

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

DOCKET NO. 2020-03606 DIVISION "J"

RAMELLI JANITORIAL SERVICE, INC.
VERSUS
IV WASTE, LLC

Videotaped deposition of SIDNEY TORRES,
IV, taken in the law offices of STANLEY REUTER
THORNTON ALFORD, LLC, 909 Poydras Street, Suite
2500, New Orleans, Louisiana 70112, on the 18th
day of May, 2023, commencing at 9:10 a.m.

REPORTED BY:
CONNIE M. FINESCHI, CCR
CERTIFIED COURT REPORTER

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S T I P U L A T I O N

IT IS STIPULATED AND AGREED by and between counsel for the parties hereto that the deposition of the aforementioned witness is hereby being taken under the Louisiana Code of Civil Procedure, Article 1421, et seq., for all purposes, in accordance with law;

That the formalities of reading, signing, certification and filing are specifically waived;

That all objections, save those as to the form of the question and the responsiveness of the answer, are hereby reserved until such time as this deposition, or any part thereof, may be used or sought to be used in evidence.

* * * *

CONNIE M. FINESCHI, CCR, Certified Court Reporter, in and for the State of Louisiana, officiated in administering the oath to the witness.

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P-R-O-C-E-E-D-I-N-G-S

THE VIDEOGRAPHER:

We are now on the record. This is the videotaped deposition of Sidney Torres. This deposition is being held today at 909 Poydras Street in New Orleans, Louisiana, on May the 18th, 2023 at approximately 9:12 a.m.

Would counsel present please introduce themselves and the party they represent.

MR. MCGOEY:

Patrick McGoey representing Ramelli Janitorial Services, Inc.

MS. THORNTON:

Jennifer Thornton representing IV Waste, LLC.

THE VIDEOGRAPHER:

Swear in the witness, please.

SIDNEY TORRES, IV,
after having been first duly sworn by the above-mentioned Certified Court Reporter, did testify as follows:

EXAMINATION BY MR. MCGOEY:

Q. Good morning, Mr. Torres. My name is

1 Patrick McGoey. We met before the deposition. I
2 represent Ramelli Janitorial Services in this
3 litigation with IV Waste.

4 I'm going to show what I'm going to mark
5 as Exhibit 67, which is amended notice of your
6 deposition today.

7 (Document marked for identification as
8 Exhibit 67.)

9 EXAMINATION BY MR. MCGOEY:

10 Q. Do you understand that you're here today
11 to give a deposition in the case that Ramelli
12 Janitorial Services have brought against IV?

13 A. Yes.

14 Q. I was thinking we could start by you
15 just setting the record straight for everyone.
16 Can you tell us what Nicky Nicolosi's involvement
17 was with IV Waste getting the City of Kenner
18 contract?

19 A. Nothing.

20 Q. He was not involved?

21 A. Not at all.

22 Q. What do you mean by that, that he was
23 not involved?

24 A. He was not involved. I didn't deal with
25 Nicky Nicolosi for this contract.

1 Q. What do you mean you didn't deal with
2 him? Did you ever meet with Mr. Nicolosi about
3 the contract?

4 A. The first time I met Nick Nicolosi was
5 at the first meeting I went to with the mayor and
6 Foshee. It was a -- It was a group of people and
7 my lawyer was there as well. Greg Buisson had set
8 that up.

9 Q. What lawyer was at that meeting for you?

10 A. Erica Beck.

11 Q. All right. And after that meeting where
12 you said Mr. Nicolosi was, did you have any other
13 meetings with him --

14 A. No.

15 Q. -- regarding the IV Waste contract with
16 the City of Kenner?

17 A. (Shakes head negatively.)

18 Q. I'm sorry. You have to verbalize your
19 answer.

20 A. Oh, yeah, okay. No. No, I haven't.
21 No, I didn't.

22 Q. Did you have any conversations with him
23 between the first meeting that you had with the
24 City of Kenner and you ultimately getting the
25 contract in May of 2020?

1 A. Yeah. I mean I had a --

2 MS. THORNTON:

3 Object to form. You can answer.

4 THE WITNESS:

5 I mean I met him at the meeting and
6 we talked, just like I talked with
7 everybody there, but that was a
8 conversation I had with him there.

9 EXAMINATION BY MR. MCGOEY:

10 Q. Did Mr. -- Did you ever offer Mr.
11 Nicolosi a job if you got the City of Kenner
12 contract?

13 A. No.

14 Q. Did you ever offer him a job period?

15 A. I mean, he wanted to work for me, and he
16 met with my lawyer. And, you know, they
17 communicated over by phone about working for IV
18 and for us, but that was it.

19 Q. All right. What lawyer did Mr. Nicolosi
20 meet with to discuss working for you?

21 A. John Litchfield.

22 Q. And when did that occur, that meeting?

23 A. Well, by phone. I don't know -- I don't
24 know the date.

25 Q. So it's your understanding that Mr.

1 Nicolosi reached out directly to Mr. Litchfield to
2 ask for IV Waste to employ him?

3 A. Well, he was - Yeah, I mean, he was
4 looking -- My understanding, when I first met him
5 he said he worked for Ramelli in the room. And
6 then prior to that as the meeting -- as we met
7 with the city and we met with the officials in the
8 city, he was a good friend of the mayor. That was
9 my assumption because they were always together.

10 And so that was basically him being
11 around and I think he, you know, he wanted to come
12 work for us, but I did not -- My lawyer dealt with
13 him on the details of the deal of what he wanted.

14 Q. What is your understanding that Mr.
15 Nicolosi wanted from IV Waste?

16 A. He said he could help with Jefferson
17 Parish, get the Jefferson Parish contract, and he
18 said that he could get other business like that
19 was -- that he had gotten before, that he knows
20 like certain people and politicians in Jefferson
21 Parish and Harahan, and similar to like a
22 salesperson, consultant.

23 Q. So did Mr. Nicolosi ask you to hire him
24 to help try to solicit other public work?

25 A. Yeah, of course. That's why he was

1 talking to my lawyer.

2 Q. All right. And in discussing trying to
3 help you get other public work, did he offer to
4 help get you the Kenner contract?

5 A. No, not at all.

6 Q. So it's your understanding that Mr.
7 Nicolosi wasn't looking to get paid in connection
8 with you receiving the Kenner contract?

9 A. Not at all.

10 Q. But he would -- But he was interested in
11 getting paid to help you get other public work?

12 A. Correct.

13 Q. And did he ultimately ever get you --
14 Did he try to get you other public work?

15 MS. THORNTON:

16 Object to form.

17 THE WITNESS:

18 It didn't go anywhere because, you
19 know, he didn't -- I wouldn't agree to
20 pay him what he wanted. And he -- From
21 my understanding with talking with John
22 Litchfield is that he didn't want to put
23 in the hours that were going to have to
24 be committed.

25 EXAMINATION BY MR. MCGOEY:

1 Q. What did Mr. Nicolosi tell you or Mr.
2 Litchfield that he wanted to be paid?

3 A. You would have to ask my lawyer, but he
4 talked to Mr. Litchfield about it.

5 Q. But you said you understood that you
6 weren't going to pay him what he wanted. So my
7 question is, what did you understand Mr. Nicolosi
8 wanted to be paid?

9 A. I think he wanted 10,000 a month.

10 Q. And the conversation -- And did you tell
11 him no or did Mr. Litchfield tell him no, we're
12 not going to pay you \$10,000?

13 A. I don't recall.

14 Q. Did you think that was ethical to be
15 paying someone to try to get you public work?

16 MS. THORNTON:

17 Object to form.

18 THE WITNESS:

19 I didn't hire him, so...

20 EXAMINATION BY MR. MCGOEY:

21 Q. So you thought he was asking to do
22 something that was unethical?

23 A. No, I didn't say that.

24 Q. Okay. So you think it's ethical to pay
25 someone to help you get public work?

1 A. I mean my opinion is it didn't work out
2 with the terms that he wanted, and so we didn't do
3 it.

4 Q. Okay. When do you recall Mr. Nicolosi
5 asking for \$10,000 a month?

6 A. I can't recall.

7 Q. Do you recall the council meeting on
8 March 5th of 2020 where you got up and said,
9 "Nicky doesn't work for me"?

10 MS. THORNTON:

11 Object to form.

12 THE WITNESS:

13 I mean I remember saying that.

14 EXAMINATION BY MR. MCGOEY:

15 Q. Okay. So my question is, did Mr.
16 Nicolosi ask for \$10,000 a month before you went
17 up to the public and said he doesn't work for me,
18 or was it after March 5th, 2020?

19 A. It's my recollection it was after.

20 Q. Okay. So do you recall a date of when
21 he asked for \$10,000?

22 A. No. Because the terms were more
23 important than any of that. So my lawyer was
24 dealing with that with him, typing up something
25 that we could present to him to show him and have

1 it in writing of what he would do for that amount
2 of money, which I thought was excessive.

3 Q. So was there something typed up and
4 presented to Mr. Nicolosi for employment?

5 A. I think Mr. Litchfield did, yes, sir.

6 Q. And did he send you a copy of that?

7 A. I'm pretty sure he did.

8 Q. And after that was written up, was that
9 presented to Mr. Nicolosi?

10 A. You would have to ask John Litchfield.

11 Q. Okay. You don't know?

12 A. No, I don't.

13 Q. You never had a meeting with Mr.
14 Nicolosi and Mr. Litchfield where the terms that
15 the Mr. Litchfield had typed were presented?

16 A. Mr. Litchfield dealt with and talked
17 with Mr. Nicolosi. I didn't really deal with him
18 as far as the negotiating of what he typed up or
19 how he typed it up. They were the ones that
20 communicated.

21 Q. In addition to Mr. Nicolosi asking for
22 \$10,000 a month, did you understand that Mr. Zahn,
23 Mayor Zahn wanted some money for you getting the
24 contract?

25 A. No, absolutely not.

1 Q. Nicky never asked you -- never said
2 anything like that?

3 A. No.

4 Q. How did it come to a resolution that
5 Nicky wasn't going to work for you?

6 A. In between John talking to Nicky and him
7 being around the mayor and being around, I would
8 ask him questions like "How many garbage trucks
9 run on Monday?" "I don't know." "How many
10 employees normally run throughout the week?" "I
11 don't know."

12 I started to find out really quickly
13 that he didn't really understand the garbage
14 business. And, you know, I'm very hands-on and I
15 do a lot of work myself. So, you know, the fact
16 that he's saying he can help me with something
17 wanting \$10,000 a month and he can't even tell me
18 what -- how many trucks, how many employees was
19 kind of -- I didn't even think that he could help
20 me because he didn't even know anything about what
21 he was currently doing for, according to him,
22 years working for Ramelli.

23 Q. Okay. So my question was directed at
24 what time was the resolution that he wasn't going
25 to work for you? As I understand it, at some

1 point Mr. Nicolosi said he wanted \$10,000 a month.
2 Mr. Litchfield -- Is that right?

3 A. Uh-huh.

4 Q. And Mr. Litchfield then typed up
5 something about the terms that he would work for
6 \$10,000 a month for IV; is that right?

7 A. Uh-huh.

8 Q. Then that was at some point presented to
9 Mr. Nicolosi; is that correct?

10 A. Correct.

11 MS. THORNTON:

12 Object to form.

13 EXAMINATION BY MR. MCGOEY:

14 Q. But you weren't at that meeting that it
15 was presented?

16 A. Well, I don't think they met. They were
17 communicating on the phone.

18 Q. Okay. And then as far as -- And what is
19 your understanding as in that conversation it was
20 decided that Mr. Nicolosi would not work for IV?

21 A. I don't know. You would have to ask
22 him. I don't know exactly what the final
23 conversation was. But, I mean, it was between my
24 understanding that he knew nothing about garbage
25 and John talking to him, and that was pretty much

1 the end of it.

2 Q. How long did it take you to figure out
3 Mr. Nicolosi didn't know much about garbage?

4 A. I can't recall.

5 Q. All right. So but it was before or
6 after the March 5th, 2020 council meeting?

7 A. I'd have to look at -- I'd have to
8 refresh my memory because I don't recall when, but
9 I don't know.

10 Q. Was it before or after you took over the
11 work on May 1, 2020?

12 A. I think, from my understanding, the
13 work -- the council had already voted for us to be
14 the provider, and it was after, I think, that.
15 Because I know that there was no -- nothing signed
16 with him prior to the council agreeing to award us
17 the contract.

18 Q. Okay. Did you sign something with Mr.
19 Nicolosi after the council voted?

20 A. No.

21 Q. Okay. So you never signed an agreement
22 with Mr. Nicolosi?

23 A. No.

24 Q. But you think some time after the March
25 5th, 2020 council meeting where they approved you

1 to be the contractor, and before May 1, 2020, when
2 you actually started picking up garbage on the
3 streets --

4 MS. THORNTON:

5 Object to form.

6 EXAMINATION BY MR. MCGOEY:

7 Q. -- you believe it's in that two-month
8 period where Mr. Litchfield had a conversation
9 with Mr. Nicolosi and they said you're not going
10 to be able to work for IV?

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 I'd have to see dates and stuff.
15 I'm not sure. I know that it was after
16 the decision was made that he wasn't
17 going to work with us.

18 EXAMINATION BY MR. MCGOEY:

19 Q. Okay. You are aware that he started
20 working for David Carimi, correct?

21 A. Uh-huh.

22 Q. And that was in April of 2020 --

23 A. Okay.

24 Q. -- a month before you took over the
25 work. Do you recall that?

1 A. I think the first contract was approved
2 by the council before any of that.

3 Q. I agree. But do you recall -- Do you
4 recall Mr. Carimi coming to you and saying Nicky
5 is looking for a job for me and I'm thinking about
6 hiring him to be a salesman to try to get me other
7 public work?

8 A. I did.

9 MS. THORNTON:

10 Object to form.

11 EXAMINATION BY MR. MCGOEY:

12 Q. Okay. And it's my understanding that
13 that occurred some time in April of 2020?

14 A. I think my understanding is it happened
15 around the time that the transfer station was
16 being built.

17 Q. Okay.

18 A. I mean that's the dates that I remember.

19 Q. Yep.

20 A. Not dates, the month.

21 Q. Sure. And that was probably in April of
22 2020. We've got some documents, we can go over
23 the time period.

24 A. Yeah, whatever the documents are.

25 Q. But my question is, had you decided

1 before you had the conversation with Mr. Carimi
2 where he told you I'm thinking about hiring Nicky,
3 had you decided to not do business with Mr.
4 Nicolosi before that conversation or after that
5 conversation?

6 A. No, it was before.

7 Q. Okay. All right. So then you had told
8 Mr. Nicolosi before May 1st when you started
9 picking up garbage that he wasn't going to be
10 working for IV Waste?

11 A. I don't know if I told him or John told
12 him.

13 Q. But there's no doubt in your mind as of
14 May 1, 2020 when you started working in Kenner,
15 Nicky Nicolosi knew that he wasn't working for
16 you?

17 A. To my recollection.

18 Q. And you are certain that on May 1, 2020,
19 you had -- you or your lawyer had let Mr. Nicolosi
20 know that he wasn't going to be working for you?

21 A. I'm not certain, but I think so.

22 Q. Now, before you got to that point where
23 you told Mr. Nicolosi or Mr. Nicolosi was informed
24 that he would no longer or that he would not --
25 Strike that. Bad question. Let me start again.

1 What involvement did Mr. Nicolosi have
2 between the first meeting you had with Kenner on
3 January 17, 2020 and the time period where he was
4 told he wasn't going to be working for IV? What
5 was his involvement with the contract process, the
6 negotiations, you setting up the business to start
7 working at Kenner?

8 MS. THORNTON:

9 Object to form.

10 THE WITNESS:

11 I mean, I know that, you know, he
12 was around the mayor a lot. But as far
13 as what did he do, he really didn't do
14 anything for us. I think the one time
15 he brought a recycling cart to -- like a
16 35-gallon cart to one of the council
17 members from our corporate office. They
18 wanted to see the size of it, and I
19 think he carried it out there.

20 But as far as involvement besides
21 that, I, mean -- I think also, too,
22 there was a school board bid in
23 Jefferson Parish, and we put a bid in
24 for that and I think he said -- he
25 didn't help with any of that because he

1 said he could but he didn't.

2 So I just started to see things
3 where it was -- he couldn't deliver on
4 what he said he could deliver on.

5 EXAMINATION BY MR. MCGOEY:

6 Q. Got you. So this bid that he tried to
7 help you with the Jefferson Parish School Board,
8 that would have been before you told him he wasn't
9 going to be able to work for you?

10 A. I can't recall. I don't know. I have
11 to look at the dates. But, again, like I said, he
12 was trying to work for me. There's no doubt about
13 that. He was trying to work for me. But I'm not
14 going to pay somebody 10,000 a month just for
15 nothing. They have to work.

16 So, I mean, that was the biggest thing,
17 like that -- So that's why John was working out
18 with him on the terms and the time because I
19 wasn't just going to pay him to do nothing.

20 Q. Did Mr. Nicolosi try to help you get the
21 Harahan garbage contract?

22 A. No, not to my knowledge. I mean, he
23 said he could help but he didn't. And it
24 wasn't -- It didn't even go out to bid. It wasn't
25 up for bid.

1 Q. Right. But did you approach Harahan to
2 try to get the garbage contract from Harahan?

3 A. I'm friends with the mayor, and I said
4 when it comes up we'd like to bid on it.

5 Q. And Mr. Ramelli has that contract,
6 right?

7 A. I think so, yeah, I'm pretty sure.

8 Q. So at the time early 2020, did you have
9 Mr. Nicolosi attempt to try to help you get the
10 Harahan contract?

11 A. Not that I can recall.

12 Q. When was the first time you met Mr.
13 Nicolosi?

14 A. In the room at the mayor's office, the
15 meeting that Greg Buisson set up.

16 Q. Was Greg Buisson at that meeting?

17 A. He was not.

18 Q. You say he set it up. What do you mean?

19 A. He called me. I remember where I was
20 standing. I was in my -- I was sitting at the
21 entrance of my door at my office and he called and
22 he said that he had -- that he got a call that
23 Kenner was having issues with replacing carts, and
24 that they were frustrated with Ramelli's service,
25 and that they had all kind of issues with his

1 service, and that they were talking to multiple
2 waste haulers, and that -- but they would like to
3 interview you. And so if you're interested, we
4 can set something up and you guys can go meet.

5 So I called my lawyer and I said, "I
6 want you to come with me." And she came with me
7 and that was the first time we went to Kenner.

8 Q. And at that meeting was the first time
9 you met Mr. Nicolosi?

10 A. Correct.

11 Q. You knew of Mr. Nicolosi, though, from
12 before that meeting, correct?

13 A. I've heard his name.

14 MS. THORNTON:

15 Object to form.

16 EXAMINATION BY MR. MCGOEY:

17 Q. Where had you heard his name?

18 A. My general manager had mentioned his
19 name before about that she had heard of him
20 because she was friendly with David Starks.

21 Q. And so you're talking about Julie
22 Tufaro?

23 A. Yes.

24 Q. So before this January 17, 2020 meeting,
25 the Starks had told you -- I mean Ms. Tufaro had

1 told you about conversations she had with Mr.
2 Starks concerning Mr. Nicolosi?

3 MS. THORNTON:

4 Object to form.

5 THE WITNESS:

6 No. I mean it was like hearsay
7 about -- that -- about Nicolosi. It
8 wasn't like we didn't sit there and talk
9 about it.

10 EXAMINATION BY MR. MCGOEY:

11 Q. No, I get it. I understand that you
12 weren't part of the conversation. But what did
13 Ms. Tufaro tell you about Mr. Nicolosi?

14 A. I just recall her saying he worked for
15 Ramelli.

16 Q. Do you recall her saying that David
17 Starks said as long as Mr. Nicolosi works for Bob
18 Ramelli, he's not going to lose the Kenner
19 contract?

20 A. I don't recall that.

21 MS. THORNTON:

22 Object to form.

23 EXAMINATION BY MR. MCGOEY:

24 Q. You don't recall that. Now, you did
25 compete against Mr. Ramelli in 2007 for that

1 Kenner contract, right?

2 A. My old company STD did bid on the
3 contract.

4 Q. And were you the lower bid, the lowest
5 bid?

6 A. I'm pretty sure I think I was.

7 Q. And did you receive the contract?

8 A. No.

9 Q. Why do you believe you didn't receive
10 the contract?

11 A. I really -- After I lost it, you know, I
12 think I wrote a letter to the City of Kenner
13 stating that we were the lower bidder and we felt
14 like we could do the job. And they never got back
15 to us, and I moved on to continuing to grow my
16 garbage company, my other, SDT.

17 Q. Did you ever tell anyone that you
18 believed you lost the contract to Ramelli in 2007
19 because you didn't hire Nicky Nicolosi?

20 A. I don't recall saying that. I think
21 that -- I mean I do believe politics played a part
22 in it, but politics plays parts in all these
23 contracts.

24 Q. Let me show you what I'm going to mark
25 as Exhibit 68, which is a Facebook page series of

1 posts by you in February of this year. I'll mark
2 that as Exhibit 68 and ask you to take a look at
3 that.

4 (Document marked for identification as
5 Exhibit 68.)

6 THE WITNESS:

7 What's the question?

8 EXAMINATION BY MR. MCGOEY:

9 Q. I'll direct your attention to the second
10 page. Do you recognize this to be your Facebook?

11 A. Yes, it is.

12 Q. You start off saying, "I am humbly
13 honored by your opinion of our company IV Waste.
14 We put our heart and soul in every job we take
15 on." Was that accurate?

16 A. Absolutely.

17 Q. "It is crazy as we were not even looking
18 to go to Kenner, and we got a call Greg Buisson
19 who was then the political consultant for the
20 previous mayor and the majority of the council,
21 and said Kenner needs help. They are having
22 nothing but problems with their current garbage
23 company Ramelli." That's the conversation you
24 just told me about, right?

25 A. Yes.

1 Q. So that was accurate too?

2 A. Uh-huh. Yes, sir.

3 Q. And then you said, "He told me they were
4 expecting my call to set up a meeting." So does
5 that refresh your recollect that you called Kenner
6 to set up the meeting or that was Mr. Buisson set
7 up the meeting?

8 A. Mr. Buisson set up the meeting.

9 Q. All right. And then going down to the
10 last two paragraphs it says, "When I had my old
11 company SDT, we bid on their contract and we
12 didn't get it because we didn't hire someone, even
13 though we had the lowest bid."

14 A. Uh-huh.

15 Q. Who was it that you were referring to
16 that you didn't hire in 2007 for SDT to get the
17 contract?

18 A. I mean, I guess I was talking about the
19 politics part of it. You know, I've seen it a lot
20 of times happen where people hire people to pay
21 them to lobby to get jobs. That was my opinion at
22 the time that I wrote this and that's my opinion
23 now.

24 Q. So three months ago when you wrote this,
25 who were you referring to when you said we didn't

1 hire someone?

2 A. Nobody in particular.

3 Q. So just a general person?

4 A. Yeah, like a lobbyist. Because I don't
5 see why they wouldn't have not gone with us. We
6 had a great reputation and we were the lowest
7 bidder.

8 Q. So in this Exhibit 68 when you make this
9 reference to not hiring someone in 2007, it's your
10 testimony today that you were not referring to
11 Nicky Nicolosi as that someone?

12 A. No, I don't think I was.

13 Q. You then go on to say, "I can't wait to
14 expose all of this." What were you planning on
15 exposing?

16 A. That I had to get the discovery to find
17 out what exactly there was to put out there
18 because we're in the process of fighting for
19 discovery now.

20 Q. Well, what are you trying to expose?

21 A. The truth behind all the lies that have
22 been said, and really the smoking mirrors that
23 have been going on that are not true. So that's
24 what I meant.

25 Q. Do you plan on exposing Nicky Nicolosi's

1 involvement?

2 A. Whatever the discovery --

3 MS. THORNTON:

4 Object to form.

5 THE WITNESS:

6 Whatever the discovery provides,
7 you know.

8 EXAMINATION BY MR. MCGOEY:

9 Q. So as you sit here today, you can't
10 recall who it was you felt like you didn't hire
11 that prevented you from getting the Kenner
12 contract in 2007?

13 MS. THORNTON:

14 Object to form. That's not what he
15 said.

16 THE WITNESS:

17 That's not what I said. I told you
18 what I said. I felt that something like
19 that had to happen in order for someone,
20 a tax -- a government that had a low bid
21 with a company that was qualified, not
22 to go with it.

23 And I met with different council
24 members trying to -- Tommy Capella.
25 There was a few council members in

1 Jefferson I met with, and I could just
2 feel that there was -- and Michael
3 Thomas used to work for him at the time
4 and Yenni was in the government complex,
5 and I just felt like I was getting, you
6 know, the cold shoulder. So there was
7 no -- for me, my feeling was something
8 had to happen and that was my opinion.

9 EXAMINATION BY MR. MCGOEY:

10 Q. Did you think in 2007 your competition
11 for the Kenner contract, did you think was a fair
12 competition?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 I didn't even -- Honestly, after I
17 wrote the letter, I went on to going to
18 the North Shore and I started bidding in
19 St. Tammany. Because even with the
20 Jefferson Parish contract when I bid on
21 that, there was changes made. There
22 was -- Elton Lagasse worked for a
23 council member there, and he was working
24 for the garbage company that got the
25 contract.

1 And I just felt like I don't want
2 to operate in a situation where it's
3 like that, where, you know, we bid on
4 the contract, they changed the -- it was
5 a three-year qualification for Jefferson
6 Parish, which is one of the largest
7 parishes in the state. And we were
8 running an incredible company, doing
9 very well with it, and there was no
10 reason for us not to get it.

11 And at the last minute Gus -- there
12 was a -- Gus Bordelon and Elton Lagasse
13 and it was a group of them, they all
14 were lobbyists for Waste Connection.
15 They were all working as lobbyists and
16 employees and one worked for a council
17 member. They changed it from three
18 years to five years.

19 And so I got frustrated with all of
20 that, and I just went to St. Tammany and
21 ended up blowing up over there and
22 taking over a lot of the business. We
23 went in Tangipahoa. We went in
24 Independence. We won the LSU, the whole
25 campus of LSU, the school.

1 And so, you know, my focus was not
2 to go back and sue or do anything like
3 that. We lost, they out politicked us,
4 they did what they did, and we moved on.

5 EXAMINATION BY MR. MCGOEY:

6 Q. Okay. So I understand SDT did a lot of
7 other public work after 2007. My question was
8 directed at SDT's bid or proposal to do work for
9 the City of Kenner in 2007, the one that we just
10 looked at the Facebook post. You said you were
11 lowest, but you didn't hire someone, and that's
12 why you thought you didn't get the job.

13 My question is, do you think that
14 that was fair to you as a company that you were
15 the lower bidder and you didn't get the job
16 because of politics or someone or something like
17 that?

18 MS. THORNTON:

19 Object to form. Go ahead.

20 THE WITNESS:

21 Yeah. I told you I wrote a letter
22 and I expressed my thoughts on it, and
23 that was it. It was over with.

24 EXAMINATION BY MR. MCGOEY:

25 Q. I understand. And in your letter did

1 you say you thought it was a fair competition or
2 unfair?

3 A. Oh, that was 2007. I'd have to see a
4 copy.

5 Q. Okay. As you sit here today, do you
6 think that competition for that contract in 2007
7 was fair or unfair to SDT?

8 A. At the time I was frustrated because I
9 wanted to get it, but I moved on and grew my
10 company to one of the largest in the state. I
11 mean, it wasn't like -- It was just a small
12 fraction of what we ended up winning and bidding
13 on and getting.

14 So it wasn't like -- I didn't dwell on
15 it. I wasn't going to go waste money filing a
16 lawsuit. I just moved on and took that energy and
17 put it towards building my company that I sold.

18 Q. Well, you are here today suing Mr.
19 Ramelli's company, right? Are you aware of that?

20 MS. THORNTON:

21 Object to form.

22 THE WITNESS:

23 I think Ramelli sued me first.

24 EXAMINATION BY MR. MCGOEY:

25 Q. But you're suing him now, right?

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MS. THORNTON:

Object to form.

THE WITNESS:

We did -- We did file against Mr. Ramelli, yeah.

EXAMINATION BY MR. MCGOEY:

Q. Can you tell me what Mr. Ramelli did wrong to you?

MS. THORNTON:

Object to form.

THE WITNESS:

I don't have a problem. We just got finished having a conversation when we came in the room. I don't have a -- I'm really not angry at Ramelli or his company. I just choose not to file suit against somebody if I don't get something. That's just not how I do things.

But, again, he filed suit, we had some claims, we filed suit. But I wouldn't have filed suit if there wasn't a suit filed on us. But once we started looking at all of our evidence, we felt like we had cause too, so we filed a

1 suit back.

2 EXAMINATION BY MR. MCGOEY:

3 Q. Are you aware that you have sued Mr.
4 Ramelli's company for unfair trade practices?

5 A. Absolutely.

6 Q. Okay. Tell me what you believe Mr.
7 Ramelli's company did that constituted unfair
8 trade practices to IV Waste?

9 MS. THORNTON:

10 Object to the extent you're asking
11 him for a legal conclusion, but you can
12 answer.

13 THE WITNESS:

14 Yeah, again, I can't help with the
15 legal conclusion, but I do -- you know,
16 drivers were getting paid cash to follow
17 our trucks. Drivers were harassing our
18 trucks, camera footage showing them
19 going close, shoppers concerned that they
20 were going to get hurt.

21 You know, the -- You know, being in
22 neighborhoods early in the morning hours
23 with trucks with cameras following close
24 and harassing. And then, you know, we
25 had employees working for us that were

1 talking to other employees saying that
2 they were getting cash to -- basically
3 they were going to make up information
4 and try to do whatever they had to do to
5 get that \$100 or \$200, whatever they
6 were getting in cash to do so.

7 And even people that were fired
8 were brought on to assist with the plan
9 to try to intimidate, hurt us, or not be
10 able to do our job that we were voted to
11 do to take over.

12 So, yeah, there was things like
13 that, that was why we feel it was unfair
14 trade.

15 EXAMINATION BY MR. MCGOEY:

16 Q. Got you. So because Mr. Ramelli had
17 people follow your trucks when you started the
18 contract and video those trucks, that's what you
19 believe is unfair?

20 A. It's not just -- It wasn't just
21 following my trucks and videoing. They were going
22 very close to the trucks and they were harassing
23 them. It was going close and David Starks was
24 calling employees of ours to get information, ones
25 that we had fired, ones that we have a thick file

1 of disciplinary action before they were fired.

2 And, you know, it was just no need for
3 that. We were called to go to Kenner. They voted
4 on us to take it over, and that's what we were
5 doing.

6 Q. So just so I understand, you consider
7 Mr. Starks talking to your employees as unfair
8 trade?

9 A. It wasn't just --

10 MS. THORNTON:

11 Object to form.

12 THE WITNESS:

13 Counselor, it wasn't just talking.
14 It was "I'm going to give you cash. I'm
15 going to pay you cash to give me
16 information." It wasn't just talking.
17 It was cash.

18 EXAMINATION BY MR. MCGOEY:

19 Q. Got you. So talking to employees,
20 former employees, you don't consider to be unfair,
21 but offering to pay them cash for --

22 A. I can't say that. I didn't say that it
23 wasn't -- I said the whole thing was unfair. The
24 way that you're paying someone cash because you
25 want them to make up lies, I mean, it's just -- to

1 me it's, you know --

2 Again, we were called to Kenner. We
3 didn't -- we wasn't looking for Kenner. We were
4 called to Kenner saying that they had issues with
5 Ramelli. They were not replacing cans. The
6 trucks were leaking juice. They were having
7 issues.

8 And so we went out there based off of
9 that. That was the only reason we went out there.
10 So all the stuff that happened after they voted on
11 us to me was to try to just -- to make issues so
12 we wouldn't be able to do our job, to create
13 obstacles so we couldn't perform our work.

14 Q. Okay. Getting back to my question. I'm
15 just going to ask you one last time because I
16 don't think you've answered it. And if you can't
17 answer it, just tell me you can't answer it.

18 But do you think SDT's competition in
19 losing the Kenner contract in 2007 to Ramelli, do
20 you think you were treated fairly in that process
21 by the City of Kenner?

22 MS. THORNTON:

23 Object to form.

24 THE WITNESS:

25 Yeah. I mean I wrote a letter at

1 the time, and I don't remember what it
2 stated. But, I mean, you know, I
3 didn't -- Obviously if I wrote a letter,
4 I'm sure that I was -- I didn't think at
5 the time that if we're the low bidder,
6 the taxpayers should pay higher for
7 something that there's no need for them
8 to pay higher for.

9 So at the time when it happened,
10 I'm sure I was not happy about it, but I
11 moved on.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Fair enough. I get it. I'm going to
14 show you a video clip, part of Ms. Tufaro's
15 deposition. Did you have a chance to read her
16 deposition?

17 A. No, I didn't.

18 Q. Have you had a chance to talk to her to
19 prepare for today's depo?

20 A. I didn't talk to her about any -- what's
21 happening today. I mean I know she went through a
22 deposition, but I didn't look at her transcript
23 and I didn't talk to her about it.

24 Q. What did you do to prepare for today's
25 deposition?

1 A. I just spoke -- Nothing really. I just
2 spoke to my lawyers.

3 Q. Yeah. I'm not looking for conversation
4 with your lawyers.

5 A. But other than that, that was it.

6 MR. MCGOEY:

7 Okay. Andi, can you show a video
8 clip -- We're going to mark the video
9 clip as Exhibit 69. We'll have several
10 video clips that will -- I'll just try
11 to put something on this and we'll do a
12 placeholder.

13 (Document marked for identification as
14 Exhibit 69.)

15 MR. MCGOEY:

16 This is from page 46 to 47 of Ms.
17 Tufaro's deposition. I figured you can
18 watch the monitor right here. I'm
19 sorry? Do we need to take a little
20 break?

21 MS. ABRAMSON:

22 One minute. Sorry.

23 MR. MCGOEY:

24 That's all right. We can take a
25 break if it's a technical problem.

1 MS. ABRAMSON:

2 My wheel is spinning. Sorry.

3 THE WITNESS:

4 Jennifer, did y'all pay the
5 Internet bill?

6 MR. MCGOEY:

7 Why don't we go ahead and take a
8 break and we'll get this up and running.

9 THE VIDEOGRAPHER:

10 We're now off the record. The time
11 is 9:46.

12 (Break taken.)

13 THE VIDEOGRAPHER:

14 Returning to the record. It is
15 9:51.

16 EXAMINATION BY MR. MCGOEY:

17 Q. All right. Mr. Torres, before the break
18 we were having a little technical difficulty, but
19 now we have it up. This is a portion of the video
20 deposition of Julie Tufaro. She's your general
21 manger, right?

22 A. Yes, sir.

23 Q. And we're going to mark this video as
24 Exhibit 69, and then I'm going to ask you to watch
25 it. Then I'll have some questions.

1 A. Okay.

2 (Video playing.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. My question is, the conversations that
5 Ms. Tufaro discussed in her deposition with Mr.
6 Starks about Nicky Nicolosi, did she ever tell you
7 that?

8 MS. THORNTON:

9 Object to form.

10 THE WITNESS:

11 Not that I recall.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Do you recall ever talking to Ms. Tufaro
14 about Nicky Nicolosi and his work on the Kenner
15 garbage contract?

16 MS. THORNTON:

17 Object to form.

18 THE WITNESS:

19 I mean, not that I remember.

20 EXAMINATION BY MR. MCGOEY:

21 Q. What's your relationship with Greg
22 Buisson?

23 A. Greg and I, we've known each other for
24 some years. I don't know exactly how many, but he
25 worked with me on a couple of political things

1 that he helped write some of the press releases
2 and some of the scripts for commercials.

3 Q. You're referring to your PAC, Voice of
4 the People?

5 A. That's one of them.

6 Q. What other things, political things had
7 Mr. Buisson worked for you on?

8 A. I think we did Family Gras. I helped
9 him with that one year. It was just one year.

10 Q. Besides providing you services for your
11 PAC and working on Family Gras, do you have any
12 other business relationships with Mr. Buisson?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 No.

17 EXAMINATION BY MR. MCGOEY:

18 Q. Does he consult for you?

19 A. No.

20 Q. But you say Mr. Buisson is the one who
21 called you and told you about possibly working for
22 Kenner?

23 A. Yes.

24 Q. Have you seen Mayor Zahn's deposition?

25 A. No.

1 Q. Okay. We're going to show you a video
2 clip of Mayor Zahn's deposition. It's from Zahn
3 deposition page 86, line 15, through page 89, line
4 21, and we're going to mark that as Exhibit 70.

5 (Document marked for identification as
6 Exhibit 70.)

7 (Video playing.)

8 EXAMINATION BY MR. MCGOEY:

9 Q. So in that deposition testimony Mayor
10 Zahn says that the first time IV got brought up
11 for the City of Kenner was by Mr. Buisson at a
12 meeting at Cafe Cafe with Nicky. Were you aware
13 of that meeting?

14 A. No.

15 Q. Had you asked Mr. Buisson to try to help
16 get IV work in the City of Kenner?

17 A. Absolutely, positively not.

18 Q. But what Mr. -- the mayor said regarding
19 Mr. Buisson set up the first meeting, that was
20 true, correct?

21 A. He called me.

22 Q. And he set up a meeting?

23 A. He called me and said you need to -- "if
24 you're interested, they are having issues, you
25 might want to have your office call and set up a

1 meeting."

2 Q. Before that January 17 meeting, is it
3 your testimony that you never had any
4 conversations with Mr. Buisson regarding trying
5 to -- him trying to help you get work in Kenner?

6 A. No.

7 Q. I think you said earlier at that first
8 meeting Mr. Nicolosi said he worked for Ramelli?

9 A. That's what I recall.

10 Q. How did that come up?

11 A. They were going around the room, "Hi, my
12 name is, Hi, my name is."

13 Q. And how did Mr. Nicolosi introduce
14 himself?

15 A. He says, "I'm Nicolosi. I work for
16 Ramelli," and then it went to the next person.

17 Q. Do you find it strange that Mr. Nicolosi
18 was there and he worked for your competitor?

19 A. I mean, you know, until it got around to
20 the table, I don't know if it was Deborah Foshee
21 or Ben said that he is our liaison. He handles
22 the problems with -- between Ramelli. But I
23 didn't really ask any questions. That's what they
24 told me, so I really didn't think about it.

25 Q. Did you understand that -- Did it not

1 come up at that meeting that Mr. Nicolosi was
2 interested in being IV's liaison with the city?

3 A. Not at all.

4 Q. He did ask you after that meeting to
5 hire him, but you say it had nothing to do with
6 Kenner. It had to do with other work?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 Yeah. I don't know if it was after
11 that meeting, but it was sometime
12 after -- I don't remember when, but it
13 wasn't after that meeting.

