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19 Attorneys for Plaintiff,
20 CHRISTOPHER TIMPERIO

21 SUPERIOR COURT OF CALIFORNIA
22 COUNTY OF LOS ANGELES

23 CHRISTOPHER TIMPERIO, an individual,
24
25 Plaintiff,
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27 v.

28 VAST SPACE, LLC, a Delaware limited
liability company; VAST HOLDINGS, LLC, a
Delaware limited liability company; and DOES
1 through 20, inclusive,
Defendants.

Case No.: 24STCV07544

**PLAINTIFF'S VERIFIED COMPLAINT
FOR:**

1. **Whistleblower Retaliation in Violation of Lab. Code, § 1102.5;**
2. **Wrongful Termination in Violation of Public Policy;**
3. **Unfair & Unlawful Business Practices;**
4. **Declaratory & Injunctive Relief; and**

DEMAND FOR JURY TRIAL

Plaintiff Christopher Timperio, by and through his attorneys of record, for all causes of
action against all Defendants, hereby alleges as follows upon information and belief:

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1 **OVERVIEW OF THE CASE**

2 This case concerns serious violations of California’s whistleblower protection law and
3 public policy, which prohibit retaliation in response to an employee’s reporting of their reasonable
4 belief of a violation of a law or regulation and refusal to participate in conduct that would violate
5 a law or regulation.

6 Vast is a privately held aerospace company working to develop artificial gravity space
7 stations to “expand humanity beyond the solar system.” In
8 executing its work, it must work within government
9 regulations, including regulations in place by the United
10 States Federal Communications Commissions (FCC) to
11 ensure that private companies, like Vast, do not interfere
12 with critical national and international government
13 operations, such as the North American Aerospace
14 Defense Command (NORAD), the National Weather
15 Service (NWS), and the National Oceanic and Atmospheric
16 Administration (NOAA). However, Vast cares more about pushing its product and being first to
17 launch a private space station than complying with such regulations.



CTO Hudson

18 Part of Staff RF Engineer Christopher Timperio’s role at Vast was leading the team
19 developing the communications systems that the Vast space stations would use and to ensure Vast



CEO Hoat

20 complied with FCC regulations regarding which Radio
21 Frequencies (RF) Vast’s space stations used. Vast’s
22 leadership, CEO Maxime “Max” Hoat and CTO Alex
23 Hudson, blinded by their desire to push their first to
24 launch agenda and wanting only “yes men” on their team,
25 became upset when Mr. Timperio pushed back on their
26 desire to use certain radio frequencies that were not
27 allocated for Vast’s uses. Mr. Timperio was not some
28 unruly subordinate, but was, rather, a dedicated employee

1 who expressed his concerns that Vast would violate FCC regulations, or worse, make
2 misrepresentations to the Federal Government, were supported by Vast’s own counsel, NASA,
3 and the FCC. However, Vast’s top-most leadership was not going to allow a whistleblower to
4 disrupt their agenda—Mr. Hudson would repeatedly chastise and intimidate Mr. Timperio after
5 meetings, commanding him to brush aside his strenuous concerns about misrepresenting the
6 company adhering to federal regulations. Vast’s retaliation did not end there. Within weeks of
7 Mr. Timperio whistleblowing, he was inappropriately terminated by Vast, and was not given a
8 formal reason.

9 **PARTIES**



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17 *Plaintiff*
18 *Christopher Timperio*

1. Plaintiff is, and at all relevant times herein mentioned was, an individual residing in the County of Orange in the State of California.

2. Plaintiff is informed and believes and there upon alleges that Defendant Vast Space, LLC (“Vast” or “Defendant”) is, and at all relevant times herein



19 mentioned was, a Delaware limited liability company with its principal place of business in Long Beach, California in the County of Los Angeles in the State of California. Alex Hudson (“Hudson”) is Vast’s Chief Technology Officer. Max Hoat (“Hoat”) is Vast’s Chief Executive Officer. Daniel Buchmueller (“Buchmueller”) is Vast’s Senior Vice President of Engineering and was Plaintiff’s direct supervisor.

23 3. Plaintiff is informed and believes and there upon alleges that Defendant Vast Holdings, LLC (“Vast Holdings”) is, and at all relevant times herein mentioned was, a Delaware limited liability company with its principal place of business in Long Beach, California in the County of Los Angeles in the State of California.

