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7 Golden State Greens, LLC, Far West Management, LLC  
Far West Operating, LLC, and Far West Staffing, LLC

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12 Attorneys for Defendants 419 Consulting,  
Adam Knopf, and Justus Henkes IV

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF SAN DIEGO**

15  
16 KARL BECK, individually and on behalf  
of all other similarly situated California  
17 residents,

18 Plaintiff,

19 vs.

20 POINT LOMA PATIENTS CONSUMER  
COOPERATIVE CORPORATION, a  
21 California corporation, ADAM KNOPF, an  
individual, JUSTUS H. HENKES IV, an  
22 individual, 419 CONSULTING INC, a  
California corporation, GOLDEN STATE  
23 GREENS LLC, a California LLC, FAR  
WEST MANAGEMENT LLC, a  
24 California LLC, FAR WEST  
OPERATING, LLC, a California LLC,  
25 FAR WEST STAFFING LLC, a California  
LLC, and DOES 1-50;

26 Defendants.  
27  
28

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

**07/20/2018** at 01:15:00 PM

Clerk of the Superior Court  
By Jessica Pascual, Deputy Clerk

**CASE NO. 37-2017-00037524-CU-BT-CTL**

**DECLARATION OF ADAM KNOPF IN  
SUPPORT OF DEFENDANTS' JOINT  
MOTION TO QUASH DEPOSITION  
SUBPOENA FOR PRODUCTION OF  
BUSINESS RECORDS TO VLADIMIR  
DRABKIN DBA 420SOFT**

[Imaged File]

Judge: Hon. Joel Wohlfeil  
Dept.: 73  
Date: August 24, 2018  
Time: 9:00 a.m.

Complaint Filed: October 6, 2017  
Trial Date: March 1, 2019

1 I, Adam Knopf, declare as follows:

2 1. I am a defendant in this action, am over the age of 18, and have personal  
3 knowledge of the facts stated in this declaration, except as to those facts stated upon information  
4 and belief, which facts I believe to be true. If called as a witness, I would testify competently  
5 thereto. I make this declaration in support of Defendants' Joint Motion To Quash Plaintiff's  
6 Deposition Subpoena For Production Of Business Records To Vladimir Drabkin dba 420soft.

7 2. I am involved with several separate businesses in the medical marijuana industry.  
8 My colleague, and co-defendant, Justus Henkes, is involved in certain aspects of certain of these  
9 businesses, in varying capacities, which include Point Loma Patients Consumer Cooperative  
10 Corporation, Golden State Greens, Far West Operating, LLC, Far West Management, LLC, and  
11 Far West Staffing, LLC. .

12 3. I am the Chief Executive Officer ("CEO") for defendant Point Loma Patients  
13 Consumer Cooperative ("PLPCC"), a properly licensed medical marijuana dispensary, and have  
14 been its CEO since formation. I am also a member of PLPCC's board of directors  
15

16 4. As PLPCC's CEO, I am responsible for acquiring and maintaining a working  
17 knowledge of PLPCC's corporate history and governance procedures, and past and present  
18 structural changes. I also communicate with Justus Henkes, who advises on PLPCC's corporate  
19 and accounting matters. I am also familiar with how it was structured, the time and expense  
20 involved in opening it, the time and expense involved in hiring employees and running its day-to-  
21 day operations.  
22

23 5. In the early part of 2014, the City passed an ordinance permitting a limited number  
24 of medical marijuana dispensaries to operate in approved zones if the City approved a conditional  
25 use permit ("CUP"). On learning this information, I decided to go through the application process  
26 to open a medical marijuana dispensary.

27 6. In April 2014, to start the CUP application process, I identified a property at 3452  
28 Hancock Street that appeared to meet the City's zoning criteria and I formed a company named

1 Point Loma Patients Consumer Cooperative Corporation ("PLPCC") to submit the CUP  
2 application. (A true and correct copy of PLPCC's articles of incorporation are attached as Exhibit  
3 "1" and incorporated by reference.)

4 7. In March 2015, the City Planning Commission approved PLPCC's CUP  
5 application and on April 3, 2015, PLPCC's CUP was recorded with the San Diego County  
6 recorder as document number 2015-0157638.

7  
8 8. In August 2015, PLPCC opened.

9 9. With respect to 420soft, it acts as PLPCC's point-of-sale system. Every single  
10 transaction is tracked through 420soft, including but not limited to, every piece of inventory that  
11 comes into PLPCC and every purchase that goes out.

12 10. For every purchase that is made by a patient, 420soft tracks the patient's name, the  
13 date, the time, the payment amount, the payment method, the details of the transaction, the  
14 product purchased and the amount of product purchased, the amount spent, the tax paid – state,  
15 city, and sales, and any notes about the patient or the purchase that the salesperson wants to add.

16 11. On any given day, PLPCC can see upwards of 700 transactions.

17 12. With respect to 420soft's inventory information, it tracks every piece of inventory,  
18 the date of delivery, the unit cost, the unit price, the sales details of the individual product, the  
19 performance of the product at PLPCC, and whether the inventory is on the shelf or not.


20 13. Providing access to the 420soft information would be the equivalent of allowing  
21 someone unfettered and invasive access to PLPCC's storefront, inventory, and financial records.

22 14. 420soft only provides what comes into PLPCC; it does not maintain records of  
23 payroll expenses, loan payments, management expenses, marketing expenses, and other payments  
24 made by PLPCC to operate the business.

25 15. To my knowledge, 420soft will not allow a "Sales" Report for "Individual  
26 Transactions" to be produced without each patient's name being published in the report. Doing so  
27 would require 420soft to view every patient's name and then require them to redact each patient.  
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I declare under penalty of perjury the foregoing is true and correct. Executed in San Diego, California, on July 20, 2018.

  
Adam Knopf