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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

REPLY DECLARATION OF ROBIN
WM. VUGTEVEEN IN SUPPORT OF
MOTION FOR ORDER HOLDING
ROSS HANSEN IN CONTEMPT FOR
VIOLATION OF AUTOMATIC STAY

I, Robin Wm. Vugteveen, hereby declare as follows:

1. I am presently employed as Operations Manager for Northwest Territorial Mint, LLC (“Debtor” or “NWTM”) at its Dayton, Nevada facility. I submit this Declaration in support of the Chapter 11 Trustee’s Motion for Order Holding Ross Hansen in Contempt for Violation of the Automatic Stay (the “Motion”). I am over eighteen (18) years of age and I am competent in all ways to testify.

2. I have worked for NWTM from July 2007 to March 2012 as Special Projects Manager, from June 2013 to March 2016 as Special Assistant to the CEO, and from mid-May 2016 to the present as Operations Manager. I was the first NWTM employee to be relocated to Dayton, Nevada, after the acquisition of Medallic Art Company in July 2009 by Ross Hansen and remained at Dayton during my employment at NWTM after July, 2009.

REPLY DECLARATION OF ROB VUGTEVEEN
IN SUPPORT OF MOTION FOR ORDER
HOLDING ROSS HANSEN IN CONTEMPT FOR
VIOLATION OF AUTOMATIC STAY - 1

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1 3. I have reviewed a copy of the transcript of Ross Hansen's testimony at the hearing
2 held on May 27, 2016 in connection with the Trustee's request for approval of the sale of the
3 Debtor's assets in Tomball, Texas. In his testimony, Ross Hansen asserts that significant amounts
4 of property located at the Tomball, Texas facility were owned by Medallic Art Company, LLC
5 ("Medallic LLC"). A copy of the testimony transcript is attached hereto as Exhibit A.

6 4. After the hearing and at the request of the Trustee, I reviewed the Debtor's business
7 records in an effort to verify the accuracy of Mr. Hansen's testimony. I also consulted with other
8 employees of NWTM, including Tom Boyle and Paul Wagner, regarding the accuracy of Mr.
9 Hansen's testimony.

10 5. Since the 2009 acquisition, Medallic has not had any manufacturing operations. All
11 the employees in the Dayton manufacturing facility are employees of NWTM. NWTM has
12 operated under the Medallic tradename since July of 2009 and the Medallic is described as a
13 division of NWTM on the company's website.

14 6. In his testimony, Mr. Hansen falsely represented that significant assets in the
15 NWTM facility at Tomball, Texas belong to Medallic Art Company as opposed to the Debtor.
16 While there are number of false statements and inaccuracies in Mr. Hansen's testimony, this
17 declaration focuses on a few of the more significant misrepresentations made by Mr. Hansen.

18 7. On page 9, lines 18-24, of the testimony transcript, Mr. Hansen stated that Medallic
19 Art Company has 400,000 coining dies and that Medallic sent 1,500 coining dies to Tomball,
20 Texas. This is not true. There is no record of dies owned by Medallic Art Company existing in
21 Tomball, Texas. There were five coining dies in Texas that were associated with the "Medallic"
22 tradename owned and used by the Debtor. Those five coining dies were created by NWTM in 2013
23 and 2014. Mr. Hansen had a very strict policy that no archive dies were to be transferred outside of
24 the Dayton building, and there are no records that document the transfer of any dies from the
25 Dayton archive of Medallic Art Company to any other location.

REPLY DECLARATION OF ROB VUGTEVEEN
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VIOLATION OF AUTOMATIC STAY - 2

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on August 2, 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 2nd day of August, 2016 at Seattle, Washington.

/s/ Denise A. Evans
Denise A. Evans

REPLY DECLARATION OF ROB VUGTEVEEN
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HOLDING ROSS HANSEN IN CONTEMPT FOR
VIOLATION OF AUTOMATIC STAY - 4

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