

1 CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS  
2 STATE OF LOUISIANA

3  
4 DOCKET NO. 2020-03606 DIVISION "J"

5  
6 RAMELLI JANITORIAL SERVICE, INC.

7 VERSUS

8 IV WASTE, LLC

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11  
12 Videotaped deposition of JULIE TUFARO, IV  
13 Waste, LLC., 730 South Pierce Street, New Orleans,  
14 Louisiana 70119, taken in the law offices of  
15 BERRIGAN LITCHFIELD, LLC, 111 Veterans Memorial  
16 Boulevard, Suite 1720, Metairie, Louisiana 70005,  
17 on the 8th day of September, 2022, commencing at  
18 10:04 A.M.

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22  
23 REPORTED BY:

24 CONNIE M. FINESCHI, CCR

25 CERTIFIED COURT REPORTER

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19 ALSO PRESENT:

20

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22 RACHEL RAMELLI

23

24 JORDAN LA FRANCE, CLVS

25 (DEPO-VUE, INC.)

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S T I P U L A T I O N

IT IS STIPULATED AND AGREED by and among  
 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:

This is the videotaped deposition of Julie Tufaro. This deposition is being held at 111 Veterans Memorial Boulevard, Metairie, Louisiana, on Thursday, September 8th, 2022, at the time indicated on the video screen, which is 10:04 A.M.

Would counsel please introduce themselves?

MR. MCGOEY:

Patrick McGoey on behalf of Ramelli Janitorial Services.

MR. LITCHFIELD:

John Litchfield and Michael Marsiglia representing IV Waste, LLC.

THE VIDEOGRAPHER:

Would the court reporter please swear in the witness?

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

MR. MCGOEY:

1 Usual stipulations?

2 MR. LITCHFIELD:

3 Yes, sir.

4 MR. MCGOEY:

5 All right. Great.

6 MR. LITCHFIELD:

7 What those are, just so we know, we  
8 have agreed that I'll only object to the  
9 form of the question, not anything else  
10 like hearsay. So I reserve the rights  
11 to do that in case he ever seeks to  
12 introduce this testimony.

13 So my only objections would be to  
14 the form of the question.

15 MR. MCGOEY:

16 And if I can fix the form, I'll  
17 try. And if not, he preserved the  
18 objection.

19 MR. LITCHFIELD:

20 Right.

21 EXAMINATION BY MR. MCGOEY:

22 Q. Can you give me your name and address?

23 A. Julie Tufaro, 730 South Pierce, New  
24 Orleans.

25 Q. Is that IV's office address?



1           A.    Yes.

2           Q.    Okay.  And can you briefly tell me your  
3 educational background?

4           A.    College.

5           Q.    Where did you attend?

6           A.    Loyola University in New Orleans.

7           Q.    All right.  Did you graduate?

8           A.    No.

9           Q.    All right.  And when did you stop  
10 working or stop going to Loyola?

11          A.    Oh, I don't remember --

12          Q.    '90s?

13          A.    -- exactly, or '96-ish.

14          Q.    Okay.

15          A.    I may be off a year.

16          Q.    And after you left Loyola in roughly the  
17 mid-'90s, what did you do for work?

18          A.    I worked for my family's business.

19          Q.    And what was that?

20          A.    Real estate development.

21          Q.    And what was the name of that company?

22          A.    Clipper Estates.

23          Q.    Okay.  And then how did you get into the  
24 garbage business?

25          A.    After that I worked for another

1 developer, and they dissolved their partnership  
2 after Katrina, and that's when I started working  
3 for the garbage business.

4 Q. Okay. So that was in 2005 you started  
5 work for SDT?

6 A. '06.

7 Q. 2006. And at that time what was your  
8 position at SDT?

9 A. Originally?

10 Q. Yes.

11 A. At that time office manager.

12 Q. All right. And did you move up to any  
13 other positions?

14 A. Yes.

15 Q. What positions?

16 A. CAO.

17 Q. Well, it's a CAO but I think it's a  
18 different kind. Chief --

19 A. Administrative --

20 Q. -- administrative officer. Okay. So as  
21 a CAO what were you responsible for for SDT?

22 A. Large major accounts. I managed the  
23 customer service department. I managed the sales  
24 department. I assisted with municipal contracts.

