

1 Scott Cross, SBN 199116
2 Wiley R. Driskill, SBN 253913
3 **LOZANO SMITH**
4 7404 N. Spalding Avenue
5 Fresno, CA 93720-3370
6 Telephone: 559-431-5600
7 Facsimile: 559-261-9366

E-FILED
3/29/2023 5:25 PM
Superior Court of California
County of Fresno
By: A. Ramos, Deputy

Attorneys for Applicant, City of Reedley

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF FRESNO

IN RE PROPERTY LOCATED AT:

Case No.: 23CECG00912

850 "I" Street
Reedley, CA 93654

**DECLARATION OF JESALYN HARPER IN
SUPPORT OF APPLICATION FOR
ABATEMENT WARRANT AND ORDER
AUTHORIZING ENTRY ON THE
PROPERTY TO ABATE PUBLIC
NUISANCE**

APN: 368-010-64S

(Application for Abatement Warrant and
Order; and [Proposed] Abatement Warrant
and Order filed concurrently.)

AY-NC-LP, OWNER.

I, JESALYN HARPER, declare as follows:

1. I am currently, and at all times relevant have been, employed as a Code Enforcement Officer with the City of Reedley ("City").

2. I have personal knowledge of the matters contained herein and could, if called upon, competently testify thereto. As to those matters asserted on information and belief, I believe them to be true.

3. My general responsibilities as a Code Enforcement Officer are inspecting properties to ensure that they are in compliance with state and local building regulations as well as responding to complaints from the citizens in our community and enforcing the City Municipal Code with special attention to Substandard Housing and Public Nuisance properties.

1 4. Through various certification requirements and continuing education, I have extensive
2 training and experience in the enforcement of the City Municipal Code. I am trained and familiar with
3 the State housing law, the California Health and Safety Code (“H&S”), the California Building
4 Standards Code (“CBSC”), the California Building Code (“CBC”), the California Residential Code
5 (“CRC”), the California Fire Code (“CFC”), the California Electrical Code (“CEC”), the California
6 Plumbing Code (“CPC”), the Uniform Code for the Abatement of Dangerous Buildings (“UCADB”),
7 the Uniform Housing Code (“UHC”), other local building codes, and the Reedley Municipal Code
8 (“RMC”).

9 5. Code Enforcement has been personally involved with the efforts to bring the property at
10 850 “I” Street, Reedley, California 93654 (Assessor’s Parcel Number 368-010-64S) (the “Property”)
11 into compliance since March 3, 2023. It is my information and belief that the record owner of the
12 Property is AY-NC-LP, and the tenant of the Property is a business called Prestige Biotech, Inc. The
13 Property consists of a 1.73-acre parcel lot with an industrial warehouse.

14 6. Due to the City’s knowledge that the Property was being used to store various unknown
15 chemicals, the City involved the California Department of Toxic Substances Control (“DTSC”), the
16 Federal Bureau of Investigations, the California Department of Public Health (“CDPH”), and the
17 Fresno County Department of Public Health in its investigation of the Property.

18 7. After the tenants of the Property refused to permit City staff to inspect all portions of the
19 Property, the City applied to the Court for an Inspection Warrant. On March 13, 2023, the Court issued
20 an Inspection Warrant allowing the City, and agents from the above-referenced agencies, to enter the
21 Property and inspect for Health and Safety Code, Building Code, and Municipal Code violations.

22 8. On March 16, 2023, at approximately 11:00 a.m., the City served the Inspection Warrant
23 on Wang Zhaolin, the individual responsible for the Property at the time of the inspection and carried
24 out an inspection of the entirety of the Property. The City documented several building and safety code
25 violations. CDPH documented embargoed items being stored in the Property and made an inventory of
26 the contents of the lab. DTSC inspected how the tenant was disposing of toxic substances and tested
27 the air to ensure it was safe to breathe. One of the rooms was found to contain several vessels of
28 liquids and various apparatus that made it potentially unsafe to enter.

