



CITY OF KENNER  
OFFICE OF THE CITY ATTORNEY

E. "BEN" ZAHN III  
MAYOR

EDWARD S. RAPIER, JR.  
CITY ATTORNEY

May 6, 2020

Mr. Bryan A. Vorndran  
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New Orleans, LA 70126

Mr. Peter Strasser.  
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Eastern District of Louisiana  
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Chief Michael J. Glaser  
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Kenner, LA. 70062

Mr. Paul D. Connick, Jr  
Jefferson Parish District Attorney  
200 Derbigny St.  
Gretna, La. 70053

Re: Ramelli Janitorial Services

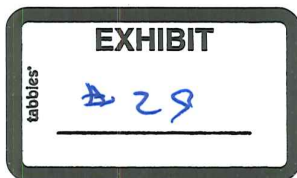
Dear Gentlemen:


Following up on my earlier letter, I am enclosing copies of two Affidavits from former Ramelli drivers who clearly state that they were instructed not to take recyclables to the recycling center. Instead, they were instructed to bring the recyclables to Ramelli's yard where they were mixed with municipal solid waste, reloaded in to garbage trucks and brought to the River Birch Landfill. All the while Ramelli charged Kenner as if it was actually recycling the material.

As noted before, the purpose of the recycling program was to divert recyclable material from the waste stream, thereby reducing the amount of waste deposited in the River Birch landfill. This reduction of waste would save Kenner money because of the reduced tipping fees at the landfill. As a result of the deliberate actions Ramelli, Kenner did not get the benefit of the reduced tipping fees while paying for the recycling program.

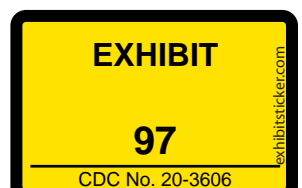
As the City acquires more evidence, I will naturally forward that information to you as we receive it, but I wanted to advise you of the allegations that have been uncovered so far.

Yours very truly,



  
Edward S. Rapier, Jr.  
City Attorney

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AFFIDAVIT

STATE OF LOUISIANA


PARISH OF ORLEANS

BEFORE ME, the undersigned Notary Public, personally came and appeared:

EARL SYLVESTER,

a person of the full age of majority and a resident of the Parish of Orleans, State of Louisiana,  
who being duly sworn and depose and said that:

1. I have been employed by Ramelli Janitorial Service, Inc. ("Ramelli") for approximately the past 15 years. I worked on the City of Kenner route.
2. Part of my duties was to pick up solid waste and participate in its disposal by trucking it to the River Birch facility in Jefferson Parish.
3. Another part of my duties was to pick up materials designated as recyclables. These recyclables would be placed curbside by Kenner residents and they would be picked up in a Ramelli truck dedicated to that task.
4. The recyclables were supposed to be delivered to a recycling facility, not the River Birch landfill.
5. On many occasions over the last several years, I and others employed by Ramelli were instructed to not deliver the recyclable material to the recycling facility but rather, to mix the recyclable material with the ordinary waste to be delivered to the River Birch landfill in a Ramelli waste truck for disposal in the landfill. The recyclable material was mixed with the ordinary waste in small proportions so as not to be recognized by landfill personnel or anyone else as anything other than ordinary waste and debris.

  
\_\_\_\_\_  
EARL SYLVESTER

SWORN TO AND SUBSCRIBED

BEFORE ME ON THIS 5<sup>TH</sup> DAY

OF MAY, 2020.

  
\_\_\_\_\_  
Print Name:

Bar/Notary No. 17896

My Commission is for life.

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF ORLEANS

BEFORE ME, the undersigned Notary Public, personally came and appeared:

GREGORY HOWARD,

a person of the full age of majority and a resident of the Parish of Orleans, State of Louisiana, who being duly sworn and depose and said that:

1. I have been employed by Ramelli Janitorial Service, Inc. ("Ramelli") for approximately the past 5 years. I worked on the City of Kenner route.
2. Part of my duties was to pick up solid waste and participate in its disposal by trucking it to the River Birch facility in Jefferson Parish.
3. Another part of my duties was to supervise the pick up materials designated as recyclables.

These recyclables would be placed curbside by Kenner residents and they would be picked up in a Ramelli truck dedicated to that task.

4. The recyclables were supposed to be delivered to a recycling facility, not the River Birch landfill.

5. On many occasions over the last several years, I and others employed by Ramelli were instructed to not deliver the recyclable material to the recycling facility but rather, to mix the recyclable material with the ordinary waste to be delivered to the River Birch landfill in a Ramelli waste truck for disposal in the landfill. The recyclable material was mixed with the ordinary waste in small proportions so as not to be recognized by landfill personnel or anyone else as anything other than ordinary waste and debris.

  
GREGORY HOWARD

SWORN TO AND SUBSCRIBED

BEFORE ME ON THIS 5<sup>TH</sup> DAY

OF MAY, 2020.

  
Print Name:

Bar Notary No. 17896

My Commission is for life.