27 4. Plaintiff is informed and believes that Vast and Vast Holdings are a joint venture, enterprise and/or partnership. Plaintiff is further informed and believes that Vast Holdings was

1 his joint employer at all times relevant to this action. Therefore, all references to Vast herein are
2 to Vast Holdings as well.

3 5. Plaintiff is ignorant of the true names and capacities of the defendants sued herein
4 as DOES 1 to 20, inclusive (“Doe Defendants”), and therefore sues these defendants by such
5 fictitious names. Plaintiff will amend this Complaint to insert the true names and capacities of
6 said defendants when they are ascertained. Plaintiff is informed and believes and thereon alleges
7 that each Doe Defendant is liable to Plaintiff for the acts, events, and occurrences alleged herein
8 as a result of said defendants’ relationship to all named co-defendants, or by participation in said
9 acts, events, or occurrences. At such times as Doe Defendants’ true names become known to
10 Plaintiff, Plaintiff will seek leave of court to amend this Complaint and insert such true names
11 and capacities of such Doe Defendants.

12 6. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned
13 herein, Doe Defendants and Defendant, and each of them, were the co-owners, partners, agents,
14 servants, employees and/or joint venturers, successors, predecessors, parent or subsidiary
15 corporations of each other co-defendant and were, as such, acting within the scope, course, and
16 authority of said partnership, agency, employment, and/or joint venture. Plaintiff is informed and
17 believes, and thereon alleges, that at all times mentioned herein, Doe Defendants and Defendant,
18 and each of them, are vicariously liable for their co- defendant’s actions.

19 **JURISDICTION AND VENUE**

20 7. Jurisdiction is proper in this Court because Plaintiff worked for Defendant in the
21 County of Los Angeles and Vast’s principal place of business is in the City of Long Beach, in the
22 County of Los Angeles.

23 8. Venue is proper in Los Angeles County pursuant to Code of Civil Procedure
24 §§ 395(a) and 395.5, because the unlawful actions alleged herein occurred in Los Angeles
25 County.

26 9. Jurisdiction and venue are also proper in this court because the monetary damages,
27 restitution, and statutory penalties sought herein exceed the minimal jurisdictional limits of this
28 Court and will be established at trial, according to proof.

1 **FACTUAL ALLEGATIONS**

2 10. Vast is a company developing private artificial gravity space stations to allow
3 individuals to live in space.

4 11. On or around March 31, 2023, Plaintiff accepted Vast’s offer of fulltime
5 employment as a Staff RF Engineer. On or around April 24, 2023, Plaintiff began working at
6 Vast.

7 12. During his time working for Vast, Plaintiff received high praise from his managers.
8 While he never received a formal performance evaluation, he received a lot of positive feedback,
9 including comments, on or around November 1, 2023, from Buchmueller that he should be
10 promoted to Senior Manager. Even while terminating Plaintiff’s employment a month later,
11 Buchmueller commented that Plaintiff had “done an amazing job” and “built a great team here.”

12 13. Such praise supports Vast’s lack of any legitimate reason to terminate Plaintiff
13 when it did so on December 1, 2023, in retaliation for Plaintiff reporting and refusing to
14 participate in conduct that he reasonably believed would violate Federal Communications
15 Commission (FCC) regulations regarding radio frequency (RF) waves and require him to make
16 misrepresentations on Vast’s licensing application to the FCC.

17 14. Specifically, the FCC regulates RF communications from U.S. satellites and space
18 stations to Earth (known as space-to-Earth), from Earth to space stations or satellites (known as
19 Earth-to-space), and from space stations or satellites to other space stations or satellites (known
20 as space-to-space). These regulations define which frequencies private companies and federal
21 agencies are allowed to use when communicating to space-to-Earth, Earth-to-space, or space-to-
22 space.

23 15. Per the International Telecommunication Union (ITU), radio frequencies are
24 divided into 12 different bands based on their wavelength. The FCC assigns certain bands to
25 certain uses (or allocations/classifications) and users to ensure that certain bands, such as those
26 used for government purposes, are not overcrowded. The FCC has published its FCC Online table
27 of Frequency Allocations in 47 C.F.R. § 2.106 (rev. July 1, 2022).

