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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: September 1, 2017
Hearing Time: 9:30 a.m.
Response Date: August 25, 2017

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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 CHRISTINE UNWIN IN
SUPPORT OF TRUSTEE'S SECOND
MOTION FOR ORDER GRANTING
AUTHORITY TO RETURN STORED
INVENTORY TO CUSTOMERS

15 I, Christine Unwin, hereby declare as follows:

16 1. I submit this Declaration in support of the Trustee's Second Motion for Order
17 Granting Authority to Return Stored Inventory to Customers (the "Motion"). I am over eighteen
18 (18) years of age, and I am competent in all ways to testify.

19 2. I am a consultant for Cascade Capital Group, LLC. I have more than 15 years
20 experience as a business operations executive. On April 11 and April 12, 2016, I led the inventory
21 process at Northwest Territorial Mint, LLC's ("NWTM" or the "Debtor") Dayton, Nevada facilities
22 (the "Dayton Office"). In connection with my inventory of precious metals at the Dayton Office, I
23 secured and identified inventory marked as storage inventory for specific customers (the "Stored
24 Inventory"). I took photographs of inventory located at the Dayton Office or supervised the work of
25 two Dayton Office employees who also took pictures. On a site visit to the Dayton Office on June 8
26

DECLARATION OF CHRISTINE UNWIN IN SUPPORT
OF SECOND MOTION FOR ORDER GRANTING
AUTHORITY TO RETURN STORED INVENTORY - 1

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500481449 v3

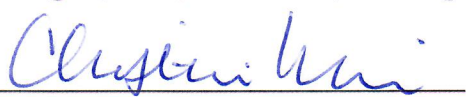
1 and June 9, 2016 I verified inventory photographs sent to me and confirmed that inventory remained
2 in the original vault location recorded on April 11, 2016. In particular, I confirmed the existence,
3 identification and location of certain Stored Inventory.

4 2. Through my personal inspection of the inventory in the Dayton Office, I identified
5 two 100 oz. silver bars which were located on a shelf in the lower right center of the Dayton Office
6 vault (number 38 on the schematic attached hereto as Exhibit A). The bars were stored together with
7 a receipt identifying them to Dr. and Mrs. Richard Pehl. Photographs of the bars and receipt are
8 attached hereto as Exhibit B.

9 3. While conducting the inventory, I also located a Centennial Car Ingot Collection Set
10 (the "Car Ingot Set") located on the top shelf in the rear-right portion of the vault (number 24 on
11 Exhibit A). The Car Ingot Set did not have any paperwork with it that identified it to a particular
12 customer. I was told by one of the employees that Ross Hansen had informed him that the area in
13 the vault where the Car Ingot Set was located "belonged to him (Ross)" and that the employee "was
14 not to inventory it". Accordingly, the items found in location number 24 along with surrounding
15 items discovered in this section of the vault, were classified as Third-Party Related Dispute with
16 ownership to be determined after investigation. A photograph of the Car Ingot Set is attached hereto
17 as Exhibit C.

18 I declare under the penalty of perjury under the laws of the United States that the foregoing is
19 true and correct to the best of my knowledge.