1 9. During the inspection, we found a room housing hundreds of laboratory mice. Wang
2 Zhaolin informed us that these mice were genetically engineered to catch and carry the COVID-19
3 virus. (Attached hereto as **Exhibit A**, is a true and correct copy of photos of the mice.)

4 10. On March 17, 2023, I received an email from a Xiuquin Yao, who indicated that they
5 were the President of Prestige Biotech, Inc. I exchanged emails with Yao from March 19 to March 27,
6 2023, and inquired as to whether they could provide any licenses or certifications permitting the
7 experiments and breeding of these mice. They never provided any certifications or licenses from any
8 state or federal agency that permitted the activities being conducted on the Property. I informed them
9 that the mice were being kept in inadequate conditions in overcrowded cages and there was a lack of
10 food and water for the mice. No plan was given by Yao regarding a plan to care for the mice, or where
11 the mice would be moved since the building was red tagged following the City's inspection. (Attached
12 hereto as **Exhibit B** are true and correct copies of my email correspondence with Xiuquin Yao from
13 March 17 to March 27, 2023.)

14 11. Yao had provided names of individuals who were supposed to provide food and water to
15 the mice but they have not returned any of my calls or have claimed to not be employees of Prestige
16 Biotech, Inc. Due to the lack of response from the tenants of the Property, the City has had to take over
17 providing care for the mice left on Property that would otherwise be left without food or water.

18 12. On March 27, 2023, I received an email from Dr. Nina Hahn, a veterinarian who also
19 inspected the Property. She indicated that the mice are being housed in conditions that are far outside of
20 all animal welfare regulations and standards of care. The issues include the cages being overcrowded,
21 improper sanitation, exposure to wild rodents, and being exposed to lights 24 hours a day despite the
22 mice being nocturnal. Dr. Hahn recommends that the mice either be removed from the location by the
23 tenants or that the City seize the mice to prevent any further mistreatment of the animals. (Attached
24 hereto as **Exhibit C** is a true and correct copy of Dr. Hahn's email.)

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26 ///

27 ///

28 ///

LOZANO SMITH
7404 N. Spalding Avenue Fresno, CA 93720-3370
Tel 559-431-5600 Fax 559-261-9366

1 13. Based on the facts above, the City is requesting that an Abatement Warrant be issued to
2 allow for the City staff and its designees to enter the Property and seize all of the laboratory mice so
3 that they may be humanely euthanized.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing is
5 true and correct.

6
7 DATED: March 29, 2023

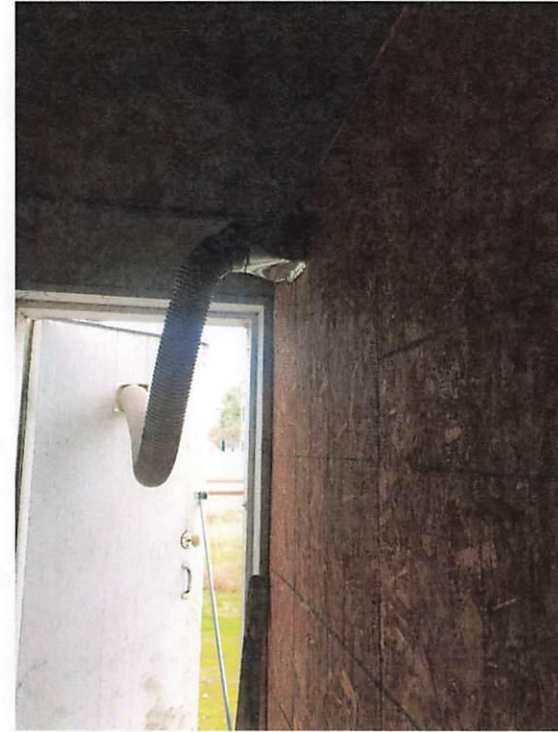
/s/ Jesalyn Harper _____
Jesalyn Harper
Code Enforcement Officer
City of Reedley

EXHIBIT A

Mice

850 | St

Inadequate housing and ventilation



Dr. Hahn stated this breed of mice is sensitive to light. The light is left on 24/7 and is causing severe distress to the mice.