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1 16. Plaintiff was overseeing the development of the communications systems that
2 would allow the space stations Vast was developing, i.e., the Haven-1 and Haven-Demo
3 (collectively, the “Haven Stations”) to send and receive transmissions between the Haven Stations
4 and satellite relay stations, and/or Earth based ground stations. Part of Plaintiff’s job involved
5 coordinating with FCC attorneys and staff to ensure that the communications system operated
6 within the laws and regulations.

7 17. Vast designed a space station that used frequencies outside of the FCC’s
8 regulations for the X-band and L-band. During a meeting in October 2023, the Vast team met
9 with the FCC’s Space Bureau to brief them on Vast’s Haven Stations. The FCC’s Space Bureau
10 informed Vast that its RF plans were outside of the applicable FCC regulations. Plaintiff and other
11 engineers confirmed that Vast’s RF system design plans would need to change to comply with
12 FCC regulations, pointing to specific sections of 47 C.F.R. § 2.106. Vast would be applying to
13 the FCC for a license to use a specific RF band and would need to state on the application for that
14 license the Haven Stations’ classification under the FCC regulations.

15 18. Also in late October 2023, Plaintiff and Vast’s Mission Manager, Alex Stuetz
16 (“Stuetz”), had a conference call with Cathy Sham (“Sham”), NASA’s Lunar & Human
17 Spaceflight Spectrum Manager, and her colleague. Sham expressed several concerns with Vast’s
18 RF system, but her primary concern was its use of the X-band and L-band. During the meeting,
19 Plaintiff and Stuetz strategized with Sham to ascertain whether the Haven Stations could fall
20 under the “Earth Observation” category or if they would need to use other spectrum bands. Sham
21 affirmed that there is not an allocation for Vast’s classification in the X-band, since that
22 spectrum’s primary users are federal users. In addition, she affirmed that the other users in the X-
23 band and L-band spectrums would be interfered with, if Vast were to use those bands.

24 19. During a technical briefing meeting on or around November 3, 2023, Plaintiff
25 briefed Hoat and the rest of the team on his findings and recommended a path forward for the RF
26 system. Plaintiff, with assistance, had put together a detailed Google Slides presentation that
27 highlighted the applicable regulation and explained why the current proposal did not comply,
28 specifically citing 47 C.F.R. § 2.106 and excerpting certain relevant tables from that regulation.

1 Plaintiff made it clear that Vast did not classify under the regulations for the bands that Vast
2 wanted to use and that Vast could not state on an application for a license from the FCC that it
3 classified for such bands.

4 20. Despite Vast developing a different product than SpaceX, Hudson and Hoat
5 countered Plaintiff's recommendations by citing that Hudson's former employer SpaceX
6 specifically used the X-band frequency that was originally proposed and that he believed using
7 the non-compliant frequency was best for Vast's system. Hudson's opposition during the meeting
8 appeared constructive and he and others joked about "throwing a camera" on to the Haven
9 Stations to look back at Earth. The idea being that doing so would allow Vast to fall under the
10 Earth Observation classification, since the craft would have a camera looking back at Earth.
11 Plaintiff professionally dismissed the idea based on his research on the issue. First, the camera
12 would serve no actual scientific or research purpose. Second, the Earth Observation classification
13 required a federal government user and Vast was not a federal government user of the data. Third,
14 this was an improper and unethical workaround and the FCC was aware of other companies
15 attempting such work arounds and, in response, had rescinded their spectrum access.

16 21. Coming out of the November 3, 2023 meeting, Plaintiff was encouraged that he
17 and his team would find a solution, as the conversation appeared to be exactly what you would
18 want from a strategic engineering meeting with collaboration, exchange of ideas, and constructive
19 criticism.

20 22. However, after the meeting in the lobby outside the meeting room, Hudson pulled
21 Plaintiff aside with Buchmueller and expressed his frustration with Plaintiff for disagreeing with
22 him in front of Hoat. Hudson demanded that he and Plaintiff meet before any additional meeting
23 with Hoat. He was clearly mad at Plaintiff and wanted Plaintiff to brush aside regulatory
24 compliance, despite Plaintiff's position being supported by the FCC, NASA, and legal authority.
25 Moreover, it was Plaintiff's job to bring these types of issues to upper management and not just
26 rubberstamp Hudson's approach. Despite Hudson's aggressive demeanor, Plaintiff remained
27 calm and collected during this exchange. However, it was apparent that Hudson was not just
28 brainstorming; rather, he appeared determined to push his agenda regardless of the need for

1 regulatory compliance.

