Michael J. Gearin, wsba # 20982 David C. Neu, wsba # 33143 Brian T. Peterson, wsba # 42088 K&L GATES LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158 (206) 623-7580

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

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NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

Case No. 16-11767-CMA

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

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I, Jody Cannady, hereby declare as follows:

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Authority to Return Stored Inventory, Other Customer Owned Inventory, and Coining Dies (the

I submit this Declaration in support of the Trustee's Motion for Order Granting

I am an accountant for Cascade Capital Group, LLC. On April 14 through April

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"Motion"). I am over eighteen (18) years of age, and I am competent in all ways to testify.

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19, 2016, I led the inventory process at Northwest Territorial Mint, LLC's ("NWTM" or the

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"Debtor") Federal Way, Washington facilities (the "Federal Way Office") and on April 20

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through April 22, 2016 I led the inventory process at NWTM's Auburn, Washington facilities

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(the "Auburn Office") (collectively, the Washington Offices). In connection with my inventory

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of precious metals at the Washington Offices, I secured and identified inventory marked as

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storage inventory for specific customers (the "Stored Inventory"). In particular, I confirmed the existence, identification and location of certain Stored Inventory. During the inventory process, Derrin Tallman took photographs of inventory located at the Washington Offices. *See* Supplemental Declaration of Derrin Tallman in Support of Motion for Order Granting Authority to Return Stored Inventory, Other Customer Owned Inventory, and Coining Dies filed concurrently with this declaration. In conducting the inventory, I not only ascertained the identity and location of metals which were marked for storage customers. I did not determine whether any of the marked Stored Inventory had been repurchased from or paid for by customers.

- Inventory marked for Arthur Rickman is held in safe 3, section 2, shelf 8 and in safe 4, shelf 3 at the Federal Way Office. I confirmed there is (1) 199 1oz silver kookaburras; (2) 300 1oz Eagles; (3) 4 10oz snake lunar; (4) 60 1oz silver maple leaf; (5) Gold American Eagle 1 oz; (6) Gold Canadian Maple Leaf 1oz; (7) Gold Vienna Philharmonics 1oz; and (8) Krugerrand 1oz marked for Mr. Rickman. In total, I found 599 ounces of silver and 4 ounces of gold stored for Mr. Rickman. Attached hereto as Exhibit A are photographs that accurately depict the Stored Inventory for Mr. Rickman.
- 4. Through my personal inspection of the inventory I determined that Stored Inventory marked for Betty Lewis is held in safe 4, shelf 3 at the Federal Way Office and in safe 1, shelf 2 at the Auburn Office. I confirmed there are (1) 75 1oz Canadian Maple Leaf; (2) 5 1oz Krugerrands at the Federal Way Office and 1,830 1oz Pan American Silver rounds at the Auburn Office. In total I found 1,830 ounces of silver and 80 ounces of gold marked for Ms. Lewis. Attached hereto as Exhibit B are photographs that accurately depict the Stored Inventory for Ms. Lewis.

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- 5. Through my personal inspection of the inventory I determined that Stored Inventory marked for Brad Cameron is held in safe 4, shelf 3 at the Federal Way Office. I confirmed there is 1 10oz gold bar marked for Mr. Cameron. In total, I found 1 10oz. gold bar stored for Mr. Cameron. Attached hereto as Exhibit C is a photograph that accurately depicts the Stored Inventory for Mr. Cameron.
- 6. Through my personal inspection of the inventory I determined that Stored Inventory marked for Gary Bushouse is held in safe 3, section 3, shelf 1 at the Federal Way Office. I confirmed there are 3 100oz silver bars marked for Mr. Bushouse. In total, I found 300 ounces of silver stored for Mr. Bushouse. Attached hereto as Exhibit D is a photograph that accurately depicts the Stored Inventory for Mr. Bushouse.
- 7. Through my personal inspection of the inventory I determined that Stored Inventory marked for Gerald Walken is held in safe 4, shelf 3 at the Federal Way Office and in safe 2, shelf 2 at the Auburn Office. I confirmed there are (1) 7 1oz gold Canadian Maple Leaf; (2) 10 pieces of 1/10oz gold Canadian Maple Leaf and (3) 4 pieces of 1/2oz gold Canadian Maple Leaf at the Federal Way Office marked for Mr. Walken. I confirmed there are 10 100oz Pan American silver bars marked for Mr. Walken at the Auburn Office. In total, I found 1,000 ounces of silver and 10 ounces of gold stored for Mr. Walken. Attached hereto as Exhibit E are photographs that accurately depict the Stored Inventory for Mr. Walken.
- 8. Through my personal inspection of the inventory I determined that Stored Inventory marked for Greg Difrancesco is held in safe 2, shelf 2 at the Auburn Office. I confirmed there are 5 100oz Engelhard silver bars marked for Mr. Difrancesco. In total, I found 500 ounces of silver stored for Mr. Difrancesco. Attached hereto as Exhibit F is a photograph that accurately depicts the Stored Inventory for Mr. Difrancesco.
- 9. Through my personal inspection of the inventory I determined that Stored Inventory marked for the James Merlino Estate is held in safe 3, section 2, shelf 8 at the Federal

