

To The County of Lake Planning Commissioners;

Commissioner John Hess
Commissioner Everardo Chavez Perez
Commissioner Batsulwin Brown
Commissioner Christina Price
Commissioner Maile Field

My name is Michael Wegner, I am a consultant for different types of businesses, but my work mainly involves assisting my clients with; permits, licenses, and certifications for agricultural companies. These typical projects include; Alcoholic Beverage Control licensing, Organic and Food Safety Certifications, as and Cannabis permitting and licensing at both local and state levels.

I have been working in the Cannabis Industry since 2009 when I opened the first permitted cannabis dispensary in Sonoma County named The Valley of The Moon Collective I sat on advisory ad hoc committees for the City of Santa Rosa and County of Sonoma when the county developed its initial cannabis regulations during that time.

For clarity, my services are always at the request of the client and their particular needs. For example, an audit by CCOF for a GAP Food Safety Inspection, the client would request my assistance for said audit, the client would then tell me what is to be audited and inspected, I then review the areas and equipment pertinent to the audit inspection, I give my findings to the client and support any necessary corrections. At no point do I make decisions for a client or go outside what they have requested from me. The scope of my services for Legendary Farms was limited and my connection to the violations at Legendary Farms (UP19-15) is misrepresented in the Staff Report included in the agenda packet for the Commission's hearing on this item. Moreover, I was never given notice that the Director was requesting, as part of recommendation to revoke UP19-15, that I be determined to be a "Responsible Party" for the violations found at Legendary Farms' location, and I only found out two days ago when the agenda packet was posted. To be limited to defending myself to a few minutes of public comment is fundamentally unfair and violates my rights to due process.

The Staff Report does have factual information such as my presence at the Annual Compliance Monitoring Inspection of UP19-15. Legendary Farms Melissa Smith is a former client. What the report omits, among other things, is that my participation, in Abating the Nuisance at the location 2290 Soda Bay Road, Lakeport CA (APN 008-010-29) was at the request of Cannabis Code Enforcement Officer Linda Bill. My involvement in this action was in good faith to assist Cannabis Code Enforcement Officer Linda Bill, whom I have the upmost respect for as a professional. To imply that my actions make me a Responsible Party is entirely unwarranted. I had neither the keys to the Ag Buildings nor permission from the owner to authorize access.

The Staff Report submitted commission by County of Lake Community Development Director Mireya G. Turner, contains false allegations and accusation.

The erroneous statements made in the Staff Report have indicated myself Michael Wegner Consultant as a "Responsible Party" to this "High Severity Violation", I contest this in fact and oppose these defamatory accusations.

Under LAKE COUNTY CODE, Chapter 13 – NUISANCESS, ARTICLE VII, Sec. 13-47 – Definitions 47.1 (q)

q. Responsible Person(s) means any person, as defined in this section, who is any of the following:

- i. A person who causes or materially contributes to the causation of an Administrative Violation;
- ii. A person who maintains or allows an Administrative Violation to continue by his or her action or inaction;
- iii. A person whose agent, employee, consultant, or independent contractor causes or materially contributes to the causation of an Administrative Violation;
- iv. An on-site manager of a business who is responsible for the activities occurring at the premises where an Administrative Violation occurs;
- v. A trustee or other person who is given the legal authority to manage property on behalf of someone else where an Administrative Violation occurs;
- vi. A person who is a parent or guardian having custody and control of a Minor who contributes to the causation of an Administrative Violation;
- vii. A person who is the owner of, or who exercises control over, or any lessee or sub lessee with the current right of possession and control of, real property where a property related Administrative Violation occurs.

My actions and the consulting work I performed for my former client do not following do not satisfy any of the alternative grounds for me to be a Responsible Party. I did not cause or contribute to the unpermitted grow or Ag buildings. I did not maintain or allow those activities to continue. I was not even aware of the unpermitted grow in the hoop houses or indoor grow in the Ag buildings. I am not a person whose agent, employee, consultant or independent contractor caused or materially contributed to the violation that are the subject of today’s hearing. Neither was I an on-site manager responsible for activities at Legendary Farms. I have never had legal authority to manage the property and was never the owner or in control of the property, the business or any leaseholder.; I am not, a person who causes or materially contributes to the causation of an Administrative Violation.

Since I do fit any of these definitions of a “Responsible Party”, I respectfully request that this Planning Commission for the record explicitly find that I am not a “Responsible Party”. The bald assertion in the report lacks any evidence that I caused or controlled, legally or in fact, any of the activities or conditions that violate the county code or Legendary Farms’ use permit. Accordingly, I again ask for the Commission to find that I am not a Responsible Party or, alternatively, to continue the matter to afford me a meaningful opportunity to present evidence to counter the innuendo and false accusation that has been leveled against me without proper notice.

Sincerely,

Michael Wegner Consultant 707-349-4179