2 23. On or around November 15, 2023, a follow up meeting was held with Vast
3 leadership regarding the FCC that was attended by Plaintiff, Hoat, Hudson, Buchmueller, and
4 others. During that meeting, Plaintiff again professionally and calmly spoke up that he disagreed
5 with Hudson’s proposal, explaining that it violated regulations and that he “could not recommend
6 using this spectrum of X-band as a path forward.” During the meeting, Hoat, apparently frustrated
7 that Plaintiff was flagging a legal compliance issue, told Plaintiff something along the lines of,
8 “when we left the last meeting, I told you to let this go and you are still doing this.” He told
9 Plaintiff something along the lines of “drop it” or that it was a “direct order.” Following the
10 meeting, Buchmueller told Plaintiff that he should not have disagreed with Hudson during the
11 meeting. Plaintiff reiterated his concerns and his strong basis for flagging the illegality of Hudson
12 and Hoat’s decision to use the non-compliant frequency and Buchmueller appeared to agree with
13 Plaintiff. Again, Plaintiff made it clear that Vast did not classify under the regulations for the
14 bands it wanted to use and that Vast could not state on an application for an FCC license that it
15 did classify under those bands.

16 24. Plaintiff was particularly concerned with this issue as it would likely be his
17 signature on the application to the FCC and he did not want to make a material misrepresentation
18 to the federal government. Plaintiff made his desire not to move forward clear to Hudson,
19 Buchmueller, and Vast’s in house counsel, explaining clearly that it was because he did not want
20 to violate FCC regulations or make a misrepresentation to the FCC.

21 25. The next day, on November 16, 2023, Hudson pulled Plaintiff into another
22 meeting. During the meeting, Hudson displayed physical frustration with Plaintiff and was openly
23 mad that he had disagreed with him during the November 15, 2023 meeting with Hoat. Hudson
24 scolded Plaintiff, telling him that all information must flow through Hudson and should never go
25 directly from Plaintiff to Hoat. Plaintiff felt threatened and bullied by Hudson’s actions, and, thus,
26 he ceased pushing his position during the meeting. However, before backing down, he restated
27 his position that Vast did not classify under the bands it wanted to use and could not state that it
28 did on an application for an FCC license.

1 26. Later that day, Plaintiff had two additional meetings. Another technical follow-up
2 meeting about the FCC spectrum issue and a meeting regarding Haven-1. Buchmueller and
3 Hudson were both among those in attendance at both meetings.

4 27. During that technical follow up meeting about the FCC spectrum, Plaintiff was
5 afraid to speak up, but was required to present the material at hand and did so to allow everyone
6 to review the RF team’s concerns. During that meeting, Hudson presented that he still believed
7 that Vast could be within the Earth Observation classification, which would qualify them for the
8 original X-band frequency, despite repeatedly hearing why, as discussed above, it would violate
9 FCC regulations. During this meeting, Hudson went into greater detail about how he believed
10 Vast could exploit this non-compliant Earth Observation workaround, once again pushing his
11 agenda regardless of regulations and in a way that would require Vast to make misrepresentations
12 on its licensing application to the FCC. However, Hudson eventually said he would consider the
13 use of another RF band and thus Plaintiff left the meeting feeling uncertain but hopeful that Vast
14 would reach a regulatory-compliant resolution.

15 28. Regarding the November 16, 2023 Haven-1 meeting, Plaintiff believed it went
16 well. All the technical leaders presented why using the RF system that Hudson was pushing for
17 on the Haven-1 did not make sense and supported their arguments with data. However, Hudson
18 once again made it clear that their opinions and data did not matter, and the company was still
19 going to do what he wanted.

20 29. The following day, November 17, 2023, Plaintiff had another meeting with
21 Hudson. During that meeting, Hudson was less angry and appeared calm and professional.
22 Plaintiff and Hudson discussed the technical plan for the RF system and spectrum to make sure
23 they were aligned. Plaintiff asked Hudson’s opinion about the regulatory risk of using the X-band
24 and whether Vast would take that risk. Hudson responded that they were not sure what they would
25 do, but to make the hardware agnostic for the X-band system so to allow use at both the non-
26 compliant band Hudson was pushing for and a regulatory-compliant band that Plaintiff and others
27 had suggested.