25 Q. Who did you report to as CAO?

1 A. The owner.

2 Q. Which was Sidney Torres?

3 A. Yes.

4 Q. And it's my understanding that SDT was  
5 sold in 2016?

6 A. No.

7 Q. When was it sold?

8 A. 2011.

9 Q. I'm sorry. That's right. What did you  
10 do between 2011 and 2016?

11 A. I worked for ISI and Progressive Waste  
12 and Waste Connections, all who were the same  
13 company. Those were mergers and name changes.

14 Q. Okay. And what position did you have  
15 with those entities after 2011?

16 A. Major accounts manager, Southeast  
17 Louisiana recycling coordinator, and I believe I  
18 had one other title. I don't recall.

19 Q. Okay. Major accounts, were those  
20 commercial accounts?

21 A. And municipal accounts.

22 Q. All right. What municipal accounts did  
23 you have?

24 A. City of New Orleans, St. Charles Parish,  
25 and a little bit of St. Bernard Government in the

1 beginning.

2 Q. As recycling coordinator what did you do  
3 for that position?

4 A. I assisted with implementing recycling  
5 and educating businesses with recycling.

6 Q. Okay. And what was ISI and Progressive  
7 Waste recycling program you said you implemented,  
8 what did that involve?

9 A. ISI?

10 Q. Yeah, ISI.

11 A. I don't understand the question.

12 Q. You said you implemented their recycling  
13 program.

14 A. With businesses.

15 Q. And what did that involve?

16 A. Educating customers on how to recycle.

17 Q. And then where did you-all recycle?

18 A. I don't --

19 Q. Where did you take the recycling when  
20 you worked for --

21 A. Where did I take the recycling?

22 Q. Yeah?

23 A. To Tom Drive in Baton Rouge.

24 Q. That was the MRF that you-all used, ISI?

25 A. They owned it with the merger.

1 Q. All right. And then how did you come  
2 about working for IV Waste?

3 A. What do you mean, how did I come about?

4 Q. Well, when did you start working for IV  
5 Waste?

6 A. Either '17 or '18. I'm not sure.

7 Q. And at the time you came on for IV  
8 Waste, what was its business? Did it have any  
9 municipal accounts?

10 A. No.

11 Q. So it just had commercial accounts?

12 A. Correct.

13 Q. And what was -- What were you hired to  
14 do?

15 A. Initially sales.

16 Q. And does sales involve going to  
17 companies and saying let us pick up your garbage?

18 A. Correct.

19 Q. In 2017 did IV Waste offer recycling to  
20 its customers?

21 A. I don't know. I believe so, but I  
22 couldn't tell you. I didn't sell recycling.

23 Q. All right. How long were you a  
24 salesperson for IV?

25 A. I still am.

1 Q. Okay. Do you enjoy any other positions  
2 with IV?

3 A. Of course.

4 Q. All right. What are your other  
5 positions?

6 A. What are my other positions? You mean  
7 what are my duties?

8 Q. Well, no. I've seen correspondence  
9 where you say you're the general manager of the  
10 company.

11 A. Correct.

12 Q. So when did you become the general  
13 manager of IV Waste?

14 A. I don't have an exact date. At least  
15 three years ago, maybe four. I'm not sure.

16 Q. So 2018, 2019?

17 A. I feel like it was '19, but I don't know  
18 exactly when.

19 Q. And when you got the general manager  
20 position at IV Waste, were you still considered a  
21 salesperson as well or --

22 A. I'm always a salesperson.

23 Q. Just not --

24 A. I sold an account yesterday.

25 Q. Okay. Do you get a commission for your

1 sales?

2 A. No.

3 Q. So when you became a general manager you  
4 no longer got commissions?

5 A. Correct.

6 Q. As a general manager for IV Waste, what  
7 are your responsibilities?

8 A. Ensuring that operations is handled  
9 properly and everyone is doing their job and  
10 everything from the top to the bottom.

11 Q. Okay. Who do you report to as general  
12 manager?

13 A. For finances the CFO, for most  
14 everything Mr. Torres.

15 Q. Who is the CFO of IV Waste?

16 A. Patrice Gunter.

17 Q. And how long has she been in that  
18 position?

19 A. Since April or May.

20 Q. Okay. And before that who was the CFO?

21 A. Chuck Brechtel.

22 Q. All right. And who as general manager  
23 at IV do -- Who reports to you? Do the drivers,  
24 the hoppers?

25 A. The drivers, the managers, the office

1 staff, the dispatchers, customer service, the  
2 mechanics, accounting staff.