Over crowding



EXHIBIT B

Harper, Jesalyn

From: Harper, Jesalyn
Sent: Monday, March 27, 2023 5:32 PM
To: 'Jessezhu'
Cc: info.1320pbi; prestibio2021
Subject: RE: Mice and Freezer Update

Good evening,

Again, you are unable to clearly answer our questions or provide valid information to resolve the issue. Please see my responses below. We need your companies cooperation to be able to get the information and licenses to be able to operate legally.

1, Who will be providing care for the mice and are they trained in PPE and in how to properly and ethically handle the mice?

...Raising mice is a relatively simple task. Just add water and food on time and clean the bedding with same UMI procedures. No breeding and experiments until find an official site.

There are regulations and standards for keeping mice. You are not meeting these at standards at a state or local level. You have yet to provide us with the UMI procedures that would outline your care plan for these mice. I need you to send me the UMI procedures.

2, How will you be disposing of the PPE and the waste?

...The operation in this respect is carried out in accordance with the procedure of UMI guidance. The dead and the experimental mice will be frozen in the refrigerator below -20°C degrees. It is regularly recycled by recycling companies with special qualifications. The normal padding are replaced, put into thickened garbage bags, discarded in the usual way like normal bedding for pets.

Again, we have not been given anything referencing the UMI guidance. It is our understanding that these mice are being currently disposed of in the general trash services, not in freezers. If you have contracted a recycling company, we will require their information.

3, Is there a specific diet these mice require? We ask this because there is no food present on the site.

...Yes, these pure and precious mice need special foods which purchased from the laboratory animal feed company. Lynn or Jose will bring the whole bags of feed to show you or take pictures today or tomorrow for the packing model and specification.

Lynn Warner has repeatedly told the City of Reedley and other agencies that she is not affiliated with your company and not an employee or representative. Jose has refused to return our calls and come to the site to care for the mice during regular business hours. Anyone caring for the mice are required to wear and properly dispose of the PPE and to follow the standards and regulations for keeping mice. Our contracted Veterinarian has visited the site and looked over the mice. There is great concern for the way the mice are being kept and cared for. With the building in the condition, it currently is, staff needs to be aware of the dangers and PPE requirements. Are there other employees that are associated with PBT that can care for the mice during regular business hours?

4, How will you be providing water to the mice? We ask this because there are no water services turned on at the site.

...Ordinary tap water can be used without special experiments. There are two places with tap water in 850 site, one is the Washroom, and the other is in the Electrical control room (It should be on the opposite side of the 850 entrance)

The washroom and the electrical control room are in high dangerous locations of the building due to the hazardous and illegal electrical work done and the structure being compromised.

5, Could you provide any form of license you might have possessed for the breeding and testing of mice in the 6 years you have possessed them?

...The setup of these particular purebred mice was done by the original UMI experts in biology. They bought and raised them with the permission of the Tulare county (UMI was founded in Tulare in 2015) and the instruction of the Veterinarian in local. After the population is established, it is managed by the UMI's technicians.

You did not answer my question. Was there at any point of time, a government licensing body that oversaw the creation of these mice? Do you have paperwork from Tulare County stating they were aware of the mice and that you could perform tests on them? The population has clearly been established, you have approximately 1000 mice. We need the names and credentials of the UMI technicians that are managing this population.

6, We also looked at the freezers that you had mentioned in prior correspondence. One freezer was set at -70 and the other was -59. Could you provide for us the information that Environmental and Public Health have requested?

...These freezers are hundreds of species cell lines that produce monoclonal antibodies and specific biological factors. These cells and substances are non-toxic and non harmful. No special license has been applied by UMI. It is the core technical material for the future industrialization and the establishment of diagnostic production which Made in the United States.

Again, you have provided a vague answer that will not assist with us getting you properly licensed to operate. You need to send any form of paperwork you had that gave you authorization at some point of time to operate the lab. We need to know what types of monoclonal antibodies. Are these being used for research with COVID or cancer? Public Health and Environmental health specialists are the ones that will determine if they are non-toxic and harmless. They cannot determine this until they are made aware of what is being done, and you definitely will not be licenses to do any form of production if we cannot get this information.

