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10 CROWN DODGE

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF VENTURA**

13 NATALI GODINEZ ZUNIGA, individually,
14 and on behalf of other aggrieved employees
15 pursuant to the California Private Attorneys
16 General Act;

17 Plaintiff,

18 v.

19 CROWN DODGE, a California corporation;
20 and DOES 1 through 100, inclusive,

21 Defendants.

Case No.: 2023CUOE017631

**DECLARATION OF DAN WALLIS, COO FOR
DEFENDANT CROWN DODGE, IN SUPPORT
OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF PAGA
SETTLEMENT**

Date: August 26, 2026
Time: 1:30 p.m.
Dept: 44

Complaint Filed: December 11, 2023
Trial Date: Not Set

22 **DECLARATION OF DAN WALLIS**

23 I, Dan Wallis, hereby declare the following:

24 1. I am the Chief Operations Officer of Crown Dodge, which is the named defendant
25 in the above-entitled matter, *Zuniga v. Crown Dodge*, filed in the Superior Court of California,
26 County of Ventura, Case No. 2023CUOE017631.

27 2. I submit this declaration in support of Plaintiff Natali Godinez Zuniga's ("Plaintiff")
28 Motion for Preliminary Approval of PAGA Settlement Agreement ("Motion"). I am over the age of
18, I have personal knowledge of the matters stated in this Declaration, and if called as a witness, I

1 could and would competently testify to these facts.

2 3. As Chief Operations Officer of Crown Dodge, I have direct access to the company's
3 financial records, accounts, tax filings, sales reports, and employment data. The statements made in
4 this Declaration concerning Crown Dodge's financial condition are based on my personal
5 knowledge and my review of the company's financial records and documents maintained in the
6 ordinary course of business.

7 4. I submit this declaration to provide information regarding Crown Dodge's current
8 financial condition, and specifically its ability to pay a settlement agreed upon by the parties in the
9 PAGA Settlement at issue in the Motion. Based on the information set forth below, it is my opinion
10 that Crown Dodge does not have the financial capacity to pay a settlement amount greater than that
11 which has been agreed upon by the parties over twelve (12) monthly installments. Increasing the
12 monthly amount or shortening the time within which Crown Dodge pays the agreed upon settlement
13 would significantly compromise Crown Dodge's financial obligations and ability to operate with its
14 current workforce.

15 5. Crown Dodge has experienced significant financial hardship for several years and
16 particularly during 2025-2026 year-to-date. The following facts demonstrate the severity of Crown
17 Dodge's current financial condition:

- 18 a. Crown Dodge has been forced to reduce its sales department workforce by
19 approximately twenty-eight percent (28%) during this period due to declining
20 business and the need to reduce operating costs.
- 21 b. The number of vehicles sold by Crown Dodge has decreased by approximately
22 twenty percent (20%) compared to the prior year.
- 23 c. Crown Dodge's net profits have declined by approximately twenty-five percent
24 (25%) compared to the prior year.
- 25 d. Crown Dodge's operating expenses have increased by approximately fifteen
26 percent (15%) due to significant vendor price increases, further reducing the
27 company's profit margins and available operating capital.
- 28 e. Crown Dodge's gross sales have declined by approximately seventeen percent

1 (17%) compared to the prior year.

2 f. Crown Dodge has an outstanding tax lien from 2022 exceeding \$300,000 that
3 remains due and continues to constitute a significant financial obligation for
4 Crown Dodge.

5 g. Crown Dodge's financial difficulties are consistent with broader industry trends.
6 National sales for Stellantis/Fiat Chrysler Automobiles, Crown Dodge's vehicle
7 manufacturer, declined by approximately forty-four percent (44%) in 2025. This
8 substantial industry-wide decline has had a direct and material negative impact
9 on Crown Dodge's business operations and financial performance.

10 6. The cumulative effect of the above factors – declining vehicle sales, reduced gross
11 sales and net profits, reduction in sales force, increased operating costs, existing tax obligations, and
12 industry-wide downturns – has placed substantial strain on Crown Dodge's workforce, operations,
13 and overall financial stability. Crown Dodge has been forced to make difficult decisions to reduce
14 staff and control costs while continuing to meet its ongoing financial obligations. Under these
15 circumstances, the settlement amount and payment schedule agreed upon by the parties in the PAGA
16 Settlement reflects a reasonable and appropriate resolution of this matter given Crown Dodge's
17 limited financial capacity to pay a greater amount.

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

20
21 Executed on Aug. 21, 2026, at Ventura, California.

22
23 Dan Wallis

Dan Wallis (Aug 21, 2026 12:55:35 PDT)

24 **DAN WALLIS**

Dan Wallis

Dan Wallis (Aug 21, 2026 12:55:35 PDT)

25 Chief Operations Officer, Crown Dodge

PROOF OF SERVICE

Natali Godinez Zuniga, et al. v. Crown Dodge, et al.
Ventura County Superior Court Case No.: 2023CUOE017631
[Defendant CROWN DODGE]

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is: 800 Wilshire Boulevard, 15th Floor, Los Angeles, CA 90017. On August 21, 2026, I served the within document described as:

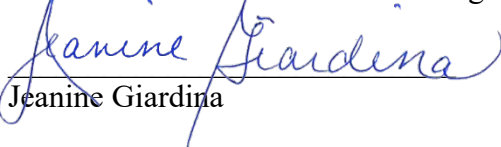
**DECLARATION OF DAN WALLIS, COO FOR DEFENDANT CROWN DODGE, IN
SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF PAGA SETTLEMENT**

- ☒ by transmitting via email/electronic service the document listed above to the address(es) set forth on the attached Service List(s) on this date before 11:59 p.m.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth on the attached Service List(s).
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth on the attached Service List(s).
- ☐ by OVERNIGHT COURIER - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via _____.
- ☐ by causing personal delivery by an agent of _____ of the document(s) listed above to the person(s) at the address(es) set forth below.

SEE ATTACHED SERVICE LIST

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 21, 2026, at Los Angeles, California.


Jeanine Giardina

SERVICE LIST

Natali Godinez Zuniga, et al. v. Crown Dodge, et al.
Ventura County Superior Court Case No.: 2023CUOE017631
[Defendant CROWN DODGE]

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