I	Case 2:19-cv-00290-RSL Document 42	0 Filed 04/21/21 Page 1 of 3
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2	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
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4	PDUCE CODKED at al. on babalf of	Case No. 2:10 CV 00200 DSI
5	BRUCE CORKER, <i>et al.</i> , on behalf of themselves and others similarly situated,	Case No. 2:19-CV-00290-RSL DECLARATION OF CÉSAR VEGA
6	Plaintiff,	The Honorable Robert S. Lasnik
7	v.	The Honorable Robert 5. Lashik
8	COSTCO WHOLESALE CORPORATION, et al.,	
9	Defendants.	
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11	I, César Vega, declare as follows:	
12	1. My name is César Vega. I am a New York City based coffee professional with	
13	over 10 years of hands on experience in specialty coffee production, processing, quality control	
14	and export logistics at origin, as well as commercial roasting and cafe operations in the United	
15	States, Canada, and Asia. I have been a licensed Q Grader for arabica coffees for the past 7 years,	
16	and have participated as member in both national and international juries for three Cup of	
17	Excellence events. Over the course of my work I have studied and dealt directly with many of the	
18	regulatory complexities of exporting and importing coffee from a variety of origins.	
19	Additionally, I have studied coffee production trends and how they have been influenced by	
20	government programs, policies, and certification.	
21	2. In the coffee industry, there are very few examples of coffees that carry the same	
22	clout and "brand identity" as Kona. It is important to note that Kona is a designated origin, and	
23	not just limited to a specific variety, process, or presentation. I attribute Kona's status in the	
24	industry to a number of factors, but perhaps most important are the unique geography and	
25	topography of Kona, and the limited nature of the planting and production of Kona Coffee. As is	
26	the case in any coffee of origin, this unique combination of factors will contribute to a special and	

often unique number of aromas, tastes, and qualities that create a signature flavor profile. In this
respect the best analogue would be Jamaica Blue Mountain Coffees ('JBM'), which has similar
brand recognition, limited production, and historically high prices (paired with rarity). It is worth
noting that other attempts at such "designated and protected origins" have had only mixed success
in their creation, enforcement, and recognition, and have not had the same long-lasting positive
effects in either reputation or valuation, including Costa Rica's Tarrazu, Honduras' Marcala,
Guatemala's Antigua, and Tanzania's Kilimanjaro, to name a few.

8 3. Other "brands" within the industry have garnered fame, recognition, or otherwise 9 high prices fueled by demand, but are not tied to a geographical origin and are not otherwise 10 comparable to Kona. The most notable, perhaps, is the "Gesha" or "Geisha" variety, a unique 11 cultivar of the arabica species, renowned for its exquisite and unique flavor profile first made 12 famous by two families in Panama's Boquete region. Over the course of the past decade, it has 13 seen the variety grown in just about every producing country in Latin America and beyond with 14 variable and often disappointing results. Gesha's quality is no longer to be expected thanks to 15 varying degrees of traceability, quality and little to no regulation around the variety.

4. Jamaica Blue Mountain remains the closest point of comparison to Kona's unique
situation. The island nation inherited many of the same ancient varieties through trade in the
Caribbean, which have ultimately contributed significantly to both Kona's and JBM's signature
flavor profiles. They each have unique topographies that rely on increasingly difficult growing
conditions leading to low yields, and they are limited to small overall acreage that can be
designated as within the JBM or Kona designation, and furthermore, the average producer is a
small farmstead with a modest yearly output.

5. JBM has, since the mid-1940s, been closely monitored and controlled by the
Jamaican government and its relevant agencies to ensure that the origin of the coffee is
certifiable, and as a result the very limited amounts of JBM trade for very high and stable prices.

-2-

1	6. While counterfeiting in coffee is normally very rare, the high price of both JBM	
2	and Kona have been attractive to enterprising parties. However, the Jamaican authorities have	
3	done a much better job of monitoring and logging production throughout the Blue Mountain	
4	growing regions. There are many mechanisms by which the Jamaican Coffee Board, its	
5	regulatory agency, ensures this - they require that all producers, processors, and otherwise	
6	manipulators of coffee at any stage of its production are registered and licensed with the Board,	
7	receiving documented certification for the coffee at every inflection point through the production,	
8	processing and eventual sale. The Board also oversees and certifies all coffee exports as well as	
9	foreign imports (largely prohibited) through its agency and an established national clearing house.	
10	Furthermore, the Jamaican Control Board critically controls exports, and prohibits the importation	
11	of coffee in any form from other countries, making counterfeiting and the adulteration of coffee	
12	lots far more difficult. They have also published extensively concerning fraudulent JBM coffees.	
13	7. In my opinion, Kona and JBM exhibit a high degree of comparability, with the key	
14	difference between the two being the superior extent to which Jamaican authorities have sought	
15	to, and have been successful at, protecting JBM from counterfeit activity.	
16	I declare under penalty of perjury that the forgoing is true and correct. Executed this 20th	
17	day of April 2021, in New York, NY.	
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19	<u>/s/ César Vega</u> César Vega	
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