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1 35. Labor Code section 1102.5, subdivision (b), provides,

2 An employer, or any person acting on behalf of the employer, shall not retaliate
3 against an employee for disclosing information, or because the employer believes
4 that the employee disclosed or may disclose information, to a government or law
5 enforcement agency, to a person with authority over the employee or another
6 employee who has the authority to investigate, discover, or correct the violation or
7 noncompliance, or for providing information to, or testifying before, any public
8 body conducting an investigation, hearing, or inquiry, if the employee has
 reasonable cause to believe that the information discloses a violation of state or
 federal statute, or a violation of or noncompliance with a local, state, or federal rule
 or regulation, regardless of whether disclosing the information is part of the
 employee's job duties.

9 36. Labor Code section 1102.5, subdivision (c), provides,

10 An employer, or any person acting on behalf of the employer, shall not retaliate
11 against an employee for refusing to participate in an activity that would result in a
12 violation of state or federal statute, or a violation of or noncompliance with a local,
 state, or federal rule or regulation.

13 37. As detailed above, Plaintiff reported that Vast was proceeding in a way that would
14 violate FCC regulations, specifically, Code of Federal Regulations, title 47, section 2.106 (rev.
15 July 1, 2022). In written and verbal communications to Vast's highest most management, Plaintiff
16 detailed how the RF band that was being pushed by management did not comply with that
17 regulation.

18 38. As detailed above, Plaintiff also refused to participate in illegal conduct with
19 respect to creating an RF system that used an unpermitted band and filing an application for a
20 license from the FCC that Plaintiff reasonably believed would require Vast to make a
21 misrepresentation or misrepresentations to the FCC.

22 39. Within weeks of Plaintiff's whistleblowing and refusal (and certainly less than 90
23 days after his whistleblowing and refusal), Vast retaliated against Plaintiff as a proximate result
24 of his complaints and refusal by terminating his employment.

25 40. As a direct and proximate result of Vast's conduct, Plaintiff has incurred and will
26 continue to incur general and special damages in an amount to be proven at trial. These damages
27 include lost income, employment, career opportunities, depression, anxiety, embarrassment,
28 anger, humiliation, loss of enjoyment of life, and severe emotional distress. The symptoms of

1 Plaintiff's emotional distress have also taken on physical manifestations, including but not limited
2 to insomnia, chest pains, headaches, delirium, and heart palpitations.

3 41. The acts taken toward Plaintiff alleged herein were carried out by Vast's officers,
4 directors, and/or managing agents, including but not limited to Hudson, Hoat, and Buchmueller,
5 acting in a despicable, oppressive, fraudulent, malicious, deliberate, egregious and inexcusable
6 manner and in conscious disregard for the rights and safety of Plaintiff, thereby justifying an
7 award of punitive damages in a sum appropriate to punish and make an example of Vast, pursuant
8 to Civil Code section 3294.

9 42. Plaintiff has incurred and continues to incur legal expenses and attorneys' fees,
10 and hereby requests his attorneys' fees pursuant to Government Code section 12965.

11 **SECOND CAUSE OF ACTION**

12 **Wrongful Termination in Violation of Public Policy**

13 **(Against All Defendants and Does 1-20)**

14 43. As a separate and distinct cause of action, Plaintiff complains and re-alleges all
15 the allegations contained in this Complaint and incorporates them by reference into this cause of
16 Action as though fully set forth herein, except those allegations which are inconsistent with this
17 cause of action.

18 44. It is an unlawful employment practice for an employer to discharge, expel, or
19 otherwise discriminate against any person because the person has opposed any unlawful practice
20 or has refused to engage in any unlawful practice. *Tameny v. Atlantic Richfield Co.*, (1980) 27
21 Cal.3d 167.

22 45. Vast discharged Plaintiff for opposing Vast's decision to violate FCC regulations
23 which Plaintiff reasonably believed was illegal and refused to participate in.