7, An itemized listed of what chemicals and biological samples are being stored on site?

...This part of the information is being sorted out. Because of the large number and variety, it is very confusing when moving, so there is no good list now. If you allowed our creditors to conduct a detailed inspection and classification of the goods inside, it should take two weeks to complete.

No one is allowed into the building to do any form of inspection or classification because of the hazards associated with the building. If the UMI filed for bankruptcy and liquidated all assets to PBT, then there should be a list of all itemized items involved with the liquidation. Please consult the UMI attorney that is handling the bankruptcy about providing a list of items.

8, Have you found a location to relocate to?

...We have found two new factories which are ideal bases for the production of in vitro diagnostic manufacturer. It is expected to be moved in May. Before signing the formal lease agreement, we must wait for your local government to allow us to move out. The lease of 850 I st. expires in May.

We will require the addresses for these locations. Environmental and Public Health must confirm these sites can be licensed or you will not be able to operate there. You also will not be able to move or access the building until the agencies regulating your line of work have received the information, we are all requiring and we have established representatives associated with PBT to move. The building at this time is too dangerous for individuals to be inside move items around.

Furthermore, I have spoken with Katelyn Gomez from the State Public Health and she has still not received a response in regards to the embargoed products on site. Please review the information she provided you and form a response. You are currently running out of time, as they require a response within 10 days of the letter being issued.

Jesalyn Harper

Life Safety/Code Officer
City of Reedley Fire Department
1060 D Street
Reedley CA 93654
(559)637-4230
Jesalyn.Harper@reedley.ca.gov



From: Jessezhu <jituanguanli@126.com>
Sent: Monday, March 27, 2023 4:32 PM
To: Harper, Jesalyn <Jesalyn.Harper@reedley.ca.gov>
Cc: info.1320pbi <info.1320pbi@gmail.com>; prestibio2021 <prestibio2021@gmail.com>
Subject: Re: Mice and Freezer Update

External

Dear Ms. Harper

I am very happy and grateful to see your reply email when I woke up today.

First of all, I immediately asked Lynn to contact Jose, ask him or his wife to arrive at 850 today or tomorrow to take care of the mice.

Following, I will try my best to answer your subordinates' questions:

1, Who will be providing care for the mice and are they trained in PPE and in how to properly and ethically handle the mice?

...Raising mice is a relatively simple task. Just add water and food on time and clean the bedding with same UMI procedures. No breeding and experiments until find an official site.

2, How will you be disposing of the PPE and the waste?

...The operation in this respect is carried out in accordance with the procedure of UMI guidance. The dead and the experimental mice will be frozen in the refrigerator below -20°C degrees. It is regularly recycled by recycling companies with special qualifications. The normal padding are replaced, put into thickened garbage bags, discarded in the usual way like normal bedding for pets.

3, Is there a specific diet these mice require? We ask this because there is no food present on the site.

...Yes, these pure and precious mice need special foods which purchased from the laboratory animal feed company. Lynn or Jose will bring the whole bags of feed to show you or take pictures today or tomorrow for the packing model and specification.

4, How will you be providing water to the mice? We ask this because there are no water services turned on at the site.

...Ordinary tap water can be used without special experiments. There are two places with tap water in 850 site, one is the Washroom, and the other is in the Electrical control room (It should be on the opposite side of the 850 entrance) .

5, Could you provide any form of license you might have possessed for the breeding and testing of mice in the 6 years you have possessed them?

...The setup of these particular purebred mice was done by the original UMI experts in biology. They bought and raised them with the permission of the Tulare county (UMI was founded in Tulare in 2015) and the instruction of the Veterinarian in local. After the population is established, it is managed by the UMI's technicians.

6, We also looked at the freezers that you had mentioned in prior correspondence. One freezer was set at -70 and the other was -59. Could you provide for us the information that Environmental and Public Health have requested?

...These freezers are hundreds of species cell lines that produce monoclonal antibodies and specific biological factors. These cells and substances are non-toxic and non harmful. No special license has been applied by UMI. It is the core technical material for the future industrialization and the establishment of diagnostic production which Made in the United States.

