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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING**

STATE OF WASHINGTON,  
DEPARTMENT OF ECOLOGY,  
  
Plaintiff,  
  
v.  
  
CITY OF BOTHELL, BOTHELL  
SERVICE CENTER ASSOCIATES,  
NORMAN OLSEN, NANCY OLSEN,  
LANCE CROSS, ANITA CROSS, ROSS  
LUNDE, and ESTATE OF MERCER  
RHODES,  
  
Defendants.

NO.  
  
DECLARATION OF JEROMEO CRUZ

I, JEROMEO CRUZ, declare as follows:

1. I am over 21 years of age and am competent to testify herein. The facts set forth in this declaration are from my personal knowledge.
2. I am employed by the Washington State Department of Ecology as a Site Manager in the Toxics Cleanup Program for Ecology's Northwest Regional Office. I am the designated Site Manager for the Bothell Service Center Simon & Sons (BSCSS) Site (Site), and I am therefore knowledgeable about matters related to this Site.
3. The Site is located in Bothell, Washington.
4. Ecology has determined that a release and/or threatened release of hazardous substances has occurred at the Site.