20 EXECUTED this 1ST day of August, 2017, at Bellevue, Washington.

21 
22 _____
23 Christine Unwin

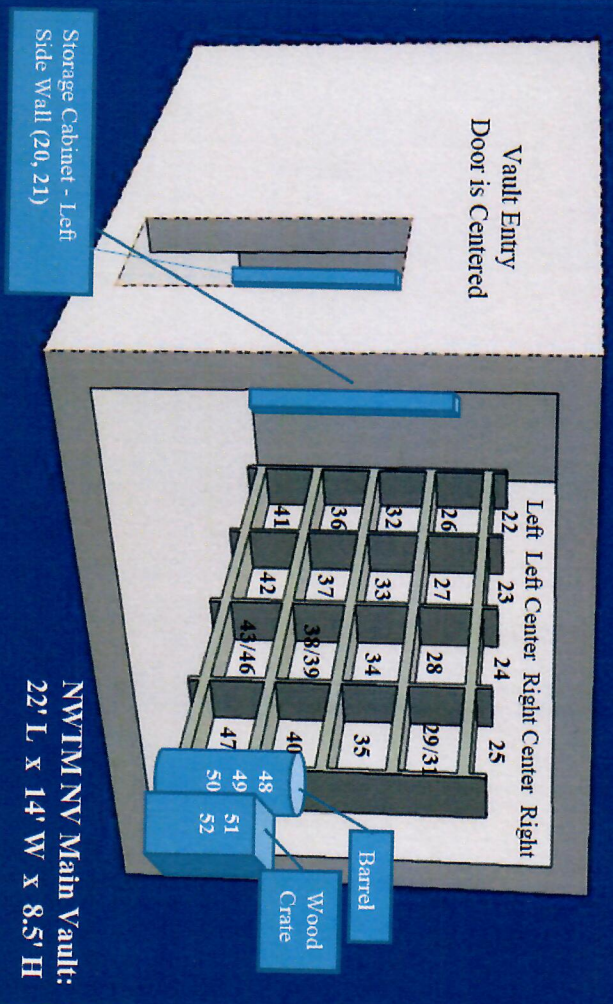
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DECLARATION OF CHRISTINE UNWIN IN SUPPORT
OF SECOND MOTION FOR ORDER GRANTING
AUTHORITY TO RETURN STORED INVENTORY - 2

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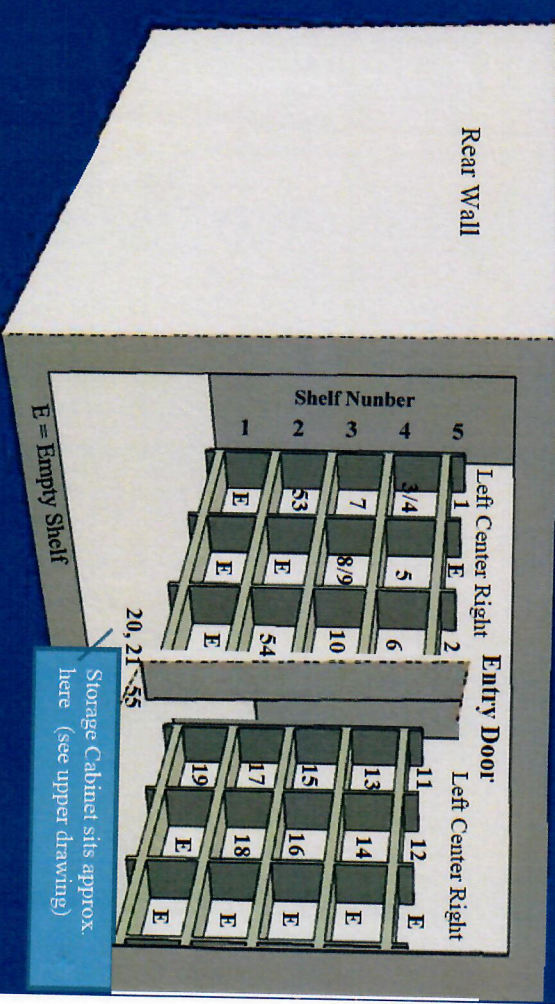
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EXHIBIT A