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...This part of the information is being sorted out. Because of the large number and variety, it is very confusing when moving, so there is no good list now. If you allowed our creditors to conduct a detailed inspection and classification of the goods inside, it should take two weeks to complete.

8, Have you found a location to relocate to?

...We have found two new factories which are ideal bases for the production of in vitro diagnostic manufacturer. It is expected to be moved in May. Before signing the formal lease agreement, we must wait for your local government to allow us to move out. The lease of 850 I st. expires in May.

Thank you very much for your special attention.

Best regards.

Xiuqin Yao
President of PBI

---- Replied Message ----

From: Harper, Jesalyn<Jesalyn.Harper@reedley.ca.gov>
Date: 03/27/2023 10:15
To: Jessezhu<jituanguanli@126.com>
Cc: info.1320pbi<info.1320pbi@gmail.com>, prestibio2021<prestibio2021@gmail.com>
Subject: Mice and Freezer Update

Good morning,

On March 24, 2023, Code Enforcement, Environmental Health, and a contracted Veterinarian visited the site to check on the welfare of the mice. They were able to confirm the mice are alive, and were able to provide water and distribute food. They were unable to clean the bedding. However, there are some concerns for the wellbeing and care of the mice.

We are in need of further information so we can determine how the mice need to be cared and provided for.

1. Who will be providing care for the mice and are they trained in PPE and in how to properly and ethically handle the mice?
2. How will you be disposing of the PPE and the waste?
3. Is there a specific diet these mice require? We ask this because there is no food present on the site.
4. How will you be providing water to the mice? We ask this because there are no water services turned on at the site.
5. Could you provide any form of license you might have possessed for the breeding and testing of mice in the 6 years you have possessed them?

We would be willing to allow Jose and his wife to enter the building today at 1:00pm to care for the mice.

We also looked at the freezers that you had mentioned in prior correspondence. One freezer was set at -70 and the other was -59. Could you provide for us the information that Environmental and Public Health have requested?

An itemized list of what chemicals and biological samples are being stored on site?

Have you found a location to relocate to?

I want to thank you for your cooperation, please let me know as soon as possible if they will be able to feed and care for the mice today.

Thank you,

Jesalyn Harper

Life Safety/Code Officer

City of Reedley Fire Department

1060 D Street

Reedley CA 93654

(559)637-4230

Jesalyn.Harper@reedley.ca.gov



From: Jessezhu <jituanguanli@126.com>

Sent: Monday, March 27, 2023 8:48 AM

To: Harper, Jesalyn <Jesalyn.Harper@reedley.ca.gov>

Cc: info.1320pbi <info.1320pbi@gmail.com>; prestibio2021 <prestibio2021@gmail.com>; Katelyn.Gomez

<Katelyn.Gomez@cdph.ca.gov>; Zenobia.Bradley <Zenobia.Bradley@cdph.ca.gov>; csauls <csauls@fresnocountyca.gov>
Subject: Re: 850 goods and technical materials

External

Dear Ms. Harper

I heard Lynn say that the mice has not been taken care of in time. It's been 10 days as of today. Some of the mice may have died. I make a particularly urgent appeal here, Please ask you and the relevant government officials to allow our designated personnel to go in and check, even for an hour or two.

These mice are very precious. They are a special purebred population that took six years to build up. It is of special significance in the study of immunology and oncology. The value of its biological assets is likely to be hundreds of thousands or even one million.

By all means, please let someone go in and take care of it today. It doesn't matter whether Jose, Lynn or Steven.

I would like to express my sincere thanks.

Sincerely

Xiuqin Yao

President of PBI

----- Replied Message -----

From: Harper, Jesalyn<Jesalyn.Harper@reedley.ca.gov>
Date: 03/22/2023 16:58
To: Jessezhu@jituanguanli@126.com>
Cc: info.1320pbi@info.1320pbi@gmail.com>, prestibio2021@prestibio2021@gmail.com>, Katelyn.Gomez@cdph.ca.gov>, Zenobia.Bradley@cdph.ca.gov>
Subject: RE: 850 goods and technical materials

Good evening,

After discussing the health and safety concerns of the property, the security of the embargoed property, and the security of the property of Alliance, we have agreed to allow Jose to come and tend to the mice. However, Jose will be the only one allowed inside the building. We will also have him check the temperatures on the freezers and refrigerators and I will send an email when all is complete.