SUPPLEMENTAL DECLARATION OF JODY CANNADY IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 3

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Way Office. I confirmed there are 3 bags marked for the Merlino Estate. Two bags contain 6 - 100oz silver bars and 1 bag contains 5 - 100 oz silver bars marked for the Merlino Estate. In total, I found 1,700 ounces of silver stored for the Merlino Estate. Attached hereto as Exhibit G are photographs that accurately depict the Stored Inventory for the Merlino Estate.

- 10. Through my personal inspection of the inventory I determined that Stored Inventory marked for Jeffrey McMeel is held in safe 3, section 3, shelf 1 at the Federal Way Office. I confirmed there are 480 US Morgan dollars marked for Mr. McMeel. In total, I found 371 ounces of silver stored for Mr. McMeel. Attached hereto as Exhibit H is a photograph that accurately depicts the Stored Inventory for Mr. McMeel.
- Inventory marked for Jessica Hardy is held in safe 3, section 2, shelf 8 and in safe 3, section 1, shelf 7 at the Federal Way Office. I confirmed there are 1106 1oz silver rounds .999 and 1 Silver American Eagle marked for Ms. Hardy. In total, I found 1,299 ounces of silver stored for Ms. Hardy. Attached hereto as Exhibit I are photographs that accurately depict the Stored Inventory for Ms. Hardy.
- 12. Through my personal inspection of the inventory I determined that Stored Inventory marked for John Peterson is held in safe 4, shelf 3 at the Federal Way Office. I confirmed there are 29 1oz gold bars and 33 1oz Krugerrands marked for Mr. Peterson. In total, I found 62 ounces of gold stored for Mr. Peterson. Attached hereto as Exhibit J is a photograph that accurately depicts the Stored Inventory for Mr. Peterson.
- 13. Through my personal inspection of the inventory I determined that Stored Inventory marked for Lisa Vincent (f/k/a Zimmerman) is held in safe 3, section 3, shelf 1 and safe 4, shelf 3 at the Federal Way Office. I confirmed there are 100 10z silver bars and 6 10z gold bars marked for Ms. Vincent. In total, I found 100 ounces of silver and 6 ounces of gold

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stored for Ms. Vincent. Attached hereto as Exhibit K are photographs that accurately depict the Stored Inventory for Ms. Vincent.

- 14. Through my personal inspection of the inventory I determined that Stored Inventory marked for Mary Louise Donovan Trust is held in safe 2, shelf 2 at the Auburn Office. I confirmed there are 1,000 1oz Silver American Eagles marked for the Donovan Trust. In total, I found 1,000 ounces of silver stored for the Donovan Trust. Attached hereto as Exhibit L are photographs that accurately depict the Stored Inventory for the Donovan Trust.
- 15. Through my personal inspection of the inventory I determined that Stored Inventory marked for Mary Secaur is held in safe 2, shelf 2 at the Auburn Office. I confirmed there are 500 1oz Silver American Eagles marked for Ms. Secaur. In total, I found 500 ounces of silver stored for Ms. Secaur. Attached hereto as Exhibit M is a photograph that accurately depicts the Stored Inventory for Ms. Secaur.
- 16. Through my personal inspection of the inventory I determined that Stored Inventory marked for Matthew Staley is held in safe 4, shelf 3 at the Federal Way Office. I confirmed there are 12 Krugerrand pieces marked for Mr. Staley. In total, I found 12 ounces of gold stored for Mr. Staley. Attached hereto as Exhibit N is a photograph that accurately depicts the Stored Inventory for Mr. Staley.
- 17. Through my personal inspection of the inventory I determined that Stored Inventory marked for Norman Hauptman is held in safe 3, section 3, shelf 1 at the Federal Way Office and on the cart, shelf 2 at the Federal Way Office. I confirmed there are (1) 1500 Silver Philharmonics 1oz coins; (2) 7 1oz Gold Vienna Philharmonics; (3) 33 1/10 Gold Vienna Philharmonics; (4) 33 1/10oz Gold American Eagle; (5) 32 1/10oz Gold Canadian Maple Leaf; (6) 9 1oz Gold American Eagle; (7) 7 1oz Gold Canadian Maple Leaf and (8) 300 1oz silver rounds marked for Mr. Hauptman. In total, I found 1800 ounces of silver and 32.8 ounces

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of gold stored for Mr. Hauptman. Attached hereto as Exhibit O is a photograph that accurately depicts the Stored Inventory for Mr. Hauptman.