Nevada Inventory by Vault Location - REAR WALL



Nevada Inventory by Vault Location - FRONT ENTRY WALL

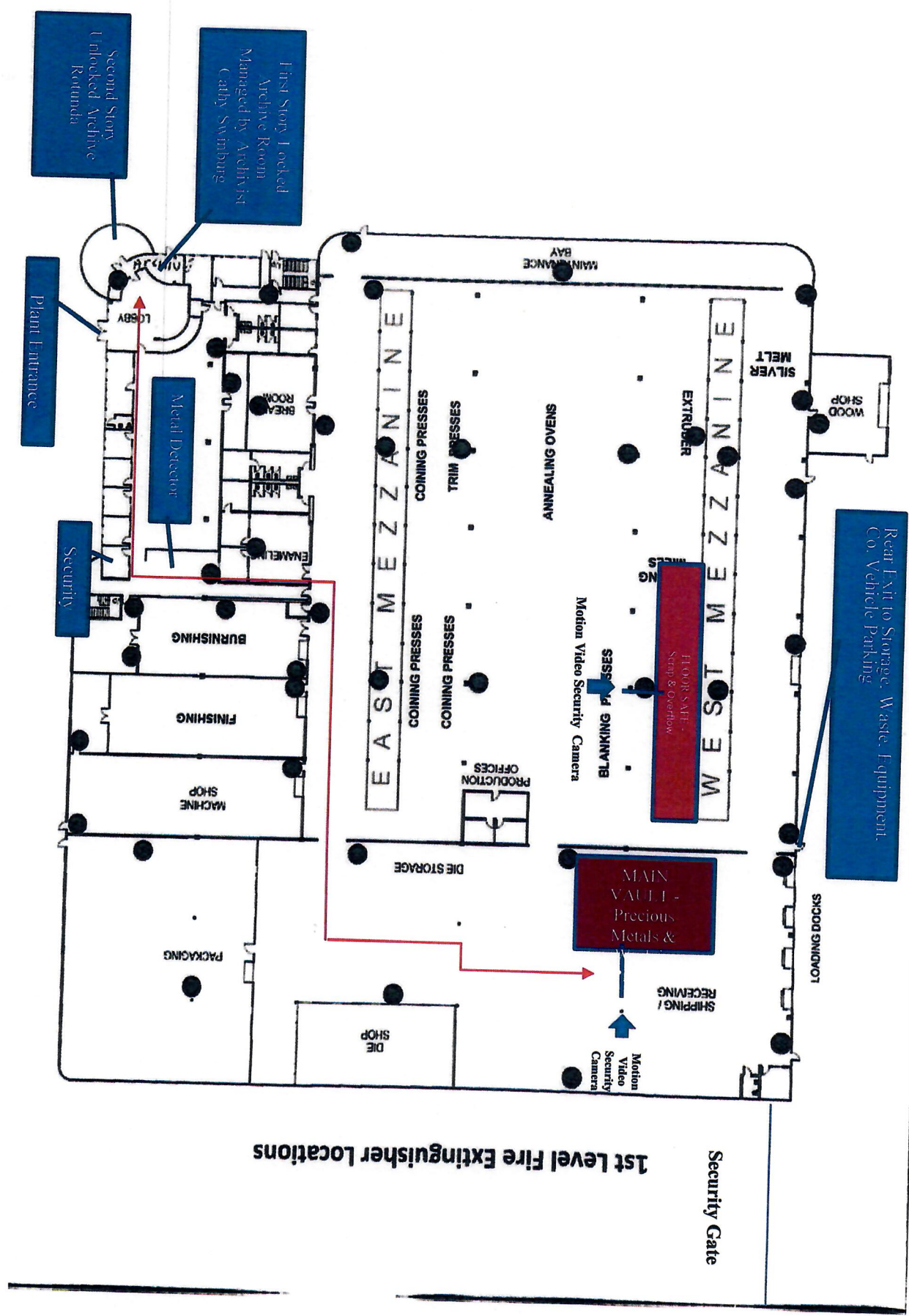


No.	Labeled	Ownership	Status /	No.	Labeled	Ownership	Status /
1	NWTM Samples	Mint Owned		36	Presumed Hansen	3rd Pty Rel. Disp.	
2	NWTM Samples	Mint Owned		37	Empty	N/A	
3	NWTM Archives	Mint Owned		38	Pell Storage	Dr/Mrs. Pell	
4	NWTM Samples	Mint Owned		39	Mulbauer Storage	F. Mulbauer	
5	NWTM Samples	Mint Owned		40	Knives+Die Set	Mint Owned	
6	Blanchard Storage D. Blanchard			41	Paolucci Storage	D/M Paolucci	
7	NWTM Samples	Mint Owned		42	Paolucci Storage	D/M Paolucci	
8	Sales Samples	Mint Owned		43	D. Erdman UPS	3rd Pty Rel. Disp.	
9	Coin Samples	Mint Owned		44	D. Erdman UPS	3rd Pty Rel. Disp.	
10	Empty Boxes	Mint Owned		45	D. Erdman UPS	3rd Pty Rel. Disp.	
11	Steel Filling Tools	Mint Owned		46	D. Erdman UPS	3rd Pty Rel. Disp.	
12	Empty Coin Tubes	Mint Owned		47	Goldpanner Round	Mint Owned	
13	Sales Samples - br	Mint Owned		48	Scrap Buckets	Mint Owned	
14	Empty Tray	Mint Owned		49	Scrap Barrel	Mint Owned	
15	Sterling Award - S	Mint Owned		50	Scrap Bucket Left	Mint Owned	
16	Sales Samples	Mint Owned		51	H. Toomey/F. Hous	3rd Pty Rel. Disp.	
17	NWTM Scrap	Mint Owned		52	D. Routh, presumer	3rd Pty Rel. Disp.	
18	NWTM Scrap	Mint Owned		53	Empty	(Formerly Ariel)	
19	NWTM Scrap	Mint Owned		54	Empty	N/A	
20	S. Firebaugh	3rd Pty Rel. Disp.		55	12 Strips Zirconium	Mint Owned	
21	Floor Cabinet	Mint Owned					
22	Presumed Hansen	3rd Pty Rel. Disp.					
23	Presumed Hansen	3rd Pty Rel. Disp.					
24	Presumed Hansen	3rd Pty Rel. Disp.					