14 EXAMINATION BY MR. MCGOEY:

15 Q. So he asked you for a job before that
16 meeting?

17 A. No, no, I didn't say that. I said
18 after -- Like we had a meeting and then we left.
19 We didn't talk about him working for me.

20 Q. At that January 17th meeting?

21 A. If that's when the date was.

22 Q. Yes. Just so you feel comfortable with
23 the dates, I'm going to show you what I'm going to
24 mark -- which was previously marked as Exhibit 25,
25 which was a January 17, 2009 -- or 2020 email at

1 2:09 p.m. from Mr. Rapier to Julie saying, "Julie,
2 pleasure meeting you today. Here's my contact
3 info. If you can send me a copy of St. Bernard
4 contract, that would be most helpful." Seeing
5 Exhibit 25, does that refresh your recollection
6 that that first meeting with the City of Kenner
7 was on January 17, 2020?

8 A. I mean, I don't know if this was after,
9 before, but I guess it was -- I don't remember
10 seeing this email, but I'm looking at it now, so I
11 guess it could have been the day that we met with
12 them the first time.

13 Q. Did y'all talk about the St. Bernard
14 contract?

15 A. Not in the meeting. I think this was
16 between he and Julie.

17 Q. Got you. If this was the date of that
18 first meeting, he's sending an email at 2:09, do
19 you recall that your meeting with the City of
20 Kenner that first time was at 1:30 p.m.?

21 A. I don't recall.

22 Q. You don't recall?

23 A. Uh-uh.

24 Q. When Mr. Buisson told you to call to set
25 up a meeting with the City of Kenner, did he tell

1 you that he and Nicky were going to meet with the
2 mayor before you got there?

3 A. I don't remember that.

4 Q. You don't remember that?

5 A. No.

6 Q. I'm going to show you what I'm going to
7 mark as Exhibit 71, which are portions of Mayor
8 Zahn's calendar, public calendar.

9 (Document marked for identification as
10 Exhibit 71.)

11 EXAMINATION BY MR. MCGOEY:

12 Q. You've done a public records request for
13 Mayor Glaser's calendar, right?

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 My counsel may have.

18 EXAMINATION BY MR. MCGOEY:

19 Q. Weren't you in court yesterday
20 complaining that they didn't give you everything?

21 MS. THORNTON:

22 Objection.

23 THE WITNESS:

24 Like I said, my counsel has.

25 EXAMINATION BY MR. MCGOEY:

1 Q. Okay. But you were in court yesterday
2 trying to get more documents from the City of
3 Kenner?

4 A. Yes. My legal team and I were.

5 Q. And one of the things you wanted was the
6 mayor's calendar, right?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 It's not you, just me. I think
11 it's between counsel --

12 MS. THORNTON:

13 That's incorrect, but --

14 THE WITNESS:

15 Yeah, they put the request in.

16 EXAMINATION BY MR. MCGOEY:

17 Q. Well, what you have in front of you is a
18 portion of Mayor Zahn's calendar. So if you look
19 on the first page, Friday, January 10, the mayor
20 was having a meeting with Buisson at Cafe Cafe.

21 A. Uh-huh.

22 Q. We just watched the video where Mayor
23 Zahn says that was the day that Mr. Buisson and
24 Nicky -- he asked Nicky if you could get some work
25 in the City of Kenner. But you were not aware of

1 that meeting?

2 A. I was not.

3 Q. Okay. If you touch to the second page
4 on Friday, January 17th, at the bottom left-hand
5 corner, can you tell us who Mayor Zahn was meeting
6 with between 11:00 a.m. and 12:00 p.m. that day?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 I have no idea.

11 EXAMINATION BY MR. MCGOEY:

12 Q. Well, what does the mayor's calendar
13 reflect he was meeting with on Friday, January
14 17th at 11:00 a.m.?

15 A. I mean, it just -- I don't know.

16 Q. Okay. Well, does the calendar entry for
17 Mayor Zahn on Friday, January 17th at 11:00 a.m.
18 to 12:00 p.m. have the notation Nicky/Buisson
19 mayor's office. Did I read that correct?

20 A. You did.

21 Q. On your first meeting with Mayor Zahn,
22 was that at the mayor's office?

23 A. It was.

24 Q. And we know from looking at Exhibit 25
25 that it was before 2:09 p.m.; is that correct?

1 MS. THORNTON:

2 Object to form.

3 THE WITNESS:

4 That's what the documents say.

5 EXAMINATION BY MR. MCGOEY:

6 Q. You don't recall if it was at 1:30?

7 A. I don't.

8 Q. How long was that meeting you had with
9 the mayor, that first meeting?

10 A. I don't recall. I mean I don't recall
11 how long.

12 Q. How did that meeting go?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 I think they -- I think they -- I
17 think they -- Obviously they wanted to
18 have a second meeting or meet again, so
19 I think that it went pretty well.

20 EXAMINATION BY MR. MCGOEY:

21 Q. Did they tell you that they were going
22 to hire you to do the garbage work?

23 A. I don't think they committed to that in
24 that room. I think they -- I don't think they
25 committed to it in the room, no.

1 Q. At that meeting did you talk about what
2 price you would do the work for the City of
3 Kenner?

4 A. I don't remember.

5 Q. Well, what do you recall talking about
6 at that meeting?

7 A. Just, you know, our company and what we
8 were doing for other people, and that we just
9 started getting back with growing the company
10 besides just being in the French Quarter.

11 Q. When you left that meeting on the 17th
12 with the mayor, were you confident that you were
13 going to get the work?

14 A. I don't know if I was -- I don't
15 remember if I was confident.

16 Q. Okay. I'm going to show you a series of
17 text messages from January 17th from you, and the
18 number 913-9689. Do you know whose number that
19 is?

20 A. No.

21 Q. Maybe after I show you the exhibit you
22 can -- it will refresh your recollection. I'm
23 going to show you what's marked as Exhibit 72.

24 (Document marked for identification as
25 Exhibit 72.)

1 THE WITNESS:

2 Oh, that's small print.

3 EXAMINATION BY MR. MCGOEY:

4 Q. It's small print, and I apologize, but
5 this is how you produced your text messages in
6 this case.

7 MS. THORNTON:

8 Patrick, I'm sorry. What are we
9 looking at on it?

10 MR. MCGOEY:

11 We're looking on the first page,
12 the second portion.

13 EXAMINATION BY MR. MCGOEY:

14 Q. And if you work -- The way these work is
15 it's a stream of texts that you start at the
16 bottom and you've got to work your way up. So
17 this is Exhibit 72. So it looks like at January
18 17th at 6:44 p.m. --

19 A. Which one are you looking at?

20 Q. Right here. Right here, this first one,
21 and then we're going to go up.

22 A. Okay.

23 Q. It's a text. Is your number 305 --

24 A. Yes.

25 Q. So it's from -- This text is from

1 913-9689 to you. It says, "Scale of 1 to 10, 10
2 being best, how did it go?" And your response was
3 20 with a bunch of muscle arms, I guess?

4 A. Uh-huh.

5 Q. So then I take it you thought the
6 meeting went well?

7 A. Yeah, I think -- Like I said, I thought
8 we had a shot. They were calling us.

9 Q. Then the next message says, "Good. Ben
10 told me he's happy too." Now, I'm going to
11 represent to you that this cell phone is Greg
12 Buisson's cell phone.

13 A. Okay.

14 Q. Because that's the number I have for
15 him.

16 A. Uh-huh.

17 Q. Do you recall Mr. Buisson texting you
18 after the meeting?

19 A. I don't, but I see here and this is his
20 text to me, yeah.

21 Q. Okay. So if I understand it correctly,
22 your testimony is Mr. Buisson called you and
23 reached out to you about getting the work at
24 Kenner?

25 A. Yes.

1 Q. Then Mr. Buisson met, according to Mayor
2 Zahn's records, on -- with the mayor and Nicky on
3 the same day that you met with the mayor to talk
4 about the contract.

5 MS. THORNTON:

6 Object to form.

7 EXAMINATION BY MR. MCGOEY:

8 Q. That's what we just saw in exhibit, what
9 was it, 71; is that right?

10 MS. THORNTON:

11 Object to form.

12 THE WITNESS:

13 That's what the documents show.

14 EXAMINATION BY MR. MCGOEY:

15 Q. Okay. And then right after, that night,
16 the same night of the meeting he's texting you
17 asking you how it went; is that correct?

18 A. That's what the text messages show, yes.

19 Q. And then he's also in those text
20 messages telling you he's spoken to the mayor and
21 the mayor feels good about it too, right?

22 A. Correct. That's what the text messages
23 say.

24 Q. So is it fair to say or accurate to say
25 that Mr. Buisson was right there in the middle of

1 how you got the contract in the City of Kenner?

2 MS. THORNTON:

3 Object to form.

4 THE WITNESS:

5 I mean, I can't -- I don't know
6 what he was doing. I had not authorized
7 those meetings and I don't know why --
8 and what he was doing at those meetings.

9 EXAMINATION BY MR. MCGOEY:

10 Q. Did you ever tell Mr. Buisson you were
11 going to hire Mr. Nicolosi?

12 A. I told him that he's looking for a job,
13 but -- and that my lawyer was talking to him to
14 see what he could offer.

15 Q. When did you tell Mr. Buisson that Nicky
16 was looking for a job?

17 A. I don't recall.

18 Q. But your testimony was at this first
19 meeting on January 17th, when Mr. Nicolosi
20 introduced himself to you and said I work for
21 Ramelli, he didn't ask for a job at that meeting?

22 A. No.

23 Q. So it would have had to have been
24 sometime after January 17th as to when you told
25 Mr. Buisson that Nicky was looking for a job from

1 you?

2 A. I don't recall.

3 Q. Well, do you think it's possible that
4 you told Mr. Buisson before you ever met Mr.
5 Nicolosi that he was looking for a job from you?

6 A. I didn't say that.

7 Q. In fact, had you had any conversations
8 with Mr. Nicolosi before January 17th?

9 A. No.

10 Q. Now, at this meeting on the 17th, did
11 you ask Mr. Nicolosi to do anything for you?

12 A. Not that I recall.

13 Q. Did you ask him to try to find out
14 information about Mr. Ramelli's trucks and the
15 routes in Kenner?

16 A. Not that I recall.

17 Q. Okay. Is it possible you did?

18 A. Not -- I mean I know that, like I said
19 earlier, and I don't recall the date, but that,
20 you know, when he was trying to get a job, I
21 wanted to see what he knew, but he didn't know
22 much. So I don't recall the dates.

23 Q. I'm going to show you what I'm going to
24 mark as Exhibit 73, which is a series of text
25 messages produced in this case by Ramelli.

1 (Document marked for identification as
2 Exhibit 73.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. I'll ask you to take a look at this.
5 I'll represent to you this is how these text
6 messages were produced, and it's Bates stamped RJS
7 000210. And I'll direct your attention to the
8 third column down at the bottom, which is a text
9 at 11:33 a.m. on January 18th. So that would be
10 the morning after you met with Mr. Nicolosi; is
11 that right?

12 MS. THORNTON:

13 Object to form.

14 THE WITNESS:

15 I don't remember.

16 EXAMINATION BY MR. MCGOEY:

17 Q. Do you recall looking at Exhibit 25 from
18 January 17th where Mr. Rapier was telling Ms.
19 Tufaro "It was a pleasure meeting you today"?

20 A. That was the meeting, the first meeting
21 we went to?

22 Q. According to this email, if you know.

23 A. I think so.

24 Q. So then this would be -- this text
25 message from Nicky to Ed Witchen. Do you know

1 Eddie Witchen?

2 A. No, I don't.

3 Q. I'll represent to you he works for Mr.
4 Ramelli.

5 A. Okay.

6 Q. The text says, "Eddie, Sidney wants to
7 know how many trucks do we run daily." Had you
8 asked Mr. Nicolosi to find out how many trucks ran
9 daily for Ramelli?

10 A. No.

11 Q. I thought you said earlier that you had
12 asked him some questions about the garbage
13 business, and he didn't have answers for you?

14 A. I did ask him questions, but I didn't
15 ask him to call anybody to go get the question. I
16 wanted to see if he knew the business.

17 Q. Got you. So you didn't ask him to try
18 to ask around Ramelli to get the information?

19 A. Absolutely not.

20 Q. Would that be ethical to ask somebody's
21 employee to get some information, proprietary
22 information from the boss that you compete with?

23 MS. THORNTON:

24 Object to form.

25 THE WITNESS:

1 I think so.

2 EXAMINATION BY MR. MCGOEY:

3 Q. You think so what?

4 A. No, I think -- I mean I would never do
5 that.

6 Q. So you don't think that would be fair?

7 A. I mean, I would never -- I never asked
8 him to go ask anybody. I wanted to see what
9 knowledge he had about his job that he worked at
10 for 15 years.

11 Q. Okay. I'm going to show you what I'm
12 going to mark as Exhibit 74, which is another
13 series of text messages produced in this case.
14 This is a set of texts between David Starks -- We
15 know he works for Ramelli, right --

16 A. Yes.

17 Q. -- Eddie Witchen, who I represent to you
18 works for Ramelli, and Nick Nicolosi. I'll mark
19 it as Exhibit 74 and ask you to take a look at
20 that.

21 MR. MCGOEY:

22 For the record this is Bates
23 labeled RJS 000200.

24 (Document marked for identification as
25 Exhibit 74.)

1 EXAMINATION BY MR. MCGOEY:

2 Q. And if you look at the fourth column
3 here, this is about 15 minutes later on January
4 18th, the day after you met with City of Kenner.
5 And Mr. Starks is saying, "Good afternoon, Nick.
6 We run 9 routes daily with 8 trucks. Depending
7 upon the day, we will run a max of 10. Again, the
8 number is dependent upon the amount of garbage on
9 the street. It varies about three times per week.
10 I try and run it as financially feasible as
11 possible without any consequence to The City. In
12 addition, there are usually two, and occasionally
13 three landfill trips for several of the trucks.
14 It depends upon how we juggle the routes."

15 Is it your testimony that you hadn't
16 asked Mr. Nicolosi to find out about the number of
17 trucks and the number of trips -- I'll just say
18 that, the number of trucks Ramelli was running in
19 Kenner?

20 A. I asked him what did he know about it.
21 I didn't ask him to call anybody about it. And I
22 don't know if this was around the time that I
23 asked him, but --

24 Q. Did you ask him about -- to find out how
25 many landfill trips that Ramelli was making daily?

1 A. No, I didn't. I didn't ask him to do
2 that.

3 Q. Were you interested in that, knowing how
4 many trucks you needed for Kenner and the number
5 of trips to the landfill?

6 A. I was -- No, not that I recall.

7 Q. I'll show you what I'm going to mark as
8 Exhibit 75, which is a January 23, 2020 email from
9 Ed Rapier to several people in the City of Kenner
10 and Nicky Nicolosi.

11 (Document marked for identification as
12 Exhibit 75.)

13 EXAMINATION BY MR. MCGOEY:

14 Q. I know you're not on the email. I just
15 have a question about this email for you. The
16 subject line on this email on January 23rd is IV
17 Waste. Do you see that on the first page?

18 A. Oh, sorry. Yes.

19 Q. Were you aware that on January 23rd,
20 Nicky Nicolosi and the City of Kenner officials
21 were setting up a meeting for Monday, January 27th
22 at 1:00 p.m.?

23 A. No, not that I recall.

24 Q. Mr. Nicolosi didn't tell you about this
25 meeting?

1 A. Not that I recall.

2 Q. Then I take it you don't know what was
3 discussed at that meeting?

4 A. Correct.

5 Q. Even though the Re line was IV?

6 A. I don't -- I didn't know anything about
7 it.

8 Q. All right. I'll show you what I'm going
9 to mark as Exhibit 76. This was used several
10 times in other depositions. I'm going to put 76
11 on the top just so we know this is used today, a
12 series of emails and I'll ask you to take a look
13 at that and then I have a series of questions for
14 you.

15 (Document marked for identification as
16 Exhibit 76.)

17 MS. THORNTON:

18 Is the exhibit numbers you're using
19 today picked up from where Julie's left
20 off? Is that --

21 MR. MCGOEY:

22 Yes. That's how we run them in
23 this case. But some of these other
24 exhibits were used in other cases.

25 MS. THORNTON:

1 Okay.

2 EXAMINATION BY MR. MCGOEY:

3 Q. So this might be easiest to follow if
4 you start at the back for this email trail.

5 A. Okay.

6 Q. So it looks like the first email is
7 February 6th, 2020 from Ed Rapier. He was the
8 City of Kenner's counsel?

9 A. Yes.

10 Q. And it's to Erica Beck. I think you
11 said that was your lawyer?

12 A. Correct.

13 Q. She was at that first meeting on January
14 17th?

15 A. She was.

16 Q. And then it copies Mr. Zahn, Ms. Foshee,
17 Nick Nicolosi, and Eric Mund. And the subject is
18 Proposed Contract. And Mr. Rapier says, "Attached
19 is a draft of the proposed contract. This is not
20 written in stone and is subject to change, as it
21 has not been reviewed by all parties here in
22 Kenner, but this lets you get started on your
23 review. I still have to check internal
24 references."

25 Can you tell me why Nicky Nicolosi was

1 included in the circulation of the first proposed
2 contract between IV Waste and the City of Kenner?

3 A. No, I cannot.

4 Q. Was that a surprise to you that he
5 was -- when you found out that he was included in
6 the contract?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 I don't remember if I felt it was a
11 surprise or not.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Okay. Well, at this time the only thing
14 you told me that your interaction with Mr.
15 Nicolosi was that he worked for my client, Mr.
16 Ramelli?

17 A. Uh-huh.

18 Q. So two weeks later you're getting a
19 contract proposal from the City of Kenner, and
20 they are copying your competitor's consultant.
21 Did you not find that to be a little concerning?

22 MS. THORNTON:

23 I object to form and he's not on
24 any of these emails.

25 THE WITNESS:

1 I know. That's what I was getting
2 ready to say. I mean I was getting
3 ready to say the same thing. My name is
4 not on here, so I didn't even see this,
5 don't think.

6 EXAMINATION BY MR. MCGOEY:

7 Q. So it's your testimony, as you sit here
8 today, you were not aware that on February 6th
9 Nick Nicolosi was included in the first proposed
10 contract between IV Waste and the City of Kenner?

11 A. I don't recall if that was -- I don't
12 remember because I wasn't on here.

13 Q. On the first page of this email, Exhibit
14 76, on February 7th Julie Tufaro responds back,
15 "Good evening, Ed. Please let us know if you have
16 time to meet with Sidney, John Litchfield, Nick,
17 and I on Tuesday, February 11th, early afternoon
18 around 12:30. John represents us on other
19 projects, and we think it's best we all sit down
20 so we can get through this more efficiently."

21 Why was Ms. Tufaro suggesting that you,
22 her, your lawyer, and Nick sit down with the City
23 of Kenner?

24 MS. THORNTON:

25 Object to form.

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THE WITNESS:

You'd have to ask her.

EXAMINATION BY MR. MCGOEY:

Q. So you don't know?

A. No.

Q. You weren't on this email?

A. I don't see my name on it.

Q. So does it come as a surprise to you to learn today that on February 7th, 2020, about two and a half weeks after your first meeting with the City of Kenner, that your employee, your general manager, is suggesting a meeting with you, your lawyer, and Mr. Nicolosi?

A. What's your question?

Q. Are you surprised to learn that today?

A. No.

Q. Okay. So you knew at this point that Nick was involved in contract negotiations or not?

MS. THORNTON:

Object to form.

THE WITNESS:

I didn't say that.

EXAMINATION BY MR. MCGOEY:

Q. Okay. Did you know he was involved?

MS. THORNTON:

1 Object to form.

2 THE WITNESS:

3 I mean that's what the email says.

4 He was copied on it.

5 EXAMINATION BY MR. MCGOEY:

6 Q. Right. So my question to you is, as of
7 February 7th, 2020, had Mr. Nicolosi told you he
8 wanted a job making 10,000 a month from IV?

9 A. I don't recall the timeline. I don't.

10 Q. Okay. But Mr. Litchfield is the one
11 that Mr. Nicolosi met with where he talked
12 about --

13 A. Well, they --

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 -- talked on the phone.

18 EXAMINATION BY MR. MCGOEY:

19 Q. They talked on the phone. How did you
20 come to learn that Mr. Nicolosi stopped working
21 for Ramelli?

22 A. I really don't remember.

23 Q. Do you recall ever talking to Mr.
24 Nicolosi about it?

25 A. I don't remember.

1 Q. Do you ever recall talking to Mr.
2 Buisson about Nicky Nicolosi stopped working for
3 Mr. Ramelli?

4 A. I don't remember.

5 Q. Now, to my understanding after these
6 emails that you weren't on that we just looked at
7 in Exhibit 76, a meeting took place to go over the
8 contract terms and negotiate it at the Esplanade
9 Mall. Do you recall a meeting at the Esplanade
10 Mail?

11 A. Yes, we did meet at the Esplanade Mall.

12 Q. And at that meeting the mayor was there?

13 A. I don't recall if he was there or not.
14 I know the city attorney was there.

15 Q. Ed Rapier?

16 A. Yes.

17 Q. Mr. Litchfield was there?

18 A. Yes, he was.

19 Q. You were there?

20 A. Yes.

21 Q. Ms. Tufaro was there?

22 A. Yes, she was.

23 Q. And Nick Nicolosi was there?

24 A. Yes, he was.

25 Q. What was Mr. Nicolosi doing at that

1 meeting?

2 A. You have to ask him.

3 Q. If we look at -- back at the mayor's
4 calendar, what exhibit was that just so I --

5 A. 71.

6 Q. 71. If we look at his calendar on
7 February 13th, there's a contract meeting at 11:00
8 a.m. to 12:30 with Ed Rapier at the Kenner
9 Recreation Office in the Esplanade Mall.

10 A. Uh-huh.

11 Q. Is that where you met with Mr. Nicolosi
12 and Ed Rapier to discuss contract terms?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 I think that's where we met, yes.

17 EXAMINATION BY MR. MCGOEY:

18 Q. A this meeting, February 13th, 2020, do
19 you recall whether or not Mr. Nicolosi had asked
20 you for a job yet?

21 A. No, I don't.

22 Q. Do you recall at this meeting on
23 February 13th, 2020 whether or not you had told
24 Mr. Nicolosi things aren't going to work out, no,
25 you can't work for IV?

1 A. I don't remember the timeline.

2 Q. What, if anything, do you recall Mr.
3 Nicolosi saying at this meeting on February 13th
4 to discuss contract terms?

5 A. I don't remember him saying anything.

6 Q. On February 13th, 2020, when you met
7 with Mr. Nicolosi to discuss your contract terms
8 with the City of Kenner, did you understand that
9 he still worked for Bob Ramelli?

10 A. No. I don't remember talking about
11 that.

12 Q. So you didn't think that was strange
13 that your competitor's consultant is at the first
14 meeting with you to discuss taking his contract
15 away and then at a meeting to discuss the contract
16 terms for your contract?

17 A. I didn't pay any attention to it.

18 Q. Did you not consider these discussions
19 or negotiations confidential?

20 A. I mean no.

21 Q. Was it not discussed at this February
22 13, 2020 meeting that Mr. Nicolosi would be IV's
23 liaison with the City of Kenner?

24 MS. THORNTON:

25 Object to form.

1 THE WITNESS:

2 I don't remember ever talking about
3 that with him.

4 EXAMINATION BY MR. MCGOEY:

5 Q. Now, if you look at Exhibit 71, on March
6 3rd up at the top right it's a Tuesday, and Mayor
7 Zahn's calendar reflects from 9:30 a.m. to 11:30
8 a.m. there was a field trip to IV Waste. Is that
9 what his calendar reflects?

10 A. Yes, that's what it says.

11 Q. Do you recall Mayor Zahn and others
12 coming to inspect IV's facility?

13 A. Yes. It was the council members.

14 Q. And that happened on March 3rd?

15 A. That's what it says, yes. I mean, I
16 don't know, but that's what it says. I mean I
17 know they were there and they came.

18 Q. And you recall who being there to
19 inspect the facilities besides Mayor Zahn?

20 A. It was Mayor Zahn, the council, and the
21 mayor did bring Nicky with him.

22 Q. Did the mayor also bring some community
23 members?

24 A. He did.

25 Q. And those were the community members

1 that would then get up and talk at the March 5th
2 council meeting?

3 A. I don't know. I don't know if that's
4 what he brought them for or not, but he did bring
5 community leaders.

6 Q. Why was Nicky brought to inspect the IV
7 Waste facility?

8 A. You would have to ask the mayor.

9 Q. It was a surprise to you to learn when
10 Nicky showed up on March 3rd at 9:30 a.m.?

11 A. It wasn't a surprise because I knew that
12 they were friends.

13 Q. Do you think at this point, March 3rd,
14 you had already told him he couldn't work for IV
15 or Mr. Litchfield had told him that?

16 A. I don't -- I mean I don't recall.

17 Q. Was Greg Buisson at the inspection of
18 the facility?

19 A. No, he wasn't.

20 Q. You do recall that. It's your position
21 that as of March 3rd Nicky Nicolosi didn't work
22 for IV Waste?

23 A. Correct.

24 Q. Now, if you look at the mayor's calendar
25 underneath March 3rd, March 5th, 5:30 to 6:30

1 p.m., there was a council meeting. Do you recall
2 that's the council meeting that you stood up and
3 spoke and Mr. Ramelli stood up and spoke?

4 A. If that's the date. I remember that
5 meeting. I don't know -- I mean, I don't remember
6 it was on the 5th, but it's on his calendar, so I
7 guess it was.

8 Q. And that was the meeting that the
9 council approved the mayor to enter into a
10 contract with IV. You recall that?

11 A. Yes, I remember.

12 Q. And before that, had you asked Greg
13 Buisson to do a press release for you?

14 A. No.

15 Q. You hadn't asked him to do any press
16 release?

17 A. Uh-uh.

18 Q. Okay. Now, he has done press releases
19 for you in the past, right?

20 A. Yeah, he has.

21 Q. But you didn't ask him to do one about
22 the Kenner contract?

23 A. Not that I recall.

24 Q. All right. I'm going to show you what
25 I'm going to mark as Exhibit 77, which was

1 previously marked as Exhibit 60 in another
2 deposition. I'll ask you to take a look at that.

3 (Document marked for identification as
4 Exhibit 77.)

5 THE WITNESS:

6 Uh-huh.

7 EXAMINATION BY MR. MCGOEY:

8 Q. All right. So this is a March 3rd, 2020
9 email at 2:35 p.m. --

10 A. Uh-huh.

11 Q. -- from Mr. Buisson to you. Did you
12 receive this?

13 A. Yes.

14 Q. All right. And the Re line is
15 Recommendations?

16 A. Correct.

17 Q. Can you tell me how this came about?

18 A. I really honestly don't know because I
19 never asked him to put this together.

20 Q. So Mr. Buisson did this on his own?

21 A. I guess. You would have to ask Mr.
22 Buisson, Greg.

23 Q. You hadn't talked to him before -- Well,
24 let me ask it this way. After your January 17th
25 meeting and this date March 3rd, 2020, had you

1 discussed the City of Kenner contract with Mr.
2 Buisson?

3 A. I don't remember.

4 Q. All right. This email is the same day
5 that the mayor and Nicky and council members came
6 and inspected your facility; is that correct?

7 A. Yes.

8 Q. All right. So he says in this email,
9 "Read below and call me." It starts off, "I'm
10 proud to have the opportunity to service Kenner,
11 the largest city in Jefferson Parish. I was
12 contacted a couple weeks ago by Mayor Ben Zahn."
13 Now, was that true, you were contacted by Mayor
14 Ben Zahn?

15 A. No.

16 MS. THORNTON:

17 Object to form.

18 EXAMINATION BY MR. MCGOEY:

19 Q. Okay. It goes on to say on that one,
20 two, three, four, five -- "We negotiated quickly
21 and to the benefit of the city, and in a
22 non-exclusive agreement, the mayor agreed to allow
23 IV Waste to show what it could do for Kenner."
24 Was that accurate?

25 MS. THORNTON:

1 Object to form.

2 THE WITNESS:

3 I didn't ask for this to be
4 written. This was Greg writing this.

5 EXAMINATION BY MR. MCGOEY:

6 Q. I understand, but was that accurate, you
7 negotiated quickly with the City of Kenner?

8 A. I don't -- I mean I don't know what you
9 consider quickly, but --

10 Q. Less than a month from --

11 A. Was that how long it was?

12 Q. Well, Ed Rapier sent the proposed
13 contract -- you weren't on that email but we
14 looked at it. It was on February 6th --

15 A. Okay.

16 Q. -- and this email is March 3rd. So do
17 you consider that a quick negotiation?

18 MS. THORNTON:

19 Object to form.

20 THE WITNESS:

21 I don't -- I have no --

22 EXAMINATION BY MR. MCGOEY:

23 Q. All right. So you can't agree that it's
24 accurate that you negotiated quickly to the
25 benefit of the city. I get that. What about his

1 statement that says in a non-exclusive agreement.
2 Did you understand your contract with the City of
3 Kenner was non-exclusive?

4 MS. THORNTON:

5 Object to the extent you're calling
6 for a legal conclusion, but you can
7 answer if you understand.

8 THE WITNESS:

9 Can you ask the question again?

10 I'm sorry.

11 EXAMINATION BY MR. MCGOEY:

12 Q. Did you understand -- Is that accurate?
13 Did you understand that your contract with the
14 City of Kenner was going to be a non-exclusive
15 agreement?

16 A. We renegotiated the contract with terms
17 in it.

18 Q. What do you understand a non-exclusive
19 agreement to be?

20 MS. THORNTON:

21 Same objection for the record, but
22 go ahead.

23 THE WITNESS:

24 It depends. If it doesn't have
25 terms in it like we put in the contract,

1 then my understanding is that -- But
2 every contract is different. So my
3 understanding from my non-exclusive
4 contract was that we put terms in it so
5 that if they did cancel within four
6 years, they would have to pay us. So
7 that's the way the -- that's the way our
8 contract was written.

9 EXAMINATION BY MR. MCGOEY:

10 Q. You got -- So you considered your
11 agreement to be exclusive for the first four years
12 with the City of Kenner?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 I mean I'm not a lawyer, but, I
17 mean, I just want to make sure the 6.2
18 million I put up was going to be covered
19 within a period of time of working the
20 contract.

21 EXAMINATION BY MR. MCGOEY:

22 Q. No, I get that. I get that. So as of
23 March 3rd, did you believe your contract with the
24 City of Kenner that you had already negotiated,
25 was going to be exclusive to IV for the first four

1 years of the contract?

2 MS. THORNTON:

3 Object to form.

4 THE WITNESS:

5 There were two negotiations. It
6 was voted on one time, and then they had
7 to lay over and then they had to redo
8 it. So I know there were some changes
9 made, so I don't know.

10 EXAMINATION BY MR. MCGOEY:

11 Q. Okay. So as you sit here today, you
12 don't recall whether or not you believed in March
13 of 2020 that the agreement you had negotiated with
14 the City of Kenner was going to be non-exclusive
15 or exclusive for four years, then non-exclusive?

16 MS. THORNTON:

17 Object to form.

18 THE WITNESS:

19 Yeah. I mean, I didn't write this,
20 I didn't tell him to write this, and I
21 don't -- I mean, my contract says what
22 it says.

23 EXAMINATION BY MR. MCGOEY:

24 Q. Got you. So you believe this part of
25 Greg Buisson's March 3rd email was incorrect as

1 well, that it was not a non-exclusive agreement
2 that you negotiated?

3 MS. THORNTON:

4 Object to form.

5 THE WITNESS:

6 I didn't say that.

7 EXAMINATION BY MR. MCGOEY:

8 Q. Okay. So was it correct or not correct?

9 MS. THORNTON:

10 Objection. He didn't write this.

11 EXAMINATION BY MR. MCGOEY:

12 Q. And I'm just asking him whether you
13 believe what he wrote and sent to you saying "read
14 below and call me," whether that was correct or
15 not correct?

16 MS. THORNTON:

17 He's already answered the question,
18 but you can answer again.

19 THE WITNESS:

20 My answer is we negotiated our
21 contract with terms in it so that we can
22 protect ourselves from the non-exclusive
23 piece.

24 EXAMINATION BY MR. MCGOEY:

25 Q. And that was, what you negotiated, was a

1 provision that said you couldn't be terminated for
2 the first four years of the contract?

3 A. Four years, correct.

4 MS. THORNTON:

5 Object to form.

6 EXAMINATION BY MR. MCGOEY:

7 Q. Right. And so my question to you is,
8 did you understand during the first four years of
9 your contract that you negotiated with the City of
10 Kenner, that it was going to be exclusive to IV?

11 MS. THORNTON:

12 Object to form.

13 EXAMINATION BY MR. MCGOEY:

14 Q. Meaning IV could be the only garbage and
15 recycle hauler for the City of Kenner?

16 MS. THORNTON:

17 Objection to form and you're asking
18 for a legal conclusion, and it was
19 compound. I think you need to ask it
20 again.

21 EXAMINATION BY MR. MCGOEY:

22 Q. That's fine. You can answer.

23 A. I don't recall.

24 Q. You don't recall. Okay. Do you recall
25 telling the public that your contract was

1 non-exclusive?

2 MS. THORNTON:

3 When?

4 EXAMINATION BY MR. MCGOEY:

5 Q. March 5, 2020, at the city council
6 meeting?

7 A. I remember I spoke at the city council
8 meeting.

9 Q. Okay. We'll look at that later. So as
10 you sit here right now, you don't recall what you
11 said at the city council member meeting on March
12 5th about your contract that you negotiated with
13 the City of Kenner being non-exclusive?

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 Yeah, again, show me and I'll
18 answer the question.

19 EXAMINATION BY MR. MCGOEY:

20 Q. Fair enough. We will. Then under this
21 Exhibit 77 on this email from Mr. Buisson it says,
22 "Regarding Nicolosi --" I'm going to go this line
23 by line. "Nick Nicolosi has been in and around
24 government for most of his career." Did you
25 understand that to be accurate or inaccurate?

1 A. I mean, that's what I understood he was.

2 Q. Okay. So that sentence was accurate.

3 "He knows the city and its waste management
4 needs." Did you think that to be accurate or
5 inaccurate?

6 A. I mean I don't know the timeline, but
7 when I spoke to him I didn't think he did.

8 Q. Okay. Fair enough. That sentence you
9 don't think was accurate. Next sentence, "He
10 understands the expectations of the mayor,
11 administration, and council members in Kenner."
12 Did you believe that to be accurate?

13 MS. THORNTON:

14 Object to form. Are you asking did
15 he believe it then or now?

16 MR. MCGOEY:

17 Yes.

18 MS. THORNTON:

19 Okay. It's not clear.

20 THE WITNESS:

21 You're asking me from back then?

22 EXAMINATION BY MR. MCGOEY:

23 Q. Uh-huh, what you thought.

24 A. I mean, I really, honestly, to tell you
25 the truth, I didn't ask for this to be written,

1 and back then I don't even think I really cared
2 what it said because it wasn't something I asked
3 to be written.

4 Q. Well, did you read the email when he
5 sent it to you?

6 A. I glanced -- I glazed over it.

7 Q. Okay. Do you recall what your
8 perception was, whether it was accurate or
9 inaccurate?

10 A. I really wasn't even paying attention to
11 it because Greg did this on his own.

12 Q. Did you think Exhibit 77, what Mr.
13 Buisson put together and emailed to you, did you
14 think it was accurate was my question?

15 A. I don't think it was -- I mean it didn't
16 go out, so obviously there's a reason it didn't go
17 out.

18 Q. Well, tell me why it didn't go out. You
19 told him you weren't -- it didn't go out -- it
20 wasn't going to go out?

21 A. I don't remember, but it didn't go out
22 because he -- there was no need for it to go out.
23 He came up with this on his own.

24 Q. You decided it wasn't going to be sent
25 out?

1 A. It wasn't -- I didn't decide. It just
2 didn't go out.

3 Q. Well, I mean it was for -- it was
4 written as you're speaking, right?

5 A. No.

6 Q. "I am proud to have the opportunity to
7 service Kenner, the largest city in Jefferson
8 Parish."

9 A. I didn't tell him to write that.

10 Q. I didn't say you told him to write it.
11 But did you not understand what he sent you was
12 supposed to be in your writing?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 I can't -- I don't know what Greg
17 Buisson was thinking when he wrote this.
18 But I didn't tell him to write it, and
19 so --

20 EXAMINATION BY MR. MCGOEY:

21 Q. All right. Let's get back to regarding
22 Nicolosi portion of Mr. Buisson's email. It
23 states, "When I learned that he was no longer
24 affiliated with another waste management company,
25 I brought him in as a consultant to help us

1 identify ways that we could provide services that
2 would exceed the expectation of government
3 leaders, and more importantly, residents and
4 business owners of Kenner."

5 True or false, as of March 3, 2020, had
6 you brought in Nicky Nicolosi as a consultant to
7 IV?

8 A. False.

9 Q. So Greg Buisson was mistaken when he put
10 that in this email?

11 A. He had to be.

12 Q. Next sentence says, "His hiring came
13 after my discussions with Mayor Zahn and I look
14 forward to Nicky helping my team better understand
15 the neighborhoods of Kenner." That's what Mr.
16 Buisson wrote on March 3rd, 2020, correct?

17 A. Correct.

18 Q. True or false, Nicky's hiring came after
19 discussions you had with Mayor Zahn?

20 A. It didn't happen.

21 Q. So that's false?

22 A. Yes.

23 Q. So Mr. Buisson was mistaken again?

24 A. He had to be because it didn't happen.

25 Q. True or false, did you have discussions

1 with Mayor Zahn regarding hiring Nicky as a
2 consultant?

3 A. Not that I recall.

4 Q. So, again, Greg was mistaken in this
5 email because it says "after my discussions with
6 Mayor Zahn"?

7 A. I don't know what their discussions
8 were, but Nicky was not hired.

9 Q. My question was, did you have
10 discussions with Mayor Zahn about hiring Nicky as
11 a consultant?

12 A. Not that I recall.

13 Q. So that might be true, but you just
14 don't recall?

15 A. No. I mean --

16 Q. So he was mistaken --

17 A. What I'm saying is I don't recall, and
18 he wrote this without me saying anything to him to
19 write it.

20 Q. It says, "I look forward to Nicky
21 helping my team better understand the neighborhood
22 of Kenner." At this point on March 3rd, had you
23 brought Nicky into the IV Waste team?

24 A. No.

25 Q. So Greg Buisson was mistaken again,

1 correct?

