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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 DAVE HUFFMAN
IN SUPPORT OF TRUSTEE'S
MOTION FOR ORDER HOLDING
ROSS HANSEN IN CONTEMPT FOR
VIOLATION OF AUTOMATIC STAY

I, Dave Huffman, hereby declare:

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

2. I was acting in the course and scope of my employment on May 18, 2016, when Ross Hansen and his live-in girlfriend, Diane Erdmann, showed up at the NWTM facility in Federal Way. At the time, both the Trustee and the Chief Information Officer of the Debtor, Paul Wagner, were out of the State. I suspect that Mr. Hansen had been in contact with one or more employees of NWTM and chose to come to NWTM on the May 18, 2016 because he knew that Paul Wagner and the Trustee were not at the Federal Way facility.

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

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1 3. At about 1:30 p.m. on May 18, 2016, I received a text message from an employee of
2 the Debtor informing me that Ross Hansen and Diane Erdmann were in the Debtor's facility in
3 Federal Way, Washington.

4 4. When I located Mr. Hansen and Ms. Erdmann, they were in Annette Trunkett's
5 office. Mr. Hansen was leaning over the front of Annette's desk and speaking very quietly to
6 Annette. I was within a few feet of Mr. Hansen but could not hear what he was saying to her. It
7 appeared to me that Hansen was attempting to intimidate Annette. I approached Mr. Hansen and he
8 told me that he had authority to take records from the NWTM offices. Mr. Hansen handed me an
9 email from his attorney and a piece of paper on which "Authorization to Retrieve Records &
10 Property" was hand-written. Attached hereto as Exhibit A is a photograph of the hand written-note
11 and email. Attached as Exhibit B is a copy of the email.

12 5. I spoke on the phone with Paul Wagner. Mr. Wagner informed me that Mr. Hansen is
13 not permitted to take any documents from the office. He further instructed me to inform Mr. Hansen
14 and Ms. Erdmann that they must leave the premises. I told him that the police would arrest him for
15 trespass if he did not immediately leave the facility. Mr. Hansen kept insisting that he had authority
16 to collect records pertaining to the Medallic Art Company, and that the "letter" he handed me
17 authorized him to collect documents. I informed Mr. Hansen that he did not have the authority to
18 take documents from the premises and that requests for documents must be made to the Trustee. Mr.
19 Hansen continued to try and talk his way past me, and I continued to tell him that he must leave
20 immediately.

21 6. The same day, after I left work, Ross Hansen called my cell phone. During the call,
22 Hansen repeatedly asked me to be his "point of contact" at NWTM. I repeatedly told him I would
23 not be his point of contact. I told Ross that he was not listening to me and because he was continuing
24 to ask me the same question over and over, I was terminating the conversation.

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

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7. About a week after Mr. Hansen showed up at the Federal Way facility unannounced, I was at the Federal Way facility when Mr. Hansen phoned NWTM. After the call was transferred from the receptionist to a human resources employee, I took the call. Ross told me that he always viewed me "as a friend," rather than an employee. He asked me whether I was looking for a job, and told me that he is "coming back" to take control of the company again. I understood that Mr. Hansen was attempting to manipulate me and extract information from me for his benefit. I asked him to identify the person or persons who have fed him information regarding NWTM and told him that if he wasn't going to answer, that there was nothing further for us to discuss. Mr. Hansen hung up the call shortly thereafter.

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

DATED this 10th day of June, 2016.

By 
Dave Huffman 6/13/16

DECLARATION OF DAVE HUFFMAN IN SUPPORT OF
TRUSTEE'S MOTION FOR ORDER HOLDING ROSS
HANSEN IN CONTEMPT FOR VIOLATION OF THE
AUTOMATIC STAY - 3

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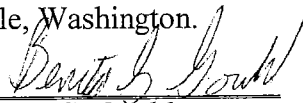
CERTIFICATE OF SERVICE

1 The undersigned declares as follows:

2 That she is a practice assistant in the law firm of K&L Gates LLP, and on June 28, 2016, she
3 caused the foregoing document to be filed electronically through the CM/ECF system which caused
4 Registered Participants to be served by electronic means, as fully reflected on the Notice of
5 Electronic Filing.