25	Presumed Hansen	3rd Pty Rel. Disp.					
26	Presumed Hansen	3rd Pty Rel. Disp.					
27	State Coins (50 Str)	Mint Owned					
28	State Coins (50 Str)	Mint Owned					
29	Box	Mint Owned					
30	Empty	N/A					
31	Lapel Pin Boxes Old Vehicle Trackers,	Mint Owned Owned, 3rd Pty Rel.					
32	Presumed Hansen Disp.						
33	Niobium Scrap+N	Mint Owned					
34	Russell Storage	Aaron Russell					
35	Sales Samples - Ki	Mint Owned					

NOTE: Numbers in bold appear on Cascade Capital's "Customer Owned Inventory to Return"

NWTM Dayton, NV Plant - Estimated 100,000 Square Feet
MAIN VAULT AND FLOOR VAULT LOCATIONS
 Estimate - Not to Scale

Motion Video Security Camera



1st Level Fire Extinguisher Locations

First Story Locked Archive Room Managed by Archivist Cathy Swinburg

Second Story Unlocked Archive Rotunda

VISITOR AND EMPLOYEE PARKING

EXHIBIT B



title IMG_4503.JPG

PEHL #38

date June 9, 2016 at 4:19:59 PM

filename IMG_4503.JPG

camera iPhone 6

1/30 | f/2.2 | 4.2 mm | ISO: 200 | Flash: Yes



title IMG_4425.JPG DEHL #38

date June 9, 2016 at 3:34:35 PM

filename IMG_4425.JPG

camera iPhone 6

1/30 | f/2.2 | 4.2 mm | ISO: 200 | Flash: Yes



999+
FINE
SILVER

100
TROY OUNCE

IN GOD WE TRUST

1625/02
ALL
1790



013948

1 x 100
TROY OUNCE
SILVER BAR



THE AMERICAN TRADITION IN PRECIOUS METALS
ENGELHARD

999+ FINE SILVER 100 TR

ROYAL CANADIAN MINT

P 724208

EXHIBIT C



title

description

date April 14, 2016 at 1:34:20 PM

keywords #24 NV Vault

filename vault 082.JPG

camera Canon PowerShot ELPH 115 IS

1/20 | f/3.2 | 5 mm | ISO: 640 | Flash: Yes