3 Q. So all of the operations fall under  
4 your --

5 A. Yes.

6 Q. -- control, I guess, or  
7 responsibilities?

8 A. Yes.

9 Q. What about with respect to sales, do you  
10 still handle sales to customers?

11 A. Yes.

12 Q. And what about for the municipal  
13 contracts, what's your role with respect to the  
14 municipal contracts?

15 A. What is my role, for which one in  
16 particular?

17 Q. Okay. Well, the first contract you-all,  
18 IV got was St. Bernard, correct?

19 A. Yes.

20 Q. All right. So what involvement did you  
21 have in IV obtaining the contract with St.  
22 Bernard?

23 A. Well, I attended the pre-bid. I  
24 attended the initial meeting.

25 Q. Did you work on negotiating the



1 contract?

2 A. For St. Bernard?

3 Q. Yes.

4 A. No.

5 Q. Who handled that for IV?

6 A. What do you mean by negotiating? We did  
7 a pre-bid.

8 Q. Yeah, I've seen some emails where you're  
9 sending around drafts of that contract with St.  
10 Bernard before it's finalized. And so I assume  
11 you were somehow involved in the drafts -- the  
12 drafting of the contract with St. Bernard. Is  
13 that not the case?

14 A. I don't remember. I don't know if it  
15 was with our attorney. I don't know -- I honestly  
16 don't know what you're talking about. So did I  
17 see the draft, yes, but I don't know what you mean  
18 by negotiation.

19 Q. Well, did you have any role in crafting  
20 the language that went in the St. Bernard contract  
21 or any provisions in the contract?

22 A. I don't remember.

23 Q. What about with Kenner, what was your  
24 role in getting --

25 A. The same.

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MR. LITCHFIELD:

Hold on.

THE WITNESS:

Where's he going?

MR. LITCHFIELD:

No, no, no. You don't worry where he's going. Just listen to the question. You've got to let him finish the question. And then think about the answer and then give the answer. Okay?

THE WITNESS:

It's just I feel like the question is vague.

MR. MCGOEY:

That's fine.

MR. LITCHFIELD:

And you can tell him. Let me just interrupt the deposition, please. Listen to the question. If you don't understand it, you can tell him you don't understand it.

THE WITNESS:

Okay.

MR. LITCHFIELD:

And he might repeat it or might try

1 to clarify it. But he wants to make  
2 sure that his question is accurate and  
3 we need to make sure your answer is  
4 accurate.

5 THE WITNESS:

6 Okay.

7 MR. LITCHFIELD:

8 So let him finish. And if you  
9 don't understand it, you can tell him  
10 you don't understand it.

11 EXAMINATION BY MR. MCGOEY:

12 Q. Okay. So with respect to St. Bernard,  
13 you went to the pre-bid meeting and the initial  
14 meeting, and you don't recall if you had any  
15 involvement in drafting of the contract?

16 A. I know that -- Wait. I don't recall.  
17 So what I remember is we had drafts going back and  
18 forth with our attorneys, but I don't -- I mean  
19 that's what I remember.

20 Q. Okay.

21 A. I guess I didn't understand the  
22 question.

23 Q. Were you -- So once IV got the contract  
24 with St. Bernard, what was your responsibility  
25 with that municipal contract?

1           A.     I am the contact for IV Waste if  
2 something is needed from the company from the  
3 government.

4           Q.     Who contacts you from St. Bernard?

5           A.     Mr. Louis Pomes and Mr. Ronnie Alonzo.

6           Q.     Do you have anyone else at IV that's  
7 responsible for St. Bernard?

8           A.     And we have other contacts in St.  
9 Bernard. Some of the administration contacts me  
10 as well. Do I have anyone else from St. Bernard  
11 who --

12          Q.     At IV that is responsible for the St.  
13 Bernard contract?

14          A.     Of course, Mr. Torres. It's his  
15 company.

16          Q.     Okay. Anybody under you?

17          A.     Yes. If a cart is needed, dispatch is  
18 contacted.

19          Q.     It's my understanding that you-all have  
20 a transfer station in St. Bernard?

21          A.     Yes.

22          Q.     Who built that?

23          A.     It was there before our contract. I'm  
24 not sure.

25          Q.     Did you-all do -- Did IV do any work on

1 that transfer station?