Since I am unable to speak with you over the phone or meet with you, I need verification that I am speaking with the CEO of Prestige Bio Tech. Can you please provide a photo of your ID? I also want to verify, if PBT has found a new location to operate?

This information could help speed up the process, we appreciate any and all cooperation.

Jesalyn Harper

Life Safety/Code Officer

City of Reedley Fire Department

1060 D Street

Reedley CA 93654

(559)637-4230

Jesalyn.Harper@reedley.ca.gov



From: Jessezhu <jituanguanli@126.com>

Sent: Wednesday, March 22, 2023 7:25 AM

To: Katelyn.Gomez <Katelyn.Gomez@cdph.ca.gov>; Zenobia.Bradley <Zenobia.Bradley@cdph.ca.gov>; Harper, Jesalyn <Jesalyn.Harper@reedley.ca.gov>

Cc: info.1320pbi <info.1320pbi@gmail.com>; prestibio2021 <prestibio2021@gmail.com>

Subject: Fw: 850 goods and technical materials

External

To whom it may concern

I sent two emails to the Mrs Harper in the last week. The background of the goods stored at 850 I St. was described in detail. Special emphasis was placed on the thousands of mice in need of urgent care. This is a very valuable biological asset. It took Universal Meditech Inc seven years to develop. There has been no physical supply of water and foods or replacement of bedding for a week now.

Given that thousands of mice are dying, once again, I urgently appeal to the heads of government, today or tomorrow, allowed stuffs who raise mice can go in and take care for about three hours. If having any concerns, You can find a suitable supervisor to accompany. In fact, We don't think the related court order has stopped people taking care of the mice. Therefore, it is reasonable to send caretakers to spend a little time on emergency care of mice, which will not affect public safety and health, especially under supervision.

I have officially delegated Lynn and Steven, on behalf of all the creditors of UMI, go to various departments of the related local government for consultation in order to negotiate an emergency rescue plan today or tomorrow. Please give good reception and discussion.

The lawyer in charge of UMI's bankruptcy liquidation is Michael Lin. You can contact him if necessary. His email address and telephone contact information are as follows:

Michael M. Lin, D.C., Esq.
Lin Law Group, P.C.
5288 Spring Mtn. Rd.
Suite 103
Las Vegas, NV 89146
Telephone: 702-871-9888
Facsimile: 702-648-0888
Email: ml@linlawgroup.com
www.linlawlv.com
www.linlawgroup.com

I deeply thank the responsible director of various local government departments for special attention and support to this matter.

Sincerely yours.

Xiuqin Yao
President of PBI

--- Forwarded Message ---

From Jessezhu<jituanguanli@126.com>
Date 03/19/2023 18:04
To jesalyn.harper<jesalyn.harper@reedley.ca.gov>
Cc
Subject Re: 850 goods and technical materials

Dear Ms. Harper

I sent you a long email on Friday about the background of the temporary storage of goods, and hope you have received it.

On Friday afternoon, I received a message from Lynn that you told her that the electricity had not been cut off, so all the refrigerators were working normally. On behalf of the all creditors, I would like to express my heartfelt thanks to you. I would like to ask you again about the care of mice. Since a notice has now been posted on the door, our caretakers are not allowed to enter. But there has been no water and no food for three days. And the padding should be replaced immediately. Please do find a way to get our caretakers in on Monday.

Otherwise, thousands of precious mice will die Soon!

Our bankruptcy lawyer specifically warned us: Because our personnel can not enter to check, we need to install a video monitor to monitor the low-temperature refrigerator. Because the cryogenic refrigerator needs to be kept powered on at all times to ensure that the temperature must be below -75摄氏度, otherwise the monoclonal antibody cells inside will die. The monitor is now in the temporary factory building, but it needs Lidia to set up. Please do grant this request. In this case, once the temperature is abnormal or the power is cut off unexpectedly, we will contact you immediately and take emergency measures.