2 A. I'm not saying he's mistaken, but this
3 was not my statement. This was from him. You
4 have to ask him.

5 Q. I'm not asking whether -- I'm asking
6 whether you had brought Nicky into your team as of
7 March 3rd --

8 A. I answered that.

9 Q. -- 2020?

10 A. I answered that. I said no.

11 Q. Okay. So then his statement that he
12 wrote for you in this proposed press release was
13 not accurate?

14 A. Correct.

15 Q. Okay. And so was there anything really
16 accurate in this proposed press release that he
17 recommended to you?

18 A. I mean, maybe "proud to have the
19 opportunity," but that would be the only thing.

20 Q. Okay. So then I take it once you read
21 this with all the inaccuracies, you told Mr.
22 Buisson this is all wrong?

23 MS. THORNTON:

24 Object to form.

25 EXAMINATION BY MR. MCGOEY:

1 Q. I'm not sending this out. Did you tell
2 Mr. Buisson that?

3 A. I don't recall telling him.

4 Q. Do you recall telling him anything?

5 A. Well, it didn't go out, right, so I
6 don't -- Obviously I didn't tell him to do it, so
7 it didn't go out.

8 Q. So as you sit here today, do you not
9 recall telling Mr. Buisson that this looked
10 perfect?

11 A. I didn't say that.

12 Q. So you wouldn't say that?

13 A. No, I'm not saying I didn't say that. I
14 don't recall saying it, but if I did, I don't
15 recall.

16 Q. Well, let me see if I can refresh your
17 recollection. I'm going to show you what I'm
18 going to mark as Exhibit 78, which is an email
19 that you sent to Mr. Buisson on March 3rd, 2020 at
20 2:42 p.m., seven minutes after he sent this to you
21 and said "Read below and call me."

22 (Document marked for identification as
23 Exhibit 78.)

24 EXAMINATION BY MR. MCGOEY:

25 Q. So back then on March 3rd, what was your

1 response to Mr. Buisson saying that press release
2 that he drafted for you on his own saying that you
3 had hired Nicky and brought him into your team and
4 you looked forward to working for him, what was
5 your response?

6 A. It says, "This is perfect."

7 Q. Exclamation mark, "This is perfect!"

8 A. Correct.

9 Q. So what was perfect about this?

10 A. The first line, "I'm proud to have the
11 opportunity," I guess. I mean I wouldn't see why
12 the other stuff was because I didn't ask him for
13 this.

14 Q. Well, it wasn't -- Not only did you not
15 ask him for it, it was all inaccurate according to
16 your testimony today, right, about Mr. Nicolosi?

17 A. I mean, I didn't -- These are not my
18 words.

19 Q. Isn't it true after you told Mr. Buisson
20 on March 3rd that this was perfect, you sent this
21 press release to your counsel?

22 A. Did I? I don't know. Did I?

23 Q. I'll show you what I'm going to mark as
24 Exhibit 79.

25 (Document marked for identification as

1 Exhibit 79.)

2 EXAMINATION BY MR. MCGOEY:

3 Q. And I don't want to know about any of
4 the substance of your conversations. I just want
5 you to confirm that, what, five minutes after you
6 told Mr. Buisson his press release was perfect,
7 you forwarded the same press release to Mr.
8 Litchfield. Is that accurate?

9 A. That's what the email shows.

10 Q. What do you recall, if anything, of
11 conversations you had with Mr. Buisson after March
12 3rd, and him sending you this proposed press
13 release?

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 I don't remember if I had a
18 conversation. I don't remember if I did
19 or didn't.

20 EXAMINATION BY MR. MCGOEY:

21 Q. Do you recall Mr. Ramelli coming out to
22 the paper and saying that you had hired Nicky away
23 from him and that you were taking the contract in
24 a backroom deal?

25 A. I remember --

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MS. THORNTON:

Object to form.

THE WITNESS:

I remember the backroom deal
comment.

EXAMINATION BY MR. MCGOEY:

Q. Well, let's see if I can refresh your
recollection about other things that Mr. Ramelli
had said. I'm going to show you what I'm going to
mark as Exhibit 80, which is a March 5, 2020
report done by Faimon Roberts. Do you know Mr.
Roberts?

A. Yes. He's a reporter.

Q. He's a reporter with nola.com. And this
report, this article is titled "Sidney Torres IV
vs. Robert Ramelli: Kenner trash contract is
causing a stink between these two." I'll ask you
to take a look at that and I'll have some
questions about statements and comments you and
Mr. Ramelli made in that -- to that report.

(Document marked for identification as
Exhibit 80.)

EXAMINATION BY MR. MCGOEY:

Q. I'm interested in statements -- Feel
free to read the whole thing. I'm interested in

1 some statements starting on page 3. When you're
2 ready to discuss this, just let me know.

3 A. Go ahead.

4 Q. Okay. On page 3, the fourth
5 paragraph -- third paragraph it says, "Until
6 January, Nicolosi acted as a liaison --"

7 A. Where is that?

8 Q. Right here.

9 A. Okay.

10 Q. "Until January, Nicolosi acted as a
11 liaison between the city and Ramelli, Ramelli
12 said. Nicolosi called Ramelli in late January,
13 Ramelli said, and said he was ending his contract
14 with the waste collection firm."

15 In the quote Mr. Ramelli says, "'He said
16 some other companies had come to him with an
17 opportunity,' Ramelli recalled. 'I asked if he
18 was going to take Kenner's contract away from me.'
19 Ramelli said he believed that Nicolosi had gone to
20 work for IV Waste." Did you ever go to Mr.
21 Nicolosi with an opportunity?

22 A. No.

23 Q. But he did ask for a job?

24 A. Yes.

25 Q. And you didn't give it to him?

1 A. Correct.

2 Q. Even though the press release two
3 days -- that Mr. Buisson wrote two days before
4 this article says that you had hired him?

5 A. I can't speak for Buisson, but I can
6 tell you that he wasn't hired.

7 Q. Right. And in fact --

8 A. I work too hard to be doing backroom
9 deals.

10 Q. That's what you were quoted?

11 A. That's correct.

12 Q. And that's accurate?

13 A. Absolutely.

14 Q. And then it says, "Torres acknowledged
15 that he had spoken to Nicolosi, but said he had
16 not hired him. He also said that Kenner had
17 approached him after having problems with
18 Ramelli." Was that accurate?

19 A. Correct, it was.

20 Q. Now, do you recall scrambling the day
21 before this article and reaching out to Mr.
22 Buisson --

23 MS. THORNTON:

24 Object to form.

25 EXAMINATION BY MR. MCGOEY:

1 Q. -- to ask him what he needed to tell the
2 press about Nicky?

3 A. I don't recall doing that.

4 Q. You don't recall any conversations you
5 had?

6 A. No.

7 Q. Do you recall texting Mr. Buisson about
8 what you needed to tell the press about Nicky
9 Nicolosi?

10 A. Not that I recall.

11 Q. I'm going to show you what I'm going to
12 mark as Exhibit 81. Again, this is -- I apologize
13 for how this is presented, but it's a spreadsheet.
14 This is how you-all produced your text messages.

15 (Document marked for identification as
16 Exhibit 81.)

17 EXAMINATION BY MR. MCGOEY:

18 Q. I'm going to start on page 2. Do you
19 see under the dark line about two-thirds down, and
20 it's probably easier to figure out if you go under
21 the column that says Date Time Sent.

22 A. Uh-huh.

23 Q. It's a series of text messages on March
24 4th. Do you see those?

25 A. I see the dark line down.

1 Q. Let's start at the top one, March 4th at
2 9:50 a.m. from Greg Buisson to you, the text
3 message says, "Can I call you later?"

4 A. Uh-huh.

5 Q. And a minute later you respond, "It's
6 really important I speak with you as the TV
7 stations are calling and wanting to intervene me
8 right now -- interview me right now."

9 A. Uh-huh.

10 Q. Why did you have to talk to Mr. Buisson
11 about your interviews with the TV stations?

12 A. Because, like I said before, he's
13 written press releases and he's helped me with the
14 press with stuff before. So I just wanted to talk
15 to him about it.

16 Q. Later on that morning you text him, "Can
17 you call me? Channel 6 is on their way to my
18 office."

19 A. Uh-huh.

20 Q. Do you recall Mr. Buisson -- talking
21 with Mr. Buisson on March 4th?

22 A. I don't recall, but, I mean, we did --
23 I'm sure we did speak because here's the text.

24 Q. Okay. And what you told the paper the
25 next day was that Mr. Nicolosi doesn't work for

1 me?

2 A. Correct.

3 Q. Which is the exact opposite, would you
4 agree, of what Mr. Buisson put in your proposed
5 press release the day before? Would you agree
6 with that?

7 A. I can't control what Buisson puts in his
8 press release, but he was not hired. I know for a
9 fact he was not hired.

10 Q. Now, going back, do you remember I asked
11 you earlier about whether or not you had asked
12 Nick to try to count Mr. Ramelli's trucks and
13 trips to the --

14 A. I didn't ask him. You're putting words
15 in my mouth. I didn't ask him to count his
16 trucks. I asked him how many trucks run. I
17 didn't ask him to count his trucks.

18 Q. All right. Well, let's go look and see
19 what your text messages actually say --

20 A. Okay.

21 Q. -- what you said about Nick. If you go
22 to page 1, we can start up at the top. We can
23 start on January 18th, which again this is the day
24 after your first meeting with the City of Kenner
25 and Nick Nicolosi, and it's the day that Nick

1 Nicolosi texted Mr. Witchen and Mr. Starks asking
2 information about Mr. Ramelli's trucks in Kenner.

3 So if you go one, two, three, four,
4 five, six, seven lines down there, this is a text
5 from Julie Tufaro to you on January 18th at 8:16
6 a.m. says, "Please send me 130's phone number."

7 A. Uh-huh.

8 Q. Then you write to him -- write back to
9 her 504-388-5354.

10 A. Uh-huh.

11 Q. Whose number is that?

12 A. I don't know.

13 Q. Well, I'm going to show you a document
14 your counsel -- You're aware that your counsel
15 produced a list of phone numbers and names that
16 were on your texts because we had complained that
17 we didn't have names. Were you aware of that?

18 A. No, I wasn't.

19 Q. All right. Well, I'm going to show you
20 what's marked as Exhibit 82, which is a July 1,
21 2022 email from Michael Marsiglia.

22 (Document marked for identification as
23 Exhibit 82.)

24 EXAMINATION BY MR. MCGOEY:

25 Q. He's your lawyer? He's one of your

1 lawyers?

2 A. Not on this case anymore, but he was.

3 Q. He was. He works for Mr. Litchfield?

4 A. Yes.

5 Q. And I'm going to show you Exhibit 82.

6 And if you turn to page 2, do you see the fifth
7 number down is 504-388-5354?

8 A. Correct.

9 Q. And your lawyer, Mike Marsiglia,
10 represented to us that that was Nick Nicolosi's
11 cell phone number; is that correct?

12 A. I mean if that's what it says -- if
13 that's what he said.

14 Q. Okay. So is that the same number that
15 you were texting Julie Tufaro on January 18th, the
16 morning after your meeting?

17 A. On what, line seven?

18 Q. Line eight.

19 A. Please send -- Okay.

20 Q. She says, "Please send me 130's number,"
21 and you respond back sending her number 504 --

22 A. Yes, that's the same number.

23 Q. Same number?

24 A. Yes.

25 Q. So am I accurate, reading these text

1 messages accurately, that Ms. Tufaro was referring
2 to Nick Nicolosi as 130?

3 A. No.

4 Q. Well, what does 130 mean?

5 A. It could be a truck number, like the
6 driver.

7 Q. Got you. So as you're reading these
8 texts you think she was asking you about an IV
9 Waste driver and you sent her Nick Nicolosi's cell
10 phone number?

11 A. I always -- If I have an issue with a
12 driver, I'll say send me -- like if there's an
13 issue -- like somebody calls and say a truck ran a
14 light or whatever, I'll say send me the truck
15 number, the number to the guy.

16 Q. Yeah. So maybe just so you understand,
17 I don't want you to be confused. The first email
18 that says "Please send me 130's --"

19 A. You mean text message?

20 Q. Text message that says, "Please send me
21 130's phone number," that's from Ms. Tufaro. You
22 see she's under the sender column, and that's to
23 the receiver, which is you.

24 A. Uh-huh.

25 Q. So she asks you to send her 130's phone

1 number, and your response back is to text her Nick
2 Nicolosi's cell phone number. Am I reading that
3 accurately?

4 A. I didn't say that. I mean I said for
5 her to send me the 130 -- I don't know why that
6 would be like that. I don't know.

7 Q. Well, did you have Nick Nicolosi's cell
8 phone number before your January 17th meeting at
9 the City of Kenner?

10 A. I can't -- I don't remember.

11 Q. Do you recall him giving you his cell
12 phone number at that meeting?

13 A. I don't know if it was at that meeting
14 or after.

15 Q. Well, if it was after, it would have had
16 to have been that night because at 8:19 in the
17 morning you're sending Nick Nicolosi's cell number
18 to Ms. Tufaro. Is that accurate?

19 A. Yeah.

20 MS. THORNTON:

21 Object to form.

22 THE WITNESS:

23 Yeah. I'm saying I could have
24 called somebody to get the number. I
25 don't know.

1 EXAMINATION BY MR. MCGOEY:

2 Q. Your response back to her then is,
3 "What's his first name?" And then you write back
4 and say Nick. Am I reading that accurate?

5 A. Yeah, I don't know.

6 Q. So my question to you is, after you got
7 Nick Nicolosi's number on January 18th, do you now
8 recall calling him and asking him to find out
9 information about Mr. Ramelli's trucks?

10 A. I already answered that.

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 I never did that.

15 EXAMINATION BY MR. MCGOEY:

16 Q. This doesn't refresh your recollection?

17 A. No. You're trying to tie this to your
18 narrative, and that didn't happen.

19 Q. Fair enough. Go down a little further
20 to text message now at 8:30 a.m., 8:30 and 38
21 seconds. Ms. Tufaro is saying, "This is listed on
22 their website. I asked 132 though." Were you and
23 Ms. Tufaro talking about Nick Nicolosi as a code
24 of 130?

25 A. No.

1 MS. THORNTON:

2 Object to form.

3 THE WITNESS:

4 No. We don't need to talk about a
5 code.

6 EXAMINATION BY MR. MCGOEY:

7 Q. So you think 130 is a driver for IV
8 Waste?

9 A. I call drivers and I ask what truck
10 number. I do that now but I don't -- there's
11 no -- we don't need to do codes. There's nothing
12 to do a code about.

13 Q. Let's go down a little further on
14 January 18th at 8:54 a.m. So this is the morning
15 after your first meeting with the City of Kenner,
16 you text Julie Tufaro saying, "We need to think of
17 what we want to say in our press release into the
18 media on what we want to get out to the residents
19 in the next few weeks."

20 A. Uh-huh.

21 Q. What was that concerning?

22 A. I don't -- I mean, I don't remember at
23 the time. It could have been just relaying
24 information on our pickup schedule or whatever.

25 Q. It wasn't about a press release about

1 Mr. Nicolosi?

2 A. No, I don't think so, because he wasn't
3 hired.

4 Q. All right. Let's go down a little
5 further on the text from January 19th at 11:39 and
6 29 seconds. It looks like Ms. Tufaro is texting
7 you the next morning saying, "Nick is going to
8 count for me." Do you recall what Ms. Tufaro
9 asked Nick to count for her?

10 A. No, I don't.

11 Q. Your response back to her was, "A lot of
12 those trucks are junk trucks." Were you referring
13 to Mr. Ramelli's trucks?

14 A. I don't recall if I was or was not.

15 Q. Well, do you recall asking Mr. Nicolosi
16 to do anything for you at this time?

17 A. I never asked Nicolosi -- I don't
18 remember asking -- I don't remember asking
19 Nicolosi to do that. I asked Nicolosi what he
20 knew. That was it.

21 Q. Okay. Go to the next page of the texts.
22 So this is page 2 about halfway down, it's on
23 line -- Well, the times is easiest. January 24,
24 9:11:50 a.m.

25 A. Line what?

1 Q. 9:11 a.m.

2 A. Okay.

3 Q. You see that?

4 A. Okay.

5 Q. And just so we're all on the same page
6 of context, this is the day after Mr. Nicolosi met
7 with the City of Kenner officials that we looked
8 at, that calendar invite. You remember that?

9 A. This one here?

10 Q. Not that calendar, this one. I believe
11 Exhibit 75.

12 A. Okay.

13 Q. So on January -- Oh, no, I take that
14 back. The meeting was January 27th. The email
15 was January 23rd; is that right?

16 A. I don't know.

17 MS. THORNTON:

18 Object to form.

19 EXAMINATION BY MR. MCGOEY:

20 Q. Well, does Exhibit 75 reflect that there
21 was a meeting with Ed Rapier and Nick Nicolosi for
22 January 27th?

23 A. Yeah, I see his email is on here.

24 Q. And the Re line for the meeting is IV
25 Waste, right?

1 A. That's what the email says.

2 Q. So going back to your text of January 24
3 from Ms. Tufaro to you at 9:11 a.m., she says,
4 "Want to out Nick off until next week or is he
5 coming to you all about the agreement?"

6 A. Uh-huh.

7 Q. At this time in January 2020, what
8 agreement was Nick -- was Ms. Tufaro asking you
9 that Nick was coming to you about?

10 A. I don't know.

11 Q. It wasn't an agreement to work for
12 him -- to work for you?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 No, I don't think so.

17 EXAMINATION BY MR. MCGOEY:

18 Q. But at some point he did that and at
19 some point -- correct?

20 A. At some point he communicated with my
21 lawyer.

22 Q. And I think your testimony was that your
23 lawyer put something together?

24 A. Correct.

25 Q. All right. Now, I want to talk to you

1 about the March 5th, 2020 council meeting. That
2 was the one where they approved your contract.

3 THE WITNESS:

4 Can I use the restroom?

5 MR. MCGOEY:

6 Absolutely. We'll take a break.

7 (Break taken.)

8 THE VIDEOGRAPHER:

9 We are now off the record. The
10 time is 11:04.

11 (Break taken.)

12 THE VIDEOGRAPHER:

13 Returning to the record. It's
14 11:15.

15 EXAMINATION BY MR. MCGOEY:

16 Q. All right. Mr. Torres, when we stopped
17 we were about to start talking about the March 5,
18 2020 council meeting. That was the council
19 meeting that the City of Kenner council voted for
20 you to get the contract. Do you recall that?

21 A. It was.

22 Q. All right. And do you recall talking to
23 the public at that council meeting?

24 A. I did get up and talk.

25 Q. I'm going to play you a few clips of

1 what you said at that council meeting and then I
2 have some questions for you.

3 (Document marked for identification as
4 Exhibit 83.)

5 MR. MCGOEY:

6 Andi, can you play the first clip?

7 (Video playing.)

8 EXAMINATION BY MR. MCGOEY:

9 Q. Okay. So this clip you start off by
10 telling the public that there weren't any backroom
11 deals, right?

12 A. Correct.

13 Q. And you still today state that position?

14 A. 100 percent.

15 Q. But you do admit that for your first
16 meeting on this deal you met with the City of
17 Kenner and Mr. Ramelli's consultant?

18 A. The mayor brought the people to the
19 meeting. I was invited to the meeting. I had
20 nothing to do with who he brought.

21 Q. Were you aware that the City of Kenner
22 and Mr. Nicolosi told Mr. Ramelli that they were
23 going to be meeting with you about his contract?

24 A. No.

25 Q. Would you agree it was a backroom deal

1 towards Mr. Ramelli felt that?

2 MS. THORNTON:

3 Object to form.

4 THE WITNESS:

5 There was no backroom deal, so I
6 don't know.

7 EXAMINATION BY MR. MCGOEY:

8 Q. And you said, "Nick does not work for
9 me"?

10 A. Correct.

11 Q. Is that something, a position that Mr.
12 Buisson and you discussed on March 4th after he
13 drafted that press release?

14 A. What position?

15 Q. The position that he didn't work for
16 you?

17 A. Yeah, he doesn't -- He didn't work for
18 me.

19 Q. But on March 3rd you agree that Mr.
20 Buisson wrote you an email -- a press release for
21 you that said you had hired him, right? We went
22 over that earlier.

23 A. Uh-huh.

24 Q. So my question is, between March 30
25 email and this March 5th council meeting where you

1 say he doesn't work for me, how did you come to
2 that conclusion?

3 A. Because I guess at that time I realized
4 he is not -- he doesn't know the business and
5 there's no -- nothing he's going to bring to add
6 value to the business to help with our getting new
7 business or anything like that.

8 Q. Got you. So as of March 5th when you
9 told the public Nick doesn't work for me, you had
10 made the decision at that point that Nicky wasn't
11 going to work for IV?

12 A. That's what I said.

13 Q. Well, that's what you said. We just
14 watched it, right?

15 A. That's what I'm saying.

16 Q. So it's your understanding then as of
17 March 5th Mr. Litchfield had told Mr. Nicolosi,
18 "It ain't going to work out. You're not working
19 for IV"?

20 MS. THORNTON:

21 Object to form.

22 THE WITNESS:

23 I didn't say that.

24 EXAMINATION BY MR. MCGOEY:

25 Q. Okay. So were you still in discussions

1 on March 5th about Nicky working for you?

2 A. I don't remember if we were or not.
3 But, I mean, if I said at the council meeting that
4 he doesn't work for me, he didn't work for me and
5 he's never worked for me.

6 Q. Got you. So when you said at the March
7 5th council meeting that "Nick doesn't work for
8 me," did you still believe there was a possibility
9 he might work for you in the future?

10 A. I looked pretty -- I mean I looked
11 pretty convincing to myself that I had made a
12 decision that he's not working for me, he's not
13 going to work for me.

14 Q. Okay. And had that been conveyed to Mr.
15 Nicolosi as of March 5th, 2020?

16 A. I don't recall.

17 Q. So it's a possibility that you had
18 decided on that date March 5th that Nick wasn't
19 going to work for you. You just hadn't -- that
20 hadn't been conveyed to Mr. Nicolosi yet?

21 A. I'm only saying based off of that video
22 I just watched, it looks like I'm pretty confident
23 that he's not going to work for me.

24 Q. Okay. And as of March 5th had Mr.
25 Nicolosi asked you to work for \$10,000 a month?

1 A. I don't remember.

2 Q. You think he might have asked you after
3 you told the public that he doesn't work for me?

4 A. No. I mean it had to be before.

5 Q. Fair enough. So he asked you before
6 March 5th for a job to get 10,000 a month, and by
7 March 5th you believe you had told him it's not
8 going to work out?

9 MS. THORNTON:

10 Object to form.

11 THE WITNESS:

12 I don't know what I told him. But
13 I know that was public and it was
14 televised, so...

15 EXAMINATION BY MR. MCGOEY:

16 Q. Now, up until this point, March 5th, you
17 had met with Mr. Nicolosi on January 17th, right?

18 A. The mayor brought him to the meeting.

19 MS. THORNTON:

20 Object to form.

21 EXAMINATION BY MR. MCGOEY:

22 Q. And then he had -- you had met with him
23 at the Esplanade Mall to go over your contract
24 terms, right?

25 MS. THORNTON:

1 Object to form.

2 THE WITNESS:

3 The mayor brought him to the
4 meeting.

5 EXAMINATION BY MR. MCGOEY:

6 Q. You didn't bring him to the meeting on
7 February 13th to discuss your contract?

8 A. Why would I? He didn't work for me.

9 Q. Well, did you see Julie Tufaro's email
10 asking when she could -- when the City of Kenner
11 could set up a meeting with you, John Litchfield,
12 and Nicky?

13 A. I just saw it today.

14 Q. So is it possible that Julie brought
15 Nicky to the meeting on your behalf but you didn't
16 know about it?

17 A. Why would she --

18 MS. THORNTON:

19 Object to form.

20 THE WITNESS:

21 Why would she bring him if he's not
22 an employee?

23 EXAMINATION BY MR. MCGOEY:

24 Q. Well, the press release that Mr. Buisson
25 prepared on March 3rd said you had hired him as a

1 consultant, correct?

2 A. I had nothing to do with Buisson, what
3 he writes and how he does things. I mean that's
4 what he said. I didn't say that.

5 MR. MCGOEY:

6 All right. Can you show the second
7 clip, Andi?

8 (Video playing.)

9 EXAMINATION BY MR. MCGOEY:

10 Q. Okay. So, again, on March 5th, 2020
11 you're telling the public that Kenner called you
12 the first time, right?

13 A. Uh-huh.

14 Q. But we watched Mayor Zahn's sworn
15 deposition testimony earlier in your deposition
16 where he said that Greg Buisson asked Nicky if you
17 could work in Kenner. You recall that?

18 MS. THORNTON:

19 Object to form.

20 EXAMINATION BY MR. MCGOEY:

21 Q. You recall seeing that?

22 A. I saw that.

23 Q. So what Mayor Zahn testified to in his
24 deposition was wrong, was a lie?

25 MS. THORNTON:

1 Object to form.

2 THE WITNESS:

3 I told you the truth on what
4 happened with me.

5 EXAMINATION BY MR. MCGOEY:

6 Q. So you'd say Mayor Zahn wasn't telling
7 the truth?

8 MS. THORNTON:

9 Object to form.

10 THE WITNESS:

11 I didn't say that.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Okay. Well, Mayor Zahn's testimony was
14 that the first involvement that IV had with the
15 City of Kenner was when Greg Buisson asked him at
16 Cafe Cafe if IV could get involved.

17 A. Uh-huh.

18 Q. So you're saying that that happened or
19 didn't happen?

20 A. I don't know anything about that
21 happening. All I know is Greg Buisson called me
22 and asked me that -- told me that they were having
23 problems and that they -- you might want to give
24 them a call.

25 MR. MCGOEY:

1 Okay. Andi, can you play the third
2 clip?

3 (Video playing.)

4 EXAMINATION BY MR. MCGOEY:

5 Q. Okay. So at the council meeting you
6 told the public that you offered employees a job
7 and you were going to pay them more?

8 A. I said the people that I saw outside
9 that were concerned that they were going to lose
10 their job because the City of Kenner and the
11 government decided they wanted to switch because
12 they were having bad service, not replacing
13 recycling carts, and a bunch of other reasons why
14 they gave us why they were canceling, that the
15 government was going with us, and that I didn't
16 want to see them lose their jobs. So absolutely
17 if that was a concern, we would be willing to give
18 them an opportunity if it worked out. They had to
19 go through a review process, but if it worked out
20 we would. They wouldn't lose their job.

21 Q. So just so we're clear, when you spoke
22 at the council meeting, the council had not voted
23 yet to whether or not to give you a job, a
24 contract. Were you aware of that?

25 A. Didn't they vote that night?

1 Q. They did after you spoke.

2 A. Okay.

3 Q. But you testified before they voted that
4 you had already offered all of Mr. Ramelli's
5 employees that are on the street saying don't
6 approve this, you offered them a job. Is that not
7 right?

8 MS. THORNTON:

9 Object to form.

10 THE WITNESS:

11 No. I said that I would. I never
12 offered them anything.

13 MR. MCGOEY:

14 Andi, can you play it again?

15 (Video playing.)

16 MR. MCGOEY:

17 Stop it there.

18 THE WITNESS:

19 Correct.

20 EXAMINATION BY MR. MCGOEY:

21 Q. So is it accurate to say before you got
22 up and spoke at the council meeting, you had
23 offered Mr. Ramelli's employees a job and told
24 them you would pay them more?

25 A. I ran into two people or one person and

1 I did say they were concerned they were going to
2 lose their job. And that's what -- it was two
3 people as I was walking in.

4 Q. Two people?

5 A. Yeah.

6 MR. MCGOEY:

7 Can you play that again? See if
8 you qualified how many employees you
9 offered jobs to with Mr. Ramelli.

10 (Video playing.)

11 MR. MCGOEY:

12 Stop.

13 EXAMINATION BY MR. MCGOEY:

14 Q. So you told the public you offered every
15 one of his employees that were on the street --

16 A. Finish playing it.

17 MS. THORNTON:

18 Object to form.

19 MR. MCGOEY:

20 You can play it.

21 (Video playing.)

22 THE WITNESS:

23 Everyone that I saw. I didn't talk
24 to everyone. There was only two that I
25 saw when I was walking in the door.

1 EXAMINATION BY MR. MCGOEY:

2 Q. Okay. So it's your testimony today that
3 when you told -- you were offering all of his --
4 every one of his employees out there a job, it was
5 only two?

6 MS. THORNTON:

7 You're mischaracterizing the video.

8 THE WITNESS:

9 Yeah.

10 EXAMINATION BY MR. MCGOEY:

11 Q. And did some of those employees that you
12 offered jobs to from Mr. Ramelli's office go work
13 for you?

14 A. I don't remember if any of those people
15 did.

16 Q. So just so I understand, on March 5th
17 you were telling the public that you offered Mr.
18 Ramelli's employees a job, but you had
19 specifically told Mr. Nicolosi, the consultant
20 that your general manager testified was
21 responsible for Mr. Ramelli having the Kenner
22 contract, you told him you weren't going to give
23 him a job?

24 MS. THORNTON:

25 Object to form, and you are

1 mischaracterizing his testimony.

2 EXAMINATION BY MR. MCGOEY:

3 Q. You can answer.

4 MS. THORNTON:

5 No.

6 MR. MCGOEY:

7 Yes, he can.

8 MS. THORNTON:

9 You can try to answer, but my
10 objection stands.

11 THE WITNESS:

12 I already answered that question.

13 MR. MCGOEY:

14 Can you play the next clip from
15 that council meeting?

16 (Video playing.)

17 EXAMINATION BY MR. MCGOEY:

18 Q. All right. So you said several things
19 in that clip to the public at the council meeting.
20 One was that you would have to agree to a
21 non-exclusive contract just like Mr. Ramelli.

22 MS. THORNTON:

23 Object to form.

24 EXAMINATION BY MR. MCGOEY:

25 Q. Did you say that?

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MS. THORNTON:

Object to form.

THE WITNESS:

If I signed his contract.

EXAMINATION BY MR. MCGOEY:

Q. Okay. So after this meeting where you told the public you were agreeing to a non-exclusive contract like Mr. Ramelli --

MS. THORNTON:

Object to form. You're not -- That is not what the video said.

EXAMINATION BY MR. MCGOEY:

Q. Why don't you just tell me how it came about that you told the public you were going to have a non-exclusive contract, but you believe now --

MS. THORNTON:

That's not what the video said.

MR. MCGOEY:

You've got to let me finish, Jennifer. You can't do a speaking objection.

MS. THORNTON:

Because you're sitting here mischaracterizing it.

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MR. MCGOEY:

You cannot make a speaking objection. Object to the form after I'm finished asking the question, please.

EXAMINATION BY MR. MCGOEY:

Q. Did you tell the public that you would have to live by a non-exclusive agreement just like Mr. Ramelli?

MS. THORNTON:

Object to form.

THE WITNESS:

I was talking about Mr. Ramelli's --

EXAMINATION BY MR. MCGOEY:

Q. My question was did you say it to the public?

MS. THORNTON:

Object to form.

THE WITNESS:

I'm answering the question.

EXAMINATION BY MR. MCGOEY:

Q. It's a yes or no and then you can --

A. I'm telling you that the contract that I was talking about was if I signed the same contract Ramelli signed, I would have to live by

1 that.

2 Q. Well, were you aware that a contract was
3 presented to the council for that meeting that you
4 had already negotiated --

5 MS. THORNTON:

6 Object to form.

7 EXAMINATION BY MR. MCGOEY:

8 Q. -- and they were approving Mayor Zahn
9 entering into a contract?

10 A. I know that my lawyers were going back
11 and forth with a contract, and the first one that
12 we did didn't go through and we had to -- they had
13 to redo it.

14 Q. Okay. All right. So it's your
15 testimony that if you would have signed the same
16 contract Mr. Ramelli signed, then it would have
17 been a non-exclusive contract for IV?

18 A. From what I understood from the city
19 attorney and the mayor's office is that that
20 contract, yes, if that was the same contract.

21 Q. Okay. But it's your belief that you
22 signed a different contract?

23 A. No. We put a time in there if it was
24 canceled.

25 Q. Okay. And during the first four years

1 of your contract you believe you're supposed to be
2 the exclusive provider for all services for
3 garbage and recycling for the City of Kenner?

4 MS. THORNTON:

5 Object to the extent you're asking
6 for a legal conclusion about the
7 contract.

8 THE WITNESS:

9 Once it was invoked, yes.

10 EXAMINATION BY MR. MCGOEY:

11 Q. So it's your position that the City of
12 Kenner is in breach of your contract by Mr.
13 Ramelli now having the recycle business for the
14 City of Kenner?

15 A. I'm only -- My petition speaks for
16 itself as far as what we believe that they broke
17 the contract and they can't separate it, based off
18 of the language that my lawyers put in the
19 contract.

20 Q. Got you. But you believe they could
21 separate Mr. Ramelli's contract and give the work
22 to you?

23 A. Based off of what the city attorney and
24 the mayor's office told me.

25 Q. Now, you also said to the public on

1 March 5th that you were agreeing to do the work
2 for the same price that Mr. Ramelli did?

3 A. Correct.

4 Q. Did you say that?

5 A. Yes.

6 Q. Okay. As we sit here today, will you
7 admit that your contract, you were charging the
8 City of Kenner a higher price than Mr. Ramelli?

9 A. No.

10 Q. You won't agree to that?

11 A. No, I would not agree to that.

12 Q. Are you aware that a judge in Jefferson
13 Parish already determined as a matter of law your
14 contract was more expensive than Mr. Ramelli's?

15 MS. THORNTON:

16 Object to form.

17 THE WITNESS:

18 I don't know what the judge did.

19 EXAMINATION BY MR. MCGOEY:

20 Q. Okay. Well, do you recall putting out
21 on Facebook numerous times the judges all
22 disagreed with Mr. Ramelli's position and he was a
23 corporate sore loser by filing all these lawsuits?

24 A. I don't remember. You can show me and
25 I'll refresh my memory.

1 Q. Okay. You don't remember doing that?

2 A. No. I said refresh my memory if you
3 have something. I don't --

4 Q. Okay. I'll show you what I'm going to
5 mark as Exhibit 84, which are reasons and
6 judgment -- Reasons For Judgment in the case Sam
7 Capitano versus City of Kenner.

8 (Document marked for identification as
9 Exhibit 84.)

10 EXAMINATION BY MR. MCGOEY:

11 Q. Are you familiar with that lawsuit?

12 A. I mean I heard that someone got this guy
13 to do this.

14 Q. What do you mean, somebody got this guy
15 to do this?

16 A. There was some rumors that this guy was
17 asked to do this.

18 Q. Are you referring to the judge?

19 A. No, no. I'm talking about Sam.

20 Q. Got you. Got you. I'm asking you,
21 though, so you knew about the case?

22 A. Uh-huh.

23 Q. And the case --

24 A. I don't know a lot about it, but I heard
25 of it.

1 Q. All right. Well, I'm going to direct
2 your attention to page 6 of 11. And this was
3 Reasons For Judgment signed by Judge Raymond
4 Steib, Jr. Do you know him?

5 A. I've heard of him.

6 Q. It's dated May 18, 2020, which was 18
7 days after you started working in the City of
8 Kenner. The last sentence on page 6 of his
9 Reasons For Judgment says, "The IV Waste contract,
10 on the other hand, provided for garbage collection
11 services at \$11.96 per service unit per month.
12 Therefore, the IV Waste contract represented an
13 increased charge to the citizens of Kenner, even
14 if Ramelli's alleged undercharging (at 11.28 per
15 service unit) is not considered."

16 Were you aware that Judge Steib in the
17 24th Judicial District Court issued a ruling in
18 May of 2020 that your contract was charging the
19 citizens of Kenner higher prices than the Ramelli
20 contract?

21 A. I wasn't aware of this, no.

22 Q. So then I take it, will you acknowledge
23 now for the first time on the record that your
24 contract, you charged the citizens of Kenner more
25 money than Ramelli's contract?

1 MS. THORNTON:

2 Object to form. Which contract?

3 THE WITNESS:

4 We followed the letter of our
5 contract, and we did exactly what the
6 admission and council voted on, and
7 that's what we did.

8 EXAMINATION BY MR. MCGOEY:

9 Q. Did you tell the public you were doing
10 the work in Kenner for the same price Ramelli was
11 going to do it?

12 A. The same contract -- Like I said, our
13 contract is what we followed, and we believed that
14 our contract would be the same as far as the
15 pricing.

16 Q. But it turned out that your contract was
17 for more money than Ramelli's contract. You don't
18 recall that?

19 MS. THORNTON:

20 Object to form.

21 THE WITNESS:

22 Uh-uh.

23 EXAMINATION BY MR. MCGOEY:

24 Q. You don't recall that?

25 A. No. I think we did exactly what our

1 contract calls for.

2 Q. And your contract called for charging
3 the citizens of Kenner more money than Ramelli's
4 contract?

5 A. I didn't say that.

6 MS. THORNTON:

7 Object to form.

8 EXAMINATION BY MR. MCGOEY:

9 Q. You don't recall that?

10 A. No, I didn't say that. I said we
11 followed the contract as it was written.

12 Q. Do you recall adhering to emergency
13 contracts with the City -- a temporary agreement
14 with the City of Kenner and then an emergency
15 contract with the City of Kenner all because your
16 contract was charging the City of Kenner more
17 money?

18 A. No. You're characterizing this in the
19 way you want your narrative to come out. It was a
20 layover provision that was the issue, and that's
21 why it had to carry over. That's why they did
22 that.

23 Q. Okay. So I'm going to show you a
24 contract that I'm going to mark as Exhibit 85,
25 which has got a footer of March 23, 2020 between

1 IV Waste and the City of Kenner.

2 (Document marked for identification as
3 Exhibit 85.)

4 EXAMINATION BY MR. MCGOEY:

5 Q. And confirm for me that you signed it on
6 March 23rd, 2020.

7 A. That's my signature.

8 Q. Okay. And look at Section 6.02 and
9 confirm for me that your contract --

10 A. What page?

11 Q. It's page -- probably around 27. I
12 don't have it -- Do you see a Section 6.1 Service
13 Fees? Go to the next page. Here we go, Service
14 Fees. So your first contract with the City of
15 Kenner you agreed to pick up garbage for how much
16 per resident per month?

17 A. I don't recall. I mean, oh, on the
18 paper?

19 Q. Yeah.

20 A. 11.96.

21 Q. Yeah, \$11.96 per household per month?

22 A. Uh-huh.

23 Q. And was your testimony that I was
24 looking for a narrative to try to explain why you
25 dropped your price in later contracts? Was it not

1 because Judge Steib ruled that that contract was
2 charging the citizens of Kenner more money than
3 Mr. Ramelli's contract?

