

**STATE OF NEW YORK  
DEPARTMENT OF AGRICULTURE AND MARKETS**

**In the Matter of Considering the Issuance of an Order to:**

**Meadowsweet Dairy, LLC  
Barbara and Stephen Smith  
Respondents**

**AFFIDAVIT OF CHAW CHANG**

**PUERTO RICO                    :**  
**COUNTY OF VIEQUES        :**

I, Chaw Chang, being under oath, do hereby make the following statements based on my personal knowledge, understanding and belief.

1. I reside at 1605 Trumansburg Road, Ithaca, NY, 14850.
2. I am the owner of a vegetable farm at 1605 Trumansburg Road, Ithaca, NY that operates under the name Stick and Stone.
3. I have been a vegetable farmer since 1997.
4. I have known Steve and Barbara Smith since 1998.
5. I have an agreement with Steve and Barbara Smith and Meadowsweet Dairy, LLC (hereinafter "LLC") whereby they deliver milk and dairy products to my farm and I in turn deliver those products to members of the LLC.
6. When I state I "deliver those products to members of the LLC," this means that members of the LLC come to Stick and Stone farm to pick up their milk and dairy products to avoid having those members drive all the way to the Smiths' farm, which I understand is located in Lodi, NY, Seneca County.
7. I do not sell or offer for sale or otherwise make available to any consumers any of the milk or dairy products I receive from the Smiths.

8. All of the milk and dairy products I receive from the Smiths are made available only to members of the LLC and to nobody else.
9. The only persons who have access to the dairy products of the LLC at my farm are the LLC members themselves.
10. I have reviewed sampling and analysis report numbers 313251, 313252 and 313253 which indicates, erroneously, that buttermilk, raw milk and butter were “Purchased @ Stick & Stone Farm.”
11. Those reports are erroneous because I have never sold any of the LLC’s dairy products to anybody.
12. I have never received money for any of the milk or dairy products that I have turned over to LLC members, I have never received any other form of compensation or remuneration for turning over the milk or dairy products to LLC members, nor have I ever asked for or charged anything in exchange for turning over the milk and dairy products to LLC members.
13. Moreover, the reports indicate that the “purchase” occurred at 7:25 am on July 11, 2007. I never met anybody at that time on that day to make the LLC’s dairy products available to anybody.
14. Whoever took the buttermilk, raw milk and butter did so without my knowledge, permission, consent or a search warrant.
15. I am in Puerto Rico from January 13, 2008 until January 20, 2008.
16. I will be unavailable to testify at the administrative hearing scheduled for January 17<sup>th</sup> and 18<sup>th</sup> in this matter.

17. Had I been available to testify I would have testified on behalf of the Smiths and the LLC.

18. I verify that attachments A, B, C and D are true and accurate unsigned copies of letters dated January 3, 2008 that I sent to Patrick Hooker, Commissioner for the Department of Ag. and Mkts., Joseph Corby, Director of Dept. of Ag. and Mkts. Food Inspection, Will Francis, Director of Dept. of Ag. and Mkts. Food Inspection, and Senator Barbara Lifton, State Senator.

19. The originals of attachments A through D were signed by me, dated January 3, 2008, and were mailed to the persons identified above.

20. Attachments A through D explain how disturbed I am at the false statements contained in reports 313251 through 313253.

FURTHER AFFIANT SAYETH NAUGHT

\_\_\_\_\_  
Chaw Chang

Signed and sworn before me in my presence this \_\_\_\_\_ day of January, 2008.

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Notary public