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8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 In re:

11 NORTHWEST TERRITORIAL MINT, LLC,
12 Debtor.

Case No. 16-11767-CMA

SUPPLEMENTAL DECLARATION OF
CHRISTINE UNWIN IN SUPPORT OF
MOTION FOR ORDER GRANTING
AUTHORITY TO RETURN STORED
INVENTORY, OTHER CUSTOMER
OWNED INVENTORY, AND
COINING DIES

16 I, Christine Unwin, hereby declare as follows:

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

20 2. I am a consultant for Cascade Capital Group, LLC. I have more than 15 years
21 experience as a business operations executive, additionally licensed as a Private Investigator in
22 the State of Washington. On April 11 and April 12, 2016, I led the inventory process at
23 Northwest Territorial Mint, LLC's ("NWTM" or the "Debtor") Dayton, Nevada facilities (the
24 "Dayton Office"). In connection with my inventory of precious metals at the Dayton Office, I
25 secured and identified inventory marked as storage inventory for specific customers (the "Stored")

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1 Inventory”). I took photographs of inventory located at the Dayton Office or supervised the
2 work of two Dayton Office employees who also took pictures. On a site visit to the Dayton
3 Office on June 8 and June 9, 2016 I verified inventory photographs sent to me and confirmed
4 that inventory remained in the original vault location recorded on April 11, 2016. In particular, I
5 confirmed the existence, identification and location of certain Stored Inventory.

6 3. Through my personal inspection of the inventory I determined that Stored
7 Inventory marked for Daniel J. Paolucci and Mildred Paolucci is held in vault location 41 and 42,
8 shelf 1, at the Dayton Office. I confirmed there are fourteen boxes marked for Daniel J &
9 Mildred Paolucci in these vault locations. Twelve boxes contain Johnson Matthey, Silver Bars,
10 100 oz, Qty 7 and two boxes contain Johnson Matthey, Silver Bars, 100 oz, Qty 8. In total, I
11 found 100 Johnson Matthey Silver bars 100 oz. each stored for the Paoluccis. Attached hereto as
12 Exhibit A are photographs of the Stored Inventory for the Paoluccis which were taken by Jeffrey
13 Goodfellow or myself and accurately depict the Paolucci’s Stored Inventory.

14 4. Through my personal inspection of the inventory I determined that Stored
15 Inventory marked for Daphne Blanchard is held in vault location 6, shelf 4 at the Dayton Office.
16 I confirmed there are thirteen boxes marked for Daphne Blanchard. Of the thirteen boxes, five
17 boxes each contain 500 one ounce Silver American Eagle Coins and eight boxes each contain
18 500 one ounce Silver Canadian Maple Leaf Coins. In total I found 6500 ounces marked for Ms.
19 Blanchard consisting of 2500 one ounce Silver American Eagle Coins, and 4000 one ounce
20 Silver Canadian Maple Leaf Coins. Five of the boxes marked for Daphne Blanchard were
21 discovered in an area of the Dayton vault location 51 denoted as “R. Hansen Owner’s area”.
22 Attached hereto as Exhibit B are photographs of the Stored Inventory for Ms. Blanchard which
23 were taken by Matthew Lee or myself and accurately depict Ms. Blanchard’s Stored Inventory.

24 5. Through my personal inspection of the inventory I determined that Stored
25 Inventory marked for Fred Muhlbauer is held in vault location 39, shelf 2, at the Dayton Office.

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COINING DIES - 2

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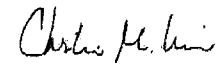
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I confirmed there are four boxes marked for Fred Muhlbauer. Three boxes contain six Pan American Silver Bars, 100 oz. each and one box contains five Pan American Silver Bars, 100 oz. In total, I found twenty-three Pan American Silver Bars, 100 oz. each stored for Mr. Muhlbauer. Attached hereto as Exhibit C are photographs of the Stored Inventory for Mr. Muhlbauer which were taken by Jeffrey Goodfellow or myself and accurately depict Mr. Muhlbauer's Stored Inventory.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 16th day of August, 2016, at Seattle, Washington.



Christine Unwin

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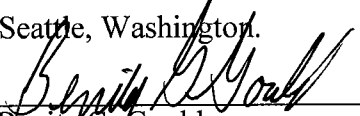
1 CERTIFICATE OF SERVICE

2 The undersigned declares as follows:

3 That she is a Sr. Practice Assistant in the law firm of K&L Gates LLP, and on
4 August 18, 2016, she caused the foregoing document to be filed electronically through the
5 CM/ECF system which caused Registered Participants to be served by electronic means,
6 as fully reflected on the Notice of Electronic Filing.

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

9 Executed on the 18th day of August, 2016 at Seattle, Washington.

10 
11 _____
12 Benita G. Gould

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