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Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Room 7206  
Hearing Date: August 5, 2016  
Hearing Time: 9:30 a.m.  
Response Date: July 29, 2016

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re  
NORTHWEST TERRITORIAL MINT, LLC,  
Debtor.

Case No. 16-11767-CMA

DECLARATION OF ROSS HANSEN

I, Ross Hansen, declare as follows:

1. Prior to the appointment of Mr. Calvert as Chapter 11 trustee, I was the president of Northwest Territorial Mint.
2. I make this declaration based on my personal knowledge.
3. I have reviewed the declarations filed in support of the Trustee's motion for contempt. I am not in this declaration responding to every allegation made in those declarations.
4. Attached hereto as Exhibit A is a copy of an email chain between me and Mr. Calvert starting on April 12, 2016, the day after I left Northwest Territorial Mint. ("NWTM").
5. At the time that I left NWTM, Mr. Calvert agreed that I would be permitted to obtain my personal effects, and documents I needed related to my personal affairs and the affairs of Medallie Art Company LLC. Following my departure, I worked through my assistant Maura Richardson, to obtain copies of documents. See Exhibit C.

1           6.       Attached hereto as Exhibit B is a copy of a "Suppression Memo" that I  
2 understand was circulated to all employees of NWTM.

3           7.       Attached hereto as Exhibit C is a copy of an email that I sent to Ms. Richardson  
4 after the Suppression Memo was circulated to employees. As the email indicates, following  
5 circulation of that memo I received a number of phone calls from employees of NWTM. I  
6 asked Ms. Richardson to try to help quell the problems that had been created by Mr. Calvert's  
7 treatment of me and his approach to the company.

8           8.       With respect to Mr. Wagner's declaration regarding our conversation at the June  
9 3 hearing in bankruptcy court, Mr. Wagner willingly engaged in conversation with me. The  
10 conversation started outside the courtroom before the hearing. At no time did Mr. Wagner  
11 express that he did not wish to talk to me. If Mr. Wagner had been concerned about talking to  
12 me, he certainly could have walked away or asked me not to speak to him. Mr. Wagner's  
13 recollection of the conversation is inaccurate. During our conversation, Mr. Wagner expressed  
14 concern about the direction of the case. He was concerned that the Trustee would sell the  
15 company on an expedited basis, and that he and other employees would lose their jobs. He said  
16 that he and many other employees employees had their resumes on the street and that morale  
17 was very low. Mr. Wagner suggested that I call him over the weekend following the hearing. I  
18 did try to call him as he requested. He did not answer the phone, and I did not pursue the  
19 matter further.

20           9.       On May 18, 2016, Ms. Erdmann and I did go to NWTM's offices. My  
21 understanding was that Ms. Turkett had made copies of documents related to Medallic Art  
22 Company (including financial reports), and that they were sitting on her desk. I also believe  
23 that there are legal documents at NWTM's offices related to the acquisition of Medallic Art in  
24 2009. We went to NWTM's offices to retrieve copies of those documents. When Mr. Huffman  
25 told us to leave the premises, we did. I have not been back to NWTM's offices since.

26           10.      I have requested that NWTM forward to me personal mail, including mail  
27 related to healthcare. So far, NWTM has not forwarded any of my mail to me.

1           11.     I never instructed Ms. Krum to disable any machinery. In a telephone call, Ms.  
2 Krum told me that she was looking for a job. When she had previously been on maternity  
3 leave, the custom software in her machine had been corrupted, and she was concerned that it  
4 would be corrupted again. I suggested that she make a copy of the software so it would be  
5 available in the future. I was also concerned that in the event the Trustee lays off Ms. Krum or  
6 she is employed elsewhere, the machine would again become inoperable.

7           12.     We did not send boxes to the Dayton, Nevada facility to hide assets. The boxes  
8 contained materials that belonged in the archives maintained in Dayton, but that were in  
9 various places in the Federal Way and Auburn offices. As Mr. Vugeteen's declaration  
10 indicates, he was not employed by NWTM at the time the boxes were sent, so there was no one  
11 on the premises familiar with the archives.

12           13.     I never "yelled" at Ms. Turkett for four hours. I was very upset with Ms.  
13 Turkett and NWTM's former CFO at one time long before the bankruptcy case was filed when  
14 I discovered that they had made significant mistakes that cost the company a lot of money. I  
15 have not "yelled" at any employees of NWTM during this bankruptcy case.

