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IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
FOR PACIFIC COUNTY

BEACON CHARTERS AND RV )  
PARK, LLC, FKA BEACON RV PARK )  
Plaintiff, )  
v. )  
LAWRENCE BERGQUIST, )  
and all other occupants, 332 Elizabeth Av SE )  
space 40, Ilwaco, WA 98624; )  
Defendants. )

Case No. 22-2-00135-25  
DECLARATION IN SUPPORT OF  
RESPONSE IN OPPOSITION TO  
DEFENDANT’S MOTION  
FOR PRELIMINARY INJUNCTION

I, Matt Gagliasso, declare as follows:

1. I hold a position of the Chief Executive Officer at Deer Point Meadows Investments, LLC.
2. As such I am familiar with the matters related to the ownership and operation of the Beacon RV Park.
3. I was requested by seller Mr. Mike Cassinelli to help create the notice of termination that was issued on 2/25/22.
4. Mr. Cassinelli requested help because he said as Mayor of Ilwaco he had limited time to do so himself and required our assistance to issue the notice. Thus the notice of 2/25/22 was issued to the residents of the park on Mr. Cassinelli’s request.

1           5. As Mayor, Mr. Cassinelli was intimately knowledgeable of the Lease terms with the Port  
2 of Ilwaco and the need to have the residents vacate the park to allow the buyers to perform the  
3 needed upgrades/remodel.

4           6. I personally visited the Park on multiple occasions and personally observed the condition  
5 of the Park. I never carried a gun for which a license is required to the premises on any of my visits.  
6 I never personally opened the doors and/or went inside anyone's trailers/RVs when the notices were  
7 posted/served.

8           7. I received notice from our onsite management that abandoned and park owned RV that  
9 were on site were being used by houseless persons without permission with the purpose of obtaining  
10 relocation incentive.

11           8. To prevent this from happening and to secure the premises, on July 22, 2022 the park  
12 contracted provider began demolition of 6 company owned Rvs on site that extended to July 27,  
13 2022. Demolitions occurred in a proper format and no sewer collector tanks were ruptured on site.  
14 There was no feces and urine contamination from the demolitions. I personally observed the area  
15 after demolition and it was cleaner than when the contractor began work on it.

16           9. The RV s were tagged for towing prior to demolition to ensure there was no one inside.  
17 While demolition was in progress, there remained some debris on site, however, all remaining  
18 debris from the demolition was collected by the contractor.

19           10. During the demolition one of the City of Ilwaco councilmen arrived and I discussed with  
20 him what was transpiring on site.

21           I declare under penalty or perjury of laws of the State of Washington that the foregoing is true  
22 and correct.

Signed in Vancouver WA, on October 26, 2022

\_\_\_\_\_  
Matt Gagliasso

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on October 28, 2022, I served the foregoing Declaration on the party(s)  
3 listed below by the method described below:

4  
5  **Facsimile**

6  
7  **U.S. Mail, postage prepaid**

8 Last known address:

9 Sebastian Miller, WA AAG  
10 Washington State Attorney General  
11 800 Fifth Avenue, Suite 2000  
12 Seattle WA 98104

13 Robina Rayamajhi  
14 Thurston County Volunteer Legal Services  
15 P.O. Box 405  
16 Olympia, WA 98507

17  **Hand delivered in Court:**

18 DATED: October 28, 2022

19 */s/ Robert S. Phed*

20 \_\_\_\_\_  
21 Mark G. Passannante, WSBA#  
22 Robert S. Phed, WSBA# 42399  
23 Of Attorneys for Defendants  
24  
25  
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