24 46. As a direct and proximate result of Vast's conduct, Plaintiff has incurred and will
25 continue to incur general and special damages in an amount to be proven at trial. These damages
26 include lost income, employment, and career opportunities, and emotional distress, depression,
27 anxiety, embarrassment, anger, humiliation, loss of enjoyment of life, and severe emotional
28 distress. The symptoms of Plaintiff's emotional distress have also taken on physical

1 manifestations, including but not limited to insomnia, chest pains, headaches, delirium, and heart
2 palpitations.

3 47. The acts taken toward Plaintiff alleged herein were carried out by Vast’s officers,
4 directors, and/or managing agents, including but not limited to Hudson, Hoat, and Buchmueller,
5 acting in a despicable, oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable
6 manner and in conscious disregard for the rights and safety of Plaintiff, thereby justifying an
7 award of punitive damages in a sum appropriate to punish and make an example of Vast, pursuant
8 to Civil Code section 3294.

9 48. Plaintiff has incurred and continues to incur legal expenses and attorneys’ fees,
10 and hereby requests his attorneys’ fees pursuant to Government Code section 12965.

11 **THIRD CAUSE OF ACTION**

12 **Unfair, Fraudulent, and Unlawful Business Practices**

13 **(Against All Defendant and Does 1-20)**

14 49. As a separate and distinct cause of action, Plaintiff complains and re-alleges all
15 the allegations contained in this Complaint and incorporates them by reference into this cause of
16 action as though fully set forth herein, except those allegations which are inconsistent with this
17 cause of action.

18 50. At all relevant times, Plaintiff has been entitled to the benefits and protections of
19 Business and Professions Code sections 17200, *et seq.* (“UCL”).

20 51. Vast’s unfair, unlawful, and fraudulent conduct alleged herein amounts to and
21 constitutes unfair and unlawful competition within the meaning of the UCL. Due to their unfair
22 and unlawful business practices alleged herein, including but not limited to violations of the
23 California Labor Code, Vast has unfairly gained a competitive advantage over other comparable
24 companies doing business in California that comply with their legal obligations.

25 52. As a result of Vast’s unfair, unlawful, and fraudulent competition alleged herein,
26 Plaintiff has suffered injuries in fact and lost money.

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1 **PRAYER FOR RELIEF**

2 Plaintiff prays for judgment against Defendant and Vast Holdings and Doe Defendants 1-
3 20 on all causes of action as follows:

- 4 1. For general damages according to proof at trial;
5 2. For special damages according to proof at trial;
6 3. For attorneys' fees;
7 4. For exemplary and punitive damages according to proof at trial;
8 5. For all costs of suit herein incurred;
9 6. For all penalties available under California Labor Code any other applicable
10 statutes;
11 7. For an award of interest, including prejudgment interest, as provided by law and
12 according to proof at trial;
13 8. For tax neutralization;
14 9. Post-judgment interest on all unpaid amounts;
15 10. For declaratory relief sought herein;
16 11. For injunctive relief sought herein; and
17 12. For such other and further relief as the Court may deem just and proper.

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20 Date: March 26, 2024

By: 
LAWRANCE A. BOHM, ESQ.
KELSEY K. CIARIMBOLI, ESQ.
LAUREN E. GROCHOW, ESQ.
DANIEL M. KALINOWSKI, ESQ.


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23 Attorneys for Plaintiff,
24 CHRISTOPHER TIMPERIO
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DEMAND FOR JURY TRIAL

Plaintiff Christopher Timperio hereby demands a trial by jury on all claims.

Date: March 26, 2024

By: 
LAWRANCE A. BOHM, ESQ.
KELSEY K. CIARIMBOLI, ESQ.
LAUREN E. GROCHOW, ESQ.
DANIEL M. KALINOWSKI, ESQ.

Attorneys for Plaintiff,
CHRISTOPHER TIMPERIO

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VERIFICATION

I, Christopher Timperio, am the plaintiff in the above-entitled action. I have read the foregoing VERIFIED COMPLAINT FOR: 1. WHISTLEBLOWER RETALIATION IN VIOLATION OF CAL. LAB. CODE § 1102.5; 2. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY; 3. UNFAIR & UNLAWFUL BUSINESS PRACTICES; AND 4. DECLARATORY & INJUNCTIVE RELIEF (“Verified Complaint”) and know its contents. The matters stated in the Verified Complaint are true based on my own personal knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on 03/22/2024, at Orange, California.

Christopher Timperio

Christopher Timperio