4 MS. THORNTON:

5 Object to form.

6 THE WITNESS:

7 No, I don't agree with you.

8 EXAMINATION BY MR. MCGOEY:

9 Q. Okay. Well, let's look at the next
10 contract you entered in with the City of Kenner.
11 I'm going to mark that as Exhibit 86. It's got a
12 footer of the date 5/20/21 [sic], and it's called
13 an Emergency Contract.

14 (Document marked for identification as
15 Exhibit 86.)

16 EXAMINATION BY MR. MCGOEY:

17 Q. Can you tell me what the emergency was
18 in May of 2020, May 20th, two days after Judge
19 Steib issued his judgment saying that you were
20 charging more than Mr. Ramelli's contract?

21 A. This was because they needed the garbage
22 picked up, and it had to have a layover. That was
23 the issue from my understanding from the legal
24 team.

25 Q. All right. Turn to page 27 of your

1 Emergency Contract. Well, let's start at the last
2 page first. Confirm you signed this on May 20th,
3 2020.

4 A. That's what the signature says, yes.

5 Q. And confirm for me that's two days after
6 Judge Steib issued his Reasons For Judgment,
7 Exhibit 84, that we just looked at?

8 A. Uh-huh.

9 Q. Is that right?

10 A. Yes, if that's what it says.

11 Q. Now turn to page 27 and confirm for me
12 under your Emergency Contract you dropped your
13 price to picking up garbage to \$11.28 per service
14 unit per month?

15 A. Uh-huh.

16 Q. That's right?

17 A. The city -- This is what the city
18 said -- the legal team said we need to do and our
19 legal team agreed to -- we agreed to it.

20 Q. Okay. Did you not understand that you
21 agreed to it because your first contract that you
22 and the city told the citizens of Kenner was going
23 to be the same price was, in fact, a higher price
24 than Ramelli's contract?

25 A. No. I think it was something to do with

1 the confusion of him not billing the CPI and that
2 was the issue, they forgot to bill the CPI. You
3 guys filed a suit in federal court on that. And I
4 think that because he didn't do that, there was an
5 issue with him not doing that which caused when
6 they calculated it based off of what his rates
7 should have been, it wasn't done, and that's why
8 this Emergency Contract -- Well, this was a
9 layover, and that's why they did the Emergency
10 Contract. But for the pricing that's my answer.

11 Q. Got you. I take it that that's your
12 answer. Now I just want to see if Judge Steib in
13 the 24th Judicial District Court agreed with your
14 answer or disagreed. So will you pull back up
15 Exhibit 84, which is the Reasons For Judgment,
16 this one. Again, go to page 9 of 11, the last
17 sentence says, "The IV Waste contract, on the
18 other hand, provided for garbage collection
19 services at \$11.96 per service unit per month."

20 A. Uh-huh.

21 Q. There's the contract we just looked at,
22 the one you signed in March of 2020, correct?

23 A. The emergency one?

24 Q. No, the first one.

25 A. Okay.

1 Q. The one you told the citizens of Kenner
2 it was going to be the same price as Ramelli's
3 contract.

4 A. It was. It was based off him not doing
5 the CPI.

6 Q. Well, let's see what Judge Steib had to
7 say about that.

8 A. I don't know what Judge Steib had to
9 say.

10 Q. Well, let's read the next sentence.

11 A. I'm only going by City of Kenner and my
12 lawyers and what they came up with.

13 Q. Okay. I'm a lawyer and I go by what
14 judges say, so let's see what Judge Steib says in
15 the next sentence as the reasons for judgement.

16 A. That's fine.

17 MS. THORNTON:

18 Let me just object to the extent
19 you keep asking him to read and
20 interpret what a judge said in a ruling
21 that he said he's never seen until
22 today.

23 MR. MCGOEY:

24 Fair enough.

25 MS. THORNTON:

1 But go ahead.

2 EXAMINATION BY MR. MCGOEY:

3 Q. "Therefore, the IV Waste contract
4 represented an increased charge to the citizens of
5 Kenner even if Ramelli's alleged undercharging is
6 not considered." That's what Judge Steib said.

7 A. That's his opinion.

8 Q. So you disagree with Judge Steib?

9 A. I'm only going by my experience with
10 dealing with the city.

11 Q. So you're not willing to admit today on
12 the record that your first contract was charging
13 the citizens of Kenner more money than Ramelli's
14 contract?

15 A. I'm willing to admit what I said before
16 is that my -- he didn't bill for the CPI, and
17 that's how they calculated it and that's why they
18 put it in there, so that's why we were billing for
19 that.

20 Q. Now, Ms. Tufaro testified in her
21 deposition that Nick Nicolosi came to your office
22 and begged for a job. Do you recall that?

23 A. I mean he wanted a job. I don't know if
24 he begged.

25 Q. She recalled that he came to your office

1 and y'all had a conversation in the kitchen. You
2 have a kitchen in your office?

3 A. We have two kitchens, yes.

4 Q. Do you recall him coming in your kitchen
5 and begging for a job?

6 A. I don't know if he was begging. That
7 was her opinion.

8 Q. All right. Can you -- Let's see if we
9 can refresh your recollection of that meeting.

10 MR. MCGOEY:

11 Andi, can you play the video from
12 Ms. Tufaro's deposition page 131.

13 (Video playing.)

14 MR. MCGOEY:

15 Stop it right there.

16 EXAMINATION BY MR. MCGOEY:

17 Q. We saw your text earlier, though, on
18 January 18th you sent Ms. Tufaro Nicky's cell
19 phone number, right?

20 A. That's what the texts show.

21 Q. And one of those texts we looked at she
22 said she spoke to Nick and Nick's going to look
23 into the trucks, right?

24 MS. THORNTON:

25 Object to form.

1 THE WITNESS:

2 I don't --

3 MR. MCGOEY:

4 Okay. You can continue.

5 (Video playing.)

6 EXAMINATION BY MR. MCGOEY:

7 Q. You heard Ms. Tufaro talk about this
8 uninvited meeting with Mr. Nicolosi in the kitchen
9 at IV's office. Do you recall that meeting?

10 A. I don't recall that meeting.

11 Q. You have no independent recollection of
12 it?

13 A. I mean I know he came by our office
14 besides he came the one time with the council and
15 I know he came one or two times before. But it
16 could have been one of those times.

17 Q. Okay. So she said she thought it was
18 after the contract was awarded to y'all March 5th.
19 But you're saying the only other times Nicky came
20 to the office was before the --

21 A. I didn't say that.

22 Q. You have to let me finish. You tied it
23 to before they came to visit with the council
24 members?

25 A. Uh-uh (indicating negatively). No, he

1 came with the council members, and then I stand by
2 what she says, it was after it was voted on.

3 Q. Okay. So when do you believe that this
4 meeting in the kitchen happened after March 5th?

5 A. I just told you I don't know.

6 Q. You don't recall the date?

7 A. No.

8 Q. Do you recall any of the specifics?

9 A. I know that he was looking for a job.
10 And I told you that already, he was trying to get
11 a job.

12 Q. Okay. So as I understand it then, he
13 asked -- Mr. Mr. Nicolosi asked for \$10,000 a
14 month to work for IV, correct?

15 A. Uh-huh. Well, he wanted a job and that
16 was what he wanted for pay.

17 Q. And then on March 5th you told the
18 public he doesn't work for me, correct?

19 A. That's what the video shows.

20 Q. And then after March 5th he came to you
21 again pleading for a job?

22 A. I mean didn't she say it was after the
23 council meeting?

24 Q. That is what she said.

25 A. Okay. So then I stand by what she says,

1 that it was after.

2 Q. Was it before you started working on May
3 1st?

4 A. I don't remember.

5 Q. What do you recall Mr. Nicolosi doing
6 for IV Waste after the council meeting on March
7 5th?

8 A. Nothing.

9 Q. Nothing?

10 A. I don't remember him doing anything, not
11 that I remember.

12 Q. Okay. So as you sit here today, you
13 have no independent recollection of Mr. Nicolosi
14 doing any work for IV after March 5th?

15 A. Well, I mean, I told you he did the
16 35-gallon cart, you know. But I don't remember
17 the time when that happened and when that
18 happened.

19 Q. Other than that you don't recall
20 anything else?

21 A. And then the school board thing that I
22 told you about with the Jefferson Parish.

23 Q. Who did -- Did he take you to meet with
24 anybody at Jefferson Parish?

25 A. No.

1 Q. Do you remember Nicky Nicolosi taking
2 you to meet with Deano Bonano --

3 A. No.

4 Q. -- for a job in Jefferson Parish?

5 A. I never met with Deano Bonano with
6 Nicky.

7 Q. It didn't happen?

8 A. No.

9 Q. Specifically, though, about the City of
10 Kenner, you don't recall him doing any work for
11 you after March 5th, 2020, other than maybe
12 bringing a 35-gallon container to the council
13 member?

14 A. Correct.

15 Q. Do you recall at this meeting after
16 March 5th in the kitchen of IV Waste, whether you
17 told Mr. Nicolosi that he was not -- you weren't
18 going to give him a job?

19 MS. THORNTON:

20 Asked and answered.

21 THE WITNESS:

22 I don't think. I mean, no, I don't
23 think I told him anything.

24 EXAMINATION BY MR. MCGOEY:

25 Q. Okay. Let's go back to those text

1 messages that we looked at earlier. This is
2 Exhibit 81. I want to go to the, let's see, one,
3 two, three, four, the fifth page. About halfway
4 down there's a series of texts from Nick Nicolosi
5 to you. Do you see Nick's name in bold?

6 A. I do.

7 Q. All right. So it looks like he's now
8 texting you on April 10, 2020 saying, "Okay.
9 Working with David to come up with a fence line so
10 we can establish a fence to put the cans in
11 security. Got to get city to haul junk cars that
12 are in the way, but they should be gone by
13 Tuesday."

14 A. Uh-huh.

15 Q. What is Mr. Nicolosi doing here?

16 MS. THORNTON:

17 Object to form.

18 THE WITNESS:

19 He was the one that the city told
20 us to talk to about the Kenner yard.

21 EXAMINATION BY MR. MCGOEY:

22 Q. So Nicky asked you for a job, you told
23 him no, but now he's working for the City of
24 Kenner as somebody on the yard?

25 MS. THORNTON:

1 Object to form.

2 THE WITNESS:

3 That's not what I said. I said the
4 City of Kenner told him -- told us to
5 deal with him on the Kenner yard.

6 EXAMINATION BY MR. MCGOEY:

7 Q. Who at the City of kenner told you to
8 deal with Nicky on the Kenner yard?

9 A. I don't remember.

10 Q. Was it Mayor Zahn?

11 A. No.

12 Q. Was it Deborah Foshee?

13 A. It could have been Deborah.

14 Q. Anybody else? Could it have been Ed
15 Rapiere?

16 A. I really don't recall. I don't know.

17 Q. All right. So you don't think he was
18 working in April for David Carimi?

19 A. I don't know.

20 Q. Do you realize that that's what this
21 text is about, that's who he's referring to as
22 David, David Carimi?

23 A. David, he built the drop site for me.
24 He was the one that was hired to build the drop
25 site. He does all my construction.

1 Q. So he was putting the fence up for the
2 drop site?

3 A. Well, he was looking to put the fence
4 up. They were trying -- They had to get cars
5 cleared and supposed Nick Nicolosi was the public
6 works director for years and he worked for the
7 city for years and CAO for years, and so they said
8 he was the one that kind of knew that yard and
9 that's who they wanted us to deal with on that
10 yard, and that's who we were dealing with.

11 Q. Got you. And so you thought David was
12 dealing with Nicky on April 10th because Nicky was
13 the liaison for the City of Kenner that you had to
14 deal with?

15 A. Yeah. I mean, I know that's what it
16 was.

17 Q. Okay. Great. Well, you are aware that
18 in April of 2020 David Carimi hired Nicky to work
19 for him?

20 A. Yeah. David asked me about that.

21 Q. Okay. So you said in this April 10th
22 Nicky was acting as the liaison for the City of
23 Kenner, but at the same time you were aware that
24 David Carimi, your subcontractor, had hired Nicky
25 to do work for him?

1 A. I didn't know that at that time, no. I
2 said that David had talked to me. I didn't tell
3 you a time. I said that he asked me about Nicky.
4 I don't remember when it was. It wasn't this
5 time. Why would he be doing it at this time? He
6 asked me as time went on about it. And I think
7 one time he asked me about it.

8 Q. Well, you were aware that Nicky Nicolosi
9 pulled the permit for David Carimi to build the
10 drop site, right?

11 A. Yeah. Like I just told you, the city
12 said to deal with Nicky on getting it done.

13 Q. Got you. And when Nicky pulled the
14 permit for the drop site, were you aware that he
15 was working for David Carimi?

16 A. At the time I didn't know.

17 Q. Let me show you what was previously
18 marked as Exhibit 44, and I'm going to mark it
19 as --

20 MR. MCGOEY:

21 Andi, do you know what number we're
22 on?

23 MS. ABRAMSON:

24 Do you want the Julie clip to be an
25 exhibit?

1 MR. MCGOEY:

2 Sure. Yeah, let's have the Julie
3 clip. So the Julie Tufaro video clip
4 that we looked at I'm going to mark as
5 Exhibit 87. And I'm going to mark
6 Exhibit 88 a January 12, 2021 email that
7 has a permit attached, and I'm going to
8 ask you questions about that.

9 (Documents marked for identification as
10 Exhibits 87 and 88.)

11 EXAMINATION BY MR. MCGOEY:

12 Q. So on the third page of Exhibit 88 is
13 what Carimi Construction in this email said was
14 the permit that was issued for the drop site.

15 A. Uh-huh.

16 Q. And that permit is dated April 28, 2020.

17 A. Uh-huh.

18 Q. Were you aware that on April 28th, 2020
19 Nick Nicolosi obtained this permit for Carimi?

20 A. I think I do remember the city saying to
21 deal with him on getting the permit .

22 Q. And at the time when you were dealing
23 with Nicky Nicolosi on getting the permit for the
24 drop site, were you aware that Mr. Carimi had
25 hired Nicky to do that?

1 A. I don't know if he did or did not at the
2 time.

3 Q. When did you learn that Mr. Carimi had
4 hired Nicky?

5 A. I don't know the date, but I told you
6 that he asked me what I thought about hiring
7 Nicky.

8 Q. Where was that conversation? Was it on
9 the phone or in person?

10 A. I don't remember.

11 Q. And what did you tell David about his
12 question to you, should he hire Nicky?

13 A. David was like, I think, wanting to get
14 into service work, grass cutting and public
15 government work, and so he asked me if he thought
16 that he could help him with that. And I thought
17 that like government buildings and buildings in
18 Jefferson and other places and I said, "Yeah, I'm
19 sure he can."

20 Q. Were you also aware that he was going to
21 be overseeing the construction of the drop site?

22 MS. THORNTON:

23 Object to form.

24 THE WITNESS:

25 That who was?

1 EXAMINATION BY MR. MCGOEY:

2 Q. Nicky.

3 A. I don't know what David had him doing.
4 That's not my place. I don't know.

5 Q. Did you and Mr. Carimi discuss what he
6 was going to pay Nicky?

7 A. No, not at all.

8 Q. Other than this one conversation with
9 Mr. Carimi, did you ever speak to Nicky about
10 working for Carimi?

11 A. Not to my knowledge.

12 Q. All right. So the permit was pulled on
13 April 28th, 2020. Do you think by that point it
14 was clear that Nicky was not going to work for
15 you?

16 A. I mean I don't know. I mean I doubt he
17 was, I mean, or he would have been hired.

18 Q. Did David Carimi tell you after your
19 initial conversation that, in fact, he did hire
20 Nicky?

21 A. I think he did.

22 Q. Did you ever see Nicky working in the
23 yard, the drop site area, for David Carimi?

24 A. I think I saw him out there with Kenny
25 Melvin.

1 Q. Now, who did you buy your garbage cans
2 from for Kenner?

3 A. Cascade.

4 Q. What was Nicky's involvement in getting
5 your cans, IV's cans out in the City of Kenner?

6 A. I don't know if he had any involvement.

7 Q. You don't recall --

8 A. Besides the 35-gallon with showing the
9 council.

10 Q. You didn't ask Cascade to get with Nicky
11 to deal with IV getting its cans to the City of
12 Kenner?

13 A. The only way that would have happened is
14 if like we had to use the Kenner yard to do it,
15 and the Kenner -- the City of Kenner said that
16 Nicky was the guy for the Kenner yard.

17 Q. All right. I'm going to show you what
18 I'm going to mark as Exhibit 89, which is an April
19 28, 2020 email from you to Julie Tufaro.

20 A. Uh-huh.

21 (Document marked for identification as
22 Exhibit 89.)

23 THE WITNESS:

24 Okay.

25 EXAMINATION BY MR. MCGOEY:

1 Q. So dispatch at IV is asking Julie about
2 a campground in Kenner that only has one water
3 meter but the owner says -- the owner said since
4 1989 the city has always given her 17 garbage cans
5 for that location.

6 A. Uh-huh.

7 Q. And she forwards that to you. "How do
8 you want to handle," and you respond back, "Please
9 ask Nick what he thinks."

10 A. Correct, because the City of Kenner --
11 Go ahead and ask your question. Sorry.

12 Q. Why were you asking Nick what he thinks
13 about how you were going to get your cans out?

14 A. Because the City of Kenner told us to
15 deal with him if we had any questions in regards
16 to the City of Kenner because he was the deputy
17 CAO and he used to run public works.

18 Q. Got you. So at this time April 28, 2020
19 it was clear that Nicky wasn't working for IV?

20 A. Nicky never worked for IV, never ever,
21 ever worked for IV.

22 Q. All right. Now, you filmed a series of
23 commercials before you took over the work in
24 May -- in April of 2020. You recall those?

25 A. Uh-huh. There was commercials filmed.

1 Q. All right. What was Nicky's involvement
2 in you filming commercials?

3 A. I don't -- What's your question?

4 Q. Well, was he involved?

5 A. I mean I'm sure like he was around the
6 Kenner yard. He was around the mayor. He was
7 around at times, but I don't know -- to say he was
8 involved, that he was -- he didn't have any -- I
9 don't think he had anything to do with the filming
10 of it, unless it was somewhere in the city.

11 Q. Okay. I'm going to show you what I'll
12 mark as Exhibit 90, which is a couple of outtakes
13 from a video.

14 (Document marked for identification as
15 Exhibit 90.)

16 EXAMINATION BY MR. MCGOEY:

17 Q. The top photo, do you recall doing a
18 commercial, a video with Mayor Zahn in front of an
19 IV Waste truck and IV Waste container?

20 A. I remember looking at this now. This
21 was a giveaway during COVID I think. It was a
22 giveaway, food giveaway, and there were council
23 members there and all kind of people, and Mayor
24 Zahn brought his friends and Nicky is his friend.

25 Q. So that's Nicky in the bottom photo,

1 bottom left?

2 A. Correct, that is Nicky.

3 Q. So it's your recollection that on this
4 day when you were filming this commercial with
5 Mayor Zahn, Nicky was there at the request of
6 Mayor Zahn?

7 A. And the city because he was friends with
8 Deborah too.

9 Q. Now, do you recall Nicky giving -- Well,
10 let's just watch the video.

11 MR. MCGOEY:

12 Play video, Bates number 3929.

13 (Document marked for identification as
14 Exhibit 91.)

15 MS. THORNTON:

16 What's the date?

17 (Video playing.)

18 EXAMINATION BY MR. MCGOEY:

19 Q. So was that Nicky in the -- that we just
20 heard telling you what days you-all were going to
21 be picking up?

22 A. Yes, he was -- that was his voice.

23 Q. Okay. What was his involvement on the
24 days that IV Waste was going to be picking up
25 garbage?

1 A. I told you that already. He's friends
2 with the mayor and the mayor said that's who he
3 wanted us to dealt with with the yard and if we
4 had questions about Kenner.

5 Q. Okay. So you believe -- it's your
6 testimony at the time of this filming he was
7 assisting the City of Kenner and not IV Waste?

8 A. Correct.

9 Q. All right. I'm going to show you what
10 was previously marked as Exhibit 59 in another
11 deposition in this case. It's a May 18, 2020
12 email from Nick Nicolosi to Amanda at Carimi
13 Construction. Do you know Amanda?

14 A. Yes. She works for David.

15 Q. It says, "Good morning, Amanda. Please
16 find the attached invoice for the month of April,
17 2020."

18 A. Uh-huh.

19 Q. And if you turn to page 2, that's an NBN
20 Services invoice. Do you know that NBN Services,
21 LLC is a company owned by Nicky Nicolosi?

22 A. I've heard, yes.

23 Q. And he's billing for working for Carimi
24 for the month of April.

25 A. Uh-huh.

1 Q. And he's charging them \$5,833 for the
2 month. And the description of the work is,
3 "Services rendered during the month of April for
4 construction oversight and business development."

5 A. Uh-huh.

6 Q. Have you seen this invoice before?

7 A. No.

8 Q. When did you learn that Nicky Nicolosi
9 was being paid for work in April of 2020 for
10 Carimi?

11 A. I can't recall. And, I mean, through
12 the litigation I've heard it, but I don't remember
13 when.

14 Q. In April of 2020 -- Well, strike that.
15 You don't recall when David Carimi told you that
16 he was thinking about hiring Nicky, right?

17 A. He asked me my opinion. I don't
18 remember when that was.

19 Q. Could it have been in April of 2020?

20 A. I'm not going to guess.

21 Q. All right. Fair enough. I'm going to
22 show what was previously marked as Exhibit 47
23 which is a document. You've seen this before,
24 right, all the payments that Carimi had made to
25 Nicolosi from April -- or from May of 2020 through

1 November of '21?

2 A. No, I haven't.

3 Q. You've never seen this?

4 A. No, I haven't.

5 Q. Did you not sue Lee Zurik over
6 disclosing this?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 My petition speaks why I sued Lee
11 Zurik.

12 EXAMINATION BY MR. MCGOEY:

13 Q. So it's your testimony as you sit here
14 today you've never seen Exhibit 47 before?

15 A. I don't remember seeing this, no.

16 Q. But you were aware that Lee Zurik
17 reported about NBN Services receiving all these
18 payments from David Carimi?

19 A. I didn't watch Lee Zurik's reports. I
20 didn't watch one of them.

21 Q. You didn't watch any of them?

22 A. I read them, but I didn't watch them. I
23 read the story -- I read the hard print, but I
24 didn't watch the videos.

25 Q. But you sat down with him for an

1 interview, right?

2 A. No, I didn't.

3 Q. Off the air you didn't sit down with Lee
4 Zurik and --

5 A. We had an off the record --

6 MS. THORNTON:

7 Object to form.

8 THE WITNESS:

9 I had the -- My lawyer suggested an
10 off the record meeting. We met at my
11 lawyer's office and we met off the
12 record.

13 EXAMINATION BY MR. MCGOEY:

14 Q. Okay. And you were asked questions
15 about payments that NBN had gotten from David
16 Carimi?

17 MS. THORNTON:

18 Object to form.

19 THE WITNESS:

20 He said he wasn't really worried
21 about that. He was more concerned on
22 the information you guys gave him, so we
23 provided --

24 EXAMINATION BY MR. MCGOEY:

25 Q. At some point in 2021 or 2022, did you

1 not learn that Carimi had been paying Nick
2 Nicolosi's company for months?

3 A. I told you that David asked me my
4 opinion about Nicky. I didn't have anything to do
5 with the payments.

6 Q. Right. But once Mr. Zurik had some
7 articles, you didn't go -- did you ever go back to
8 David and ask him what Nicky was doing for him?

9 A. He already -- He asked me what he was
10 doing for him, and so I knew that he -- He asked
11 me what he was doing for him. I saw him getting
12 things. I saw him doing things. My thought was
13 he hired him, but I didn't -- It was none of my
14 business what he paid him or what he did with him.

15 Q. So you didn't have any conversations in
16 2021 or 2022 with Mr. Carimi regarding what work
17 Nicky had done for him?

18 A. I mean, it could have been in passing
19 they were bidding on some items, some jobs, but it
20 wasn't really my concern.

21 Q. Well, do you recall talking to him about
22 what he did, what Nicky did for Carimi over that
23 year or two?

24 MS. THORNTON:

25 Object to form.

1 EXAMINATION BY MR. MCGOEY:

2 Q. I'm just trying to find out if you had a
3 conversation with Mr. Carimi about it when it was
4 disclosed by Mr. Zurik on TV that Mr. Carimi had
5 been making all these payments?

6 A. I didn't talk to --

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 I didn't talk to David about the
11 payments.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Okay. All right. Going back to Exhibit
14 81 which was the text messages, I'm now on the
15 second-to-last page. No, I take that back,
16 third-to-last page.

17 A. So third-to-last page?

18 Q. Third-to-last page. I'm sorry.

19 A. Okay.

20 Q. It looks like this is an April 10, 2020
21 text message from Nick to you saying, "Julie, we
22 still need to talk about the food bank. Some of
23 what we need: Size, cost? I suspect the cost is
24 going to be high. That's going to matter to
25 Kenner. We may need to come up with a bigger

1 dumpster and empty more often. Can you get
2 various sizes and cost? Also, specifications.
3 I'm feeling the cost, even for a smaller unit,
4 will not fit their budget."

5 What was Nicky and IV Waste doing about
6 this food bank?

7 A. The City of Kenner had said that they
8 were having issues with the -- they needed a
9 compactor there. And I think from my
10 understanding Julie had -- was told to deal with
11 him on it, so we dealt with him on the food bank
12 because he knew the people over there and they
13 wanted a compactor.

14 Q. So he wasn't working for you at this
15 time?

16 A. He's never worked for me. You can ask
17 the question a million different ways. He never
18 worked for me.

19 Q. He was working with the City of Kenner?

20 A. The City of Kenner said that's their
21 person. That's their guy.

22 Q. All right. On April 20th, further down,
23 at 7:48 a.m. Nick Nicolosi is texting you, "Please
24 send me a 6 or 8 yard container to put trash from
25 the cans in. Bring to the fuel station." Why is

1 Nicky telling you to bring him a container?

2 A. I already answered and I'll answer it
3 again. The City of Kenner said to deal with him.

4 Q. So my question is, what was his dealing
5 with the fuel station?

6 A. I have no -- I don't remember. I don't
7 recall this, but it was something to do with the
8 City of Kenner needed some assistance.

9 Q. All right. Go back a few pages, one,
10 two, three, the fourth-to-last page. This is a
11 series of texts on April 10, 2020.

12 A. Uh-huh.

13 Q. About the middle of the page Julie texts
14 you, "It's a Good Friday." Nicky then texts,
15 "Yes, it is." Prayer emoji, heart emoji. Then
16 later that day Nick texts you saying, "It's at
17 home in Kenner. These guys were so polite.
18 Awesome." And then a little further down he texts
19 you saying, "I'm having fun again?"

20 A. Uh-huh.

21 Q. What was -- Do you recall what Mr.
22 Nicolosi was having fun about in April 10, 2020?

23 A. I don't, no.

24 MR. MCGOEY:

25 We're at a stopping point. You

1 want to grab a quick lunch break and
2 then come back?

3 MS. THORNTON:

4 I know he does.

5 MR. MCGOEY:

6 Yeah, we can go off the record.

7 THE VIDEOGRAPHER:

8 We're off the record. The time is
9 12:13.

10 (Break taken.)

11 THE VIDEOGRAPHER:

12 Returning to the record. It is
13 1:01.

14 EXAMINATION BY MR. MCGOEY:

15 Q. Mr. Torres, you're aware that in March
16 of 2023 Ramelli Janitorial took back collecting
17 recycling in the City of Kenner?

18 A. Oh, yeah, I'm aware.

19 Q. Were you aware that your counsel sent
20 Mr. Ramelli a letter saying for him not to touch
21 or use any of your IV Waste cans?

22 A. Correct.

23 Q. I'm going to show you what I'm going to
24 mark as Exhibit 92. It's a February 23, 2023
25 letter to me saying, "It has come to our attention

1 that Ramelli Janitorial will be performing
2 curbside recycling services for the City of Kenner
3 on March 1, 2023."

4 A. Yes.

5 (Document marked for identification as
6 Exhibit 92.)

7 EXAMINATION BY MR. MCGOEY:

8 Q. Have you seen this letter before?

9 A. Yes, sir.

10 Q. Okay. That second paragraph it says,
11 "Please be advised that IV Waste does not give
12 janitorial service or anyone associated with or
13 acting on its behalf permission to use, operate,
14 move, empty, handle, or otherwise do anything that
15 may cause damage to the 35-gallon rollout
16 recycling carts that were distributed by IV Waste
17 in Kenner and which remain IV Waste property."

18 A. Correct.

19 Q. Did you instruct your lawyer to send
20 this letter?

21 MS. THORNTON:

22 I'm going to object to privilege.

23 MR. MCGOEY:

24 That's fine.

25 EXAMINATION BY MR. MCGOEY:

1 Q. Do you agree with the statement that
2 your lawyer wrote in this letter?

3 A. I do.

4 Q. Okay. And is that consistent with your
5 position that Mr. Ramelli can't use your cans?

6 A. That's what the letter states.

7 Q. Okay. It says, "We'll take any and all
8 legal action necessary to respond to any
9 conversion or damages caused to its property by
10 Ramelli Janitorial Service."

11 In March of 2023 when Ramelli started
12 taking over recycling again in Kenner, did you
13 send people out with video cameras to video the
14 Ramelli trucks?

15 A. No.

16 Q. You didn't send anyone out?

17 A. I didn't -- I didn't authorize any
18 trucks to go out.

19 Q. Did you have anybody go around and watch
20 whether or not Ramelli was touching IV Waste cans?

21 A. I think for one or two days the guys who
22 were recycling just were riding around seeing if
23 they were touching them for a day or two.

24 Q. Did you ever see any of the Ramelli
25 people touching the IV Waste cans?

1 A. I never did check back with them on
2 that.

3 Q. Okay. So as you sit here today, no one
4 reported back to you that Ramelli's employees were
5 touching IV Waste's cans?

6 A. No, I haven't talked to them about that.

7 Q. Now, you started picking up garbage in
8 Kenner on May 1st, 2020; is that correct?

9 A. I think. I mean I guess. Is that what
10 the contract says?

11 Q. Yes. When you started picking up
12 garbage cans in Kenner on May 1st, did you have --
13 had you distributed to all the Kenner residents IV
14 Waste garbage cans?

15 A. That was the plan, but somebody at the
16 factory had COVID and they couldn't -- it got
17 delayed.

18 Q. Okay. What did you understand your plan
19 to be to have all the cans out by May 1st?

20 A. My plan was to have them all out, but
21 because of the delay it didn't happen.

22 Q. When did you originally plan to have the
23 first can delivered to Kenner?

24 A. I don't recall.

25 Q. All right. But you thought you would

1 have all 22,000, 23,000 by May 1st on the streets?

2 A. That was the plan.

3 Q. When did you realize that your plan was
4 not going to happen?

5 A. I think the factory sent an email saying
6 they were having problems because the faculty
7 had -- some people contracted COVID and they were
8 not going to be able to deliver on a timely basis.

9 Q. Okay. And so before -- Is it accurate
10 to say before May 1st, 2020 you realized you
11 weren't going to have cans out to all the
12 residents?

13 A. I don't remember the date.

14 Q. When you learned that you weren't going
15 to have all the cans delivered because of this
16 COVID problem, what was your plan?

17 A. I called the city.

18 Q. And?

19 A. They said to pick up the cans and the
20 bags around the cans that were out wherever your
21 cans were not.

22 Q. So the city told you to pick up the
23 Ramelli cans?

24 A. Correct.

25 Q. All right. Who with the city told you

1 that?

2 A. I don't remember.

3 Q. So is it safe to say someone with the
4 city of Kenner before May 1st, 2020 told you it's
5 okay to pick up garbage out of Ramelli's cans?

6 A. I don't remember the date when we
7 realized that they were not going to be delivered.
8 But when we realized that the date that they were
9 not all going to be delivered on that date, I
10 don't know if it was the administration -- it was
11 the administration, but I don't know who in the
12 administration.

13 Q. Okay. Now, on May 1st did you receive a
14 copy of this letter that I'm going to mark as
15 Exhibit 93, which is dated May 1, 2020, from my --
16 from me to your lawyer John Litchfield?

17 (Document marked for identification as
18 Exhibit 93.)

19 THE WITNESS:

20 I don't remember seeing this.

21 EXAMINATION BY MR. MCGOEY:

22 Q. Okay. It's similar to the letter your
23 lawyer wrote to Mr. Ramelli and I in 2023 in the
24 sense that it says, "It has come to my attention
25 that in order to perform these obligations, IV

1 Waste has been accessing the rollout carts that
2 are on the property of Ramelli Janitorial
3 Service."

4 Was that accurate like as of May 1, your
5 first day on the job, you were accessing Ramelli
6 cans to dispose of the garbage?

7 A. I mean, I don't -- I'm sure we were
8 dumping carts that did not have the IV carts
9 there, but I don't remember how many.

10 Q. Okay. This letter in the last paragraph
11 says, "Please consider this letter a formal
12 request to your client that he immediately cease
13 and desist any further use, access, or
14 interference with any rollout carts or other
15 garbage receptacles or dumpsters that are the
16 property of Ramelli." Do you see that?

17 A. Uh-huh, I do.

18 Q. Are you saying that in May -- on May
19 1st, 2020 you were not aware that the cease and
20 desist letter had gone to your lawyer?

21 A. I don't remember the time frame, no,
22 sir.

23 Q. All right. Is it accurate to say on May
24 2nd you still continued to dump garbage out of
25 Ramelli receptacles?

1 A. I just told you I don't remember the
2 time frame.

3 Q. Well, let's see if we can help refresh
4 your recollection. I'm going to show you what I'm
5 going to mark -- it was previously marked as
6 Exhibit 35. This is a May 4th, 2020 email from
7 you to Pierre Richardson. Who is that?

8 A. He worked with Cascade.

9 Q. Okay. It says, "Thanks for the update.
10 Please let Nik know how many more cans we're gonna
11 need to finish up this job if we do this." Who's
12 the "Nik" you're referring to?

13 A. The person the city told us to deal
14 with, Nick Nicolosi.

15 Q. Got you. So Nick Nicolosi was involved
16 in with Cascade in getting IV Waste cans out?

17 A. No. He was dealing, like I said before
18 and I stand to my statement, at the Kenner yard,
19 he was in charge of the -- he was -- We were told
20 to deal with him with anything with the Kenner
21 yard. So that's where we were unloading and
22 loading this. And there was a fuel dock there
23 too, so that we had to have a certain place to put
24 them.

25 Q. On the second page of this email is a

1 schedule, a delivery schedule for what was planned
2 and what actually occurred for the garbage
3 receptacles. You're familiar with this?

4 A. No, it doesn't look familiar, but, let
5 me --

6 Q. It's got --

7 A. This was attached to this email here?

8 Q. Yes, sir.

9 A. And this was sent from me -- This
10 spreadsheet was sent from me?

11 Q. This spreadsheet was sent from Pierre
12 Richardson to you?

13 A. Okay. Yeah. I guess it's the way he
14 tracked -- they were tracking it from Cascade.

15 Q. Yeah. And under the plan it shows that
16 they planned on delivering 19,767 rollout carts on
17 or before May 4th. You see that column under
18 Plan, Deliverables, it's got up at the top
19 nineteen thousand --

20 A. Nineteen thousand seven --

21 MS. THORNTON:

22 Object to form.

23 EXAMINATION BY MR. MCGOEY:

24 Q. 767?

25 A. Yeah.

1 Q. And under Actual as of May 4th he was
2 saying he had only delivered 14,338. Do you see
3 that?

4 A. Uh-huh.

5 Q. All right. So is that consistent with
6 your recollection like by May 4th you only had
7 maybe 14,000 cans out there, not 22 or 23,000 cans
8 that you needed for the City of Kenner?

9 A. That's what the sheet shows.

10 Q. So on May 4th were you still accessing
11 Ramelli's carts to dump garbage for the City of
12 Kenner?

13 A. I'm sure that if it's 14,338, I'm sure
14 the difference of that and the 23,000, that people
15 had private cans, people purchase cans. So I
16 don't know what that number would have been that
17 would have been Ramelli's cans that he said to
18 empty for the residents.

19 Q. But more than 7,000 residents as of May
20 4 didn't have an IV Waste can. Would you agree
21 with that?

22 A. I mean if you're basing it off of this
23 number.

24 Q. Yeah. Well, that's the number that the
25 company you contracted with to make and deliver

1 the cans was telling you?

2 A. Yeah, but they wouldn't know they could
3 privately own or who bought cans.

4 Q. Got you. Do you ever recall telling
5 Mayor Zahn that it was common in the industry for
6 IV to use a competitor's cans up until the point
7 that they were able to get their cans out on the
8 street?

9 MS. THORNTON:

10 Object to form. Go ahead.

11 THE WITNESS:

12 I don't recall saying that to him.

13 EXAMINATION BY MR. MCGOEY:

14 Q. All right. We're going to show you a
15 video, part of Mr. Zahn's deposition, and see if
16 that refreshes your recollection of having a
17 conversation with him.

18 MR. MCGOEY:

19 You can go ahead and play it.

20 (Video playing.)

21 EXAMINATION BY MR. MCGOEY:

22 Q. Having shown you this clip, does that
23 refresh your recollection of whether or not you
24 had the conversation with Mayor Zahn about using
25 Ramelli's cans until you were able to get IV Waste

1 cans out?

2 A. My answer is the same, I don't recall.

3 Q. You don't recall.

4 MR. MCGOEY:

5 I'm going to mark as Exhibit 94
6 that video clip.

7 (Document marked for identification as
8 Exhibit 94.)

9 EXAMINATION BY MR. MCGOEY:

10 Q. Were you aware that as of May 1st the
11 City of Kenner was telling residents that you
12 wouldn't have all your cans out until June 1st?

13 A. I don't know. You have something to
14 show me?

15 Q. Sure. I'll show what was previously
16 marked as Exhibit 34. This is a City of Kenner
17 Government Facebook post titled Welcome to IV
18 Waste. It says, "Beginning today, May 1st,
19 Kenner's new garbage contractor is IV Waste." Do
20 you recall this post going out?

21 A. I mean it looks familiar.

22 Q. Second paragraph, it says, "Residents
23 who have received the IV Waste garbage containers
24 should use those. However, the Ramelli containers
25 can be used until all IV Waste containers have

1 been distributed, a process that will be completed
2 by June 1."

3 Were you not aware or were you aware on
4 May 1st of 2020 that the City of Kenner was
5 telling residents to keep using the Ramelli
6 containers and that you would empty them?

7 A. I don't recall that.

8 Q. You do recall shortly thereafter Mr.
9 Ramelli filing a suit against you and getting a
10 temporary restraining order?

11 A. Yes, I do.

12 Q. Okay. I'm going to show you what was
13 previously marked as Exhibit 37. Do you recognize
14 that to be the Temporary Restraining Order that
15 was issued by Orleans Parish Court?

