

1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WASHINGTON  
3 AT SEATTLE

4 BRUCE CORKER, *et al.*, on behalf of  
5 themselves and others similarly situated,

6 Plaintiff,

7 v.

8 COSTCO WHOLESALE  
9 CORPORATION, *et al.*,

10 Defendants.

Case No. 2:19-CV-00290-RSL

**DECLARATION OF CÉSAR VEGA**

The Honorable Robert S. Lasnik

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

1 often unique number of aromas, tastes, and qualities that create a signature flavor profile. In this  
2 respect the best analogue would be Jamaica Blue Mountain Coffees ('JBM'), which has similar  
3 brand recognition, limited production, and historically high prices (paired with rarity). It is worth  
4 noting that other attempts at such "designated and protected origins" have had only mixed success  
5 in their creation, enforcement, and recognition, and have not had the same long-lasting positive  
6 effects in either reputation or valuation, including Costa Rica's Tarrazu, Honduras' Marcala,  
7 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.

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

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

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