Thank you very much for your special attention.

Xiuqin Yao
President, PBI

---- Replied Message ----

From Jessezhu<jituanguanli@126.com>
Date 03/17/2023 08:33
To jesalyn.harper@reedley.ca.gov
Cc
Subject 850 goods and technical materials

Dear Ms. Harper

My name is Xiuqin Yao. I am the President of Prestige Biotech Inc. Our company is registered in Las Vegas, Nevada.

Numerous goods currently stored at 850 I St. Reedly has caused trouble to you and your colleagues in administration, First of all, I would like to express my deep apologies.

In fact, these goods mainly come from Universal Meditech Inc公司UMI公司. This company's capital chain was broken due to its own business problems. It has now entered bankruptcy and liquidation proceedings. My company has

lent a lot of money to UMI in the past two years. So my company must be the biggest creditor of UMI.

After UMI had no money to support the company's continued operation and had a bad relationship with the original landlord, all the creditors had to scramble to find a temporary warehouse where we could store all of UMI's goods and technical assets. But in Fresno area, it is very difficult to find a Warehouse that can be stored for less than one year. One of my friend in Fresno happened to introduce to 850 I street, we felt that the price and the place were suitable, so we quickly entrusted the moving company to move here.

Because all of Creditor don't have employees in Fresno, and we can only manage UMI goods temporarily through friends. Among them, Lidia and Lynn are both from Qingdao, and we are from the same hometown. They are all very good, but they has been in the United States for a relatively short time and has no good experience in social and English. Of course they are timid and unwilling to take responsibility. If you think there is something inappropriate about their performance, please understand and forgive them.

I am now applying for a visa to come to the United States. The number of people applying for visas to the United States increased sharply at the US Embassy in Beijing. Now the interview has been lined up until July. I'm going through an expedited procedure to see if I can get to the United States before May to attend the creditors' meeting. If I can make the trip soon, I will visit you and your colleagues right away.

If you and your colleagues want to know more details about the above background, please feel free to send me an email. I'll try to answer all of them.

Yesterday Lynn reported to me that you and your colleagues have obtained an investigation order from the court to inspect the goods, which I fully support. If you have any questions about these goods, you can contact me by mail. At the same time, I'll report to the bankruptcy attorney in Las Vegas. In this way, we can discuss relevant solutions together.

Here I implore you to care two things in particular:

1, Don't turn off the power to the refrigerator, In particular, there are two Ultra-low temperature freezer. Because there are many monoclonal antibody cell lines and many biological agents that are particularly sensitive to temperature. These are of great significance and value to the future development of many diagnostic products. It is the most important part for our major creditors. If some adjustments need to be made in terms of electrification, Please feel free to talk to me by email, I will do my best and cooperate well.

2, There are more than 1000 pure mice, It is a very precious variety that has been cultivated for seven years by UMI. I beg you to allow the feeding stuffs shall regularly add water, food and change the materials. Do not cause these precious mice to die because of artificial restrictions.

Our creditors rented this temporary warehouse for half a year. Should be moving somewhere else in May. We are looking for suitable plant to rebuild in vitro rapid diagnostic test kits for human and veterinary use. If you have a suitable place in the Fresno area, please recommend it to us. I have full confidence in the establishment of a brand new medium-sized production base for in vitro diagnostic reagents in this region. This can partly change the situation that most of the products are imported from outside the United States, and truly Made in USA. I sincerely hope to get the understanding, support and help from you and your colleagues.

Once again, I would like to thank you and your colleagues for your special care and support.

Best regards.

Xiuqin Yao

EXHIBIT C

Harper, Jesalyn

From: Nina Hahn <nhahn@dvm.com>
Sent: Monday, March 27, 2023 2:22 PM
To: Harper, Jesalyn
Subject: Fwd: Suspicious Message Follow-up

External

Hi Jesalyn,

I wanted to follow up with you after my "assessment" visit to 850 I street.