2 A. Yes.

3 Q. Who did that work for IV?

4 A. I don't know.

5 Q. Did Carimi Construction do that?

6 A. I don't know.

7 Q. With respect to Kenner's contract, what  
8 role did you have in obtaining that contract for  
9 IV?

10 A. I attended the initial meeting when we  
11 were called. So we met with the administration  
12 and then some of the council members at  
13 administration came to our office. I was there  
14 for that. And I was part of the back and forth  
15 with the contract with our attorneys who were  
16 present at both meetings.

17 Q. Okay. You said both meetings. What  
18 meetings are you referring to?

19 A. We met with Kenner's administration and  
20 we had attorneys with us both times.

21 Q. So you only recall meeting with Kenner  
22 officials on two occasions over the contract?

23 A. No. They came to our office as well.

24 Q. So you had three meetings with Kenner  
25 officials?

1 MR. LITCHFIELD:

2 You're talking about before the  
3 contract was signed?

4 MR. MCGOEY:

5 Yeah, before the contract was  
6 signed.

7 THE WITNESS:

8 Because I'm --

9 EXAMINATION BY MR. MCGOEY:

10 Q. Yeah, that's what I was talking about.

11 A. I don't -- I don't remember exactly, but  
12 those are the ones that stand out.

13 Q. Okay. So where do you recall these  
14 three meetings over the contract taking place?

15 A. At Kenner City Hall. I don't know the  
16 address. I think they moved. And one was at our  
17 office when they visited our office.

18 Q. Do you recall -- I think there was a  
19 meeting at the Galleria. Well --

20 A. No.

21 Q. No. Was there a meeting in the mayor's  
22 conference room?

23 A. Yes. That was the first meeting.

24 Q. Okay. And there was another meeting  
25 that you recall at City Hall in a different

1 location?

2 A. I thought it was at the same place.

3 Q. Okay.

4 A. But I believe that building flooded. I  
5 don't know where that was. Maybe on Williams.

6 Q. All right. At the three meetings that  
7 you recall meeting with the City of Kenner before  
8 getting the contract, was Nicky Nicolosi at any of  
9 those meetings?

10 A. Yes.

11 Q. Which ones?

12 A. He was at the initial meeting.

13 Q. Was that --

14 A. I don't remember if he was at the second  
15 one.

16 Q. Okay. Do you recall --

17 A. I know he was there the first time.

18 Q. Do you recall that he was at IV's  
19 offices when the administration came?

20 A. I don't believe he was, but I'm not --  
21 I'm not certain. I don't remember him if he was.

22 Q. Okay. When was the first time you met  
23 Mr. Nicolosi?

24 A. The first time I met him was at City  
25 Hall when we met with Kenner.

1 Q. For this contract?

2 A. When we were called by Kenner, he was  
3 there.

4 Q. So that was the first time you ever met  
5 him?

6 A. He said I met him at St. Bernard, but I  
7 don't remember meeting him at the pre-bid.

8 Q. At the meeting when you met him in  
9 Kenner he introduced himself and said he --

10 A. And he said he -- Yeah, I don't remember  
11 him though. I had never seen him before.

12 Q. When you met him for the first time at  
13 that meeting, what did you understand he was at  
14 the meeting for?

15 A. I didn't understand what he was there  
16 for.

17 MR. LITCHFIELD:

18 You're talking about not the St.  
19 Bernard meeting when he says -- You're  
20 talking about the Kenner meeting?

21 MR. MCGOEY:

22 Yes.

23 THE WITNESS:

24 I didn't know.

25 EXAMINATION BY MR. MCGOEY:



1 Q. At that first meeting in the City of  
2 Kenner, did Nick, Mr. Nicolosi, tell you that he  
3 worked for Bob Ramelli?

4 A. He told the group, not just tell me. He  
5 told the group after it was explained to our  
6 attorney, who wasn't John.

7 THE WITNESS:

8 You weren't at that first meeting,  
9 and he told us --

10 MR. LITCHFIELD:

11 You can tell him that. Don't tell  
12 me that.

13 THE WITNESS:

14 I know, but you weren't there. He  
15 told the group -- So it was explained to  
16 us the issues that Kenner was having  
17 with Ramelli. And it was told to us  
18 that they called three companies or were  
19 calling three companies, and we were one  
20 of them.

21 They explained that they were  
22 having problems with Ramelli not  
23 recycling Christmas trees and something  
24 about not replacing carts, and that they  
25 were fed up with it.