16 A. I do.

17 Q. And specifically the order says that,
18 "Defendant, IV Waste, be and is hereby enjoined,
19 restrained, and prohibited from using, accessing,
20 or interfering with any and all Ramelli-owned
21 rollout carts, dumpsters, or other garbage
22 containers." Did I read that accurate, correct?

23 A. Right.

24 Q. All right. What did you understand were
25 Ramelli-owned rollout carts, dumpsters, and

1 garbage containers that IV Waste was prohibited
2 from using, accessing, or interfering with?

3 A. The cans with Ramelli's name on it.

4 Q. So you understood this order to mean any
5 can that had Ramelli's name on it, you couldn't
6 touch?

7 A. Correct.

8 Q. But if it didn't have Ramelli's name,
9 you were going to dump it?

10 A. No. I didn't -- Because there was talks
11 that some of those cans that were not -- that
12 residents had purchased private cans, and there
13 were some that they said could be Ramelli's cans.
14 But, again, I didn't have any knowledge of that.
15 But when we received this, we immediately --
16 There's tons of emails, and I'm sure you're not
17 going to provide me with those emails, but where I
18 was very strict with dispatch and drivers and
19 everyone "Do not touch their cans at all." And
20 they were instructed not to do that and we did
21 not -- After we received this, we told them
22 "Anything with Ramelli on it, you do not touch
23 it."

24 Q. Okay. So you -- All I'm trying to
25 understand is what you instructed your people to

1 do.

2 A. Not to touch Ramelli's cans.

3 Q. All right. And by Ramelli's cans you
4 took this order to mean the cans -- only cans that
5 had Ramelli's name on it?

6 A. When I first got the order, yes.

7 Q. And then did it somehow change?

8 A. Like I just told you, I heard that there
9 was people that said that there were other cans
10 that were purchased from Waste Management, and
11 that's when -- I didn't know that the -- I didn't
12 have documents to prove that, but that's what we
13 were told.

14 Q. So then at some point you instructed
15 your employees not to touch cans that had Waste
16 Management's name on it too?

17 A. I told them, yeah, don't touch anything.
18 And then we had residents coming and saying, "I
19 bought that can. Here's a a receipt, and, you
20 know, can you please, you know, come back and pick
21 it up." So we went through that for some time.

22 Q. Okay. So there was a time period after
23 the TRO was issued on May 7th, 2020 where you
24 understood IV Waste employees were dumping cans
25 that had Waste Management's name on it, maybe just

1 not Ramelli's name?

2 A. They weren't doing it on purpose. Dark
3 night and they'd see a can, they are dumping it.
4 I mean it wasn't -- It wasn't instructed or we
5 didn't tell them to do that.

6 Q. Well, your first instruction to them was
7 only stay away from cans that had Ramelli's name
8 on it, right?

9 A. Correct.

10 Q. So in those first days after the TRO was
11 issued, did your employees actually dump cans that
12 didn't have Ramelli's name on it?

13 A. The only ones I know of are the ones
14 that you sent a video of our guys dumping a can
15 without a logo on it. That's the only ones that I
16 know of.

17 Q. Okay. Now, when Mr. Ramelli filed this
18 lawsuit and got the TRO, do you remember making --
19 sending out an email blast to all your followers?

20 A. I don't remember.

21 Q. Let me show you what I'm going to mark
22 as Exhibit 95, which is an email from you and I'll
23 ask you to take a look at it.

24 (Document marked for identification as
25 Exhibit 95.)

1 THE WITNESS:

2 Uh-huh.

3 EXAMINATION BY MR. MCGOEY:

4 Q. You had a chance to read it. So was
5 this a -- Exhibit 95, is this an email blast that
6 you sent out to all your followers --

7 A. I don't know if it went --

8 Q. -- on May 11th?

9 A. Yeah. I don't know if it went out to
10 all my followers. It just says blast, but it
11 could have been a test. I don't know.

12 Q. Do you not recall sending this out?

13 A. I don't send -- I mean what I'm saying
14 is that if it was a proof of like a draft, I don't
15 send it through the system that it goes out to.
16 So is there an email that said that it went out?

17 Q. I do have it. I don't have it in this
18 box.

19 A. Okay.

20 Q. So at a break we'll go get it for you so
21 you can confirm that you actually did send this
22 out.

23 A. That's fine.

24 Q. So you start off by saying, "Late
25 Wednesday afternoon, Ramelli Waste owner Bob

1 Ramelli asked a New Orleans judge for a court
2 hearing regarding the use of his trash cans as a
3 way to impede and slow the work of my company."
4 That's this lawsuit we're in today, right?

5 A. Uh-huh.

6 Q. You say -- The next paragraph you say,
7 "Bob Ramelli's childish legal action --" What was
8 childish about Mr. Ramelli filing a lawsuit to
9 prevent you from emptying his cans?

10 A. That's my opinion.

11 Q. But didn't you have your lawyer send Bob
12 the same letter in 2023 when he took over
13 recycling?

14 A. My lawyer did send a letter but I
15 don't -- I mean that has nothing to do with this
16 letter.

17 Q. So it's childish for Bob Ramelli to
18 prevent you from touching his cans, but it's okay
19 for you to send a letter to him saying don't touch
20 my cans?

21 MS. THORNTON:

22 Object to form.

23 THE WITNESS:

24 Yeah. Just my opinion.

25 EXAMINATION BY MR. MCGOEY:

1 Q. So it's your opinion that it's childish
2 for Mr. Ramelli to be upset when you start
3 touching his cans, but it's legal for you to
4 threaten to sue him if he touches your cans?

5 MS. THORNTON:

6 Object to form.

7 THE WITNESS:

8 That's my opinion.

9 EXAMINATION BY MR. MCGOEY:

10 Q. Well, your lawyer did say if he touched
11 your cans it was conversion. Did you see that in
12 the letter?

13 A. Yeah.

14 Q. What do you understand conversion to be?

15 MS. THORNTON:

16 Object to the extent you're calling
17 for a legal conclusion.

18 THE WITNESS:

19 It's just my opinion, Counsel.

20 EXAMINATION BY MR. MCGOEY:

21 Q. Okay. And so I understand your opinion,
22 and it's clear for the record, it's childish for
23 Mr. Ramelli to take legal action, you believe,
24 against IV Waste for you touching his cans?

25 A. It's my opinion that it was childish to

1 go to three different -- to sue in all these
2 different areas to try to stop this.

3 Q. I'm specifically asking you about you
4 using his cans. Was that childish? That's your
5 opinion?

6 A. My opinion is that that's what the
7 letter states -- I mean the draft email. You said
8 I sent it out. If I sent it out, I want to see
9 it. But I guess that's how I felt at the time
10 that it was going on, yeah.

11 Q. Okay. So in 2020 you thought it was
12 childish for Mr. Ramelli to file a suit to stop --
13 preventing you from using his equipment. Is that
14 fair to say?

15 A. I thought the trash in the cans and the
16 residents having to suffer because of it was
17 wrong. I mean, you know, they call us and say
18 they just got off the phone with them and they are
19 telling them to call us to pick up trash because
20 they are not picking it up. And people were
21 suffering and there were maggots all over and I
22 thought it was childish.

23 I mean we didn't leave -- It's a big
24 difference between this and us with recycling
25 carts that is not garbage in it. It's paper.

1 It's not maggots. It's, you know, making the
2 residents suffer over something that, you know, by
3 filing in all these different areas and courts and
4 trying to stop it, that was my opinion at the
5 time.

6 Q. Okay. And now has your opinion changed
7 that it's not childish to tell your competitor
8 "Don't touch my cans"?

9 MS. THORNTON:
10 Object to form.

11 THE WITNESS:
12 This was my opinion at the time.

13 EXAMINATION BY MR. MCGOEY:

14 Q. Yeah. And I'm saying is your opinion
15 now, as referenced in exhibit --

16 MR. MCGOEY:
17 What was the number?

18 MS. ABRAMSON:
19 92.

20 MR. MCGOEY:
21 92?

22 MR. RAMELLI:
23 93.

24 MR. MCGOEY:
25 93.

1 MS. ABRAMSON:

2 Hold on.

3 MR. MCGOEY:

4 The February 23, 2023 letter.

5 MS. ABRAMSON:

6 92.

7 EXAMINATION BY MR. MCGOEY:

8 Q. 92. Is your opinion now in 2023 that
9 it's not childish to tell your competitor "Don't
10 touch my cans"?

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 Different circumstances and I stand
15 by it. This is my opinion at the time.

16 EXAMINATION BY MR. MCGOEY:

17 Q. And I'm asking you your opinion today.

18 A. I'm answering it, Counsel.

19 Q. What is your opinion today?

20 A. My opinion is at the time that this
21 happened I thought it was childish to leave
22 garbage in cans to the residents. That's my
23 opinion.

24 Q. All right. You say, "This is his third
25 attempt to restrain IV Waste from conducting

1 business in Kenner." What are you talking about?

2 A. I don't -- I don't recall what I was
3 talking about back then.

4 MS. THORNTON:

5 Patrick, I'm sorry to interrupt.
6 Do you have another copy of that because
7 this a different -- I got a copy of
8 something else.

9 MR. MCGOEY:

10 Oh, I'm sorry.

11 MS. THORNTON:

12 That's okay. Thank you.

13 EXAMINATION BY MR. MCGOEY:

14 Q. You then go on to say that, "That sent
15 Ramelli judge shopping in New Orleans." What do
16 you mean by that?

17 A. I don't remember what I meant at the
18 time of that. I know what I felt about the
19 childish behavior, but I don't remember what I
20 meant about that.

21 Q. Mr. Ramelli sued you in Orleans Parish;
22 is that right?

23 A. He did. Yes, he did.

24 Q. That's where your office is located; is
25 that not right?

1 A. It is located in Orleans.

2 Q. And you consider that to be --

3 A. At the time it was.

4 Q. You consider that to be judge shopping?

5 A. Yeah. I mean at the time that's how I
6 fell about it. I don't know.

7 Q. And after you got sued in Orleans by Mr.
8 Ramelli, you changed your corporate address to St.
9 Bernard; isn't that right?

10 A. That's not true.

11 Q. That's not true?

12 A. Uh-uh.

13 Q. You didn't file something in late
14 October of 2020 changing your address to St.
15 Bernard?

16 A. No. We have business there. We're
17 domiciled there. That's where we started.

18 Q. You then go on to say, "He was judge
19 shopping in New Orleans where he was granted a
20 hearing without me or anyone from my company being
21 notified." You are aware that your lawyer was at
22 the hearing, do you not?

23 A. I didn't know he went. I didn't realize
24 he went when it was called, when the TRO was
25 granted. I didn't know he was at -- When it was

1 granted, you're saying he was in the courtroom?

2 Q. John Litchfield was not in the
3 courtroom.

4 A. Right.

5 Q. Monica, his associate, was.

6 A. I didn't know that. I know that he
7 missed it.

8 Q. Okay. You then go on to say, "But it's
9 more outlandish that a corporate leader would act
10 in such a juvenile manner." You think it's
11 juvenile to prevent your competitor who has just
12 taken your contract from using your equipment to
13 perform under the contract?

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 I mean I think I was relating back
18 Bob Ramelli sued me before, you know.
19 So I think like whenever he loses he
20 files suit, you know. It's my -- I just
21 don't operate like that, so that was my
22 opinion.

23 EXAMINATION BY MR. MCGOEY:

24 Q. How many lawsuits have you filed since
25 you lost recycling in the City of Kenner?

1 A. I don't know. I'd have to check to
2 figure out with my lawyers. I don't know.

3 Q. You sued the City of Kenner, right?

4 A. We did.

5 Q. And now you sued Lee Zurik and Fox 8,
6 right?

7 MS. THORNTON:

8 Object to form.

9 EXAMINATION BY MR. MCGOEY:

10 Q. Did you sue them?

11 A. I did.

12 Q. So you filed two lawsuits since you lost
13 a part of the contract. Do you consider yourself
14 to be a corporate sore loser?

15 MS. THORNTON:

16 Object to form.

17 THE WITNESS:

18 No. There was information put out
19 in the press. It's not true. There was
20 no backroom deals. You're sitting here
21 the whole time trying to accuse me of
22 hiring Nick Nicolosi, it didn't happen.
23 It's not going to happen. You can ask
24 the question ten million ways, it's
25 never going -- It didn't happen.

1 Backroom dealings and, I mean, Mr.
2 Ramelli was stuffing trash in my cans in
3 the Quarter. Mr. Ramelli's company,
4 with this comment that was made here, is
5 a history of him saying and doing things
6 by trying to use the court.

7 EXAMINATION BY MR. MCGOEY:

8 Q. You just mentioned Mr. Ramelli's
9 employees stuffing garbage in your cans in the
10 Quarter, right?

11 A. Yeah.

12 Q. Is that right?

13 A. Uh-huh.

14 Q. You sued Mr. Ramelli over that. Are you
15 aware of that?

16 A. Yeah.

17 Q. Okay. I'm going to show you what was
18 previously marked as Exhibit 6, which is a copy
19 of your Reconventional Demand in this lawsuit.
20 You sued my client claiming that it was unfair
21 trade practices for him -- for his employees to
22 touch your cans in the French Quarter?

23 A. No. My customers were having to pay for
24 trash that he was picking up and getting paid for
25 by the city. And that to me was not fair to my

1 customers. I just didn't feel like it was right,
2 my customers having to pay extra for that. They
3 had extra charges, you know, for extra trash on
4 days that it wasn't even that busy. So I thought
5 that that was not right.

6 Q. Now, getting back to the Temporary
7 Restraining Order that was issued by that judge in
8 Orleans Parish that the language of it said that
9 you were prevented from using, accessing, or
10 interfering with Ramelli-owned carts. Do you have
11 a copy of that in front of you? It was Exhibit
12 37.

13 My question to you, sir, is what did you
14 understand interfering with Ramelli-owned rollout
15 carts to be?

16 A. I told my people not to touch it, so not
17 to touch it.

18 Q. Okay. Did you think you could pay
19 people to touch it?

20 A. No, I didn't pay people to touch it.

21 Q. Did you think you could -- You didn't
22 pay people to pick up Mr. Ramelli's cans?

23 A. I didn't pay anybody to pick up
24 Ramelli's cans.

25 Q. After this TRO was issued, did you pay

1 anybody to pick up cans?

2 A. No.

3 Q. After this TRO was issued, do you recall
4 IV Waste making a list of residents in Kenner that
5 wanted their cans, their Ramelli cans to be
6 dumped?

7 A. I remember there was people called --
8 residents calling in with maggots in their cans
9 and needing assistance with getting it picked up.
10 And so, yeah, I do remember that.

11 Q. So what did IV do about that?

12 A. When they would call, just like they
13 called with a missed stop, we would write it down
14 and pass it on to the city.

15 Q. So you prepared a list of residents that
16 wanted their Ramelli can dumped, and you gave that
17 to the city?

18 A. On a daily basis when we would get
19 something, we would forward it to them.

20 Q. And then do you recall what y'all
21 referred to as a hit crew going out and picking up
22 Ramelli can?

23 A. The city sent the hit crew up.

24 Q. All right. So what was the hit crew?

25 A. They would pick up cans that were full

1 of maggots on the street.

2 Q. All right. So you would give the hit
3 crew the list of Mr. Ramelli's cans that needed to
4 be picked up?

5 A. I wasn't the only one that -- I mean
6 when people would call and said because it was a
7 health issue, we would turn that over to the city.

8 Q. All right. Did you work with Chad
9 Pitfield and the hit crew in picking up Mr.
10 Ramelli's cans after the TRO was issued?

11 A. We would send in the complaints with the
12 people who were calling saying they had maggots
13 and stuff coming out of their cans.

14 Q. All right. I'm going to show you what
15 was previously marked as Exhibit 38 and ask you to
16 take a look at this May 14, 2020 email. This is
17 from you, right?

18 A. Yes, sir.

19 Q. And it's to Jenny Tramuta. Who is that?

20 A. She works in the office in dispatch.

21 Q. And Michele Chaisson, she worked at IV?

22 A. She worked in dispatch, yes, sir.

23 Q. She was responsible for the Kenner,
24 overseeing the Kenner contract?

25 A. She was one. In dispatch there's a few

1 people over it.

2 Q. So on this email down at the bottom
3 Michele -- Actually, we can start on the first
4 email, which is the second page. So on May 14th
5 you're sending an email to all these people
6 saying, "Please note that Jenny is making a list
7 daily for the people that are complaining with
8 trash in their can't that we can't touch."

9 A. She meant "can."

10 Q. Yeah. "Can we make a list on the server
11 so she can send it to the hit crew that the city
12 has running around with trailers picking up every
13 day? Jenny is the one who's dealing directly with
14 the city on this, so let's try to make sure we
15 knock it out as they come in."

16 A. Uh-huh.

17 Q. So am I correct in understanding that IV
18 Waste, after May 7th, was preparing a list of
19 people that wanted their Ramelli cans dumped, and
20 you were providing that list to the city for the
21 city's hit crew to go pick up?

22 A. Yeah. I answered that question and I'll
23 answer it again. So when they would call us in if
24 there were maggots and stuff coming out of their
25 cans, they would write it down and they would give

1 it to the city.

2 Q. Okay. And on the email you say on the
3 front page of 38, "Please make sure you are
4 marking them off as the city hits them." You're
5 talking about off your list, the IV Waste list of
6 the people that wanted the cans to be picked up?

7 A. Like I said, when they would call in and
8 say there was maggots in their cans and they had
9 nowhere to put their trash, they would send that
10 to the city.

11 Q. But this month in May of 2020 you were
12 getting paid for picking up all the garbage in
13 Kenner, right?

14 A. I'd have to look at my records and see
15 to see exactly what I was getting paid for. I
16 don't have it right here in front of me.

17 Q. Well, we looked at the contract earlier,
18 the first contract. You were getting \$11.96 per
19 service unit, which I understood to be every
20 household in the City of Kenner.

21 A. Right. But a contract doesn't mean what
22 you're going to get paid, just like right now.

23 Q. Okay. So you can't sit here today and
24 tell me you were getting paid the contract rate in
25 May of 2020 for picking up garbage in the City of

1 Kenner?

2 A. I never said that. I said I'd have to
3 see what the check was cut as to what we were paid
4 for.

5 Q. Okay. In this May 14th email you go to
6 say, "Chad would be really good on working with us
7 with this list as he's already doing with the
8 messages you're sending him by text." What were
9 you or IV Waste employees texting Mr. Pitfield in
10 May of 2020 on?

11 A. I don't know. If you have something to
12 show me, I'd love to see it.

13 Q. And it's your testimony that IV Waste
14 didn't pay the hit crew to pick up these cans?

15 A. Not to my knowledge we didn't.

16 Q. All right. So on May 11th I'm going to
17 show you what I'm going to mark as Exhibit 39,
18 which is an email from Michele Chaisson to you,
19 Lisa Schehr, and Julie Tufaro, and the subject
20 line is Kenner Can Pick Up Money.

21 A. Uh-huh.

22 Q. So on May 11th, four days after the
23 court issued a TRO preventing you from interfering
24 with Ramelli-owned carts, Michele sends this email
25 saying, "We will be needing some money to donate

1 to the City of Kenner's residents for helping them
2 with removal of Ramelli cans."

3 A. Uh-huh.

4 Q. Sidney, please ask Lisa -- "please let
5 Lisa know how much she should cut the check for."

6 A. Uh-huh. Do you have an email that says
7 I told her to cut the check?

8 Q. I'll get there.

9 A. Okay.

10 Q. But my question right now is about this
11 May 11 --

12 A. Okay.

13 Q. Tell me about what IV paid to people to
14 pick up Ramelli cans in Kenner.

15 A. I told you I don't recall. That's why
16 I'm asking for a copy of it.

17 Q. So as you sit here today, you don't
18 recall this Exhibit 39?

19 A. I don't remember sending this, no.

20 Q. If IV Waste had been paying people to go
21 around and pick up Ramelli-owned cans, would you
22 have considered that to constitute interfering
23 with Ramelli's carts?

24 MS. THORNTON:

25 Object to form.

1 THE WITNESS:

2 I mean, we did pay for recycling
3 carts to be delivered. So I don't know.
4 I'd have to -- To answer your question,
5 I'd have to see what you're talking
6 about with the check.

7 EXAMINATION BY MR. MCGOEY:

8 Q. All right. Well, as we're looking at
9 the Exhibit 39, we can agree that this email to
10 you saying we need some money to donate to the
11 City of Kenner's residents for helping them with
12 removal of Ramelli's cans, can we agree that this
13 has nothing to do with your recycle carts?

14 A. Again --

15 Q. Can we agree on that?

16 A. I didn't write this, so I couldn't --

17 Q. You couldn't tell me?

18 A. No.

19 Q. All right. Could you point to me where
20 in Exhibit 39 the word recycle is used?

21 A. I didn't write it. Michele did.

22 Q. I'm just asking you to --

23 A. No. I mean, there's -- it doesn't say
24 anything about recycling, but part of his cans.

25 Q. So this email, Exhibit 39, we can agree

1 was an email amongst your employees and yourself
2 talking about needing Kenner can pickup money for
3 picking up Ramelli's cans. Is that not right?

4 MS. THORNTON:

5 Object to form.

6 THE WITNESS:

7 Yeah, I told you we did the
8 recycling carts, but I don't --

9 EXAMINATION BY MR. MCGOEY:

10 Q. Who is Lisa? Who does she work for?

11 A. She works for -- She works for me.

12 Q. IV Capital?

13 A. Yes.

14 Q. Okay. So did you have IV Capital pay
15 money to Kenner residents to go pick up Ramelli's
16 cans?

17 A. I don't know. I don't recall doing
18 that.

19 Q. Okay. What about David Carimi, did you
20 get Carimi to pay Kenner residents to go pick up
21 Ramelli's cans?

22 A. Not that I recall.

23 Q. All right. We'll see if we can refresh
24 your recollection on that.

25 A. Yeah.

1 Q. I'll show you what we previously marked
2 as Exhibit 40. It's a May 11, 2020 email. It's
3 10 minutes after Exhibit 39. So Michele sends
4 this email 10 minutes after she sent the first
5 one.

6 A. I told you I didn't do it. I didn't --
7 It says right here I didn't do it. I didn't
8 donate any money to the Kenner residents.

9 Q. This email she says, "Sorry, disregard
10 this email. It was meant for Carimi Construction.
11 Thanks."

12 A. Yeah. I don't know.

13 Q. So did you ask Carimi Construction to
14 pay Kenner residents to pick up Ramelli cans?

15 A. Not to my knowledge.

16 Q. Okay. So as you sit here today, do you
17 recall this e-mail, Exhibit 40?

18 A. I don't.

19 Q. Can we agree if you were paying people
20 to pick up Ramelli cans, you would have been
21 interfering with their carts?

22 A. I didn't do it.

23 MS. THORNTON:

24 Object to form.

25 EXAMINATION BY MR. MCGOEY:

1 Q. Did you pay Michele Chaisson's son to
2 pick up Ramelli cans?

3 A. No. Michele's son delivered carts in
4 St. Bernard for us. He delivered -- He had been
5 working for us through the summer. He also
6 delivered recycling carts, but, no, I didn't pay
7 him.

8 Q. Was he an employee of IV Waste?

9 A. No.

10 Q. So you paid him on the side as an
11 independent contractor?

12 A. As an independent contractor, yeah.

13 Q. And you don't recall -- And his name was
14 Devin?

15 A. Yes, sir.

16 Q. You don't recall paying Devin to go pick
17 up Ramelli's cans in the City of Kenner?

18 A. No.

19 MR. MCGOEY:

20 Okay. Can you play the video clip
21 from Michele's -- I mean Julie Tufaro's
22 deposition, page 177.

23 (Video playing.)

24 EXAMINATION BY MR. MCGOEY:

25 Q. So would you agree with me in Ms.

1 Tufaro's deposition under oath she said IV Waste
2 paid Michele's son and Kenner kids to pick up Mr.
3 Ramelli's cans?

4 MS. THORNTON:

5 Object to form.

6 THE WITNESS:

7 She said I believe. I believe.

8 She didn't say -- She said I believe.

9 EXAMINATION BY MR. MCGOEY:

10 Q. And you believe her to be wrong or
11 incorrect?

12 A. No, I'm not saying I believe her to be
13 wrong. But she said she believes, and I don't
14 ever remember him picking up carts for Kenner.

15 Q. Okay. We do have emails where you-all
16 are talking about paying the kids to pick up
17 Ramelli carts, right?

18 MS. THORNTON:

19 Object to form.

20 THE WITNESS:

21 I would love to see what you have
22 because I don't recall.

23 MR. MCGOEY:

24 I'm going to mark that video clip
25 as Exhibit 96.

1 (Document marked for identification as
2 Exhibit 96.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. Now, you are aware you sued Mr. Ramelli
5 for unfair trade practice for what you discussed
6 earlier, surveillance of your trucks and I think
7 you said harassment?

8 A. Yes, sir.

9 Q. So that was -- Tell me, again, what your
10 problem with what he did was?

11 MS. THORNTON:

12 Asked and answered.

13 THE WITNESS:

14 Just, you know, following close,
15 guys being nervous, feeling rushed,
16 didn't want to get in an accident, being
17 approached to be paid to say things. I
18 never had to deal with that before.

19 EXAMINATION BY MR. MCGOEY:

20 Q. Okay. Now, as far as following your
21 trucks with cameras, did you ever follow Mr.
22 Ramelli's trucks with cameras?

23 A. Not that I can recall.

24 Q. Okay. Do you recall before you got the
25 Kenner contract telling your employees that you

1 needed to get a GoPro and surveil Mr. Ramelli's
2 trucks?

3 A. I don't remember saying that.

4 Q. All right. We'll see if we can refresh
5 your recollection. I'm going to show you what was
6 previously marked as Exhibit 7. This is a series
7 of emails from February 7, 2020. So that was
8 about a week and a half after your first meeting
9 with Kenner, right?

10 A. Uh-huh.

11 Q. And on that e-mail down at the bottom of
12 the first page you were e-mailing Julie Tufaro
13 saying, "I need some information for Billy so he
14 can do some investigating." Is that Billy Good,
15 your pilot?

16 A. No.

17 Q. What Billy is that?

18 A. Billy Fletcher, Billy -- I forgot
19 Billy's last name, but it's a guy who used to run,
20 run and do errands for us and stuff like that.

21 Q. So he was an IV Waste employee?

22 A. Subcontractor.

23 Q. Subcontractor. Does he still work for
24 you?

25 A. He works -- I think he does some work

1 for my mother.

2 Q. Okay. You say, "He's willing to go
3 early in the morning to check on some of these
4 trucks. Can you please put something together so
5 he has something to follow."

6 A. Uh-huh.

7 Q. Was Billy going to be -- Were you saying
8 Billy was going to be following Mr. Ramelli's
9 trucks?

10 A. I don't remember. I was just -- I was
11 frustrated that he was following ours and
12 aggravated, so I don't even think they even -- I
13 don't even know if this -- I don't even think this
14 was done.

15 Q. All right. So just so you're not
16 confused on the timeline, this is three months
17 before you took over the City of Kenner contract.

18 A. Oh, February 7th. Okay.

19 Q. This was back when Mr. Ramelli had the
20 contract and you were trying to get it, and you
21 were saying to Julie, "I need some information
22 from Billy so he can do some investigation." You
23 say, "We need to get him a GoPro."

24 A. Yeah, I don't think this ever happened.

25 Q. So three months before -- Would you

1 agree with me, three months before Mr. Ramelli had
2 people watching your trucks on the City of Kenner,
3 you at least were telling Ms. Tufaro let's get
4 somebody on the streets following his trucks?

5 MS. THORNTON:

6 Object to form.

7 THE WITNESS:

8 No. There's a difference between
9 saying something and doing something.
10 And we didn't ever do this, I don't
11 think.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Okay.

14 A. There's a big difference between saying
15 I'm going to do this and doing it, and I don't
16 think we ever did it.

17 Q. You go on to say at the top of this
18 email, "Please, because I want to get on this
19 early next week as we're going to need it for
20 ammunition." What ammunition did you need in
21 February of 2020?

22 A. I have no idea. I have no idea, but I
23 don't think this was ever done. I don't think we
24 moved forward with it.

25 Q. All right. Well, let's see if we can

1 refresh your recollection that at least a week
2 later you're still working on setting up
3 surveillance on Mr. Ramelli's carts. I'll show
4 you what was previously marked as Exhibit 9. This
5 is a series of emails between you and Ms. Tufaro
6 dated February 13, 2020; is that correct?

7 A. Yes, sir.

8 Q. So if we look at the first email on the
9 second page, that's where Ms. Tufaro to you on
10 February 12 says, "This looks like seven trucks.
11 I need to put it on a calendar to see if they run
12 more in the beginning of the week. We really need
13 to get something for the boom truck." What is
14 that dealing with?

15 A. I don't know, but I don't think it ever
16 occurred.

17 Q. All right. Then you respond back
18 saying, "Please let me know so I can get Billy fed
19 us to start doing surveillance." Do you mean set
20 up to start doing surveillance?

21 A. No, I don't remember. I just -- those
22 voice texts -- I use voice texts all the time, so
23 that's probably why it reads like this. But we
24 never did -- I don't think we ever did do any of
25 this. We didn't send him out there to do this.

1 Q. Okay. But is it fair to say a week
2 after your first email about doing surveillance
3 with Billy on Mr. Ramelli's trucks, you're still
4 sending emails to Ms. Tufaro about starting to do
5 surveillance on Mr. Ramelli's trucks?

6 A. We talked about it, but it never did --
7 I don't think it ever did happen. I just don't.

8 Q. Now, in addition to talking about
9 surveilling Mr. Ramelli's trucks, did you also
10 begin communication with Mr. Ramelli's employees
11 about the Kenner contract and their work in
12 Kenner?

13 MS. THORNTON:

14 Object to form.

15 THE WITNESS:

16 I don't remember.

17 EXAMINATION BY MR. MCGOEY:

18 Q. You don't remember in April of 2020,
19 before you had the Kenner contract when you
20 started doing work, having all of Mr. Ramelli's
21 employees over to your yard?

22 A. No. I remember we had -- I remember
23 people from Ramelli came to our yard, but it
24 wasn't -- I don't remember what date and time and
25 I don't remember exactly who it was. But we're

1 always hiring. We always have -- I mean yesterday
2 I had a meeting with a group of people hiring.
3 We're always hiring drivers.

4 Q. So tell me about what you recall in
5 April of 2020 when Mr. Ramelli's employees just
6 ended up at IV Waste.

7 A. I don't -- I mean we had a regular
8 normal recruiting that we normally do for front
9 load, rear load, roll-off. We're constantly
10 hiring and adding because we're growing, so that's
11 what we do. But I don't remember who at that time
12 and month that you're saying, who was there or
13 what was there.

14 Q. All right. I'm going to show you what
15 was previously marked as Exhibit 11, which I
16 believe is a list of Ramelli employees that IV
17 Waste prepared and produced in this case as to
18 Ramelli employees that IV Waste hired. Do you
19 recognize this?

20 A. Yes, I do.

21 Q. All right. So this was prepared by IV
22 to show the names of the Ramelli employees you
23 hired, their department or positions, and the date
24 you hired?

25 A. Uh-huh.

1 Q. And then you have a final column that
2 says -- It doesn't have a heading, but it says
3 either Fired from Ramelli, Quit from Ramelli. Who
4 came up with those descriptions?

5 A. I didn't.

6 Q. Who at IV Waste came up with those
7 descriptions?

8 A. I'm not sure.

9 Q. Who else besides you was involved in
10 responding to discovery in this case?

11 A. I would have to check with my office. I
12 know there was a few people because it was a lot
13 of information.

14 Q. Okay. So of the employees, and let's
15 see, one, two, three, four, five, six, seven,
16 eight, nine, ten, eleven, twelve, thirteen,
17 fourteen, fifteen, sixteen, seventeen, eighteen,
18 nineteen, twenty, twenty-one, twenty-two -- Of the
19 twenty-three Ramelli employees that you represent
20 you hired after or you hired --

21 A. You said after.

22 Q. I'll rephrase the question. Of the 20
23 plus employees that you hired from Ramelli for IV
24 Waste, how many of them did you meet with while
25 they still worked for Ramelli?

1 A. I know that there was a bunch that came
2 over with a letter saying they didn't get paid,
3 and they were pissed off that they didn't get paid
4 their bonuses and their COVID bonuses, and they
5 were fed up with dealing with that. And they -- I
6 remember them bringing the letter to us and
7 showing us. I don't remember who it was and I
8 don't remember who I talked to, but I do remember
9 that.

10 Q. Okay. Do you remember in that April
11 time frame when these employees still worked for
12 Ramelli giving them IV Waste uniforms?

13 A. I know that there was some that quit
14 because they didn't get paid and they didn't have
15 a job. And we needed to be in St. Bernard and
16 some other areas, and they did come to work to
17 help us. But they had quit or because of money
18 issues or gotten fired, from what I heard, because
19 they came to one of our regular hirings that we do
20 weekly, and that's what happened. We hire -- you
21 know, we hire people every week.

22 Q. My question was, while the employees
23 were working for Mr. Ramelli, did you give any of
24 his employees IV Waste uniforms to come work for
25 you?

1 A. Not to my understanding unless they were
2 hired to come to work for us because they wanted
3 to work for us.

4 Q. Okay. So let's look at this list of
5 employees that you-all prepared. One, two, three,
6 four, five, six, seven down, Earl Sylvester --

7 A. Yes, sir.

8 Q. Do you remember Earl?

9 A. God bless his soul. Yes, he passed
10 away.

11 Q. He passed away. And he was a driver in
12 Kenner?

13 A. Yes. He was a great man.

14 Q. All right. And IV Waste represents in
15 this document that they produced in this
16 litigation, that you hired Earl on May 1, 2020; is
17 that correct?

18 A. I don't know. I mean, if that's what
19 the document says it says, but I don't -- I can't
20 confirm or deny.

21 Q. Well, that's the first day you picked up
22 garbage and he's a driver. Was he driving on the
23 first day for IV Waste when you took over the
24 contract?

25 A. I think he was driving.

1 Q. Okay.

2 A. Or maybe the second day. I really don't
3 recall.

4 Q. All right. So before May 1, 2020, did
5 you meet with Mr. Sylvester while he still worked
6 for Mr. Ramelli?

7 A. I don't recall if he was still working
8 there at the time or he had been working for us
9 for some time.

10 Q. Do you recall recording Mr. Sylvester in
11 conversations about him telling you about
12 recycling and Mr. Ramelli?

13 A. After speaking to my lawyer that there
14 was comments of criminal behavior, and I felt that
15 my lawyer at the time had talked to them. And I
16 had asked Mr. Sylvester if it was okay to record,
17 and he said yes, so he could say what was going
18 on.

19 Because we had -- There was obstruction
20 put up for us being able to recycle the first day
21 where we thought we were going to bring the
22 recycling. And we were talking about where we
23 were going to bring it and how we were going to
24 bring it.

25 So the people that did the recycling, we

1 were communicating with them asking what did y'all
2 used to do with it. And they started telling us
3 what they used to do with the recycling, that they
4 would mix it with garbage and bring it to River
5 Birch. And I immediately called my lawyer to tell
6 him about this, and he -- that's when -- that's
7 when the recording happened.

8 Q. You don't recall doing this and talking
9 to Ramelli's employees about it while they still
10 worked for Ramelli?

11 A. I don't recall.

12 Q. Okay. Do you recall recording a
13 conversation with Earl Sylvester, got rest his
14 soul?

15 A. Yeah.

16 Q. Yeah. And you recorded that
17 conversation on April 23rd --

18 A. Okay.

19 Q. -- 2020. Were you aware that he still
20 worked for Ramelli on April 23rd, 2020?

21 A. No, I was not.

22 Q. But somehow Mr. Sylvester ended up in
23 your office with you taping a recorded
24 conversation with him and your lawyer?

25 A. I don't - I don't remember. I don't

1 recall when the time was, like I said before, when
2 did he start, before or after.

3 Q. Well, we can pull it up and we're going
4 to pull it up and play it because you produced a
5 copy of that recording in this case.

6 A. Absolutely.

7 Q. And it reflects that it was recorded on
8 April 23rd.

9 A. Okay.

10 Q. So you were recording Bob Ramelli's
11 employees before you ever started picking up
12 recycling in the City of Kenner, right?

13 A. I don't know if it was before. I mean
14 you can play the tape, but I don't know if he
15 was -- if he quit or he didn't quit or he was
16 going to quit or he was unhappy or whatever the
17 case may be, but I don't know the exact time.

18 Q. But it wasn't about recycling that you
19 learned about once you started picking up the
20 contract. You were recording Mr. Ramelli's
21 employees a week before you even started picking
22 up anything in Kenner. Do you not recall that?

23 MS. THORNTON:

24 Object to form.

25 THE WITNESS:

1 Yeah, I don't remember the
2 timeline, but I know that we were --

3 MR. MCGOEY:

4 Can you show us the specifics of
5 the recording that Mr. Torres's company
6 produced in this case?

7 EXAMINATION BY MR. MCGOEY:

8 Q. You know recordings have dates and times
9 of when they are made?

10 A. I'm aware of that.

11 Q. All right. Does it reflect on the
12 computer screen that the media -- that the voice
13 recording that you created was done on April 23rd,
14 2020 at 2:38 p.m.? Did I read that right?

15 A. That's what it says.

16 Q. Does that refresh your recollection that
17 you were trying to come up with some charges of
18 criminality against Mr. Ramelli before you had
19 even taken over the contract?

20 MS. THORNTON:

21 Object to form. You're
22 mischaracterizing what he said.

23 THE WITNESS:

24 Absolutely false.

25 EXAMINATION BY MR. MCGOEY:

1 Q. Tell me what you did with this
2 recording.

3 A. I dealt with my lawyer on it. My lawyer
4 and I talked about it.

5 Q. And what else?

6 A. He was the one that said to -- they need
7 to sign an affidavit.

8 Q. So you had an affidavit prepared?

9 A. I didn't. My lawyer did.

10 Q. And then what else did you-all do?

11 A. We told the city what our findings were
12 and we turned it over to the city.

13 Q. Okay. What else?

14 A. That's what we did.

15 Q. And then the city turned it over to the
16 FBI?

17 A. The city -- I don't know what they did
18 with it. I didn't ask them.

19 Q. You knew that, that they were going to
20 do that, right?

21 A. No.

22 Q. That was a surprise to you that Mr.
23 Rapiere gave those to --

24 A. I did not turn it over to them thinking
25 it was going to be turned over to the FBI. I

1 turned it over to them because that's what --
2 Again, I don't want to talk about what I talked
3 about with my counsel, but I turned it over to the
4 city.