16           14.     I have expressed to Mr. Calvert my view that Medallic Art Company's assets are  
17 not property of the NWTM bankruptcy estate. In particular, I objected in writing to Mr.  
18 Calvert locking me out of the facility in Dayton, Nevada, where equipment purchased by  
19 Medallic Art Company is located. I also objected to Mr. Calvert changing the combination to  
20 the safe at that location. I expressly stated to Mr. Calvert in writing that I had no problem with  
21 him taking control of NWTM's assets, including by changing locks and combinations. Mr.  
22 Calvert has refused all requests for me to view the Dayton facility, and I have not entered that  
23 facility since the appointment of Mr. Calvert as trustee.

24           15.     Mr. Calvert was well aware of the issues related to Medallic Art Company well  
25 before NWTM's bankruptcy case was filed. The issue was discussed with Mr. Calvert when he  
26 was providing advice prior to the filing of the case.  
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16. I do not believe that Mr. Calvert's approach to this case will result in any significant recovery for creditors.

17. A copy of portions of Mr. Huffman's deposition, taken May 26, 2016, is attached as Exhibit D.

1 I declare under penalty of perjury under the laws of the state of Washington that the  
2 foregoing is true and correct to the best of my knowledge and belief.

3 EXECUTED at Seattle, Washington this 28 day of July, 2016.

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8 Ross Hansen  
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# **EXHIBIT A**

## Fwd: Change of locks and combos in Dayton

---

From:  
Ross Hansen <ross@nwtmint.com>  
To:  
rosshansen1984@outlook.com  
Date:  
Wed, 13 Apr 2016 12:50:15 -0700

---

Ross Hansen  
Northwest Territorial Mint  
253-833-7780  
800-344-6468

Begin forwarded message:

**From:** Ross Hansen <Ross@nwtmint.com>  
**Date:** April 13, 2016 at 10:13:49 AM PDT  
**To:** Mark Calvert <mark@cascadecapitalgroup.com>  
**Subject: Re: Change of locks and combos in Dayton**

Mark,

Whether or not I am to be employed with Northwest Territorial Mint has nothing to do with my position as managing member of Medallic Art Company and the fiduciary responsibility that title holds. However, your position on this relatively simple issue could affect any other relationship I might contemplate with you.

Mark--Diane and I have made it abundantly clear that we want to do everything we can to assist you in your efforts to reorganize NWTM. However, as we discussed yesterday, your actions Monday and Tuesday were both demeaning to Diane and I and do not serve to benefit our creditors or employees.

When you announced to the management team that I had no authority and I had no place in the organizational chart, combined with the fact that neither Diane nor I are employees of NWTM, I don't know what you are asking me if I resigned from. Feeling very much in danger, your two volunteers left the building under what can only be described as an extremely hostile atmosphere.

Announcing to the managers that I and the company are currently the subject of a six-month criminal FBI investigation was an incredibly boneheaded move, further exacerbated by your giddy announcements to all present every time the FBI called you. It literally made Diane and I physically ill.

As this information has now filtered through the company, I have received numerous calls from employees who are now afraid to stay, afraid that they might be wrapped up in this FBI investigation. Your direct threat to my managers that they will get an automatic five years in prison should any malfeasance (real or imagined) occur during your tenure has further undermined the morale and confidence in this company. I can only imagine what your motivations were.

You mentioned to me that you wanted to cut a significant number of employees. I suspect no cuts will be necessary, as due to your actions a number of them will be leaving soon. Unfortunately, not the ones we would choose.

I've worked at this company for 35 years and walking out was not an easy decision. Diane and I consider the employees and many of the customers and vendors to be more than just colleagues, but friends as well. I told you yesterday that I can't be a good mechanic to help you fix this company if you take away all my tools.

Ross

On Apr 13, 2016, at 8:15 AM, Mark Calvert <mark@cascadecapitalgroup.com> wrote:

Ross,

---

Will you please advise me if you have resigned.

If you have then I will understand how best to respond to this email

Thanks

Mark

-----Original Message-----

From: Ross Hansen [mailto:[Ross@nwtmint.com](mailto:Ross@nwtmint.com)]

Sent: Tuesday, April 12, 2016 9:53 PM

To: Mark Calvert

Cc: Alan Wenokur; Richard Bresler

Subject: Change of locks and combos in Dayton

Mark,

It has come to my attention that you instructed that the vault combinations in Medallie Art Company's facility in Dayton, NV be changed. It's also come to my attention that you have instructed that the door locks and the alarm codes at that same facility also be changed.