1                   And Mr. Nicolosi was quiet most of  
2                   the meeting, and towards the end he  
3                   introduced himself as, you know, he was  
4                   working for Ramelli Group. I don't know  
5                   the name of the company, Ramelli Waste,  
6                   Ramelli Group. So there was no more  
7                   discussion about why he was there or  
8                   what his role was.

9                   EXAMINATION BY MR. MCGOEY:

10                  Q.     Okay. Did you find that unusual that  
11                  the City of Kenner called you in to meet to  
12                  discuss taking a contract away from Mr. Ramelli  
13                  and Mr. Ramelli's consultant was at the meeting?

14                  A.     I mean as a human being, of course, but  
15                  I can't control where other people are and what  
16                  they are doing. We were invited to a meeting.

17                  Q.     Okay. And there was nothing discussed  
18                  about Mr. Nicolosi, or was there anything  
19                  discussed at that meeting about Mr. Nicolosi  
20                  having a role going forward with IV Waste?

21                  A.     No. We were invited to meet with them  
22                  as they were looking for another vendor, and they  
23                  invited two other waste removal companies to meet  
24                  as well.

25                  Q.     Were the other waste companies at that

1 meeting?

2 A. No.

3 Q. Do you know what waste companies those  
4 were?

5 A. I believe Metro Disposal was mentioned,  
6 Waste Pro was mentioned, and Waste Connections was  
7 mentioned. So there were three mentioned. I  
8 don't know who the other two were.

9 Q. Who was at that first meeting with  
10 Kenner besides you and Mr. Nicolosi?

11 A. Mr. Torres, Erica. I don't remember her  
12 last name, our attorney.

13 Q. Beck?

14 A. Beck. Thank you. Deborah Foshee,  
15 Edward Rapier, Ben Zahn, Lynn Roussel, and the CFO  
16 was --

17 Q. Mike Wetzels?

18 A. Mike Wetzels.

19 Q. Anyone else or you're confident it was  
20 just those --

21 A. I'm not -- There may have been one more  
22 person, but that's who I remember.

23 Q. With respect to servicing the City of  
24 Kenner contract, what are your responsibilities  
25 there?

1           A.     To ensure that all the garbage is picked  
2 up every day.

3           Q.     Are you responsible for invoicing the  
4 City of Kenner?

5           A.     No.

6           Q.     Who's responsible for that?

7           A.     Dana McKee, M-C-K-E-E.

8           Q.     I've seen correspondence where you're  
9 forwarding invoices to the City of Kenner. Is  
10 that not -- Is that something you do in addition  
11 to Ms. McKee sending an invoice?

12          A.     No. I was responsible. I'm not now.

13          Q.     Got you.

14          A.     You asked if I am.

15          Q.     So when the contract started with City  
16 of Kenner, you were responsible for submitting  
17 invoices?

18          A.     Yes.

19          Q.     When did you turn that over to Ms.  
20 McKee, sending invoices to the city?

21          A.     A couple of months ago. I believe she  
22 sent the last one, but I may have sent the one  
23 before that. But she was responsible for  
24 generating the bills.

25          Q.     And does IV use any subcontractors on

1 its municipal contract with City of Kenner?

2 A. Now or have we?

3 Q. Well, how about we'll start with have  
4 you?

5 A. Yes.

6 Q. All right. What subcontractors have you  
7 used?

8 A. During Ida, I don't know -- I know it  
9 was different subcontractors to help with  
10 tractor-trailers, but we don't now.

11 Q. Okay. Other than Hurricane Ida, just  
12 the general garbage and recycling collection, does  
13 IV Waste use subcontractors --

