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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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

10 In re:

11 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

12 DECLARATION OF JOSEPH A.
13 HAMELL IN SUPPORT OF *EX PARTE*
14 MOTION FOR EXAMINATION OF
15 RENTON COIN SHOP, INC., BRYAN D.
16 GERAGHTY d/b/a NORTHGATE RARE
COIN, THE GOLD CENTER INC., and
VICTORIA DIAMONDS, LLC d/b/a
CASH 4 GOLD PURSUANT TO
RULE 2004 AND SUBPOENAS
PURSUANT TO RULE 9016

17
18 Joseph A. Hamell declares as follows:

19 1. I am attorney with Montgomery Purdue Blankenship & Austin, PLLC, counsel for
20 Bradley Stephen Cohen in case no. 16-2-05611-3 KNT, King County Superior Court (the "Cohen
21 Lawsuit").

22 2. On June 3, 2016, I deposed Diane Erdmann in the Cohen Lawsuit. Attached hereto as
23 Exhibit A are the relevant pages from the transcript of the deposition, which were provided to me by
24 Byers & Anderson Court Reporters, in which Diane Erdmann testified regarding her personal assets.

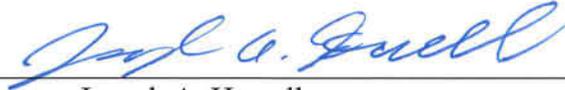
25 I declare under the penalty of perjury under the laws of the State of Washington that the
26

DECLARATION OF JOSEPH A. HAMMELL IN
SUPPORT OF *EX PARTE* MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 1
500395523 v1

K&L Gates LLP
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1 foregoing is true and correct to the best of my knowledge.

2 Executed this 12th day of May, 2017, at Seattle, Washington.

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4 

5 Joseph A. Hammell

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DECLARATION OF JOSEPH A. HAMMELL IN
SUPPORT OF *EX PARTE* MOTION FOR SUBPOENA
PURSUANT TO RULES 2004 AND 9016 - 2
500395523 v1

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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a paralegal in the law firm of K&L Gates LLP, and on May 12, 2017, she caused
4 the foregoing document to be filed electronically through the CM/ECF system which caused
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of
6 Electronic Filing.

7 Also on May 12, 2017, she caused to be deposited in the mail of the United States of
8 America, by first class postage prepaid, addressed envelopes containing copies of the foregoing
9 document and mailed to the following addresses:

10 Northwest Territorial Mint LLC c/o Ross Hansen, Member P.O. Box 2148 Auburn, WA 98071-2148	11 Renton Coin Shop, Inc. c/o Brian Wichmann, Reg. Agent 15201 Military Road South Seattle, WA 98188
12 Renton Coin Shop, Inc. c/o Steve Campau 101 Park Avenue North Renton, WA 98057	13 Victoria Diamonds LLC d/b/a Cash 4 Gold c/o Victor Ivanov 2012 Shattuck Avenue S Renton, WA 98055
14 Victoria Diamonds LLC d/b/a Cash 4 Gold 32700 Pacific Hwy South, Suite 2 Federal Way, WA 98003	15 Bryan D. Geraghty d/b/a Northgate Rare Coins & Precious Metals 11319 Pinehurst Way NE Seattle, WA 98125
16 The Gold Center 3000 W. Lles Avenue Springfield, IL 62704	17

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

20 Executed on the 12th day of May, 2017 at Seattle, Washington.

21 
22 Denise A. Lentz

EXHIBIT A

Transcript of the Testimony of

Diane Erdmann

June 3, 2016

Cohen v. Hansen

No. 16-2-05611-3



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Seattle/Tacoma, Washington**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

BRADLEY STEPHEN COHEN, an)
individual; and COHEN ASSET)
MANAGEMENT, INC., a California)
corporation,)
) No. 16-2-05611-3 KNT
Plaintiffs,)
)
vs.)
)
ROSS B. HANSEN, an individual;)
NORTHWEST TERRITORIAL MINT, LLC, a)
Washington limited liability)
company; and STEVEN EARL)
FIREBAUGH, an individual,)
)
Defendants.)

DEPOSITION OF DIANE ERDMANN

June 3rd, 2016

Seattle, Washington

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**Diane Erdmann
June 3, 2016**

**Byers & Anderson Court Reporters/Video/Videoconferencing
Seattle/Tacoma, Washington**

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APPEARANCES

For the Plaintiffs:

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Seattle/Tacoma, Washington

1 Q Which car did you drive?

2 **A Cadillac.**

3 Q Did you take anything out of the Cadillac and put it in
4 the safe deposit box?

5 **A No, I don't think so.**

6 Q What's currently in the safe deposit box?

7 **A Small amount of cash.**

8 Q How much?

9 **A Under a thousand.**

10 THE COURT REPORTER: What was that?

11 THE WITNESS: Under a thousand.

12 Q (By Mr. Hamell) A little bit earlier you testified that
13 there was somewhere between 50 and 75 thousand dollars in
14 cash in the safe deposit box, you took out 50,000 to pay
15 to Todd Tracy and now there's less than a thousand.