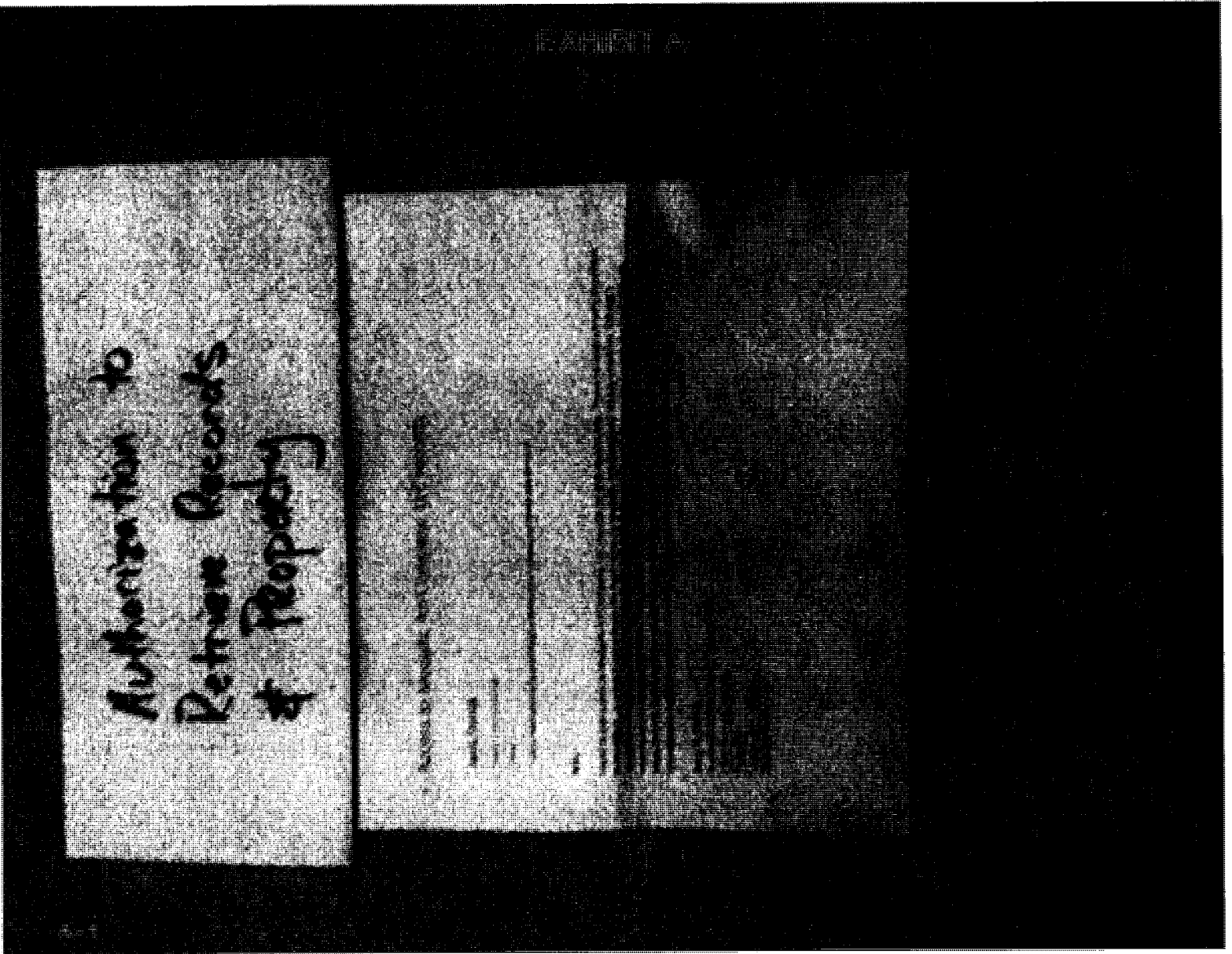
6 I declare under penalty of perjury under the laws of the State of Washington and the United
7 States that the foregoing is true and correct.

8 Executed on the 28th day of June, 2016 at Seattle, Washington.


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Benita G. Gould

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EXHIBIT A



MORE LEGIBLE COPY TO BE
PROVIDED TO THE COURT

EXHIBIT B

Access to Medallic Art Company, LLC records

Jerry Stehlik

Tue 5/17/2016 1:44 PM

Inbox

To: Ross Hansen (rosshansen1984@outlook.com) <rosshansen1984@outlook.com>;

Ross –

I need to get access to Medallic Art Company, LLC records as soon as possible. Those records are very important to my efforts to protect and enforce the legal rights of Medallic Art Company. I have asked Mr. Calvert's attorney some time ago to provide these records but he has not responded. I understand that some of these records are located in NWTM's offices in Federal Way and that you are going to try to gain access to them. I hope that Mr. Calvert will cooperate with you and allow you access, but if he does not, don't force the issue and immediately report to me what occurred so that I may prepare an appropriate motion.

Jerry N. Stehlik
Bucknell Stehlik Sato & Stubner, LLP
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Seattle, WA 98121
206-587-0144