I understand your desire and need to secure the assets of Northwest Territorial Mint and I don't question your authority to take such actions at the properties owned or leased by Northwest Territorial Mint, but I must remind you that the facility in Nevada is leased by myself, Ross Hansen, and Medallie Art Company. Neither of these entities is in bankruptcy and are not subject to your control as trustee. As managing member of Medallie Art Company, I must reiterate that the lease on the Nevada facility is guaranteed by the company's significant amount of assets in the building and you have no authority to keep us from inspecting or managing our property.

I would expect you to immediately share with me the new vault combination, which you had no authority to change, and that you cease to deny access to Medallie Art Company members or representatives. I also expect new keys and alarm codes to be delivered to me if they've been changed. If they've not been changed, I instruct you to leave them as they are.

As the managing member of Medallie Art Company, it is I who decides who does and does not have access to our building. I only allowed your representative into our facility to inventory Northwest Territorial Mint's assets as a courtesy.

Your cooperation in this matter is greatly appreciated.

Sincerely,

Ross Hansen

Managing Member

Medallie Art Company



# **EXHIBIT B**



# NORTHWEST TERRITORIAL MINT

Federal Way, WA • Auburn, WA • Dayton, NV • Green Bay, WI  
Tomball, TX • Alexandria, VA • The Pentagon

P.O. Box 2148, Auburn, WA 98071-2148  
800-344-6468 • NWTMint.com

Saturday, April 16, 2016

**TO:** All Current NWTM/MAC Employees - Alexandria, Virginia; Dayton, Nevada;  
Federal Way, WA; Fort America, The Pentagon; Green Bay, Wisconsin;  
Honolulu, Hawaii; Tomball, Texas; Freelance & Contract Areas

## SUPPRESSION MEMO

### **Employee Contact Following Resignations of Ross Hansen & Diane Erdmann**

Dear Northwest Territorial Mint Staff:

Several of you have brought it to my attention that you have been contacted by either Ross Hansen or Diane Erdmann, following their resignations from the Company. I understand the uncomfortable position these calls put you in and our attorney has reached out to Ross and Diane to ask that they cease and desist in communicating with NWTM employees.

While you may have shared company information with them up to this point, it is no longer appropriate for you to do so. Both Ross Hansen and Diane Erdmann have been instructed to direct any inquiry to Corporate Headquarters, so that their requests can be approved or denied upon legal review, under the Chapter 11 Guidelines.

You are already under a similar restriction in regard to speaking with the press. All press inquiries are to be referred to Mike Flynn, Marketing Manager.

Any NWTM employee who is found to be communicating with news agencies, Diane Erdmann or Ross Hansen - in any form - about NWTM Company business will be terminated immediately. Any employee who objects to complying with this rule will be expected to resign upon receipt of this MEMO.

FOR NORTHWEST TERRITORIAL MINT, LLC:

MARK CALVERT, TRUSTEE

# **EXHIBIT C**

**Sent:** Monday, April 18, 2016 10:17 PM  
**To:** Maura Richardson  
**Subject:** Re: documents

Maura,

Yes, I received the email about the gag order, thank you. Ironically, the company letter prohibiting contact with me generated a large amount of employee phone calls to me, most of whom were outraged about it and asked if they should quit in protest. It seems that Mr. Calvert has a bit of a mutiny going on. I have urged all to remain calm and do their work, there can only be one captain of a ship and Mr. Calvert is currently it. Do your best to help quell this rebellion, as our long-term objective is to save the company and we can't do it devoid of employees.

1. From Annette, a copy of all financial records that she did for Medallic Art Co.
2. Need any recent correspondence from Washington State office of Financial Management? And legal's file on same.
3. If you would call me there are just a bunch of little things from the legal dept.
4. Diane needs information about health insurance and how to stay on it, she requested this from Annette, but has gotten no response.

Please confirm with Annette that she is watering plants, including the two in my office and the trees across the hall. Thanks for you help.

Ross

---

**From:** Maura Richardson <[Maura.Richardson@nwtmint.com](mailto:Maura.Richardson@nwtmint.com)>  
**Sent:** Monday, April 18, 2016 5:43 PM  
**To:** 'Ross Hansen'  
**Subject:** RE: documents

Yes, it is crazy still. Can you shoot me a bullet list of what you need? Yes, I am still yo0ur point of contact. Did you get the copy of what went out on Saturday?

Maura

---

**From:** Ross Hansen [<mailto:rosshansen1984@outlook.com>]  
**Sent:** Monday, April 18, 2016 5:23 PM  
**To:** Maura Richardson  
**Subject:** documents

Maura,

I need to get some more lawyer documents. I trust you are still my point of contact. I know you must be up to you neck in alligators, but please respond one way or the other.