Mice in privately funded California research are required to register with the California Department of Public Health (<https://www.cdph.ca.gov/Programs/OSPHLD/LCS/Pages/LaboratoryAnimalUseApprovalProgram.aspx>) and follow the standards outlined by the Guide for Care and Use of Laboratory Animals.

<https://www.ncbi.nlm.nih.gov/books/NBK54050/>

In summary, the mice are housed under conditions far outside all animal welfare regulations and standard of care.

Non-compliant findings include cages overcrowded, improper sanitation, exposure to wild rodents, lights on 24 hours (mice are nocturnal need dark to sleep), no PPE for husbandry staff, no water source for washing, no appropriate place to dump soiled bedding, no evidence of routine daily checks.

My advise is as follows; For the short term mice be fed and provided water on a temporary basis by someone who is appropriately trained to work safely in this building. The mice should be move by the business owners as soon as possible to a location where they can be cared for according to standard. If that can not occur within a given time the mice should be considered abandoned and taken charge by the city or county. I can help should that last out come be necessary.

I am attaching a link to the UC Davis Mouse Biology Program- (https://mbp.mousebiology.org/services_products/) if these are valuable genetically modified mice the business may be interested in sending some of these mice so they can be preserved, and brought back into production when they are ready.

Thank you for all your work on this!

Nina

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Nina Hahn DVM, PhD, DACLAM

19 Boronda Rd
Carmel VALley CA 93924

103 Elsie St
San Francisco CA 94110

LOZANO SMITH
7404 N. Spalding Avenue Fresno, CA 93720-3370
Tel 559-431-5600 Fax 559-261-9366

PROOF OF SERVICE

I, Veronica Banda, am employed in the County of Fresno, State of California. I am over the age of eighteen years and not a party to the within entitled cause; my business address is 7404 N. Spalding Avenue, Fresno 93720.

On March 29, 2023, I served the attached: **DECLARATION OF JESALYN HARPER IN SUPPORT OF APPLICATION FOR ABATEMENT WARRANT AND ORDER AUTHORIZING ENTRY ON THE PROPERTY TO ABATE PUBLIC NUISANCE** on the interested parties in said cause, by causing delivery to be made by the mode of service indicated below:

AY-NC-LP
225 Market St.
Oakland, CA 94607

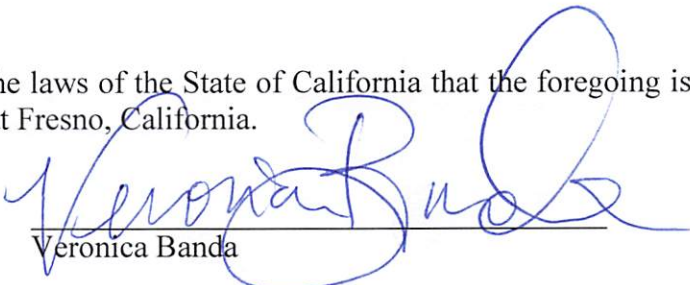
(**Regular U.S. Mail**) on all parties in said action in accordance with Code of Civil Procedure Section 1013, by placing a true and correct copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth above, at Lozano Smith, which mail placed in that designated area is given the correct amount of postage and is deposited at the Post Office that same day, in the ordinary course of business, in a United States mailbox in the County of Fresno.

(**By Certified Mail - Return Receipt Requested**) on all parties in said action in accordance with Code of Civil Procedure Section 1013, by placing a true and correct copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth above, at Lozano Smith, which mail placed in that designated area is given the correct amount of postage and is deposited that same day, in the ordinary course of business, in a United States mailbox in the County of Fresno.

(**By Federal Express/Overnight Mail**) on all parties in said action by depositing a true and correct copy thereof in a sealed envelope/packet for overnight mail delivery, with charges thereon fully paid, in a Federal Express collection box, at Fresno, California, and addressed as set forth above.

(**By Personal Service**) by causing to be personally delivered a true copy thereof to the addressee above.

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct. Executed on March 29, 2023, at Fresno, California.


Veronica Banda

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