5 Q. Okay. And did you also set up
6 interviews with WWL to run a story on June 3rd,
7 two nights before it was coming up to the city
8 council on whether or not you were going to get --
9 keep the contract in the City of Kenner, to run a
10 story making these allegations?

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 Keep the contract? I already had
15 the contract.

16 EXAMINATION BY MR. MCGOEY:

17 Q. You had several contracts that were
18 declared null and --

19 A. I was working for the city and you're
20 twisting things around.

21 Q. Fair enough.

22 A. You're saying this recording. We had
23 already started working for the city.

24 Q. Were you aware that David Hammer was
25 going to run a video, a piece on Mr. Ramelli, and

1 the affidavits and the recording that you made,
2 were you aware that he was going to run that on
3 June 3rd, right before the city council meeting?

4 A. I did not know that he was going to run
5 it. I know that he had asked questions, that he
6 received the recordings from the city and he had
7 questions for me.

8 Q. So you spoke to Mr. Hammer before he
9 aired his piece?

10 A. He called me. No different than Lee
11 Zurik calling you or you calling Lee Zurik.

12 Q. But you sued Lee Zurik for that, right?

13 A. No.

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 No. I sued Lee Zurik and FOX 8
18 together.

19 EXAMINATION BY MR. MCGOEY:

20 Q. Okay. So just so I understand, you
21 admit that before David Hammer ran his story on
22 Mr. Ramelli, that you worked with Mr. Hammer for
23 his piece?

24 MS. THORNTON:

25 Object to form.

1 THE WITNESS:

2 No, I did not. I did not work with
3 Mr. Hammer. Mr. Hammer's piece, from my
4 understanding, had been a long thing in
5 the making because they were charging
6 for locations that they didn't have
7 cans, thousands of dollars.

8 And that had been going on for
9 months and months and months. And this
10 was just another piece that the city
11 gave to him when they found out about
12 it, and they wanted him to know about
13 it. It wasn't me turning it over to
14 them. It was the city.

15 EXAMINATION BY MR. MCGOEY:

16 Q. Okay. So just so we're all on the same
17 page, I'm going to show you an affidavit -- I mean
18 a letter dated May 6, 2020, from Ed Rapier to FBI,
19 the U.S. Attorney, the Jefferson Parish DA, the
20 Chief of Police.

21 MR. MCGOEY:

22 I'm going to mark this as Exhibit
23 97.

24 (Document marked for identification as
25 Exhibit 97.)

1 EXAMINATION BY MR. MCGOEY:

2 Q. Have you ever seen that letter before?

3 A. No.

4 Q. So today is the first day you're seeing
5 that?

6 A. Yes. Yes, it is.

7 Q. Turn to the second page. This is an
8 affidavit of Earl Sylvester.

9 A. Yes, sir.

10 Q. Your lawyer prepared this affidavit,
11 correct?

12 A. Yes, sir.

13 Q. But he didn't sign it, did he?

14 A. Who's that?

15 Q. Your lawyer.

16 A. I mean, I don't see a signature on here,
17 no.

18 Q. It was notarized by Ed Rapier, the city
19 attorney.

20 A. Okay.

21 Q. Mr. Rapier notarized this sitting in
22 your office at IV Waste?

23 A. Not to my recollection he did. I don't
24 remember whether he did or he didn't.

25 Q. So you understood Earl Sylvester went to

1 the City of Kenner where he signed this?

2 A. I don't know. I don't know what he did
3 with it.

4 Q. Okay. But before he signed this, you
5 made an audio recording, correct?

6 A. When we were trying to figure out with
7 the dumping of the recycling. We were trying to
8 find out where did it go, and it came up that they
9 were mixing it and bringing it to the landfill,
10 and that was a common practice that Ramelli did.

11 Q. And I think you said Mr. Ramelli was
12 stealing thousands of dollars from the citizens
13 because of that?

14 A. That's what the city --

15 MS. THORNTON:

16 Object to form.

17 THE WITNESS:

18 That's what the city told me.

19 EXAMINATION BY MR. MCGOEY:

20 Q. As you sit here today, you realize Mr.
21 Ramelli recycled more recycling than IV Waste did
22 in the City of Kenner, do you?

23 MS. THORNTON:

24 Object to form.

25 THE WITNESS:

1 That's your opinion.

2 EXAMINATION BY MR. MCGOEY:

3 Q. As you sit here today, you don't realize
4 Mr. Ramelli put a bunch more recycling in recycle
5 facilities than IV Waste?

6 A. That's your opinion. I disagree.

7 Q. Okay. Well, let's see what your reports
8 say. I'm going to show you what was previously
9 marked as Exhibit 14, which is a June 5, 2020
10 email from Julie Tufaro to Deborah Foshee. Take a
11 look at that and tell me in June of -- in May of
12 2020, your first month of recycling, how many tons
13 of recycling did IV Waste bring to the recycle
14 facility?

15 A. It says 55.9 tons.

16 Q. Okay. Now I'm going to show you what
17 what was previously marked as Exhibit 76, which
18 is, I'll represent to you, Ramelli Janitorial's
19 recycle reports for the four months leading up to
20 May of 2020. So at least according to Mr.
21 Ramelli's reports, in January he had 66.98 tons of
22 recycling that went to a facility. Do you see
23 that?

24 A. Yeah. And I see that the month after
25 was 42.

1 Q. Okay. Perfect. So can we agree in
2 January Mr. Ramelli recycled more than you did in
3 May of 2020?

4 A. You can't compare the months. You've
5 got to go month by month.

6 Q. Fair enough. In February did 42.68
7 tons; is that right?

8 A. Yes.

9 Q. Then in March he did 54.89 tons; is that
10 right?

11 A. That's what the report says.

12 Q. And then in April he did 45.41 tons,
13 right?

14 A. And this is the report you're providing
15 me from him, yes.

16 Q. And then after your first month of doing
17 recycling at 55 tons, didn't you decide it was too
18 expensive to do all that recycling, and so you
19 need to come up with a way to save money?

20 MS. THORNTON:

21 Object to form. And also, Patrick,
22 I mean, you've been asking these
23 questions for a while. I don't want to
24 be an obstructionist, but I'm having a
25 hard time understanding the relevance to

1 the claims in this case.

2 MR. MCGOEY:

3 That's fine.

4 MS. THORNTON:

5 At some point I think we're going
6 to have to shut it down.

7 MR. MCGOEY:

8 Okay. Well, we'll put the judge on
9 the line, but --

10 MS. THORNTON:

11 Good luck.

12 MR. MCGOEY:

13 Exactly.

14 EXAMINATION BY MR. MCGOEY:

15 Q. I'm going to show you what's your annual
16 reporting. You had to annually report to the City
17 of Kenner the amount of recycling that you did,
18 right?

19 A. Yes, which we did.

20 Q. So I'm going to show you what was
21 previously marked as Exhibit 15. Confirm for me
22 that that is IV Waste Annual Report to the City of
23 Kenner for the 2020 recycling?

24 A. It is.

25 Q. All right. So in June you only had 42.6

1 tons, right?

2 A. Correct.

3 Q. July you only had 4.83 tons?

4 A. I mean sometimes stuff carries over from
5 the month before depending on what was moved out
6 of there.

7 Q. You only had four tons of recycling for
8 the whole month?

9 A. No. What I'm saying is that if you're
10 coming to the last week of the month, you could
11 have stuff in the corral that could carry over to
12 the following month, so, you know, that's what you
13 have to look at.

14 Q. These tonnages on your annual report,
15 these are backed up and supported by tickets that
16 the MRF facility gives you when you drop off
17 recycling?

18 A. Correct.

19 Q. Correct. So is it accurate to say you
20 did -- you deposited into a recycle facility in
21 the month of July 2020 4.83 tons?

22 A. It goes from the recycle -- It goes from
23 the street to where the Kenner Yard recycling
24 facility was. It doesn't go straight to the
25 facility. There we separate the contaminated from

1 the recycling, and the good stuff goes to Baton
2 Rouge.

3 Q. Got you. So would you agree with me for
4 all of the months in 2020 that Mr. Ramelli did
5 recycling, he always had more than four tons to a
6 recycle facility?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 I mean your report shows that.
11 This one shows this. I mean, you know,
12 like I said, stuff carries over from the
13 month prior sometimes.

14 EXAMINATION BY MR. MCGOEY:

15 Q. So do I understand this right that in
16 May of 2020 you didn't have any problem with
17 contaminated recycling. But after you built that
18 pen in the yard at Kenner, you started having lots
19 of contaminated recycling?

20 MS. THORNTON:

21 Object to form.

22 THE WITNESS:

23 Well, when we would bring it to the
24 recycling facility, the one that was on
25 Airline Highway, before we stopped

1 bringing it there we didn't have the
2 ability to separate the contaminated
3 from the good recycling that would go to
4 Baton Rouge.

5 So that's why I'm sure that they
6 were -- And we reported over and over
7 through emails and newsletters about the
8 contamination that we were having issues
9 with.

10 EXAMINATION BY MR. MCGOEY:

11 Q. Okay. Tell me what IV's process was
12 that you started in June of 2020 to determine good
13 recycling versus contaminated?

14 MS. THORNTON:

15 Patrick, I'm sorry, what does this
16 have to do with this case?

17 MR. MCGOEY:

18 He's already linked it up.

19 MS. THORNTON:

20 No, I mean, I'm asking because I
21 don't want to say -- I don't want to
22 instruct him not to answer.

23 MR. MCGOEY:

24 He participated in a scheme to
25 defame my client by going to WWL and the

1 FBI concerning recycling. He has said
2 that this is part of what he learned
3 from my employees, and now I'm testing
4 that and establishing that, in fact, my
5 client deposited way more monthly
6 recycling at a recycle facility than IV
7 Waste did.

8 MS. THORNTON:

9 I'm unaware of any lawsuit with
10 those claims you just made, and
11 certainly the lawsuit that I understand
12 we're here for a deposition for doesn't
13 have anything about that in it.

14 THE WITNESS:

15 And the months are not -- I mean
16 you've got January here. You don't have
17 January here. I mean it's selective.

18 EXAMINATION BY MR. MCGOEY:

19 Q. I don't want to be accused of being
20 selective, so let's look at your reports for
21 January of 2021. Because you believe that should
22 be consistent with what Mr. Ramelli did in January
23 of 2020?

24 A. No. What I'm saying is a full picture
25 for the whole year.

1 Q. All right. I'm going to give you the
2 picture of January of 2021, and I'll mark it as
3 Exhibit 98.

4 (Document marked for identification as
5 Exhibit 98.)

6 EXAMINATION BY MR. MCGOEY:

7 Q. Confirm for me that this is IV Waste
8 January Recycle Monthly Report for the City of
9 Kenner.

10 A. Where is the whole year? Do you have
11 the whole year? January was 66 -- 74.

12 Q. Yeah. You picked up 74 tons, but you
13 claim that 62 of those tons were contaminated,
14 right?

15 A. Correct.

16 Q. All right. So, again, my question is,
17 what process was IV Waste doing to try to -- that
18 they determined that, I don't know, 80 percent of
19 what you were picking up in recycling was
20 contaminated?

21 A. We were reporting it directly to the
22 city that we were having issues with photos and
23 documentation.

24 Q. The process -- I'm asking the process.
25 Who determined what was contaminated for IV

1 recycling and wasn't?

2 A. We had a guy on the machine that would
3 separate and put the contaminated in one can and
4 the good clean material in the other cans.

5 Q. And who was that guy?

6 A. It was Raymond, Raymond Williams.

7 Q. All right. Has he got any type of
8 training in determining good recycling from bad?

9 A. Well, he had a list that we went over
10 with him on what's contaminated and what's not.

11 Q. Is it fair to say that after you started
12 putting the recycling in the pen at the job site,
13 you started having more than 50 percent of the
14 recycling you were picking up was contaminated?

15 MS. THORNTON:

16 Object to form.

17 THE WITNESS:

18 Yeah, I mean, I can only go off of
19 what his decision-making was when he
20 was --

21 EXAMINATION BY MR. MCGOEY:

22 Q. Does he still work for you?

23 A. He does.

24 Q. Does he still separate good recycle from
25 bad?

1 A. No.

2 Q. Okay. He doesn't work for New Orleans?

3 A. No.

4 Q. Do you have someone in New Orleans
5 deciding what's good recycle versus bad?

6 A. A private company.

7 Q. Who's that?

8 A. Louisiana Demolition.

9 Q. And what is their process for
10 determining?

11 A. They document every day. They take
12 pictures of what's contaminated and what's not,
13 and we send it to the city.

14 Q. And what do you do with the
15 contaminated -- what you determine to be
16 contaminated recycling?

17 A. We bring it to the --

18 MS. THORNTON:

19 Object to form.

20 THE WITNESS:

21 We bring it to --

22 MS. THORNTON:

23 When, what, where? What are you
24 talking about?

25 EXAMINATION BY MR. MCGOEY:

1 Q. In 2020 for the City of Kenner, we were
2 just looking at the reports, you had contaminated
3 recycling, right?

4 A. Right.

5 Q. What does IV Waste -- what did it do
6 with the contaminated recycling?

7 A. The contaminated went to the landfill.

8 Q. Okay. So the same thing that you got
9 affidavits prepared and thought was criminal
10 behavior on behalf of Ramelli for bringing
11 recycling to the landfill, that's what you do with
12 what you consider to be contaminated recycling; is
13 that correct?

14 MS. THORNTON:

15 I'm going to object to form, and I
16 am going to instruct the witness not to
17 answer any more of these questions. You
18 are far afield from this lawsuit. You
19 haven't been able to answer me to
20 explain to me how this is relevant.

21 MR. MCGOEY:

22 Jennifer, I did. The record is --

23 MS. THORNTON:

24 No.

25 MR. MCGOEY:

1 If you stop him from -- if you
2 instruct him not to answer, I'm
3 reserving my right to come back and
4 redepose him. You know that.

5 MS. THORNTON:

6 The record will reflect that.

7 MR. MCGOEY:

8 Great.

9 MS. THORNTON:

10 If you can explain to me how it's
11 relevant to the lawsuit, then I'll --

12 MR. MCGOEY:

13 I have explained.

14 MS. THORNTON:

15 And I think I've been actually
16 quite patient.

17 MR. MCGOEY:

18 I'm suing -- Mr. Ramelli is suing
19 IV for unfair trade practices and
20 stealing its contract. Part of how he
21 did it was before he got the contract he
22 started secretly recording my client's
23 employees, which he's already admitted
24 to, and taking that information,
25 preparing affidavits, and leaking it to

1 the public.

2 MS. THORNTON:

3 I've never seen those allegations
4 in this lawsuit, but --

5 THE WITNESS:

6 And I never leaked. I gave it to
7 the city.

8 MS. THORNTON:

9 And, I'm sorry, Sidney, let me stop
10 you just because you're asking questions
11 about IV Waste recycling in 2021, well
12 after the contract was awarded to IV
13 Waste.

14 MR. MCGOEY:

15 I understand.

16 MS. THORNTON:

17 I'm trying to be patient. If you
18 have a question or two, okay, but I
19 think you've got to wrap this up because
20 it's irrelevant.

21 MR. MCGOEY:

22 I disagree. And if you're going to
23 instruct the witness not to answer my
24 questions, just put it on the record. I
25 reserve my rights to come back and ask

1 him more questions.

2 MS. THORNTON:

3 I just said if you have another
4 question or two, go ahead, but please
5 try to wrap it up.

6 MR. MCGOEY:

7 Great.

8 MS. THORNTON:

9 Because I don't want to come back.

10 EXAMINATION BY MR. MCGOEY:

11 Q. When IV Waste found contaminated
12 recycling in the City of Kenner, is it accurate
13 that you took it to the River Birch landfill?

14 A. If it was contaminated, yes.

15 Q. And who did you bill for that?

16 A. The City of Kenner. We were trying to
17 get them to help us with the contamination, so
18 there's emails and photographs to get them to
19 assist us with that. And they approved for us to
20 take the contaminated to the landfill.

21 Q. So you charged the City of Kenner's
22 contract with River Birch for the dumping of the
23 contaminated recycling? It went on their ticket?

24 A. The city approved that.

25 Q. Okay.

1 A. And we communicated with them that we're
2 having a problem with contamination. We sent out
3 newsletters and we sent them photographs. And
4 there's emails back and forth of the first few
5 newsletters after that that they wanted to come
6 and try to do some kind of fliers or something to
7 get to the residents.

8 Q. But when you met with the City of Kenner
9 and gave them the affidavits in May of 2020 about
10 Mr. Ramelli bringing recycling to the landfill,
11 the City of Kenner at that time said they
12 considered the landfill -- I mean recycling going
13 to the landfill to be a crime?

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 I wasn't taking -- pushing it out
18 of a truck, mixing it with garbage to
19 dispose of it. I was -- We were dumping
20 it, sorting through it. There was no
21 garbage being mixed with it to bring it
22 to the landfill. It was -- whatever was
23 contaminated went into a contamination
24 can that was dumped.

25 Because the city we were asking to

1 assist us to help deal with the
2 contamination issue. We were not mixing
3 it with garbage. We were separating it
4 from garbage. There's a difference. We
5 were separating it from garbage.

6 We didn't just come -- We didn't go
7 pick it up on the street, dump it on the
8 ground, and mix it in garbage, and then
9 reload it in the garbage truck and claim
10 that it's garbage. We told them it was
11 garbage. We billed them saying it was
12 garbage.

13 We didn't do it secretly or try and
14 get a Bobcat to reload it with guys and
15 make it like it's trash. We did it and
16 we were very open about how we were
17 doing it. And there was nothing --
18 There's nothing that we did that I
19 don't -- that we don't have a problem
20 with.

21 EXAMINATION BY MR. MCGOEY:

22 Q. If you were to look at recycling, can
23 you tell if it's contaminated or not? Do you
24 possess those skills?

25 A. They -- I mean I'm not an expert on it,

1 but what I'm saying is we have the form that the
2 city gave us what is, in the facility in Baton
3 Rouge, is acceptable and non-acceptable, and
4 that's what we gave Raymond.

5 Q. Okay. But my question is, can you tell
6 contaminated recycling versus regular recycling?

7 A. I mean, yeah, when I see propane tanks
8 and things that don't belong in recycling, yeah.

9 MR. MCGOEY:

10 Okay. Can you pull the video at
11 the River Birch Yard?

12 EXAMINATION BY MR. MCGOEY:

13 Q. Have you seen a video produced in this
14 case of IV Waste dumping recycling at the River
15 Birch Yard?

16 A. No.

17 (Video playing.)

18 EXAMINATION BY MR. MCGOEY:

19 Q. So the video we just watched, that I'm
20 going to mark as Exhibit 99, that was a 30 or
21 40-yard container truck?

22 A. It's a 40-yard.

23 Q. 40-yard. You used 40-yard containers in
24 the pen at the Kenner facility?

25 A. Correct.

1 Q. And this video is reflecting that
2 recycling is being dumped at the landfill. Would
3 you agree with that?

4 MS. THORNTON:

5 Object to form.

6 THE WITNESS:

7 I mean, come on. First, it's a guy
8 we fired, okay, and he's shooting a
9 truck where -- How do you know there's
10 no contamination in there? Do you know
11 what you're looking at?

12 EXAMINATION BY MR. MCGOEY:

13 Q. I don't. That's why I'm asking you.

14 A. So I relied on the guy who loaded the
15 can who said it was contaminated. So obviously he
16 felt that it was contaminated and he loaded what
17 was contaminated. That's what is in the back of
18 that can.

19 Q. And, again, his name is Raymond?

20 A. Correct, Williams.

21 Q. Williams?

22 A. Uh-huh.

23 MS. THORNTON:

24 Patrick, is there a Bates label for
25 that so we can --

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MR. MCGOEY:

Yeah, it was produced.

MS. THORNTON:

I know. That's why I'm asking.
Because we didn't get any information
about a date or anything.

MR. MCGOEY:

I think there is a date. We can
get the date.

MS. THORNTON:

Well, that's what I'm asking so the
record is clear what you're showing him.

MR. MCGOEY:

I believe it's in August of 2020,
but let's go to the details. Do you
have the details? I'm sorry.

MS. ABRAMSON:

August '21, 8/27/21.

MR. MCGOEY:

August 27, 2021. I apologize. It
was 2021.

(Document marked for identification as
Exhibit 99.)

EXAMINATION BY MR. MCGOEY:

Q. All right. Getting back to the

1 affidavits that you had prepared for the former
2 Ramelli employees --

3 MS. THORNTON:

4 Object to form.

5 MR. MCGOEY:

6 What's wrong with the form?

7 MS. THORNTON:

8 He had prepared for. He already
9 testified he didn't prepare them.

10 EXAMINATION BY MR. MCGOEY:

11 Q. You had your lawyer prepare the
12 affidavits for Mr. Sylvester, didn't you?

13 MS. THORNTON:

14 I don't know if he had them
15 prepared or not.

16 THE WITNESS:

17 I didn't have -- My lawyer
18 recommended that they sign an affidavit.
19 After that I didn't -- I don't know what
20 happened.

21 EXAMINATION BY MR. MCGOEY:

22 Q. Did you pay your lawyer to draft the
23 affidavits?

24 A. I mean, I don't remember getting a bill,
25 if I paid them or didn't pay them. But, you know,

1 John's been working for me for a long time, so --

2 Q. All right. After you had -- After the
3 affidavits were prepared and executed by former
4 Ramelli employees, did you work with anybody in
5 the community to try to spread the word about Mr.
6 Ramelli and his practices?

7 A. I don't recall.

8 Q. Do you recall a guy named Jack Zewe?

9 A. I met him, yes.

10 Q. In fact, was Jack Zewe in court with you
11 yesterday offering to be one of your witnesses?

12 A. He did --

13 MS. THORNTON:

14 It wasn't yesterday.

15 THE WITNESS:

16 Whenever it was, yeah. He did
17 public records requests on information
18 that we were asked, whether he got and
19 we didn't get, so he did say he would do
20 that.

21 EXAMINATION BY MR. MCGOEY:

22 Q. So how did you come about working with
23 Jack Zewe to say things about Mr. Ramelli?

24 MS. THORNTON:

25 Object to form.

1 THE WITNESS:

2 Yeah, I don't remember -- Jack
3 Zewe, when we first started the
4 contract -- I don't remember if it was
5 in the first few months -- he would
6 question the way we got the contract.
7 He would question things about us
8 starting with the contract. And he was
9 kind of -- he's like a watchdog for
10 Kenner taxpayers.

11 And so he was the one that was
12 reaching out to me and telling me about
13 this -- the cans that were being charged
14 for where there were no cans. And
15 that's where I heard it from. That's
16 where I first heard his name, started to
17 hear his name from the city officials.

18 EXAMINATION BY MR. MCGOEY:

19 Q. Okay. So then did you consider --
20 continue to work with Mr. Zewe?

21 A. I never worked with him.

22 Q. Did you share with him the recordings
23 that you made of Mr. Ramelli's former employees?

24 A. Not to my knowledge.

25 Q. Did you share with him the affidavits

1 that your lawyer prepared?

2 A. I don't remember.

3 Q. Did you tell him that you were working
4 with WWL to run a story on it?

5 A. I told him WWL called me.

6 Q. Okay. So why are you talking with Mr.
7 Zewe about a WWL report?

8 A. He called me. He called me. I guess
9 someone from the city shared with him that they
10 received the affidavits, from my understanding.

11 Q. Okay. I'll show you what I'm going to
12 mark as Exhibit 100, which is a series of emails
13 between you and Mr. Zewe on May 30th, 2020. So
14 that's a month after you started working in
15 Kenner.

16 (Document marked for identification as
17 Exhibit 100.)

18 MS. THORNTON:

19 Is this something we produced, do
20 you know?

21 MR. MCGOEY:

22 Yes, it is.

23 MS. THORNTON:

24 Did you ever get a return on Jack
25 Zewe's subpoena?

1 MR. MCGOEY:

2 I don't think he ever did, but I
3 can check.

4 EXAMINATION BY MR. MCGOEY:

5 Q. So it looks like you, on the bottom of
6 this first page of Exhibit 100, are sending Mr.
7 Zewe a heading that says, "Ramelli Waste stole
8 taxpayer's money for recycling by dumping the
9 recycling at the River Birch Landfill instead of
10 recycling facility." Is this something you wrote
11 up?

12 A. I don't recall writing this up.

13 Q. Well, you're sending it to --

14 A. The subject line you're talking about?

15 Q. I'm talking about this big bold heading
16 down at the bottom of the first page underneath
17 your name.

18 A. No, I didn't write that up.

19 Q. You didn't write that up?

20 A. I didn't write -- I don't remember
21 writing Ramelli stole -- I don't remember writing
22 that in bold, no.

23 Q. All right. So you think you cut and
24 pasted this from somewhere?

25 A. I can't recall.

1 Q. It says, "He will not produce receipts
2 even though his contract calls for it monthly, and
3 the city has asked multiple times in writing."
4 Did you write that?

5 A. That's the city told me, yes, sir.

6 Q. Okay. Approximately 500,000 a year paid
7 by the City of Kenner's taxpayers for recycling."
8 Did you write that?

9 A. That's what the city had told me.

10 Q. So did the City of Kenner give you this
11 information that you're forwarding to Mr. Zewe or
12 did you write it up?

13 A. I think Mr. Zewe had some of this
14 information already.

15 Q. But the way I read an email trail, this
16 is below the email that you sent.

17 A. Right, I understand, but I'm just
18 telling you I don't recall if I wrote or he wrote
19 it because I don't think I would bold it like
20 that, I mean.

21 Q. All right. Then he responds back,
22 Sid -- Do you go by Sid?

23 A. Sidney.

24 Q. Okay. "Do you have former employee who
25 can give you and your attorneys a sworn statement?"

1 Fraud upon the public money is wrong." And then
2 you write him back and say, "We have two
3 individuals who worked for Ramelli as supervisors
4 for many years that signed affidavits stating that
5 they used to dump the recycling materials at their
6 yard and then reload it into the trash trucks so
7 the landfill wouldn't see all the materials coming
8 out when they would dump it on the Kenner
9 taxpayers bill."

10 I don't understand that. We just looked
11 at a video of IV Waste dumping a 40-yard container
12 of recycling, contaminated or not, in the
13 landfill. River Birch doesn't have a problem if
14 you dump recycling in the landfill, do they?

15 A. Like I said before, the city knew that
16 we were having trouble with contamination. We
17 were not mixing it with garbage. It was when we
18 would pick it up, they -- 35-gallon bins, we
19 couldn't see if there was trash in there. And a
20 lot of people were putting trash in there because
21 of the taller bins.

22 And so they had 18-gallon bins. We had
23 35-gallon bins. And we told the city that that
24 was going to be a problem where, you know, the
25 contract reads you're supposed to be able to see

1 it when you look at it. With the 18-gallon bin
2 you can see if there's contamination in that
3 18-gallon bin. You've got a 35-gallon bin and
4 somebody puts trash in it, automatically it's
5 contaminated.

6 So there's a difference comparing with
7 Ramelli as far as the 18 gallons and the 35
8 gallons, and so we were struggling with the
9 contamination on those. So when it would get to
10 the transfer station, they would look at what was
11 contaminated and what was not, separate it. The
12 good stuff would go to River Birch. I mean the
13 good stuff would go to Baton Rouge, and the
14 contaminated would go to River Birch.

15 But the city knew about it. We had
16 approval from them. We brought them out there.
17 We told them. We sent them pictures and we also
18 sent newsletters letting them know that.

19 Q. Yeah. No. I'm talking about this part
20 in the email that you're saying to Mr. Zewe that
21 he'd "reload it into trash trucks so that the
22 landfill wouldn't see all the materials coming out
23 when they would dump it on the Kenner taxpayers
24 bill."

25 A. That's what the guys who worked for

1 Ramelli told me that's what they did. That's the
2 reason they did it.

3 Q. Got you. But we just watched a video,
4 did we not, of IV Waste dumping recycling, albeit
5 contaminated you say, into the landfill?

6 A. Big difference.

7 Q. Did you watch that --

8 MS. THORNTON:

9 Object to form.

10 THE WITNESS:

11 But you're reading like I -- It was
12 contaminated and there was a process.
13 The recycling truck didn't back up and
14 dump trash and mix trash with recycling
15 to bring it to the landfill. It dumped
16 it out and it separated what was good
17 and what was bad, and that's what --
18 what was bad went to the landfill. What
19 was good went to the recycling center.

20 EXAMINATION BY MR. MCGOEY:

21 Q. I'm not disputing what you're saying in
22 this question.

23 A. Okay.

24 Q. So I don't -- you keep not wanting to
25 answer the question.

1 A. I have no problem answering the
2 question.

3 Q. Okay. So let's get back to my question.
4 We just watched a video where you say a 40-yard
5 container from IV Waste of contaminated recycling
6 was dumped at the landfill. Was that not what we
7 just watched?

8 A. Yeah, it was contaminated.

9 Q. Okay. River Birch didn't have a problem
10 with you dumping contaminated recycling in the
11 landfill, did they?

12 A. No. Neither did the city.

13 Q. Got you. So you didn't have to hide to
14 River Birch that you were dumping recycling,
15 whether it was contaminated or not. You don't
16 have to hide that. It's a landfill. They take
17 whatever you want to pay them to dump, right?

18 A. Right.

19 Q. So did you not say, "Hey, guys, you're
20 giving me these affidavits and these statements by
21 Mr. Ramelli. What are you talking about? You
22 don't have to hide recycling to dump it in the
23 landfill. River Birch takes it all."

24 A. Well, that's -- I mean I was going off
25 of what the employees were doing and their

1 practices. So I mean that's where it came from.

2 Q. You go on to say, "I will also email you
3 the recording of one of the employees who approved
4 the recording with me and my attorney telling us
5 what they used to do." I would like -- "If you
6 would like a copy of the affidavit, I will send
7 them to you."

8 So do you recall sending Mr. Zewe the
9 audio files that he produced in this case?

10 A. If it said I did, I did, I mean.

11 Q. I'm going to show you what I'm going to
12 mark as Exhibit 101, which is an email from you to
13 Emily McCulloch at Target Video dated June 3rd,
14 2020.

15 (Document marked for identification as
16 Exhibit 101.)

17 EXAMINATION BY MR. MCGOEY:

18 Q. Is that an e-mail you sent on June 3rd,
19 2020?

20 A. Correct, that's my -- That's my email to
21 her.

22 Q. Who's Emily McCulloch?

23 A. She does video capturing. She's worked
24 for me for years.

25 Q. Okay. And how would she go about --

1 Well, you say "There's a story running on Ramelli
2 Waste and Kenner tonight at 10 AM." How did you
3 know that there was a story running on Ramelli?

4 A. I answered that. I told you that he --
5 that they -- Channel -- David reached out to me in
6 regards to the affidavits he got from the city.

7 Q. Did you meet with him or just talk to
8 him on the phone?

9 A. Did I meet with who?

10 Q. David Hammer.

11 A. I don't remember.

12 Q. Well, and so did you get a copy of the
13 Hammer video? What were you asking, to get a copy
14 of it early?

15 A. No. She sends it after theirs.

16 Q. Got you. Well, what were you going to
17 do with it?

18 A. I get videos all the time.

19 Q. You posted it?

20 A. I don't remember. I can't recall.

21 Q. Now, getting back to that article, that
22 headline, Exhibit 100 that you sent to Mr. Zewe on
23 May 30th, it looks like -- I'm going to show you
24 what I'm going to mark as Exhibit 102.

25 (Document marked for identification as

1 Exhibit 102.)

2 EXAMINATION BY MR. MCGOEY:

3 Q. It looks like you sent that same article
4 to Greg Buisson two days earlier; is that correct?

5 A. That's my email, yes.

6 Q. All right. Why are you sending this
7 email? You say in bold, "Please call me about
8 this as we need to get something out."

9 A. I don't know why it's in bold.

10 Q. Would you have typed that?

11 A. I mean, I don't usually type in bold.
12 So, I mean, I do voice text, but I don't usually
13 type in bold, so I don't know. I don't think -- I
14 mean I don't do that, so...

15 Q. All right. I've been doing -- You say,
16 "I've been doing recycling now for almost 30 days
17 and it's so expensive to do." Explain to me why
18 it was expensive?

19 A. Because we had to set up an emergency
20 account with Republic on Airline, and they did it
21 as a favor to Julie to take it, and they told us
22 that they were going to have to, you know, charge
23 more than they would normally charge, and that it
24 was a problem for them to do it for any less.

25 So they said that they were going to

1 have to charge us for hauling and -- hauling in 40
2 yards to Baton Rouge. And so that's why it was --
3 we were paying more to do that. It was a last
4 minute thing.

5 Q. Why was it you called it an emergency
6 account? Why is that?

7 A. Because we -- the place we used to bring
8 recycling to told us that Bob Ramelli said that we
9 can't bring it there. They can't take it because
10 of his employees, and he does not want y'all
11 coming here. And he provides labor for us, so
12 he's not -- they're not going to -- they can't
13 allow it to come to us. So at the last minute we
14 had to set up an emergency location to bring it.

15 Q. And when did you learn that -- Is that
16 facility called CW?

17 A. No. Oh, which one?

18 Q. The one that wouldn't take your --

19 A. Oh, CW, yes.

20 Q. CW. When did you learn that CW wasn't
21 going to take your recycling?

22 A. I don't remember. It was close to when
23 we were starting.

24 Q. Okay. So then how did you go about
25 getting a contract with Republic?

1 A. Julie dealt with the girl over there and
2 they set it up and that's where we started
3 bringing it.

4 Q. And so is it your testimony that on day
5 one of the contract you were set up to bring
6 recycling to Republic in New Orleans?

7 A. Yes.

8 Q. Now, you're aware that Terry Johnson
9 says that he was driving your recycle truck that
10 day?

11 A. I don't take -- Whatever Terry says
12 doesn't matter to me. He's the same one who got
13 paid under the table to follow us and tell lies,
14 and he wrecked -- blew up two engines. I mean
15 I've got a file this thick on him.

16 Q. Okay.

17 A. So, I mean, whatever Terry says I don't
18 believe, but --

19 Q. On May 1st, 2020 was Terry driving for
20 IV Waste?

21 A. I'm pretty sure he was driving.

22 Q. Okay. And was he driving the recycle
23 truck?

24 A. I'm not sure if he was. He drove front
25 load. He drove rear load. He drove multiple

1 trucks.

2 Q. So if Terry Johnson were to testify that
3 he was instructed to bring the recycling on May 1,
4 2020 in the IV truck straight to River Birch, he
5 would be lying?

6 A. He would be lying, yes.

7 Q. If Mr. Johnson were to testify that he
8 called Julie Tufaro on May 1st on his way to River
9 Birch landfill to drop the recycling and told her,
10 "I'm being followed by Ramelli's people and they
11 are videoing me, what do you want me to do --"

12 A. I remember that very well. He's lying.
13 I mean that was a complete lie. This facility was
14 closing. He was bringing it back to the yard, and
15 he set up a time that he was -- cameras were
16 behind him and all this stuff.

17 And we said -- We called Republic and we
18 said, "Look, we don't want to bring this back to
19 our yard. We want to bring this to your yard.
20 Can we park the truck there and then we can dump
21 it in the morning?" And the lady said, "Sure.
22 That's not a problem." So she went and picked him
23 up and brought him back to the yard.

24 Q. Did IV make money or lose money in
25 recycling in the month of May?

1 A. I don't know. I would have to look at
2 the numbers.

3 Q. So what did you do to try to save money
4 on recycling after May of 2020?

5 A. We built our own corral.

6 Q. And how did that help you save money?

7 A. Because we, instead of paying someone to
8 carry to Baton Rouge with the same equipment that
9 we own, we -- it was cheaper for us to carry it
10 ourselves to Baton Rouge on the double trailers.

11 We already -- We had already started --
12 We had already started to see what they were doing
13 with it, and we realized that we could do it for a
14 lot less with our trucks bringing it.

15 Q. So did the City of Kenner ask you to
16 build the corral to save IV money, or was that
17 IV's idea?

18 A. No.

19 MS. THORNTON:

20 Object to form.

21 THE WITNESS:

22 No. We -- I don't remember how
23 that came about, but I think my
24 recollection is that they agreed that we
25 could build the facility so we'd have a

1 place to dump it and bring it to Baton
2 Rouge.

3 EXAMINATION BY MR. MCGOEY:

4 Q. Did City of Kenner get any benefit from
5 the corral that you built?

6 A. They got benefit from the people that
7 wanted to bring the recycling there and also got
8 benefit from the drop site that was built.

9 Q. All right. I'm going to show you what I
10 marked as Exhibit 103. Did you set up cameras to
11 take pictures or videos of the Kenner yard drop
12 site?

13 A. We have cameras at all of our locations.

14 Q. All right. I'm going to show you what I
15 marked as Exhibit 103, which is an August 21, 2020
16 email from you to Michele Chaisson.

17 (Document marked for identification as
18 Exhibit 103.)

19 THE WITNESS:

20 Okay.

21 EXAMINATION BY MR. MCGOEY:

22 Q. I'm interested in the second page. Is
23 that a picture of the recycle corral that you
24 built, that Carimi built in the Kenner Yard?

25 A. Yes.

1 Q. Okay. So explain to me what we're
2 looking at here.

3 A. It's a corral that the trucks would back
4 into, dump on the ground. And then we had a
5 machine that would separate the contaminated from
6 the recycling.

7 Q. And the machine that would separate
8 contaminated from not contaminated would be a
9 Bobcat?

10 A. It was two machines. We had a Bobcat
11 and front-end loader.

12 Q. And so was one of these containers
13 contaminated and one not contaminated?

14 A. I mean from the picture -- I mean you
15 would have to be there to see it. I don't
16 really -- I mean I can't tell with that can if
17 there's trash or garbage in the bottom.
18 Contaminated, you could have a diaper, you could
19 have -- there's certain things that would
20 contaminate a load. And so those things that
21 would contaminate a load we would -- because
22 Republic would charge more if it was contaminated.
23 So we tried to do our best to get rid of the
24 contamination to be able to load into the can that
25 would go to River Birch, and then the good

1 recycling would go to Baton Rouge. And we would
2 always take two 40s at a time to Baton Rouge on
3 our trailer -- on our truck.

4 Q. Got you. So my question is, can you
5 tell if one of these -- I mean did you have a
6 system in place, one is good recycling and one is
7 contaminated or --

8 A. It would depend. I mean if he was short
9 on cans, he would load the contaminated first, and
10 then save -- push the recycling to the side until
11 they could drop extra cans, and then he would load
12 the recycling up.

13 Q. And then what about all the stuff that
14 we're looking at that's not in any of the cans,
15 that was recycling that was picked up that's just
16 dumped on the ground?