Ross

# **EXHIBIT D**

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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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In Re: )  
 )  
NORTHWEST TERRITORIAL MINT, ) No. 16-11767-CMA  
LLC, )  
Debtor. )

---

DEPOSITION UPON ORAL EXAMINATION  
OF  
DAVID E. HUFFMAN

---

1:00 P.M.  
May 26, 2016  
155 Northeast 100th Street, Suite 205  
Seattle, Washington

Reported by: CONNIE FARANDA, RPR, CCR 2204

## A P P E A R A N C E S

1  
2  
3 FOR DIANE ERDMANN:

4 DANIEL J. BUGBEE

5 DBS Law

6 155 Northeast 100th Street, Suite 205

7 Seattle, Washington 98125

8 206.489.3814

9 dbugbee@lawdbs.com

10  
11  
12 FOR THE TRUSTEE:

13 DAVID C. NEU

14 K&L Gates

15 925 Fourth Avenue, Suite 2900

16 Seattle, Washington 98104-1158

17 206.623.7580

18 david.neu@klgates.com

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EXAMINATION BY:	PAGE
Mr. Bugbee	4

EXHIBITS FOR IDENTIFICATION	PAGE
Exhibit 1      Declaration of Dave Huffman in Support of Trustee's Reply to Diane Erdmann's Response to Motion for Authority to Withdraw as Attorney for Debtor	78
Exhibit 2      [To be supplied later by Mr. Huffman if it exists.]	--
Exhibit 3      [To be supplied later by Mr. Huffman if it exists.]	--
Exhibit 4      Affidavit of Donald Schwenk, signed 4/15/16	88
Exhibit 5      Affidavit of Donald Schwenk, signed 4/18/16	88
Exhibit 6      Affidavit of Dave Huffman	96



1 Seattle, Washington; May 26, 2016

2 1:00 P.M.

3 --oOo--

4  
5 DAVID E. HUFFMAN,

6 sworn as a witness by the Certified Court Reporter,

7 testified as follows:

8  
9 EXAMINATION

10 BY MR. BUGBEE:

11 Q. Mr. Huffman, can you please state your full  
12 name for the record?

13 A. David E. Huffman, H-u-f-f-m-a-n.

14 Q. And where do you currently reside?

15 A. I reside in Kent, Washington.

16 Q. What's your address?

17 A. Post office box or street address?

18 Q. Street address.

19 A. I have to look it up.

20 27035 52nd Street -- I'm sorry, 52nd Avenue  
21 South in Kent, Washington 98032.

22 Q. Thank you.

23 And have you ever had your deposition taken  
24 before?

25 A. Yes, I have.

1     which.

2             So John, the Seattle coin dealer, in my  
3     opinion, is an expert. And you could lay those same  
4     five coins out, and he could specifically define what  
5     they are and their value. I couldn't.

6             Q. Had someone asked you what the value was?

7             A. No. I guesstimated it based upon what he  
8     bought versus what was in the bag. But again, there  
9     could have been a gold coin in that bag worth a million  
10    dollars --

11            Q. Right. No --

12            A. -- and I wouldn't have known that.

13            Q. I'm trying to get at, it looked to me like  
14    someone had given you some written questions that may  
15    have included --

16            A. No.

17            Q. No. No one did.

18            A. That's me being a cop.

19            Q. Okay.

20                                (Deposition Exhibit 6 was  
21                                marked for identification.)

22            Q. (By Mr. Bugbee) Mr. Huffman, you've been  
23    handed what's marked as Exhibit 6. Could you take a  
24    moment to review this document?

25            A. Okay.

1 Q. Do you recognize this document?

2 A. Yes.

3 Q. Is that your signature on page 2?

4 A. Yes.

5 Q. Why did you create this document?

6 A. Trying to create investigative leads for the  
7 continuing investigation of what's going on in this  
8 case.

9 Q. Who asked you to create this?

10 A. I'm sure it was the trustee.

11 Q. The trustee asked you?

12 A. Uh-huh.

13 Q. Mr. Calvert?

14 A. Yeah, Mark Calvert.

15 Q. Did he ask you to surveil Mr. Hansen?

16 A. Yes.

17 Q. Okay. And when did you start surveilling  
18 Mr. Hansen?

19 A. Well, this is dated the 29th of April. So  
20 probably several days before that.

21 Q. Are you still surveilling Mr. Hansen?

22 A. On a part-time basis, yes.

23 Q. Okay. And are you being paid for that?

24 A. Through my normal employment --

25 Q. Okay.

1 A. -- as director of security for the mint.

2 Q. How many hours a day were you surveilling  
3 Mr. Hansen during that week of April 25th to 29th --  
4 I'm sorry. Five days.

