

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

PRIME ALLIANCE BANK, INC.,  
a Utah banking corporation;  
and SERTANT CAPITAL, LLC,  
a Delaware limited liability company,

Case No. 1:23-cv-10564-LJM-PTM  
Hon. Laurie J. Michelson

Plaintiffs

v

THE GREAT LAKES TISSUE COMPANY,  
a Michigan corporation,

Defendant.

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**DECLARATION OF DONALD SWENSON**

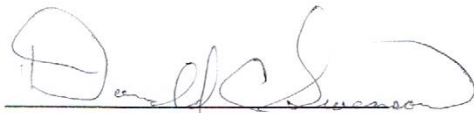
1. My name is Donald Swenson. I am over the age of eighteen and could competently testify to the matters contained in this declaration if so called.
2. I am the Chairman of Patriot Advanced Environmental Technologies, LLC (“PAET”), the current parent of Defendant Great Lakes Tissue Company (“GLT”).

3. GLT operated in a paper mill (the “Mill”) located in Cheboygan, Michigan.
4. The Mill currently employs 42 workers with plans to expand and hire up to 400 workers within the next few years.
5. In March of 2022, GLT was sold to an ownership group led by an individual named Kip Boie
6. In January of 2023, Boie’s ownership group sold the stock of GLT to PAET.
7. Since taking over GLT, the new ownership group has discovered an elaborate scheme of self-dealing and embezzlement perpetrated against GLT by Mr. Boie.
8. After buying GLT but before selling it to PAET, Boie attempted to secretly sell off all of GLT’s assets (including the subject equipment as well as future receivables).
9. Notably, the equipment at issue here *could not be sold* because that equipment was already offered as collateral to secure other corporate obligations.
10. For example, the City of Cheboygan assisted in providing fund to the mill and took a security interest in the assets.
11. The City of Cheboygan, in turn subordinated its interest to a bank, INB, to enable GLT to perform necessary plant improvements and upgrade allowing GLT to remaining an going concern.
12. Both the City of Cheboygan and INB may have a superior claim of possession.
13. I have also discovered that Boie set up two secret bank account in the name of GLT in an apparent effort to keep his fraudulent sales “off the books.”
14. Boie controlled both of these accounts and, to date, GLT has not been able to get full access to all accounts in order to do any accounting.
15. One of the banks (First Community Bank), which Sertant supposedly wired the money to, is requiring a subpoena to gain access to the account, or even discuss any information related to the account.

16. After an extensive search, I have been unable to find any “proceeds” of the “sales” that actually reached actual GLT’s corporate accounts or books.
17. Over a million dollars has disappeared without explanation.
18. Boie sold GLT to the current ownership group without disclosing that GLT supposedly had no assets.
19. Boie emptied the bank account at Citizen’s National Bank on January 13<sup>th</sup>, 2023, the day all the agreement/closing documents were signed by both Boie and the new ownership group.
20. The check, that depleted the bank account’s balance, was written out to his own company, Trout Lake Enterprises, LLC.
21. Boie would not let the new ownership group take possession, let alone step foot in the mill, until the funds from the the purchase of GLT were fully available in their bank, the following week.
22. I have found no evidence thus far that Boie disclosed his transactions to the disinterested shareholders to obtain authority for his purported sales.

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

Executed on April 14, 2023

A handwritten signature in blue ink, appearing to read "Donald C. Simon", is written over a horizontal line.