17 A. No. That's leftovers that need to be
18 loaded into a can.

19 Q. Got you. And if it rains on that --

20 A. It's not a problem.

21 Q. That's not a problem?

22 A. No.

23 Q. So this picture that we're looking at in
24 Exhibit 103 is just you hadn't had the time to
25 decide whether that the stuff on the ground was

1 contaminated or not?

2 A. Like in my testimony before, earlier
3 what I said that we would have stuff left over on
4 the ground. Now you see it yourself, and that
5 stuff would be loaded and sometimes carried over
6 to other months.

7 MR. MCGOEY:

8 You want to take a little break?

9 MS. THORNTON:

10 Yes.

11 MR. MCGOEY:

12 Great.

13 THE VIDEOGRAPHER:

14 We are now off the record. The
15 time is 2:37.

16 (Break taken.)

17 THE VIDEOGRAPHER:

18 Returning to the record. It's
19 2:53.

20 EXAMINATION BY MR. MCGOEY:

21 Q. Mr. Torres, before I move on to the next
22 subject, before the break we were talking about --
23 you remember the email blast that I called it
24 where you said that Mr. Ramelli was a corporate
25 sore loser and childish acts?

1 A. Yes.

2 Q. And you said you didn't know if that
3 ultimately went out as a blast?

4 A. Correct.

5 Q. If you look on the computer monitor,
6 this is Bates stamped Kenner ESI 62773. Is this
7 an email blast what you referred to as?

8 A. It looks like a newsletter.

9 Q. A newsletter. And you used Constant
10 Contact to send that out?

11 A. Correct. But sometimes they don't go
12 out. It could be attached. It could be a draft.
13 It could be a -- But if it shows that it went out,
14 then it went out.

15 Q. This was to -- This one is to the --
16 you-all are sending it to the bbrennan --

17 A. Oh, Brian Brennan, yeah.

18 Q. He's the city council member?

19 A. Correct.

20 Q. So you sent them drafts of your blasts?

21 A. No. What I'm saying is that when a
22 draft is sent before it goes out. And so but if
23 it's got Brian Brennan's name on it, it went out.

24 Q. It went out. That's just --

25 A. That means it went to individuals

1 besides internal.

2 Q. All right. And I want to talk to you
3 about the Isis Parade. Remember you did cleanup
4 for them or for the City of Kenner?

5 A. I did. You mean for Visit Kenner?

6 Q. Visit Kenner. I apologize. I got ahead
7 of myself.

8 I'm going to show you what I marked as
9 Exhibit 104, which is a copy of a lawsuit that IV
10 Waste filed this month against Lee Zurik and Gray
11 Media Group.

12 (Document marked for identification as
13 Exhibit 104.)

14 EXAMINATION BY MR. MCGOEY:

15 Q. You're familiar with the lawsuit?

16 A. Yes.

17 MR. MCGOEY:

18 Oh, sorry. Did you catch any of
19 it?

20 EXAMINATION BY MR. MCGOEY:

21 Q. So IV Waste sued Mr. Zurik and Gray
22 Media this month in St. Bernard; is that right?

23 A. Correct.

24 Q. And you on the last page of this
25 verified it? You signed a verification?

1 A. Yes, sir.

2 Q. Saying that the allegations contained
3 therein are true and correct to the best of your
4 knowledge, information, and belief?

5 A. Yes, sir.

6 Q. So you reviewed this petition before it
7 was filed?

8 A. Yes, sir.

9 Q. And then you verified to the best of
10 your knowledge these are accurate?

11 A. To the best of my knowledge.

12 Q. Great. Can you look at paragraph 25?
13 There's several statements in there concerning the
14 Isis Parade that I want to ask you some questions
15 about.

16 A. Sure.

17 Q. So paragraph 25 states, "There were
18 numerous false statements and inaccuracies in the
19 May 10, 2022 televised report, and Zurik and FOX 8
20 knew it. At a minimum, they published the
21 inaccurate statements with a high degree of
22 awareness of their probable falsity. First, there
23 was no public bid, nor was one required because
24 the contract for the parade cleanup was not with
25 the City of Kenner, but with a private nonprofit

1 corporation, Visit Kenner, Inc." IV -- Visit
2 Kenner, Inc., period.

3 So that's a sentence I want to ask you
4 about first. So you say IV had a contract for the
5 parade cleanup, not with the City of Kenner, but
6 with Visit Kenner, Inc.?

7 A. There was a -- Visit Kenner, Inc. paid
8 us to do the job.

9 Q. Yeah. I'm asking you who your
10 contract -- This doesn't talk about payment. It
11 says there was a contract for parade cleanup with
12 the -- not with the City of Kenner, but with a
13 private non-profit corporation, Visit Kenner,
14 Inc.?

15 A. Correct.

16 Q. So IV Waste had a contract with Visit
17 Kenner, Inc.?

18 A. It gave them a proposal and that's what
19 they told us to perform.

20 Q. So there was no written contract between
21 Visit Kenner, Inc. and IV Waste; is that right?

22 A. There was a proposal that was sent to
23 them that I guess was the contract.

24 Q. Okay. So the proposal that IV sent you
25 believe was what you're referring to here as the

1 contract for parade cleanup?

2 MS. THORNTON:

3 I'm going to object to the extent I
4 think you are asking for some legal
5 conclusions, but this is Mr. Torres's
6 understanding.

7 THE WITNESS:

8 My understanding is what I said
9 that --

10 EXAMINATION BY MR. MCGOEY:

11 Q. You didn't have a separate written
12 contract with Visit Kenner, Inc. You just sent
13 them a proposal, and that's what you believe your
14 contract was?

15 A. But they accepted it as the proposal as
16 the work that had to be done that they were going
17 to pay us for, so I consider that as a contract.

18 Q. Fair enough. Tell me who IV Waste dealt
19 with with Visit Kenner, Inc. to negotiate the
20 contract.

21 A. We were -- There was the City of
22 Kenner -- I think it was Leigh Roussel forwarded
23 the information to us as far as the City of Kenner
24 and said deal with them as far as the cleanup
25 goes.

1 Q. Okay. So you understood Leigh Roussel
2 to work for Visit Kenner, Inc.?

3 A. No.

4 Q. Who did she work for?

5 A. That's where I'm saying -- That's where
6 I'm saying the information came on what we needed
7 to provide as far as the information that they --
8 the cleanup, for the cleanup.

9 Q. Got you. So you spoke to Leigh
10 Roussel about --

11 A. I didn't. I didn't speak to Leigh
12 Roussel.

13 Q. Who spoke to Leigh Roussel?

14 A. I don't know. She was the one that the
15 information came from. I saw her name on the
16 email where the information came from for Visit
17 Kenner, Inc.

18 Q. Did you ever have a conversation with
19 anyone that worked for Visit Kenner, Inc.?

20 A. Not me personally, but my office.

21 Q. Okay. Who in your office do you believe
22 spoke to someone associated with Visit Kenner,
23 Inc.?

24 A. I'm not sure.

25 Q. Well, who in your office was responsible

1 for negotiating the contract?

2 A. It probably was Julie would be dealing
3 with them.

4 Q. Okay. Anyone else besides Julie?

5 A. No.

6 Q. All right. So you were talking earlier
7 about Leigh Roussel provided something. Ms.
8 Roussel worked for the City of Kenner, right?

9 A. To my knowledge.

10 Q. And what do you believe she provided you
11 concerning the parade cleanup?

12 A. The requirements of what they needed.

13 Q. The requirements of who needed?

14 A. Like the time --

15 Q. Visit Kenner, Inc.?

16 A. Correct.

17 Q. All right. Did she give you anything in
18 writing for the requirements that Visit Kenner,
19 Inc. had?

20 A. Yeah. You saw the evidence that they
21 gave us a proposal, the copy of the Ramelli
22 proposal.

23 Q. Okay. So I'm getting a little confused.
24 So Ms. Roussel gave you the requirements that
25 Visit Kenner, Inc. for the cleanup, and that was

1 Mr. Ramelli's proposal?

2 A. The requirements came from her. I don't
3 know if it was his proposal or not, but the
4 requirements came from her.

5 Q. All right. Were those in writing
6 anywhere?

7 A. To my recollection, that's what I'm
8 saying, it was -- she had given it to us, whether
9 it was through email, in writing, and said deal
10 with Visit Kenner, Inc. because it was separate
11 from the City of Kenner.

12 Q. Got you. Okay. So at some point Ms.
13 Roussel in the negotiations said, "Here's Visit
14 Kenner, Inc.'s requirements. Deal with Visit
15 Kenner, Inc. on this"?

16 A. To my understanding.

17 Q. All right. But you never had any
18 conversations with anyone associated with Visit
19 Kenner, Inc. Is that accurate?

20 MS. THORNTON:

21 Object to form.

22 THE WITNESS:

23 Me personally, I didn't talk to
24 anybody with Visit Kenner, Inc.

25 EXAMINATION BY MR. MCGOEY:

1 Q. Okay. And the only person that you're
2 aware of at IV that may have spoken to someone
3 with Visit Kenner, Inc. was Julie Tufaro?

4 A. To my understanding.

5 Q. So when you say you had a contract, IV
6 had a contract for parade cleanup with Visit
7 Kenner, Inc., you have no firsthand knowledge of
8 that. Is that fair to say?

9 A. Can you repeat that again?

10 Q. Yeah. When you say in your lawsuit in
11 paragraph 25 that "The contract for the parade
12 cleanup was not with the City of Kenner, but with
13 a private non-profit corporation, Visit Kenner,
14 Inc. --"

15 A. That's correct.

16 Q. -- you had no firsthand knowledge of who
17 IV Waste had a contract with. Is that accurate?

18 MS. THORNTON:

19 Object to form.

20 THE WITNESS:

21 Yeah. No, we were dealing with
22 Visit Kenner, Inc. I don't know who --
23 I guess Julie was dealing with them, but
24 that's who we were dealing with.

25 EXAMINATION BY MR. MCGOEY:

1 Q. I understand you're saying you think Ms.
2 Tufaro had dealings with Visit Kenner, Inc. I'm
3 here deposing Mr. Torres today, and I want to know
4 what you can testify to.

5 A. I just testified. I just testified to
6 it.

7 Q. Okay. And I thought your testimony was
8 is you never had one conversation with anyone at
9 Visit Kenner, Inc. Was that not your testimony?

10 A. I didn't, but my office -- I said my
11 office did.

12 Q. Okay.

13 A. And I think it was Julie.

14 Q. All right. Were you there when Ms.
15 Tufaro spoke with someone with Visit Kenner, Inc.?

16 A. No.

17 Q. Fair enough. So you have no firsthand
18 knowledge that IV Waste had a contract with Visit
19 Kenner, Inc.?

20 MS. THORNTON:

21 Object to form.

22 THE WITNESS:

23 Based off of the contract that
24 we -- the proposal we gave them, that
25 was talked to Julie -- I talked to Julie

1 about it.

2 EXAMINATION BY MR. MCGOEY:

3 Q. Fair enough. So Julie told you that she
4 submitted a proposal to Visit Kenner, Inc.?

5 A. Correct, yes.

6 Q. All right. Did she tell you who she
7 sent the proposal to with Visit Kenner, Inc.?

8 A. I don't recall.

9 Q. What else did Ms. Tufaro tell you about
10 her discussions with Visit Kenner, Inc.?

11 A. That's -- I mean basically that they
12 wanted it cleaned and they wanted it cleaned well
13 and they wanted more equipment and they needed
14 more manpower. And so I said do whatever we've
15 got to do to do a good job.

16 Q. All right. So you believe that the
17 proposal that IV Waste submitted was the contract
18 with Visit Kenner, Inc.?

19 MS. THORNTON:

20 Object to form.

21 EXAMINATION BY MR. MCGOEY:

22 Q. That's your understanding; is that
23 right?

24 MS. THORNTON:

25 Object to form.

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THE WITNESS:

Yeah, to my recollection.

EXAMINATION BY MR. MCGOEY:

Q. All right. I'm going to show you what I'm going to mark as Exhibit 19, which is, I believe, the IV Waste proposal. Can you confirm that to be the case?

A. Yes.

Q. So on January 30, 2020, Ms. Tufaro e-mailed Chad Pitfield with the City of Kenner; is that correct?

A. That's what the email says, yes.

Q. And she says, "Good evening, Mr. Pitfield. It is our hope that we can assist you with the parade cleanup for Isis in the City of Kenner. Please feel free to contact me with any questions. Thank you, Julie." Did I read that correct?

A. Correct, yes.

Q. And then attached to it is an IV Waste proposal that's on IV Waste letterhead?

A. Correct.

Q. Would you have reviewed this before Ms. Tufaro sent it out?

A. I don't recall, but I'm sure I looked at

1 it.

2 Q. Would she have had authority to enter
3 into a contract for 15,000 bucks without your
4 approval?

5 A. Yeah, she would have the authority.

6 Q. But in this scenario you recall that you
7 reviewed the proposal?

8 A. I said I recall -- I think I recall us
9 talking about it because I did tell her I want to
10 do a great job. But --

11 Q. The proposal dated January 30, again, is
12 directed to Chad Pitfield, Director of Kenner
13 Parks and Recreation Department; is that correct?

14 A. Yes.

15 Q. All right. I don't see anywhere in this
16 proposal Visit Kenner, Inc. mentioned. Is that
17 accurate? Is Visit Kenner, Inc. mentioned
18 anywhere in IV's proposal?

19 A. Not -- It just says Isis cleanup parade,
20 and it was directed to the Parks and Parkway --
21 Parks and Parkway Recreation Department, Chad
22 Pitfield.

23 Q. Sir, if you can answer my question.

24 A. No, I don't see Visit Kenner, Inc. on
25 the proposal.

1 Q. But this document, Exhibit 19, your
2 January 30, 2020 proposal is what you believe is
3 the contract you had with Visit Kenner, Inc.?

4 A. To my recollection.

5 Q. And going back to paragraph 25 of your
6 lawsuit, you then say, "IV Waste told Zurik that
7 in writing before the report aired." So you told
8 Mr. Zurik that IV had a contract with Visit
9 Kenner, Inc., not with the City of Kenner"?

10 A. My lawyer did.

11 Q. Okay. And then it says, "Accordingly,
12 IV Waste did not receive 'public dollars.' It was
13 paid by Visit Kenner, Inc., which is funded by
14 various means, including private donations, a fact
15 that is publicly available." Did I read that
16 correct?

17 A. That's what it says.

18 Q. All right. Tell me what your
19 understanding of where Visit Kenner, Inc. gets its
20 funds.

21 A. Private donors is my understanding,
22 private donors.

23 Q. How did you become aware that private
24 donors fund Visit Kenner, Inc.?

25 A. I don't recall, but I remember knowing

1 that it wasn't the City of Kenner.

2 Q. Are you aware that Visit Kenner, Inc.
3 receives funds from the hotel/motel tax from
4 Jefferson Parish?

5 A. I just recently learned that.

6 Q. So you didn't know that back in January
7 of 2020 when you made the proposal to Mr.
8 Pitfield?

9 A. I'm not saying that. I didn't say that.
10 I said I'm just -- from my recollection that's
11 when I -- it was brought to my attention about
12 that.

13 Q. When was it brought to your attention
14 that Visit Kenner, Inc. received public funds from
15 the hotel and motel tax from Jefferson Parish?

16 MS. THORNTON:

17 Object to form.

18 THE WITNESS:

19 Yeah, I can't recall.

20 EXAMINATION BY MR. MCGOEY:

21 Q. But it wasn't brought -- That wasn't
22 brought to your attention in January of 2020 when
23 Ms. Tufaro made the proposal?

24 A. I knew it wasn't the City of Kenner.

25 Q. Okay. So you knew in January of 2020

1 that you weren't contracting with the City of
2 Kenner for the Isis Parade cleanup?

3 A. I knew that Kenner -- it wasn't part of
4 Kenner -- it wasn't Kenner. It wasn't run by
5 Kenner.

6 Q. My question was, you knew in January of
7 2020 that you weren't contracting with the City of
8 Kenner for the Isis Parade cleanup?

9 A. That's what I'm saying. I said that.

10 Q. That's all I'm trying to confirm. Fair
11 enough. All right. I'm going to show you what
12 I'm going to mark as -- was previously marked as
13 Exhibit 20, which is an email where Chad Pitfield
14 responded to Ms. Tufaro. If you look at her
15 proposal, she sent it on Thursday, January 30th at
16 7:45 p.m., right, the proposal?

17 A. Uh-huh.

18 Q. And then on that Thursday night, I don't
19 know, four hours later Mr. Pitfield responds back,
20 "Thank you. We are definitely looking forward to
21 working together. Can we chat sometime next week
22 just to ensure we're on the same page with
23 everything needed."

24 Were you aware before Ms. Tufaro
25 submitted the proposal that Visit Kenner, Inc. was

1 going to use you for the parade cleanup?

2 A. I didn't -- I don't -- Not to my
3 recollection.

4 Q. Okay. So then is it your understanding
5 that Mr. Pitfield could commit Visit Kenner, Inc.?

6 A. No, not to my understanding.

7 Q. All right. So you believe that in the
8 four hours on a Thursday night after Ms. Tufaro
9 sent this proposal to Mr. Pitfield, that Mr.
10 Pitfield spoke to someone with Visit Kenner, Inc.
11 and got the authority to hire IV?

12 A. I have no idea.

13 Q. Okay. But as of January 30th, 2020, at
14 2205 p.m., it was your understanding that IV Waste
15 was going to do the parade cleanup?

16 A. Again, I don't recall.

17 Q. Well, when did you learn you had got the
18 contract?

19 A. I don't remember the dates.

20 Q. How did you learn you got the contract?

21 A. When I was told that we have to prepare
22 to do it.

23 Q. Who told you you had to prepare to do
24 it?

25 A. I think it was Julie.

1 Q. Okay. Do you know how Julie came to
2 find out, other than this email from Mr. Pitfield
3 saying, "We are definitely looking forward to
4 working together"?

5 A. I don't.

6 Q. But it's your testimony that you didn't
7 already have this contract in your pocket?

8 A. I don't recall.

9 MS. THORNTON:

10 Object to the form.

11 THE WITNESS:

12 I don't recall.

13 EXAMINATION BY MR. MCGOEY:

14 Q. Now, before Ms. Pit -- I mean Ms. Tufaro
15 prepared and sent the proposal, you said you had
16 reviewed it, right?

17 A. She had gone over with me the equipment
18 stuff.

19 Q. And before that Mr. Pitfield had sent
20 you my client's proposal to do the work, right?

21 A. He sent a copy of -- He sent it to a few
22 people, I think, or people he was looking to try
23 to get to do the work, from my understanding.

24 Q. All right.

25 A. And I don't know. He might have even

1 sent ours to people. I don't know.

2 Q. Here's Exhibit 22, which was previously
3 marked. This is an email from about a week
4 before; is that right?

5 A. Uh-huh.

6 Q. January 21, nine days before IV's
7 proposal Mr. Pitfield sends you my client's
8 proposal. Is that fair to say? Is that accurate?

9 A. It says Ramelli Group on it.

10 Q. Yeah. And your testimony was you
11 believed he sent my client's proposal to other
12 people as well?

13 A. I mean -- I guess what I'm saying is I
14 don't know if he sent mine to other people. I
15 don't know what he was doing, but he was trying
16 to, I guess, just forwarding the information
17 around for the city, Visit City of Kenner.

18 Q. Okay. It says on the first page, "Per
19 your conversation with Ms. Roussel, please see
20 attached proposal from Ramelli." Had you asked
21 Ms. Roussel to give you a copy of Mr. Ramelli's
22 proposal?

23 A. I don't remember asking for it.

24 Q. Do you recall Ms. Roussel just
25 volunteering that she would give you a copy of Mr.

1 Ramelli's proposal?

2 A. I think or from what I can recall, we
3 had a conversation and they said they want it to
4 be like the French Quarter clean. They wanted it
5 to look like I used to clean and smell like the
6 Quarter. That's what they kept saying. They
7 wanted it to be -- smell good and clean.

8 Q. And so to get it to smell good and clean
9 you needed to see what Mr. Ramelli's proposal was?

10 A. No. They were saying that they were not
11 happy with the -- what it was before and they want
12 it to be clean. They want to get a company and
13 they are talking to multiple companies about
14 possibly -- Visit Kenner was talking to multiple
15 companies about getting someone. From there I
16 dont know what they did with it.

17 Q. And, again, when you were referring to
18 Visit Kenner, Inc. you can't as of -- as of
19 sitting here today, you can't identify one person
20 who is associated with Visit Kenner, Inc.?

21 A. I mean I have a lot of customers. I
22 don't deal with every one of my customers. You
23 know, we have a lot of people, so I rely on my
24 people to deal with that. So Julie was the one
25 that was dealing with it.

1 Q. All I asked was, sir, as of today, May
2 of 2023, you can't identify one person that works
3 for Visit Kenner, Inc., can you?

4 A. I didn't deal with them.

5 MS. THORNTON:

6 Object to form. Go ahead.

7 THE WITNESS:

8 I didn't deal with them.

9 EXAMINATION BY MR. MCGOEY:

10 Q. I'm looking for an answer that is very
11 simple and I don't think you contest it, but for
12 some reason you just won't answer the question.

13 MS. THORNTON:

14 He's already answered the question
15 like three times.

16 EXAMINATION BY MR. MCGOEY:

17 Q. As we sit here today in May of 2023, you
18 cannot tell me the name of one person associated
19 with Visit Kenner, Inc., correct?

20 A. I just told you I didn't deal with them.
21 My office did. So I didn't deal with anybody from
22 Visit Kenner, Inc. My office did.

23 Q. So you can't identify anyone, right?

24 A. If I didn't deal with them, how would I
25 be able to identify who was there if I didn't deal

1 with them, right?

2 Q. Fair enough. In paragraph 25 of the
3 lawsuit you filed against FOX 8 it states,
4 "Non-confidential proposals were solicited from at
5 least three vendors, including Ramelli." What
6 other vendors did Visit Kenner, Inc. solicit
7 proposals from?

8 A. I don't remember who.

9 Q. Did Mr. Pitfield provide you with the
10 other vendor's proposal?

11 A. Not to my knowledge.

12 Q. Were you aware that the other vendor was
13 River Parish?

14 A. No.

15 Q. Were you aware that the other vendor's
16 bid was higher than Mr. Ramelli's?

17 A. No, I don't remember.

18 Q. Okay. It goes on to state, "--
19 including Ramelli, and IV Waste was chosen because
20 it was lower and provided more labor and equipment
21 than Ramelli's." Did anyone with Visit Kenner,
22 Inc. tell you they chose IV Waste because your
23 proposal was lower?

24 A. Like I said, my office -- Julie was
25 dealing with that, so you would have to ask her.

1 Q. All right. So then this statement in
2 paragraph 25, you can't -- you have no firsthand
3 knowledge of why IV Waste was chosen?

4 A. If I can recall, she did mention that
5 they liked our proposal because we had the most
6 equipment, but --

7 Q. Would you agree with me, once you were
8 provided with Mr. Ramelli's proposal, it was
9 within your power to submit a bid that was lower
10 than his proposal?

11 A. You can't even compare the bids. We had
12 different equipment and different offerings than
13 what he offered.

14 Q. I know it's difficult for you to
15 compare, but did Mr. Ramelli propose a price to do
16 the work?

17 A. It's not difficult. You have my
18 proposal in front of you?

19 Q. Yes, I do.

20 A. Can I have a copy of it?

21 Q. You should have it. Here it is right
22 there.

23 A. We had a --

24 Q. Let's just start --

25 A. We had a three -- We had a sweeper, a

1 three-wheeler street sweeper. It's a lot. It's
2 an expensive machine. He didn't have that. We
3 had 20 laborers. He had 15. We had two \$300,000
4 rear load garbage trucks, 150 trash boxes. That
5 was the same with what he had. But it was a way
6 more offering here than here. It cost a lot more.

7 Q. Got you. Would you agree that once you
8 saw Mr. Ramelli's proposal, you could 100 percent
9 certain submit a bid that was lower than his
10 proposal? Would you agree with that for price?

11 A. I knew that I could offer better
12 equipment and a better job, and that's what we
13 did. I didn't deal with his proposal. That's
14 what I offered to the city, to Visit Kenner, Inc.

15 Q. You don't dispute you had seen Mr.
16 Ramelli's proposal before you -- before Ms. Tufaro
17 submitted her proposal, do you?

18 A. I did see it, yes.

19 Q. And you knew that you were offering a
20 price lower than what your competitor had offered,
21 right?

22 A. We offered a price that we knew we could
23 make money and do the job.

24 Q. Which was lower than Mr. Ramelli?

25 A. It had nothing to do with Mr. Ramelli.

1 It had to do with what we offered.

2 Q. Okay. And once you saw Mr. Ramelli's,
3 could you then know what to include that would
4 provide more services than what he offered?

5 A. I wouldn't -- I'm not going to do a job
6 unless I can do it right, so I needed to offer the
7 equipment that I knew I could do the job with to
8 do it right.

9 Q. Did it help IV in getting a proposal
10 price lower than Ramelli's price? Did it help you
11 to have his proposal?

12 A. No.

13 Q. Did it help IV to offer more services
14 than Ramelli was offering to have his proposal?

15 A. Again, like I said, I wasn't going to
16 take the job on without doing it the right way.
17 So that's why I offered what I thought I needed to
18 offer to get it done.

19 Q. Going back to your conversations about
20 what you understood Visit Kenner, Inc. needed to
21 clean up, did they not have specifics in number of
22 trash boxes, equipment that they wanted to clean
23 up?

24 A. I don't know. You would have to ask
25 them.

1 Q. Well, you testified earlier about Visit
2 Kenner giving -- Leigh Roussel telling you what
3 their requirements were.

4 A. So what's your question?

5 Q. What were the requirements?

6 A. I don't -- At the time it was a certain
7 time, you had to follow the parade, and you had to
8 meet in a certain place. There were certain
9 things like that that we had to know to put this
10 together.

11 Q. All right. Now, IV Waste does a lot of
12 work for the City of Kenner. Is that accurate?
13 You do the garbage pickup?

14 A. I mean whatever we contracted for we do.

15 Q. You used to do recycling, right?

16 A. We did recycling, yes.

17 Q. All right. And you submit invoices to
18 City of Kenner every month for the work you do for
19 the City of Kenner?

20 A. My office did, yes.

21 Q. All right. I'm going to show you what
22 I'm going to mark as Exhibit 105 and ask you to
23 take a look at that.

24 (Document marked for identification as
25 Exhibit 105.)

1 EXAMINATION BY MR. MCGOEY:

2 Q. Can you tell me what Exhibit 105 is?

3 A. It looks like one of our invoices to the
4 City of Kenner.

5 Q. Okay. And how do you know that this
6 invoice is an invoice addressed to the City of
7 Kenner?

8 A. How do I know?

9 Q. Yeah.

10 A. It says City of Kenner.

11 Q. Got you. So it's addressed on the
12 bottom City of Kenner, 1905 24th Street.

13 A. It's the address up here and the City of
14 Kenner up here.

15 Q. Got you. So you put the address of the
16 customer in the middle of the description as well
17 as at the bottom. I guess do you mail this?

18 A. I don't really deal with this. Like I
19 said, the billing department does, so I'm just
20 saying you asked me to -- I'm reading what's on
21 here, but, I mean, they send this out to all of
22 our customers, our commercial customers.

23 Q. And do you also assign a customer number
24 to each of your customers?

25 A. That would have to be something you

1 would have to ask my accounting/billing office.

2 Q. Well, up at the top right doesn't it
3 have a customer number 001396?

4 A. It says customer PO.

5 Q. No, the top line.

6 A. Yeah, customer number. Yes, it does say
7 customer number.

8 Q. So am I right in reading this that your
9 billing soft -- IV Waste billing software
10 identifies the City of Kenner as customer number
11 001396?

12 MS. THORNTON:

13 Object to form.

14 THE WITNESS:

15 I don't know. You would have to
16 ask my billing department.

17 EXAMINATION BY MR. MCGOEY:

18 Q. So as you sit here today, you don't know
19 that that's Kenner's contract number -- customer
20 number?

21 A. I mean you're handing me this. It
22 obviously is from my office. It has a customer
23 number on it. But, like I said, I don't handle
24 the billing side of this. You would have to talk
25 to the person that does.

1 Q. Who would I talk to that was responsible
2 for this --

3 A. Julie Tufaro.

4 Q. Julie Tufaro. All right. So I get
5 this -- So I understand this, Julie Tufaro submits
6 a proposal to Chad Pitfield who works for the City
7 of Kenner, right?

8 A. I don't know. You would have to ask
9 her.

10 Q. You didn't know Chad Pitfield worked for
11 the City of Kenner?

12 A. No, no. I know he works for the
13 recreation department for the City of Kenner,
14 yeah.

15 Q. And you know Mr. Pitfield she submitted
16 the proposal to, right?

17 A. That's what the email shows, that she
18 emailed it to him.

19 Q. But you say that that proposal was
20 actually to Visit Kenner, Inc. you believe?

21 A. We did the work for Visit Kenner and we
22 were paid by Visit Kenner, Inc. I always look to
23 see who pays. Visit Kenner, Inc. paid me.

24 Q. How about we see who you billed? Would
25 that indicate who you think -- you thought you did

1 work for?

2 A. It's who paid.

3 MS. THORNTON:

4 Object to form.

5 THE WITNESS:

6 That's who paid. It's who paid,

7 Visit Kenner Inc. That's who paid.

8 EXAMINATION BY MR. MCGOEY:

9 Q. Okay. Well, let's see. I'll show you
10 what I'm going to mark as Exhibit 106, which is an
11 email dated February 25, 2020 from you to Julie
12 Tufaro. Take a look at that.

13 (Document marked for identification as
14 Exhibit 106.)

15 EXAMINATION BY MR. MCGOEY:

16 Q. The subject line is St. Bernard and
17 Kenner Parade Invoices.

18 A. Uh-huh.

19 Q. You say, "St. Bernard parade was almost
20 three weeks ago and we still haven't invoiced
21 them."

22 A. Correct.

23 Q. "I want both invoices done today so I
24 can submit tomorrow morning."

25 A. Uh-huh.

1 Q. So am I reading this right, on February
2 25th you instructed Julie to submit an invoice for
3 the Isis Parade cleanup?

4 A. I told -- The subject line is city --
5 St. Bernard and Kenner, and I said -- I was upset
6 that St. Bernard was not submitted -- was not
7 submitted for almost three weeks. I wanted that
8 invoice done.

9 Q. And so did Ms. Tufaro follow your
10 instructions and prepare an invoice for the
11 cleanup for the city -- for the Isis Parade?

12 A. I don't recall. If you have an email to
13 show me, I'll look at it.

14 Q. I will. I'll show you what I'm going to
15 mark as Exhibit 107, which is an invoice dated,
16 coincidentally, February 25th, 2020, the same day
17 you emailed her telling her to get out an
18 invoice --

19 (Document marked for identification as
20 Exhibit 107.)

21 THE WITNESS:

22 This was 2025.

23 EXAMINATION BY MR. MCGOEY:

24 Q. 2025, that's when that invoice is, the
25 year 2020. This invoice says it's for the Isis

1 Parade cleanup, right?

2 A. That's what it says, yes.

3 Q. Yeah. And the two locations what we
4 looked at in Exhibit 105 when you told me that
5 bill was for the City of Kenner, those same two
6 locations on Exhibit -- this Exhibit 107 for the
7 Isis Parade, City of Kenner is listed in both of
8 those same spots, right?

9 A. It has the address and it says City of
10 Kenner.

11 Q. So -- And then it has the same customer
12 number up at the top right, correct, 001396?

13 A. Yeah, same customer number.

14 Q. So is it accurate to say that in the IV
15 Waste billing system it billed the City of Kenner
16 for the Isis Parade cleanup?

17 A. No, it didn't.

18 MS. THORNTON:

19 Object to form.

20 THE WITNESS:

21 This was an accident. It shouldn't
22 have happened like this because Visit
23 Kenner is who we were working for, and
24 that's who we got paid from. We have
25 canceled checks from Visit Kenner. You

1 know, mistakes happen. The fact that it
2 went on this account number, but, I
3 mean, the idea -- Visit Kenner paid us
4 for this and that's who we were working
5 for.

6 EXAMINATION BY MR. MCGOEY:

7 Q. So when did you learn you had mistakenly
8 billed the City of Kenner instead of Visit Kenner,
9 Inc.?

10 MS. THORNTON:

11 Object to form.

12 THE WITNESS:

13 When did I mistakenly -- I mean I'm
14 just seeing this here right now.

15 EXAMINATION BY MR. MCGOEY:

16 Q. So before today you weren't aware that
17 you had submitted the bill to the City of Kenner?

18 A. I know that Visit Kenner, Inc. paid the
19 check because that's who we had to go pick it up
20 from them.

21 Q. My question was about your invoice.

22 A. Yeah.

23 Q. Before -- Is right now in this
24 deposition the first time you're learning that IV
25 Waste billed customer 001396, the City of Kenner,

1 for the Isis Parade cleanup?

2 MS. THORNTON:

3 Object to form.

4 THE WITNESS:

5 I mean from what I can recall, like
6 I said, I might have seen it before, but
7 looking at it here it's wrong. It's not
8 accurate.

9 EXAMINATION BY MR. MCGOEY:

10 Q. How do you know it's wrong?

11 A. Because Visit Kenner paid us and that's
12 who we did the work for. I know what you're
13 trying to get at, but it's not the truth. The
14 truth is that Visit Kenner hired us to do the work
15 and we did the work for Visit Kenner.

16 Q. Were you aware that after you submitted
17 the bill to the City of Kenner for the Isis Parade
18 cleanup, the City of Kenner's CFO reached out to
19 IV and said, "We can't pay you until you fill out
20 a vendor packet form"?

21 A. I'm not aware of that.

22 Q. All right. Well, let me shed some light
23 on it for you. I'll show you what I'm going to
24 mark as Exhibit 108, which is a March 2nd, 2020
25 email from Elizabeth Herring to Julie Tufaro.

1 (Document marked for identification as
2 Exhibit 108.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. So two days after you invoice the City
5 of Kenner for the Isis Parade, Ms. Herring -- Have
6 you dealt with her before?

7 A. I met her.

8 Q. She's responsible for paying IV Waste
9 bills with the City of Kenner; is that right?

10 A. I met her a couple times. Yeah, she
11 works there now.

12 Q. She says, "Hello, Julie. I hope you can
13 help me. Mike forwarded me the invoice for the
14 parade cleanup and I was wondering if you could
15 fill out a vendor packet. I've also included our
16 EFT authorization form, if you are interested in
17 receiving funds from us electronically."

18 Were you not aware that in response to
19 you billing -- IV billing the City of Kenner for
20 the Isis Parade cleanup, the City of Kenner said
21 you need to fill out a vendor packet form?

22 MS. THORNTON:

23 Object to form.

24 THE WITNESS:

25 I'm not aware of that and, like I

1 said, Visit Kenner paid us.

2 EXAMINATION BY MR. MCGOEY:

3 Q. But that's not what your lawsuit said.
4 Your lawsuit said that your contract was with
5 Visit Kenner, right?

6 A. When we sent it to Visit Kenner, that's
7 what it was for. The purpose was for Visit
8 Kenner, and that's who paid us.

9 Q. Who's Stacey Trahan?

10 A. Don't know.

11 Q. You don't know that she works for you?

12 A. No.

13 Q. She works at IV Capital?

14 A. What's her title?

15 Q. I don't know. I'll find out. I'll show
16 you what I'm going to mark as Exhibit 109, which
17 is an email from Stacey Trahan with ST -- STD IV
18 Capital.

19 A. STD?

20 MS. THORNTON:

21 SDT.

22 EXAMINATION BY MR. MCGOEY:

23 Q. SDT, sorry.

24 A. STD, I don't know.

25 (Document marked for identification as

1 Exhibit 109.)

2 EXAMINATION BY MR. MCGOEY:

3 Q. So have you ever seen Exhibit 109
4 before, which was a March 2nd email where Stacey
5 Trahan is submitting to the City of Kenner the
6 forms that Elizabeth Herring asked you-all to fill
7 out to get paid?

8 A. I see where she says that she completed
9 and sent. It just says Kenner-EFT.pdf. That's
10 the attachment. It says Kenner auto draft and
11 February POs, so it was multiple POs.

12 Q. Does this refresh your recollection as
13 to who Stacey Trahan was?

14 A. She -- It looks like she was working in
15 the front office.

16 Q. For IV Waste?

17 A. I think IV -- She works for IV Capital.
18 She used to work for IV Capital too. She's no
19 longer with us.

20 Q. I had another invoice that IV submitted
21 to the City of Kenner. Take a look at this one.
22 I'm going to mark it as Exhibit 110.

23 (Document marked for identification as
24 Exhibit 110.)

25 EXAMINATION BY MR. MCGOEY:

1 Q. This is a May 31, 2021 email. Do you
2 recognize who the customer is for this invoice?

3 A. It says City of Kenner.

4 Q. Okay. And it has that same customer
5 number that we looked at on the prior two invoices
6 for the City of Kenner, 001396?

7 A. Yes.

8 Q. And this invoice is for street sweeping?

9 A. Uh-huh.

10 Q. \$1500 a day.

11 A. Fifteen thousand -- Oh, 1500, yeah.

12 Q. 1500 a day. What was this invoice for?

13 A. The City of Kenner's sweeper was broken,
14 and they had asked us if we could help clean the
15 main thoroughfares off of Williams, all the main
16 thoroughfares on Friday, Saturday, and Sunday.
17 And it would vary from days what schedule,
18 depending when they would ask us, whatever days
19 they would ask us to do it.

20 And they wanted us every week and every
21 weekend to work based off of what they kind of
22 told us where to go and what to do. So until
23 their sweeper was fixed, we were told that they
24 didn't have a sweeper and they didn't have labor,
25 so they wanted us to help them with that.

1 Q. Is it accurate in saying that you didn't
2 have a written contract with the City of Kenner
3 for the street sweeping?

4 MS. THORNTON:

5 Object to form.

6 THE WITNESS:

7 To me they gave us a PO, and we
8 have -- I know we have evidence of a PO.

9 EXAMINATION BY MR. MCGOEY:

10 Q. So now I'm going to show you that
11 payment that we've been talking about a lot. It's
12 a check from Visit Kenner, Inc. dated March 16,
13 2020. I'm going to mark that as Exhibit 111.

14 (Document marked for identification as
15 Exhibit 111.)

16 EXAMINATION BY MR. MCGOEY:

17 Q. Is this the check that paid IV for the
18 parade cleanup?

19 A. Yes, Visit Kenner, Inc.

20 Q. And based upon this check from Visit
21 Kenner, Inc., that's the sole basis for your
22 statement that you had a contract with Visit
23 Kenner, Inc.?