5 A. I couldn't tell you. I didn't keep track.

6 Q. Was it like 24-hour surveillance?

7 A. No.

8 Q. Was it less than eight hours?

9 A. Probably. I don't recall an hour amount. I  
10 didn't document it specifically.

11 Q. Were you doing your regular duties at the mint  
12 during that time period?

13 A. Yeah. But this was part of my duties at that  
14 time directed by Mark Calvert.

15 Q. Okay. Have you ever surveilled someone in  
16 your capacity as director of security at Northwest  
17 Territorial Mint before this time period?

18 A. No, not at the mint.

19 Q. Okay. But in previous employment, you had  
20 done surveillance --

21 A. Yes.

22 Q. What were you tasked with looking for in  
23 conducting this surveillance?

24 A. Trying to uncover assets, if and where they  
25 exist.

1 Q. Was this the supposed buried gold?

2 A. Well, I -- I helped another employee move the  
3 airplane from Spokane over here. So, you know, that's  
4 on this list. It's still in that hangar as of that  
5 date. I've not been back since, but at that time it  
6 was there.

7 Q. Whose airplane is that?

8 A. Well, when Ross's father died, he had a Bird  
9 Dog, which is a --

10 Q. I'm familiar.

11 A. -- Vietnam vintage aircraft. And Ross got it  
12 after his father passed away. And he moved it from his  
13 father's hangar in Spokane, Washington, to Auburn  
14 Airport.

15 Q. And was that property of the mint or of Ross  
16 Hansen's?

17 A. Well, that's up for debate. What funds did he  
18 use to transport that aircraft over here? What funds  
19 did he use to pay for the airplane hangar? You know,  
20 did he use mint money for that project?

21 Q. So someone told you that if he used mint funds  
22 to transport that plane, it would make that plane  
23 property of the mint?

24 A. No. But the discussion is, is it a personal  
25 asset that Cohen can go after, or is it an asset that

1 belongs to the company? That's yet to be determined.

2 Q. And you were employed to help determine that?

3 A. I was asked to verify it was still in that  
4 hangar.

5 Q. By Mr. Calvert?

6 A. Yes.

7 Q. Okay. Is the hangar titled in the name of  
8 Northwest Territorial Mint?

9 A. I don't know.

10 Q. Okay. Were you asked to look into that?

11 A. No.

12 Q. Did you ask if it was?

13 A. No.

14 Q. If it wasn't, it was titled -- did you go  
15 inside the hangar?

16 A. I've been inside the hangar many times.

17 Q. But did you go -- during this time period, did  
18 you go inside the hangar?

19 A. Yes.

20 Q. Did you take pictures?

21 A. Yes.

22 Q. Okay. Did you verify that you were legally  
23 authorized to enter that hangar before you went in it?

24 A. Ross had authorized me to go in that hangar  
25 before. And I still had the key to get in that hangar.

1 Q. Okay. That's not what I asked. Did you have  
2 authority from Ross on that -- in that time you went --

3 A. I didn't specifically ask him his permission  
4 on that day. But previous to that day, he had given me  
5 permission to go into that hangar many times.

6 Q. For what purposes?

7 A. He did not rescind that permission.

8 Q. For what purposes?

9 A. To put things in, take things out --

10 Q. Okay.

11 A. -- of that hangar. He was using it for  
12 storage as well.

13 Q. For his own personal stuff?

14 A. I don't know.

15 Q. You don't know.

16 A. I'm sure he has personal property in there.  
17 But the division of personal property and company  
18 property, I cannot answer.

19 Q. Do you know whose name that lease is in?

20 A. I just told you I don't.

21 Q. Did you ask anyone before you went in it?

22 A. No.

23 Q. Did you go inside Mr. Hansen's rental lake  
24 home in Federal Way?

25 A. Not on that day. I've been inside his home on

1 previous occasions.

2 Q. On that day did you go inside his home?

3 A. I just said no.

4 Q. Okay. But you went onto his physical  
5 property; correct?

6 A. You don't have to go on his physical property  
7 to look at his house.

8 Q. Well, it says you searched the boat dock area  
9 below the water line.

10 A. No.

11 Q. Yes, it does. Number 1, paragraph 3, in  
12 parentheses, searched the boat dock area below the  
13 water line.

14 A. No. You're misinterpreting that statement. I  
15 didn't say I searched it. I'm making that  
16 recommendation for someone to search it.

