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6 Counsel for Respondents
7 Central Coast Agriculture, Inc.; Central Coast Agriculture, LLC;
Central Coast AG Distribution, LLC; Central Coast AG
8 Farming, LLC; Central Coast AG Products, LLC

9
10 **BEFORE THE HEARING BOARD OF THE AIR POLLUTION**
11 **CONTROL DISTRICT, COUNTY OF SANTA BARBARA**

12 **In the Matter of**

13 AERON ARLIN GENET, Santa Barbara
14 County Air Pollution Control Officer,

15 v.

16 CENTRAL COAST AGRICULTURE, INC.;
17 CENTRAL COAST AGRICULTURE, LLC;
CENTRAL COAST AG DISTRIBUTION,
18 LLC; CENTRAL COAST AG FARMING,
LLC; CENTRAL COAST AG PRODUCTS,
19 LLC

Case No. H.B. Case No. 2023-03-A

AFFIDAVIT OF MATTHEW ALLEN

Hearing Date: October 4, 2023 (or as may
be continued)

Time: 9:30 a.m.

Place: Board of Supervisors Hearing Room
511 East Lakeside Parkway
Santa Maria, CA 93455

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21 **AFFIDAVIT OF MATTHEW ALLEN**

22 I, Matthew Allen, declare and state as follows:

- 23 1. I am the President and General Counsel of Central Coast Agriculture, Inc. I have personal
24 knowledge of the matters set forth herein and can and will testify thereto if called upon to
25 do so.
- 26 2. Pursuant to the Hearing Board's Policies & Procedures, I submit this affidavit in support
27 of Respondents' Central Coast Agriculture, Inc., Central Coast Agriculture, LLC, Central
28 Coast Ag Distribution, LLC, Central Coast Ag Farming, LLC, and Central Coast Ag

Products, LLC (collectively “CCA”) Answer to the Santa Barbara County Air Pollution Control District’s (“District”) “PETITION FOR ORDER OF ABATEMENT REGARDING CANNABIS MANUFACTURING, EXTRACTION, STORAGE, AND DISTRIBUTION FACILITIES LOCATED AT 1201 WEST CHESTNUT AVENUE AND 1200 WEST LAUREL AVENUE, LOMPOC, CALIFORNIA” (“Petition”) and the above-referenced Hearing scheduled for October 4, 2023, or as may be continued.

3. CCA employs approximately 122 employees exclusively at the cannabis extraction facility located at 1201 West Chestnut Ave. and 1200 West Laurel Ave. in Lompoc, CA (“Facility”).
4. If the Petition is granted, CCA will have to close down operations at the Facility.
5. If operations at the Facility cease, CCA anticipates having to immediately layoff most, if not all, of the 122 employees currently employed at the Facility.
6. I understand that these employees do not have readily available and comparable alternative employment opportunities in the Lompoc, CA area or nearby surrounding areas.
7. I understand that many of these employees depend on CCA’s employment at the Facility to support their families and are the primary financial means of support. This would have a devastating impact on CCA and the affected individuals and families.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that, if sworn as a witness, I could competently testify to the foregoing. Executed this 22 day of September, 2023, in Buellton, CA.

DocuSigned by:
Matthew Allen
815F48DF05DC469...
Matthew Allen

PROOF OF SERVICE

I am a resident of the state of California, over the age of eighteen years, and not a party to the within-action. My business address is 2049 Century Park East, Suite 2600, Los Angeles, California 90067.

On *September 22, 2023*, I served a copy of the within document: **AFFIDAVIT OF MATTHEW ALLEN** on the interested parties in this action as follows:

Lorena Saldana, Hearing Board Clerk
Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd., Suite, A
Santa Barbara, CA 93110
E-mail: LAS@sbcapcd.com

Aeron Arlin Genet
Director and Air Pollution Control Office
Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd., Suite, A
Santa Barbara, CA 93110
E-Mail: ArlingenetA@sbcapcd.org

Ms. Jennifer Richardson, Division Chief
Santa Barbara County
County Counsel's Office
105 East Anapamu, Suite 201
Santa Barbara, CA 93101
E-mail: jrichardson@co.santa-barbara.ca.us

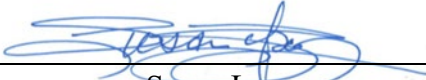
- (BY MAIL)** By placing the document(s) listed above in sealed envelope(s) in a designated "OUT" box in the office of my employer. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid. (CCP Section 1013a, 2015.5, FRCP section 5(B), or FRAP 25(d)).
- (BY FEDERAL EXPRESS)** By placing a copy of the document(s) listed above in a sealed envelope to above addressee(s) and sending it via Federal Express, with delivery fees provided for. I know that in the ordinary course of business at this office said document(s) will be deposited in a box or other facility regularly maintained by Federal Express or delivered to an authorized courier or driver of Federal Express for next day delivery. (CCP Sections 1013(c), 2015.5)
- (BY PERSONAL DELIVERY)** By providing a copy of the document(s) listed above in a sealed envelope to an attorney service with instructions to personally deliver the envelope(s) as listed above on _____.

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(BY E-MAIL) I caused a true copy of the foregoing document to be served by e-mail at the e-mail address set forth above. Each e-mail was complete and no reports of error were received.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on *September 22, 2023*, at Los Angeles, California.



Susan Lopez