- 18. Through my personal inspection of the inventory I determined that Stored Inventory marked for Norman Liedtke is held in safe 2, shelf 2 at the Auburn Office. I confirmed there are 7 1,000 oz silver bars marked for Mr. Liedtke. In total, I found 7,000 ounces of silver stored for Mr. Liedtke. Attached hereto as Exhibit P are photographs that accurately depict the Stored Inventory for Mr. Liedtke.
- Inventory marked for Ralph Fair is held in safe 4, shelf 3 at the Federal Way Office. I confirmed there are 22 Certified MS 64 St. Gaudens marked for Mr. Fair. In total, I found 21.3 ounces of gold stored for Mr. Fair. Attached hereto as Exhibit Q is a photograph that accurately depicts the Stored Inventory for Mr. Fair.
- Inventory marked for Randy and Diane Wong is held in safe 3, section 2, shelf 8 at the Federal Way Office and in safe 1, shelf 3 at the Auburn Office. I confirmed there are 21 100oz Pan American silver bars marked for the Wongs in the Federal Way Office. I confirmed there are 9 100oz Pan American silver bars and 980 1oz Silver American Eagles marked for the Wongs in the Auburn Office. In total, I found 3,990 ounces of silver stored for the Wongs. Attached hereto as Exhibit R are photographs that accurately depict the Stored Inventory for the Wongs.
- 21. Through my personal inspection of the inventory I determined that Stored Inventory marked for Randy Gaines is held in safe 4, shelf 3 at the Federal Way Office. I confirmed there are 2 100 gram gold bars marked for Mr. Gaines. In total, I found 6.4 ounces of gold stored for Mr. Gaines. Attached hereto as Exhibit S is a photograph that accurately depicts the Stored Inventory for Mr. Gaines.

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22. Through my personal inspection of the inventory I determined that Stored Inventory marked for Russ and Bonnie Sweeney is held in safe 2, shelf 2 at the Auburn Office. I confirmed there are 10 - 500oz Pan American silver bars marked for the Sweeneys. In total, I found 1000 ounces of silver stored for the Sweeneys. Attached hereto as Exhibit T are photographs that accurately depict the Stored Inventory for the Sweeneys.

- 23. Through my personal inspection of the inventory I determined that Stored Inventory marked for Yuqun Chen is held in safe 4, shelf 3 at the Federal Way Office. I confirmed there are 10 Krugerrand pieces and 10 Canadian Maple Leaf pieces marked for Mr.Chen. In total, I found 20 ounces of gold stored for Mr. Chen. Attached hereto as Exhibit U is a photograph that accurately depicts the Stored Inventory for Mr. Chen.
- 24. Through my personal inspection of the inventory I determined that Stored Inventory marked for Frederick Muhlbauher is held in safe 3, section 2, shelf 8 at the Federal Way Office. I confirmed there are 7 100oz pure silver Johnson Matthey bars and 120 1oz silver rounds marked for Mr. Muhlbauher. In total, I found 820 ounces of silver stored for Mr. Muhlbauher. Attached hereto as Exhibit V is a photograph that accurately depicts the Stored Inventory for Mr. Muhlbauher.
- 25. Through my personal inspection of the inventory I determined that Stored Inventory marked for Rosanne Herrin is held in east wall, open shelf, shelf 3 at the Federal Way Office. I confirmed there are 2 proof silver American eagles and a silver necklace marked for Ms. Herrin. Attached hereto as Exhibit W is a photograph that accurately depicts the Stored Inventory for Ms. Herrin.

I declare under penalty of perjury that the foregoing is true and correct. EXECUTED this 18th day of August, 2016, at Seattle, Washington.

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

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That she is a Sr. Practice Assistant in the law firm of K&L Gates LLP, and on August 19, 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 19th day of August, 2016 at Seattle, Washington

Benita G. Gould

SUPPLEMENTAL DECLARATION OF JODY CANNADY IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 9

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