17 Q. Okay. So you didn't go onto the property at  
18 all.

19 A. No.

20 Q. What about Hansen's Old Dominion Mine property  
21 in Colville, Washington?

22 A. I've never been there. He told me about it  
23 many, many times.

24 Q. Okay. So up in paragraph 3, you're saying:  
25 My surveillance of Mr. Ross Hansen's known whereabouts



1 and activities for the week of April 25th through 29th,  
2 2016, has been as follows.

3 And you're saying in here, in number 3,  
4 "Hansen's 'Old Dominion Mine' property in Colville,  
5 Washington." That's where you followed him to;  
6 correct?

7 A. No. That's not what I said there. That is a  
8 statement for a future investigative lead, to go to  
9 that mine.

10 Q. So did you know that he had been out there  
11 April 25th through the 29th?

12 A. No. I have no knowledge of any dates he's  
13 ever been there. I've never been there. He's verbally  
14 told me about it many, many times.

15 Q. Okay. Did you go to Hansen's newly acquired  
16 storage unit at Western Van & Storage in Kent,  
17 Washington?

18 A. No. And in fact, that was a miscommunication  
19 that someone had told me about. And it turned out that  
20 that was the sheriff's department rental storage  
21 facility when they served the search warrant on his  
22 house and they transported things to that location for  
23 secure storage. So...

24 Q. Who told you that?

25 A. I don't recall. That was part of the rumors

1 running around the office, that he had gotten a storage  
2 unit, and it turned out that that was the law  
3 enforcement storage unit.

4 Q. Okay. So you don't remember who told you that  
5 rumor?

6 A. I don't.

7 Q. What about Hansen's vehicle park at Roanoke  
8 Park, walking distance to the Queen City Yacht Club;  
9 did you go there?

10 A. No, I did not.

11 Q. How did you know that his vehicle was parked  
12 in Roanoke Park within walking distance to the Queen  
13 City Yacht Club?

14 A. Because of his cellphone.

15 Q. Did you get his cellphone records?

16 A. No. It's on the company computer system.

17 Q. What's on there?

18 A. His cellphone. You can track it.

19 Q. So you've been tracking his cellphone?

20 A. Uh-huh.

21 Q. Yes?

22 A. Yes.

23 Q. Okay. Have you been listening to his calls?

24 A. Nope.

25 Q. Do you have any records of his calls or --

1 A. No.

2 Q. -- who he's been calling?

3 A. I've not done that.

4 Q. What about activities in an office building  
5 located at 17900 -- wait. I'm sorry. Let me back up.

6 So are all these locations, do you know about  
7 them that week because of his cellphone?

8 A. In part, yep.

9 Q. Yes?

10 A. Yes, in part.

11 Q. Okay. All right. Activities in office  
12 building located at 17900 West Valley Highway,  
13 Federal Way, Washington, what's that?

14 A. Off the top of my head, I have no recollection  
15 of that address. I would have to go there and look.

16 Q. Did you go there and look?

17 A. I might have. I just said I have no  
18 recollection of that address. I'm not from this area.  
19 So I would have to drive by there and look at it to  
20 answer that question.

21 Q. Do you have a log of all the surveillance  
22 activities you've been doing on Mr. Hansen?

23 A. No.

24 Q. Do you report daily to the trustee on what  
25 were his whereabouts?

1 A. No.

2 Q. How often are you reporting to the trustee?

3 A. If he asks me questions.

4 Q. How often has he asked you questions,  
5 approximately?

6 A. Well, he's not even been in the office the  
7 last several weeks. So it's very sporadic.

8 Q. Is it phone calls?

9 A. Most of the time it's when he's there  
10 physically.

11 Q. Okay. And then he gets an update on your  
12 surveillance activities?

13 A. Uh-huh.

14 Q. Yes?

15 A. Yes.

16 Q. What about activities in an office building  
17 located at 6847 South 180th, Tukwila, Washington?

18 A. Again, that address specifically does not ring  
19 a bell. I would have to go by there and look at it.

20 Q. Do you know, as you sit here today, whether  
21 you've been there before?

22 A. I just said I'll have to drive by and look at  
23 it to answer that question. I have no memory of that  
24 specific address.

25 Q. And have you been inside any other buildings