16 What happened to the other cash?

17 **A Well, Mr. Cohen got about \$6,000 of it.**

18 Q How did Mr. Cohen get \$6,000 of it?

19 **A Sheriff seized it.**

20 Q So you took cash out of your safe deposit box at some
21 point before April 27th and took it to your home?

22 **A Yes.**

23 Q And why did you do that?

24 **A So I would have some money, expenses or money for the**
25 **expenses.**

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Seattle/Tacoma, Washington

1 Q Besides less than a thousand dollars in cash, what else
2 is in the safe deposit box?

3 **A I think there's six ounces of gold.**

4 Q Anything else?

5 **A No.**

6 Q No silver?

7 **A No.**

8 Q What happened to the silver?

9 **A It's with a friend.**

10 Q Which friend?

11 **A I rather not say.**

12 Q Ms. Erdmann, you need to answer my questions. Which
13 friend has the silver?

14 **A I rather not draw him into this.**

15 Q Ms. Erdmann, you're obligated to answer my questions.
16 Are you refusing to answer my question?

17 **A Don Schwink.**

18 Q I'm sorry?

19 **A Don Schwink.**

20 Q How do you spell his last name?

21 **A S-c-h-w-i-n-k.**

22 Q How do you know Mr. Schwink?

23 **A I met him through work.**

24 Q Northwest Mint?

25 **A Yes.**

1 **the bare minimum.**

2 Q Do you know if Mr. Hansen is an insured on the policy?

3 **A I don't think he is. It only costs \$200 a year, so it's**
4 **pretty bare bones.**

5 Q Okay. Do you have any other insurance policies that
6 might apply to your stuff or to your home, like an
7 umbrella policy or some other liability policy?

8 **A No.**

9 MR. BUGBEE: Objection; compound.

10 Q (By Mr. Hamell) Okay. Ms. Erdmann, how are you paying
11 the rent now that Mr. Hansen doesn't have access to his
12 owner's draws?

13 **A My personal funds.**

14 Q What personal funds are those?

15 **A The funds that I -- we've already referenced.**

16 Q Where are those funds?

17 **A In the safe deposit box.**

18 Q Which safe deposit box?

19 **A One of those -- whichever one of those five is still**
20 **open.**

21 Q Okay. What is in that? Of the safe deposit boxes that
22 are still open, what is still there?

23 **A Under a thousand dollars and six ounces of gold.**

24 Q How much is that six ounces of gold worth?

25 **A About 12 hundred an ounce.**

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Seattle/Tacoma, Washington

1 Q How do you plan on paying the rent once the thousand
2 dollars and six ounces of gold is spent?

3 **A I haven't figured that out yet.**

4 Q Do you have any other assets -- or do you have any other
5 cash or precious metals besides the thousand dollars and
6 the six ounces of gold in your safe deposit box?

7 MR. BUGBEE: Objection; asked and
8 answered.

9 THE WITNESS: Yes.

10 Q (By Mr. Hamell) What precious metals -- or what is that?

11 **A Silver.**

12 Q And is that the silver being held by Mr. Schwink?

13 **A Yes.**

14 Q Okay. Anything else?

15 **A No.**

16 Q Does Mr. Hansen have any cash or precious metals?

17 **A No.**

18 Q Does Mr. Hansen have any retirement accounts?

19 **A No.**

20 Q Does he have any investment accounts?

21 **A No.**

22 Q Does Mr. Hansen own any cars?

23 **A No.**

24 Q Does Mr. Hansen own any boats or airplanes?

25 **A No.**

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Seattle/Tacoma, Washington

1 Q Has Mr. Hansen discussed his future plans to deal with
2 Mr. Cohen?

3 **A No.**

4 Q Has Mr. Hansen discussed with you any of his future plans
5 regarding Northwest Territorial Mint or any of its
6 assets?

7 **A I don't recall.**

8 Q Have you guys discuss how you're going to get by
9 financially moving forward?

10 MR. BUGBEE: Objection; asked and
11 answered.

12 Are you just harassing the witness about her state
13 of financial affairs and how destitute it is?

14 Q (By Mr. Hamell) Do you have an answer, Ms. Erdmann?

15 **A We have. Nothing has really been resolved.**

16 Q Okay. What's the -- what's the plan right now?

17 **A As I said, nothing has been resolved.**

18 Q So there is no plan?

19 **A There is no plan.**

20 Q And when do you think you'll run out of money out of the
21 safe deposit box?

22 **A It won't take long since there's less than a thousand.**

23 Q And then when do you think you'll run out of the money
24 that -- in silver that Mr. Schwink is holding for you?

25 **A I don't know.**

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Seattle/Tacoma, Washington

1 Q Are there any other assets that you have or have access
2 to --

3 MR. BUGBEE: Objection; asked and
4 answered --

5 Q (By Mr. Hamell) -- that you haven't told me about yet?

6 MR. BUGBEE: -- multiples times.

7 THE WITNESS: There's stuff from the
8 sheriff's department, and there's some from Todd Tracy,
9 so that's always a possibility.

10 Q (By Mr. Hamell) Does Mr. Hansen have any other assets
11 you haven't told me about?

12 A No.

13 Q Has he hidden any money?

14 A No.

15 Q Does he have any gold or silver?

16 A No.

17 Q Does he have any other precious metals?

18 A No.

19 Q Does he have any cash?

20 A No.

21 Q Does anybody owe him any money?

22 MR. BUGBEE: Objection; asked and
23 answered.

24 THE WITNESS: No.

25 Q (By Mr. Hamell) Let's take a quick break. I'll go over