employees and appearances at the offices of
15 NWTM are an impediment to the operations of the business and I would ask for the Court's
16 assistance in curtailing Mr. Hansen's actions.

17 I declare under penalty of perjury that the foregoing is true and correct to the best of my
18 knowledge and belief.

19 DATED this 10th day of June, 2016.
20

21
22 By 
Paul Wagner

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DECLARATION OF PAUL WAGNER IN SUPPORT OF
TRUSTEE'S MOTION FOR ORDER HOLDING ROSS
HANSEN IN CONTEMPT FOR VIOLATION OF THE
AUTOMATIC STAY - 2

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CERTIFICATE OF SERVICE

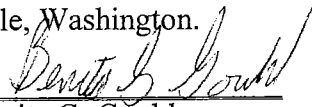
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The undersigned declares as follows:

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

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