1 2 3 4 5 6 7	William Litvak (SBN 90533) Caroline Karabian Castillo (SBN 281971) James M. Cunningham (SBN 322508) DAPEER, ROSENBLIT & LITVAK, LLP 11500 W. Olympic Blvd., Suite 550 Los Angeles, CA 90064 Telephone: (310) 477-5575 Facsimile: (310) 477-7090 Attorneys for Plaintiff CITY OF AGOURA HILLS	EXEMPT FROM FILING FEE – GOV. CODE § 6103
8	SUPERIOR COURT OF TH	
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES	
10	CITY OF AGOURA HILLS, a municipal	CASE NO. 20VECV01312
11	corporation,)
12	Plaintiff,	[Assigned for all purposes to Hon. VirginiaKeeny in Dept. W
13	VS.)
14	JAMES MAYFIELD, an individual; SHEILA) DECLARATION OF ALLEN
15	ZAMEL, an individual; WHISPERING OAKS CHURCH, INC., a California) TRIPOLSKIY IN SUPPORT OF) PLAINTIFF'S OPPOSITION TO
16	Corporation; and DOES 1-50, inclusive,	DEFENDANTS SPECIAL MOTION TO STRIKE
17	Defendants.) STRIKE
18))
19		(Filed concurrently with Opposition to(Special Motion to Strike, Declaration of
20) Amir Hamidzadeh; Declaration of Ramiro
21		Adeva, Exhibits to Declarations, Objectionsto the Declaration of James Mayfield;
22) Request for Judicial Notice]
23)
24)
25)
26	 ///	
27 28		
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	DECLARATION OF	1 ALLEN TRIPOLSKIY
- 1	DECEMBER OF OF	· · · · · · · · · · · · · · · · · · ·

DECLARATION OF ALLEN TRIPOLSKIY

- I, Allen Tripolskiy, declare and state as follows:
- I. I am over 18 years of age and am not a party to this action. I am a Code Compliance for the CITY OF AGOURA HILLS ("City") and have been employed with the by the City since February 24, 2020. I have gained personal knowledge from my review of the files in this matter maintained by the City in the ordinary course of business. If called as a witness to testify as to the matters set forth herein, I could and would testify competently thereto.
- This declaration concerns real property located at 28347 Balkins Drive, City of Agoura Hills, County of Los Angeles, California (hereinafter "Subject Property").
- 3. My duties as a Code Compliance Officer include the inspection of properties to ensure they comply with regulations of the Agoura Hills Municipal Code (hereafter, the "AHMC"), some of which are as follows: Article V [Sanitation and Health; Chapter 6 (Nuisance Abatement)], Article VIII [Building Regulations], Article VI [Taxes; Licenses; Business Regulations] and Article IX [Zoning Regulations]. When activities and/or conditions are identified that violate the AHMC, I seek their correction in order to protect public health, safety and welfare.
- 1. As part of my job duties, I regularly review files maintained by the City on real properties. I am familiar with these records as they relate to the Subject Property. I am also familiar with the City's actions with regard to the Subject Property, and letters, complaints, and other communications with Defendants and other community members related to the Subject Property.
- 4. As fully detailed in the concurrently filed declarations, the City has been receiving complaints about construction activities and weddings taking place at the Subject Property since July 2019. On January 26, 2021, I received another complaint that weddings are taking place at the Subject Property and that wedding guests are being directed to use the Old Agoura Park as a parking lot.
- A review of Defendants' recent social media posting for "Whispering Oaks
 Chapel" reveal that they are continuing to operate the Subject Property as a wedding venue (true

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 11500 W. Olympic Blvd., Suite 550, Los Angeles, CA 90064-1524.

On February 11, 2021, I served the foregoing document described as **DECLARATION OF ALLEN TRIPOLSKIY IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS SPECIAL MOTION TO STRIKE** interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Counsel for Defendants

Robert L. Scott SCOTT & ASSOCIATES 300 East Esplanade Drive, 9th Floor Oxnard, CA 93036 E: scott@civiccenter.com

BY ELECTRONIC TRANSMISSION – ONE LEGAL. I caused an electronic version of the documents to be submitted to the Superior Court of California and thereafter caused an electronic version to be served to the persons in the above service list via the litigation support service One Legal.

BY OVERNIGHT DELIVERY. I enclosed the documents in an envelope or package provided by an overnight carrier and addressed to the persons at the addresses in the above service list. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 11th day of February 2021 at Los Angeles, California.

Lila Torres, Declarant