24 MS. THORNTON:

25 Object to form.

1 THE WITNESS:

2 I don't know if it's -- I don't
3 know.

4 EXAMINATION BY MR. MCGOEY:

5 Q. Well, what else do you have from Visit
6 Kenner, Inc. concerning your parade cleanup and
7 the \$15,000 they paid you?

8 A. We sent them the proposal and they
9 authorized us to do it. And they met us out there
10 and they instructed us what to do, cleaning up for
11 the Visit Kenner, Inc.

12 Q. And the people that gave you the
13 proposal and met you out there, they all worked
14 for the City of Kenner?

15 A. No. They were guys that -- they
16 actually represented Visit Kenner, Inc. They were
17 like laborers and supervisors and -- I forgot the
18 guy's name, but he worked with Visit Kenner, Inc.

19 Q. Okay. So now you recall actually
20 meeting someone that worked for Visit Kenner,
21 Inc.?

22 A. He was like a laborer. He wasn't like
23 an administrative person. But when the parade
24 happened, I went out there and he was instructing
25 us where to go and what to do.

1 Q. And he identified himself as being paid
2 by Visit Kenner, Inc.?

3 A. We didn't talk about where he was being
4 paid, but he says that I'm here to tell you what
5 to do and where to go. I work with Visit Kenner,
6 Inc.

7 Q. Got you. So somebody on the parade
8 route told -- had a conversation and told you they
9 worked for Visit Kenner, Inc.?

10 A. Yes. They were telling us what to do.

11 Q. And you don't know who that person's
12 name is?

13 A. I don't recall.

14 Q. All right. Let's talk about Mr.
15 Pitfield. Let's set the record straight on that.
16 How did Mr. Pitfield come to get an email account
17 with IV Waste?

18 A. He -- So when all this stuff was going
19 on in the beginning when we were dealing with all
20 the issues with Kenner, he was -- I was impressed
21 by the way that he -- He was working for the
22 recreational department. And through the process
23 of working with the recreational department, I
24 thought that he was very good with logistics on
25 dealing with all the things that he was --

1 Because COVID had just hit and it was a
2 mess. It was hard to get employees. It was very
3 difficult to get employees and stuff. And we were
4 still able to get the job done, but I just -- You
5 know, we just became friends.

6 And I thought that he was a really -- a
7 guy that we liked working with. He worked long
8 hours and he was -- Even though he was with
9 recreation, he was helping with other parts of the
10 City of Kenner.

11 And we were going to hire him to work
12 for us before he had left as the recreational --
13 before he left the recreational department to go
14 to the position that Ben ultimately appointed him
15 at. And the amount of money that Ben offered him,
16 there was no way that I was going to pay that
17 amount of money to bring him on. We just didn't
18 have it in our budget.

19 So he went to work for -- He switched
20 positions from where he was to go to his new
21 position, and that was the end of it. So I kind
22 of -- We kind of jumped the gun setting up this
23 email because we thought he was going to come on
24 board with us, but he ended up not coming on board
25 with us and that was it.

1 Q. Got you. So you recall that you were
2 impressed with his working in the City of Kenner.
3 And because of that, you decided to try to hire
4 him, and you jumped the gun setting up his email
5 address?

6 A. Yeah. I mean it's very easy to add an
7 email. You know, we're not -- it was -- we
8 thought that it would be -- You know, if he's
9 going to come over, he's going to give his notice
10 and come over. But it ended up where he didn't
11 come over, and then he was helping with the
12 recycling carts with the football kids delivering
13 the recycling carts.

14 And so he helped with that process, and
15 we just thought it would -- we thought he would be
16 a good teammate to come on board, but it ended up
17 not working out and that was the end of it.

18 Q. All right. So is it accurate to say
19 that you opened up an IV Waste account for Mr.
20 Pitfield after you had made the decision to bring
21 him aboard to work for IV?

22 A. I didn't make a decision. We were
23 talking about it and we were going to do it. And
24 then I don't know what -- I can't recall what days
25 or what week or what month, but it was a period of

1 time where we were like we're going to do this.
2 You're going to come over and work -- you know,
3 you're going to leave the recreation department
4 and come work with us. And then it ended up not
5 happening, and the email stopped getting used.

6 Q. But you have no doubt that the email,
7 Mr. Pitfield's IV Waste email account was set up
8 in connection with him coming to work with IV?

9 A. It was set up for him to come -- Yeah,
10 he was going to come work for us, so we set him up
11 an email.

12 Q. And then when he got a better job offer
13 from City of Kenner, your testimony is you
14 couldn't match it, so he decided to stay at the
15 City of Kenner?

16 A. Correct.

17 Q. And at that point you cut off his IV
18 email account?

19 A. Yeah. I mean, I don't know if they cut
20 it off or they discontinued it. But, I mean, we
21 have people that are not there anymore that we
22 still have to cancel emails. But what I'm saying
23 is that there came a time -- you probably -- you
24 have all the emails of when the last email was
25 sent, so we'd have to look around that time.

1 Q. When do you recall the first email being
2 sent to his email?

3 A. I don't recall.

4 Q. I mean are we talking around Hurricane
5 Ida?

6 A. Oh, no.

7 Q. Before that or after that?

8 A. It was before Hurricane Ida.

9 Q. Got you. So was it -- Did Mr. Pitfield
10 get an email, an IV email account before you
11 started picking up garbage on May 1, 2020?

12 A. No, I don't think so.

13 Q. Okay. But it was after you started
14 working for the City of Kenner, and you liked his
15 work and you were discussing bringing him on board
16 that you set up an email account?

17 A. I recall it was months later, yeah.

18 Q. All right. So you don't recall setting
19 up an email account for Mr. Pitfield in the first
20 month that you were there?

21 A. I don't recall.

22 MS. THORNTON:

23 Object to form. Go ahead.

24 EXAMINATION BY MR. MCGOEY:

25 Q. So what communications would you send to

1 Mr. Pitfield at his IV Waste email address?

2 A. I don't know. I mean I know that the
3 recycling carts were sent to the email for the
4 ones that he delivered. I know those were sent.
5 Like when he would help with the kids that were
6 delivering, he would -- They were off for COVID,
7 they were not in school, so they would -- He kind
8 of -- or it was Louis Linn's kids. It was a
9 couple of other kids that were in high school, and
10 he would -- he was handling.

11 Because we had a hard time getting
12 deliveries done with the recycling as much as they
13 were coming in and they were getting delivered.
14 So he was assisting with getting the kids to do
15 that, the high school kids.

16 Q. It's my understanding you were
17 delivering recycle carts the first month you were
18 at the job, May of 2020?

19 A. We delivered recycling carts all the way
20 through. I mean it was constantly coming in and
21 they were delivering them.

22 Q. So you recall setting up an email
23 account in May of 2020 right when you started
24 working?

25 A. I don't recall.

1 MS. THORNTON:

2 Object to form.

3 THE WITNESS:

4 I don't recall. I said within the
5 first few months.

6 EXAMINATION BY MR. MCGOEY:

7 Q. Okay. So in that first month you had
8 decided to -- you liked his work and you were
9 bringing him on -- you wanted to bring him on
10 board IV?

11 A. I said the first few months. I recall
12 it was the first few months.

13 Q. All right. But you recall not giving
14 him an IV email address until after you had worked
15 with him and thought he was doing such a good job
16 and you wanted to bring him on?

17 A. Yeah. After working with him I thought
18 he would be good to our team and come on board.
19 That's what I recall.

20 Q. Okay. I'm looking at the privilege log
21 that your lawyer submitted in this case where you
22 said these emails were privileged and I couldn't
23 see them. And there are numerous emails on June
24 11, 2020 with Mr. Pitfield, cpitfield@ivwaste.com.
25 On June 11, 2020 did Mr. Pitfield work for IV

1 Waste?

2 A. He never worked for IV Waste.

3 Q. So he wasn't someone that you claim any
4 privilege with, did he?

5 MS. THORNTON:

6 Object to form and you're asking a
7 legal conclusion.

8 THE WITNESS:

9 Yeah. I don't know the answer to
10 that question.

11 EXAMINATION BY MR. MCGOEY:

12 Q. Okay. Did you share any secret
13 information with Mr. Pitfield?

14 MS. THORNTON:

15 Object to form.

16 THE WITNESS:

17 What are you talking about, secret
18 information?

19 EXAMINATION BY MR. MCGOEY:

20 Q. I don't know. Your lawyers claim that
21 these emails that you sent to Mr. Pitfield at IV
22 Waste email address are privileged.

23 A. Yeah. I don't know.

24 Q. Okay. Maybe this will help us pin down
25 some dates. So here's an email that I'm going to

1 mark as Exhibit 112, and it's dated June 16, 2020.

2 (Document marked for identification as
3 Exhibit 112.)

4 EXAMINATION BY MR. MCGOEY:

5 Q. So you are emailing Mr. Pitfield about
6 an extra can request; is that right?

7 A. It would be good if we can get the 95
8 gallons knocked out today or tomorrow so we can
9 focus on the recycling cans that he was helping us
10 with with the kids.

11 Q. Got it.

12 A. It says, "I will handle."

13 Q. And so his email in the middle of the
14 page that comes from his IV Waste email address,
15 it's got a signature block under his name and it
16 says IV Waste, LLC. If he didn't work for you,
17 why did his email have an IV Waste, LLC signature
18 block?

19 A. I don't know, but he did not work for
20 me. I never paid him. He never -- He was never
21 paid and he never did work for me.

22 Q. Well that's -- And that's another
23 question I have because I saw it reported in
24 articles that you told reporters that, in fact,
25 you had paid him a \$4,000 check.

1 A. No. You miss -- That was a
2 reimbursement, and I gave -- and every one of
3 those has the kids, Louis Linn's kids, all the
4 serial numbers and the addresses that they
5 delivered. He Venmo'd them the monies that he
6 Venmo'd them, and he got reimbursed for that. So
7 the money he got was a reimbursement.

8 Q. Okay. Well, I appreciate that. That
9 wasn't going to be my question, but I appreciate
10 that. My question was, is did he email you an
11 invoice for \$4,000, a reimbursement?

12 A. A reimbursement. He emailed a
13 reimbursement to get reimbursed for the Venmos
14 that he sent out for the recycling carts that he
15 was delivering.

16 Q. As you can tell, I've been through a lot
17 of emails in this case, and I don't see that that
18 email was produced in this litigation. So my
19 question is, was there an email that he sent you
20 asking for reimbursement?

21 A. I don't know if it was to me, but I know
22 he got reimbursement.

23 Q. Well, do you recall telling WWL and
24 David Hammer that in June of 2020 he used an IV
25 Waste email account to request that you reimburse

1 him for more than 4,000 in expenses?

2 A. Is that what the report says?

3 Q. Yeah, that's what the report says.

4 A. I don't recall if I said that or not.

5 Q. All right. Well, I just marked it as
6 Exhibit 41. Do you recall giving an interview to
7 Mr. Hammer in February of 2022? And,
8 specifically, I'll direct your attention to the
9 third page, but feel free to read the whole report
10 if you want.

11 A. What do you want on the third page?

12 Q. First paragraph, first sentence, "In
13 June of 2020, Pitfield used an IV waste email
14 account in his name to request that Torres
15 reimburse him for more than 4,000 in expenses he
16 incurred in helping get IV Waste established in
17 the city."

18 A. Uh-huh.

19 Q. So my question is, did he submit this
20 reimbursement to you on his email account, IV
21 Waste email account?

22 A. I can't recall, but he might have.

23 Q. Next paragraph says, "Torres said
24 Pitfield used the IV Waste email only briefly."
25 What did you mean by that?

1 A. I mean that once I decided not to hire
2 him; there was no -- there's no point in him
3 having an email because he's not working for me.

4 Q. And you didn't decide not to hire him
5 until Ben Zahn gave him a better offer as a deputy
6 CAO?

7 A. I think that was months or even a year
8 later that that happened. But there was a time
9 where -- I mean I don't know if it was because he
10 was talking to him about it or what happened, but
11 there was a period of time where it kind of just
12 went away. And I know that, you know, he ended up
13 accepting another offer. I don't know the time --
14 I don't recall the time period in between.

15 Q. Right. But you recall when he accepted
16 the other offer is when you made the decision that
17 you couldn't match it, so he wasn't going to work
18 for you?

19 A. Yeah. But I'm saying that I knew for
20 certain 100 percent when I knew what he was going
21 to be offered that I wouldn't do it. But I think
22 if you look at the email trail or you look at the
23 email history, you'll see that the email stopped
24 being used way before that, I think, to my
25 recollection.

1 Q. And you turned it off?

2 A. Like I told you before, we have emails.
3 It might have been turned off. It might still
4 be -- I'm not 100 percent certain about that.

5 Q. How does an email get set up at IV
6 Waste? Who has to do that?

7 A. You just go in the system and you add
8 the person's name. You know, we have an IT
9 person, but, you know, there's other people in our
10 office that can set it up too on our server.

11 Q. Do you know who set up Mr. Pitfield's
12 email?

13 A. I don't recall.

14 Q. You don't recall doing it?

15 A. No.

16 Q. You said in this report, "Chad wasn't
17 working for the Public Works Department when he
18 was helping with the cans." So we're looking
19 at -- We just looked at a June 2020 email telling
20 him to go put out some recycle cans. Who was Mr.
21 Pitfield working for at that time?

22 A. He was working for the recreation
23 department for the City of Kenner.

24 Q. So in your mind there's a distinction
25 between public works and recreation department?

1 A. He wasn't my boss and he was working for
2 the recreation department. And just like a lot of
3 people in Kenner, from my experience and other
4 government agencies too, they all like -- Even in
5 St. Bernard, we have a drop site, there will be
6 government people that will help unload our cans
7 or they will be -- move our equipment if it needs
8 to be moved or fueled.

9 It's not -- like we work as a group, as
10 a team, but it doesn't mean that -- and I know one
11 million percent certain he was never paid and I
12 never gave him anything, you know, of value
13 directly or indirectly or any form. He's never
14 been paid by me. He's never worked for me.

15 Q. Did you ever pay for Mr. Pitfield to go
16 on a trip with his family to Hawaii?

17 A. Absolutely one million percent no. It's
18 a joke. I mean, please.

19 Q. Have you ever been to the Ko Olina --

20 A. No.

21 Q. -- Marriott property?

22 A. Why would I? I have my own resort.

23 Q. Did Mr. Pitfield ever go to your own
24 resort?

25 A. Nope.

1 Q. What about Mr. Zahn?

2 A. Not at all.

3 Q. Are you familiar with a PAC called 100
4 Percent, LLC?

5 A. I'm familiar with it, yes.

6 Q. What's your understanding of that PAC?

7 A. I mean I don't know the details of it,
8 but, I mean, I know that they ran spots recently.

9 Q. Ran spots on what?

10 A. On the reportings that had come out in
11 regards to Kenner and the statements that were
12 made publicly.

13 Q. They ran spots against Mr. Ramelli?

14 A. They ran stories that were ran by some
15 of the things the mayor said by Ramelli, yes.

16 Q. Do you know who produced those videos?

17 A. To my knowledge I think it was Fire on
18 the Bayou.

19 Q. And that's owned by Jason Willemarette?

20 A. Willemarette.

21 Q. Willemarette?

22 A. Yes.

23 Q. And he's one of your partners?

24 A. We own a building. I mean I own 52
25 buildings, I mean, but we own one building

1 together. He has a third of it.

2 Q. And that's who you use for your videos,
3 right?

4 A. Yeah. But he does congressmen. He does
5 a lot of people in Jefferson. He does a lot of
6 people. He doesn't just do me.

7 Q. So how did you come about knowing that
8 Jason was doing a video for 100 Percent PAC
9 against Mr. Ramelli?

10 A. I heard through A.P. Marullo.

11 Q. Okay. And what is Mr. Marullo's
12 involvement with that PAC?

13 A. I have no idea.

14 Q. So what did Mr. Marullo tell you?

15 A. He just said that you're being treated
16 wrong and it's not right and he doesn't agree with
17 it. So that's all he said.

18 Q. So Mr. Marullo told you he didn't think
19 you were being treated right in Kenner, so he was
20 going to start a PAC and run ads against --

21 A. I don't know if he started a PAC or the
22 PAC --

23 MS. THORNTON:

24 Object to form.

25 THE WITNESS:

1 I don't know if the PAC was already
2 established.

3 EXAMINATION BY MR. MCGOEY:

4 Q. Okay. Do you know who else is involved
5 with that PAC?

6 A. I don't.

7 Q. Robert Ellis, do you know Robert Ellis?

8 A. I've heard his name.

9 Q. What does he do?

10 A. I don't know.

11 Q. How have you heard his name?

12 A. Through A.P.

13 Q. Did you understand through -- Did A.P.
14 tell you that Robert Ellis was contributing to
15 that PAC?

16 A. No.

17 Q. What's that?

18 A. No, he didn't.

19 Q. Do you know -- Did Mr. Marullo or A.P.
20 tell you that he was going to contribute to the
21 PAC?

22 A. No, he didn't.

23 Q. Okay. It looks like Robert Ellis, Jr.
24 contributed \$79,500 to the 100 Percent PAC, LLC --

25 A. Okay.

1 Q. -- this year. And as far as I can tell,
2 all they did was run ads. And my assumption is
3 all they ran ads was against Mr. Ramelli. You're
4 not aware of any arrangements or agreements to pay
5 Mr. Ellis back that money?

6 A. Absolutely not.

7 Q. It's just your understanding he decided
8 to contribute close to \$100,000 to a PAC to run
9 ads that attacked your competitor and supported
10 you?

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 I never -- I don't know anything
15 about how they paid, what they paid, or
16 how they paid. I never put any money up
17 at all.

18 EXAMINATION BY MR. MCGOEY:

19 Q. And you just heard about it through Mr.
20 Marullo and Jason who was doing the videos?

21 A. Correct.

22 MR. MCGOEY:

23 All right. Let's take a break.

24 I'm close to wrapping up.

25 THE VIDEOGRAPHER:

1 We're now off the record. The time
2 is 3:55.

3 (Break taken.)

4 THE VIDEOGRAPHER:

5 Returning to the record. It's
6 4:12.

7 EXAMINATION BY MR. MCGOEY:

8 Q. Mr. Torres, getting back to 100 PAC,
9 LLC, what is your understanding of A.P. Marullo's
10 involvement with that PAC?

11 A. I'm not aware of what his involvement is
12 with the PAC. I just know that he is the one that
13 knows the guy that has the PAC.

14 Q. And who do you believe is the guy that
15 has the PAC?

16 A. The name you read, what was his name?

17 Q. Robert Ellis.

18 A. Robert Ellis.

19 Q. Okay. And what about Jude Marullo, is
20 he involved at all in that PAC?

21 A. No.

22 Q. I've got --

23 A. Not that I'm aware of.

24 Q. I've got some questions about a couple
25 of your Facebook posts that are near and dear to

1 my heart because they reference me, I believe, so
2 I want to ask you some questions about that.

3 (Document marked for identification as
4 Exhibit 113.)

5 EXAMINATION BY MR. MCGOEY:

6 Q. So Exhibit 113 looks like a post that --
7 I'm interested in the part on the bottom of the
8 first page that comes from you.

9 A. Uh-huh.

10 Q. That's your post?

11 A. Yes, it is.

12 Q. And the third paragraph says, "Bob
13 Ramelli and his lawyers admitted in open court
14 that they gave a fake dossier to Lee Zurik..."
15 I'm just going to stop right there. Am I the
16 lawyer you're talking about?

17 A. I'm talking about the transcript I read
18 where Judge Sheppard ordered you to turn over what
19 you gave to Lee Zurik.

20 Q. Okay. And you believe you saw a
21 transcript where I said that I gave him a fake
22 dossier?

23 A. No. That's my opinion where I said that
24 you gave him a fake -- My opinion is from the
25 information that I saw on the news that was read,

1 because I didn't watch it, but what I read, the
2 information I read with all that information that
3 he got, emails and all that stuff, was one-sided
4 and I felt fake.

5 But the judge did order you to turn it
6 over, the stuff that you gave to Lee, and you
7 admitted you met with Lee multiple times in open
8 court. Isn't that correct?

9 Q. So you believe I manufactured documents
10 to give to Lee Zurik?

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 What Lee Zurik put on TV was false
15 and it's going to be proven in the
16 court.

17 EXAMINATION BY MR. MCGOEY:

18 Q. I'm not interested in what he put on TV.
19 I'm interested in what you're now telling people
20 that I gave him.

21 A. You admitted you gave it to him.

22 Q. Gave him a fake dossier?

23 A. You admitted you gave him information.

24 Q. Okay. So what information are you aware
25 of that I gave Lee Zurik that was fake?

1 A. The information that Lee put out he got
2 from you and to me it's all lies. It's all lies.
3 It's one-sided. It's all lies.

4 Q. So you believe I gave him actual
5 documents, but you just don't -- you think those
6 documents only tell one side of the story?

7 A. I don't believe. You in court admitted
8 that you met with him multiple times, that you met
9 with him and you gave him information.

10 Q. Correct.

11 A. And we're still waiting on that
12 information, and hopefully you end up turning it
13 over. If not, we're going to get it another way.
14 But what I'm saying to you is that you met with
15 him multiple times pitching him a story that's
16 false. And the stuff that he put out with
17 findings and all this stuff is absolutely false,
18 one-sided, you know. It's absolutely false.

19 Q. As you sit here today, can you tell me
20 one document that I gave Lee Zurik that was fake?

21 A. The stuff that they aired on the 12th
22 that you said we didn't have backup tickets for,
23 that's false. It's false, absolutely false.
24 Visit Kenner is absolutely false. It's absolutely
25 false. It's not -- It doesn't follow the public

1 bid law. There's no such thing as it following
2 the public bid law. It's a private company.

3 And you admitted that you gave him
4 information in open court, and the judge ordered
5 you to turn it over, and we still haven't gotten
6 it all yet.

7 Q. Well, you're wrong on many fronts, but I
8 don't have to testify in this.

9 A. That's your opinion. That's your
10 opinion.

11 Q. But as you sit here today, you can't
12 identify one document that I gave Lee Zurik that
13 you contend is false?

14 A. I just told you.

15 MS. THORNTON:

16 Object to form.

17 EXAMINATION BY MR. MCGOEY:

18 Q. You didn't watch the report, right?

19 A. I read the articles.

20 Q. And in the articles --

21 A. And I saw the emails going back and
22 forth between my lawyer and Zurik, and I could
23 tell that he had given information that was not
24 accurate. I can take that whole folder right
25 there and pick things out of it to create my own

1 narrative if I wanted to, if you wanted to be that
2 type of person. But my point is that you admitted
3 in open court that you gave him -- you met with
4 him multiple times and you've given him
5 information to do these reportings. So, yeah,
6 that's my opinion.

7 Q. How many times did you meet with David
8 Hammer and gave him information about my client?

9 A. I don't even remember. I think one time
10 David was at my office. But I --

11 Q. We looked at two of his articles today.
12 You gave him an email that you sent to Mr.
13 Pitfield where you reimbursed him \$4,000, and you
14 didn't produce that email in this case.

15 A. I don't know if we did.

16 MS. THORNTON:

17 Object to the form.

18 EXAMINATION BY MR. MCGOEY:

19 Q. So you met with David Hammer at least on
20 two occasions and fed him one-sided information to
21 spin a story that you wanted. Is that not right,
22 sir?

23 MS. THORNTON:

24 Objection. Don't answer. You're
25 being way argumentative, and you just

1 mischaracterized what he said also.

2 EXAMINATION BY MR. MCGOEY:

3 Q. Okay. Well, you met with Mr. Hammer in
4 May of 2020, and gave him information that accused
5 my client of committing a crime. Isn't that what
6 your testimony was earlier today, sir?

7 MS. THORNTON:

8 Object to form.

9 THE WITNESS:

10 I told you that the information I
11 gave the city, the city gave that to
12 David. I don't know if they did or
13 they didn't, but I'm pretty sure they
14 did, and that's how David got the
15 information.

16 EXAMINATION BY MR. MCGOEY:

17 Q. And then you spoke with David?

18 A. Dave called me just like Lee Zurik
19 called me.

20 Q. Got you. And did you explain to --

21 A. Just like Joe Cranney called me.

22 Q. Who is Joe Cranney?

23 A. Y'all know -- Come on.

24 Q. Who is Joe Cranney?

25 A. Google Joe Cranney's name. He works for

1 the Times-Picayune.

2 Q. Okay. I'll do that. As you sit here
3 today, can you identify one document that Bob
4 Ramelli fabricated?

5 MS. THORNTON:

6 Object to form.

7 THE WITNESS:

8 Again, I answered that question
9 already.

10 EXAMINATION BY MR. MCGOEY:

11 Q. I'll show you what I'm going to mark as
12 Exhibit 114, which is another one of your Facebook
13 posts. I'll ask you to take a look at that.

14 (Document marked for identification as
15 Exhibit 114.)

16 EXAMINATION BY MR. MCGOEY:

17 Q. You say in the middle of this post,
18 "Bobby Ramelli and his family donated over \$40,000
19 to Mike Glazier for his election." Where did you
20 get that information?

21 A. Secretary of State's site, I think, if I
22 can recall.

23 Q. And so you went on the Secretary of
24 State's website and you found where Mr. Ramelli
25 and his family donated \$40,000 to Mayor Glaser?

1 A. No, I didn't go on there.

2 Q. Who did that?

3 A. I can't recall. I don't know who did
4 it.

5 Q. So you put something in this Facebook
6 post that you're not sure is accurate?

7 A. No. I saw the document from the
8 Secretary of State. I saw a document that showed
9 that those were the donations.

10 Q. To Mike Glaser's campaign?

11 A. Yeah. And Greg Buisson admitted it when
12 we met with him two weeks ago. He admitted it.
13 And Dominick Impastato admitted it as well. He
14 said, "Oh, we didn't know that he gave that much,"
15 you know, when we met with John Litchfield and him
16 about two weeks ago.

17 Q. Tell me about this meeting two weeks ago
18 with Greg Buisson.

19 A. He wanted to try to help resolve the
20 issue and try to get it resolved. So he was -- he
21 basically said that -- so we could get out of
22 Kenner, you know. We just -- We want to just get
23 our cans paid for and get out. We don't even --
24 You know, that was originally. That's off the
25 table now. But that was the deal, and he was

1 trying, and Dominick Impastato was too, they both
2 were together.

3 Q. So who was at this meeting with Mr.
4 Buisson, Dominick Impastato, and you? Anyone
5 else?

6 A. John Litchfield.

7 Q. All right. Anyone else?

8 A. That's it.

9 Q. And this meeting a couple weeks ago --

10 A. It might have been a month ago.

11 Q. A month ago, two weeks ago, a month ago,
12 was for the purposes of trying to resolve your
13 dispute with the City of Kenner?

14 A. Correct.

15 Q. But no one with the Kenner
16 administration was at the meeting?

17 A. No.

18 Q. And no city attorney with the city of
19 Kenner was there?

20 A. My understanding is that they were
21 acting on behalf of as representing them.

22 Q. All right. And what offers were made by
23 Mr. Buisson or Mr. Impastato to you?

24 A. It really wasn't an offer. They were
25 just trying to figure out what would be a way to

1 stop, you know, all this stuff in the press, you
2 know, to put an end to all the stuff in the press
3 and the back and forths and to try to move on
4 to --

5 I mean my business is doing incredible
6 and this is just like an anchor. It's the worst
7 thing in the world. I wish I would have never
8 taken Greg Buisson's call. I really do. But we
9 are where we are right now, and so I welcome
10 anything to try to figure out a way to move on
11 and --

12 I think it was like over a month or two
13 months ago, but basically my position was -- and
14 it's the same position we gave Kenner when we met
15 with Kenner because they were acting in good
16 faith, and we find that they wasn't, getting all
17 this discovery, that they wanted to work with us.

18 So, you know, and then they lied to us,
19 didn't tell us the truth, and we see that now that
20 we got discovery. And I know I shouldn't be
21 saying and talking. I probably should shut up.
22 But I feel like we're towards the end and this
23 whole thing is just a mess.

24 MS. THORNTON:

25 I will counsel you just to answer

1 the questions.

2 THE WITNESS:

3 I know. I know. Sorry.

4 EXAMINATION BY MR. MCGOEY:

5 Q. So back to this meeting with Greg
6 Buisson and Dominick Impastato, you said both of
7 them acknowledged in that meeting that Bob Ramelli
8 and his family had given \$40,000 to Mayor Glaser?

9 A. No. Dominick said he didn't realize
10 that that -- that they did or Greg Buisson. One
11 of them said they didn't realize that he had
12 donated that much.

13 Q. How much of that \$40,000 do you
14 understand went towards a PAC?

15 A. I don't remember. I'd have to look at
16 my notes and what I got when I got all the
17 information from -- with the Secretary of State.

18 Q. So you are aware that the majority of
19 this \$40,000 figure that you claim Mr. Ramelli and
20 his family gave to Mayor Glaser went to a PAC?
21 Are you aware of that?

22 MS. THORNTON:

23 Object to form.

24 THE WITNESS:

25 I mean I'm not -- All I know is

1 that 40,000 of Mr. Bob Ramelli's money
2 went towards helping Glaser get into
3 office.

4 EXAMINATION BY MR. MCGOEY:

5 Q. How much money have you contributed to
6 your PAC, Voice of the People?

7 A. When?

8 Q. Over the course of its career.

9 A. Well, I was going to run for mayor, and
10 we were polling and I had really good polling
11 numbers. And up until the last minute I remember
12 sitting at my kitchen table and I was getting
13 ready to go qualify. And when I decided I wasn't
14 going to do it, I decided to get the message out
15 from the other politicians that were going to run.

16 And one of the candidates that was
17 supposed to show up to a debate at the last minute
18 tried to make it look like I was trying to set her
19 up with the CNN moderator that Greg Buisson was
20 bringing in because he helped with that debate.

21 And I got a little carried away with it
22 probably. So, yeah, I did invest a lot of money
23 because they started to attack me personally. And
24 so, yeah, I did probably put a couple, a few
25 hundred thousand dollars in my PAC to fight back.

1 Q. You didn't spend a million dollars on
2 your PAC?

3 A. Oh, I don't -- not for that race. Not
4 for that race, no.

5 Q. Okay. And that race was the 2017
6 mayoral election?

7 A. That was when I was going to run for
8 mayor.

9 Q. And so you contributed what you recall
10 as several hundred thousand dollars to your PAC,
11 right?

12 A. Yeah, I did.

13 Q. In that PAC you ran articles and ads
14 against Desiree Charbonnet, correct?

15 A. No.

16 MS. THORNTON:

17 Object to form.

18 THE WITNESS:

19 No. That whole thing was set up to
20 do a debate. The debate was like a
21 couple hundred grand. So I think in
22 total -- I don't remember the exact
23 amount, but the majority of the monies,
24 that was spent on the debate.

25 And we did do TV and we did -- you

1 know, we had to fight back to defend
2 myself. But I wasn't with a candidate.
3 I was -- She didn't show up to debate
4 and she made it like I was trying to set
5 her up, so I went against her. But I
6 wasn't with any candidate at that --

7 EXAMINATION BY MR. MCGOEY:

8 Q. Fair enough. Did you -- Is it accurate
9 to say that your PAC spent most of its money
10 advertising against Desiree Charbonnet?

11 MS. THORNTON:

12 Object to form.

13 THE WITNESS:

14 It was against her not showing up
15 to my debate, absolutely not showing up
16 to my debate.

17 EXAMINATION BY MR. MCGOEY:

18 Q. And as a result of the ads that your PAC
19 ran against Desiree Charbonnet, was Mayor Cantrell
20 elected?

21 MS. THORNTON:

22 Object to form.

23 THE WITNESS:

24 I don't think I was involved in the
25 runoff. It was only in the beginning.

1 And you had Bagneris. You had a whole
2 bunch of people in there. I think
3 towards -- when she -- To my
4 recollection, when she ran -- when it
5 was between her and Desiree, I don't
6 remember running any ads at that -- in
7 the second primary.

8 EXAMINATION BY MR. MCGOEY:

9 Q. So do you consider the money that you
10 put in your PAC to run ads against Desiree
11 Charbonnet, did you consider that to be money you
12 were giving to LaToya Cantrell?

13 A. It's not even a comparison. He gave
14 directly to Glaser. He supported Glaser. He made
15 it a point by -- Anyway.

16 MS. THORNTON:

17 Answer the question. And I
18 understand that Sidney opened the door
19 to these questions --

20 THE WITNESS:

21 I did.

22 MS. THORNTON:

23 -- but they are irrelevant to the
24 case.

25 THE WITNESS:

1 This whole deposition I've been
2 able to, but sorry.

3 EXAMINATION BY MR. MCGOEY:

4 Q. Did you tell the public that when you
5 ran those ads for your Voice of the People PAC
6 against Desiree Charbonnet, that one of the
7 requirements that you were going to have with that
8 PAC was anyone that was associated with it would
9 not be able to do any contracts with the City of
10 New Orleans for five years after they got off the
11 PAC?

12 MS. THORNTON:

13 Object to the form.

14 THE WITNESS:

15 I don't remember. I don't recall.

16 MR. MCGOEY:

17 Andi, can you pull up that video?

18 THE WITNESS:

19 Now we know who's talking to the
20 paper.

21 EXAMINATION BY MR. MCGOEY:

22 Q. You don't recall telling reporters that
23 back in 2017?

24 A. Let me see what it says.

25 Q. Okay.

1 (Playing video.)

2 (Document marked for identification as
3 Exhibit 115.)

4 EXAMINATION BY MR. MCGOEY:

5 Q. So my question is, in 2017 did you tell
6 FOX that anyone that served on the Voice of the
7 People PAC would sign an agreement that they
8 wouldn't do any work for the City of New Orleans
9 for the first five years after they got off the
10 PAC?

11 A. I don't remember saying that to her.
12 But if she said I did, maybe I did, but I don't
13 remember saying that to her.

14 MS. THORNTON:

15 That answered the question.

16 EXAMINATION BY MR. MCGOEY:

17 Q. Did you sign an agreement with the PAC
18 saying that you would not do any City of New
19 Orleans work for up to five years after you got
20 off the board?

21 A. We never did do that.

22 Q. So you never had any of the board
23 members of the PAC sign an agreement saying you
24 wouldn't do any work with the city --

25 A. I'd have to talk to Greg Buisson because

1 he set up the PAC.

2 Q. Who else was on the board of the PAC?

3 A. Well, my lawyer John Litchfield and Mike
4 Marsiglia set it up. And we never did get around
5 to getting the board established, so there was
6 never -- Again, I don't really know if -- That's
7 it. That's basically it.

8 Q. But you are still president, the
9 chairman of the PAC, right?

10 A. Currently, yes.

11 Q. And you do a lot of work with the City
12 of New Orleans; is that right?

13 A. Well, I do work for the City of New
14 Orleans, yes.

15 Q. You said earlier that you're now getting
16 some documents and determining that the City of
17 Kenner lied to you. What were you referring to?

18 A. Discovery. That we saw text messages
19 between Bob Ramelli and Glaser and Glaser to Lee
20 Zurik.

21 Q. And what does that -- What does that
22 show you or what did you glean from seeing these
23 text messages?

24 A. Just lies. I mean we were working in
25 good faith thinking that we were working things

1 out and we were not. Because Bobby Ramelli was
2 texting Glaser and telling him I need your help.
3 Set up a meeting the next day with you and your
4 team, and all of a sudden, you know, he told Lee
5 Zurik. I mean, there's so many things that's in
6 discovery, and I'm sure it's all public record.
7 You can get it yourself.

8 Q. But you're the one that testified and
9 said Kenner had lied to you, and so I'm trying to
10 understand what lie did they tell you and who with
11 Kenner told you this lie?

12 A. Glaser, Michelle Dufrene, Natalie
13 Newton, and Amy sat in a room in Gonzales and
14 said, "We want to work with you. If you do a good
15 job, we want to work through this. Give us a
16 proposal. Even though you have a contract, if you
17 can do a better price, give us a proposal."

18 As we're working this out, Glaser is
19 telling Lee Zurik he's canceling, and he didn't
20 even tell us that. He's telling us he wants to
21 work with us. I mean it's just so much. I mean I
22 could go on and on and on, but the bottom line is
23 that they lied to us.

24 Q. Any other lies that you can think of as
25 you sit here today?

1 A. No.

2 Q. When -- You had litigation in front of
3 Chris Bruno as a judge, right?

4 A. I did.

5 Q. And you didn't like the way that
6 litigation went, correct?

7 A. I didn't like the way he talked to my
8 lawyer. He was very disrespectful, telling him
9 you need to go look in a dictionary for the
10 word -- something he said in open court. It was a
11 very contentious fight.

12 And he basically embarrassed my lawyer.
13 And my lawyer walked out of there and he said I've
14 never -- this is what he does to everybody and
15 this is not right. And so that didn't sit well
16 with me. I just felt like when you sit on the
17 bench, it's supposed to be equal justice
18 regardless of how you rule. I've been ruled
19 against before, and I've been going against
20 judges. But his attitude and the way that he
21 talked to my lawyer I just -- I thought it was
22 very disrespectful, and the more people I talk to
23 felt the same way.

24 Q. So as a result of that experience, you
25 supported a candidate to run against Judge Bruno;

1 is that right?

2 MS. THORNTON:

3 Object to form.

4 THE WITNESS:

5 I did support another candidate who
6 I thought would be better for the bench
7 than Bruno.

8 EXAMINATION BY MR. MCGOEY:

9 Q. Did you use your PAC to support that
10 candidate or did you give money directly to that
11 candidate or both?

12 A. No. The PAC, and then I had to
13 divorce -- I worked with a campaign and then I
14 sent her a letter to divorce from the campaign and
15 I jumped into my PAC.

16 Q. And in this case with Ramelli
17 Janitorial, have you told Judge Sheppard that if
18 she doesn't rule your way, you're going to run
19 somebody against her?

20 MS. THORNTON:

21 Sidney, don't answer that.

22 THE WITNESS:

23 That's a joke. That's a joke.

24 EXAMINATION BY MR. MCGOEY:

25 Q. Is your answer no?

1 A. My answer is absolutely --

2 MS. THORNTON:

3 Don't answer that. It's
4 ridiculous.

5 EXAMINATION BY MR. MCGOEY:

6 Q. Did you tell anyone to send that message
7 to the judge?

8 A. Never in a million years would I do
9 that.

10 MR. MCGOEY:

11 No more. No further questions.
12 Thanks.

13 THE VIDEOGRAPHER:

14 This concludes the deposition. We
15 are now off the record. The time is now
16 4:35.

17 (Deposition concluded.)

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This certification is valid only for a transcript accompanied by my original signature and original required seal on this page.

I, CONNIE M. FINESCHI, Certified Court Reporter, in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that SIDNEY TORRES, IV, after having been duly sworn by me upon authority of R.S. 37:2554, did testify as hereinabove set forth in the foregoing 344 pages;

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CERTIFIED COURT REPORTER

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