14 A. No.

15 Q. -- for the City of Kenner contract?

16 A. No.

17 Q. Now, did IV use Carimi Construction in  
18 the City of Kenner?

19 A. No. For -- In what -- In what -- I'm  
20 not --

21 Q. Did Carimi Construction --

22 A. To pick up garbage?

23 Q. No. Did Carimi Construction build a  
24 drop site?

25 A. I appreciate the clear question.

1 Q. Sure.

2 A. Yes, they did.

3 Q. Okay. Who paid Carimi Construction to  
4 build the drop site?

5 A. IV Waste.

6 Q. All right. Did --

7 A. Or it may have been a different -- I'm  
8 not sure if it was IV Torres or IV Waste.

9 Q. All right. What is the difference  
10 between IV Waste and IV Torres?

11 A. They are both owned by Mr. Torres. IV  
12 Torres owns our equipment and IV Waste is the  
13 operating company.

14 Q. Did you oversee Carimi's construction of  
15 the drop site?

16 A. No.

17 Q. Or would that fall under somebody else's  
18 responsibility?

19 A. I didn't oversee the construction.

20 Q. Okay. What role does Ms. Earline Torres  
21 have in IV Waste?

22 A. She's Sidney's mom.

23 Q. Is she an employee?

24 A. No.

25 Q. Does she do work for the company?

1 A. No.

2 Q. I saw on the Secretary of State that  
3 she's the registered agent for the company. Were  
4 you aware of that?

5 A. Yes.

6 Q. How did that come about, do you know?

7 A. I don't know.

8 Q. Does she have an office in IV Waste?

9 A. No.

10 Q. Does any companies that Ms. Torres owns  
11 provide services to IV Waste?

12 A. No.

13 Q. Her janitorial doesn't do any work with  
14 IV Waste?

15 A. Correct.

16 Q. Let's talk about the City of New  
17 Orleans' contract. What role did you have in  
18 preparing the proposal on behalf of IV for the  
19 City of New Orleans?

20 A. What role, I gave my professional  
21 feedback.

22 Q. On the -- for prices?

23 A. On the operations side.

24 Q. Did you have any role in completing the  
25 bid?

1 A. No.

2 Q. Who handled that for --

3 A. AJ -- I believe his last name is Perez.

4 Q. Is that an employee of IV?

5 A. Yes.

6 Q. What position is he in?

7 A. He's in accounting.

8 Q. Anyone besides Mr. Perez help prepare  
9 that bid?

10 A. Chuck Brechtel.

11 Q. Anyone else you can think of?

12 A. No.

13 Q. As far as building the drop site in  
14 Kenner, who with IV was involved in the  
15 construction of that?

16 A. I don't understand, building the --

17 Q. The drop site. You said --

18 A. We didn't build it.

19 Q. -- Carimi did?

20 A. Correct.

21 Q. But was anyone with IV Waste in charge  
22 of overseeing Carimi build it or --

23 A. No. They are a contractor, so they  
24 built it.

25 Q. What role did you have in the delivery



1 of roll-out carts to the City of Kenner?

2 A. Not much.

3 Q. What do you mean by not much?

4 A. I was copied on emails, but I don't  
5 deliver carts.

6 Q. Who was responsible at IV Waste for the  
7 delivery of the 22,000 roll-out carts?

8 A. Cascade. I don't know the -- There's  
9 more to the company, but Cascade.

10 Q. Bob Durdin is the contact?

11 A. He was the salesperson, yes. And there  
12 was another gentleman. I don't remember his name  
13 who was responsible for delivering carts.

14 Q. Pierre Richardson?

15 A. Pierre. You know a lot more than me.

16 Q. I lived in Kenner for a long time. So  
17 what was Mr. Richardson's role?

18 A. Pierre, his role was to make sure the  
19 carts were delivered and scanned and geocoded to  
20 each address for recycling and garbage.

21 Q. And would Cascade physically deliver the  
22 cart to each house?

23 A. Whichever Pierre -- I don't know if  
24 that's a company -- a part of Cascade, but, yes,  
25 they did.

1 Q. Did IV have any employees that were  
2 assigned to assist Cascade in delivering roll-out  
3 carts to the City of Kenner?

4 A. Our hopper supervisor may have assisted  
5 if one was missed or skipped.

6 Q. And who was the hopper supervisor?

7 A. Raymond Williams.

8 Q. Now, I got some text messages last night  
9 from you, I guess, that were just produced last  
10 night. How did those come about?

11 A. I don't know. Is that a question for  
12 me? I don't know what you're talking about.

13 Q. All right. Well, I'll show you. I'm  
14 not going to mark it as an exhibit, but I just --  
15 This was a series of text messages that we  
16 received yesterday. Did you recently find some  
17 text messages to produce in the case?

18 A. I didn't recently find text messages.  
19 Is this a question for somebody else?

20 MR. LITCHFIELD:

21 But he wants to ask you --

22 EXAMINATION BY MR. MCGOEY:

23 Q. Where did they come from?

24 MR. LITCHFIELD:

25 Right. He's just asking you what

1           you know.

2           THE WITNESS:

3                     That is a text message from my  
4           telephone.

5           EXAMINATION BY MR. MCGOEY:

6           Q.     Do you know why they were just recently  
7           produced today -- yesterday?

8           A.     I know that our attorney came a few  
9           months ago, I believe, or weeks ago and took --  
10          went through our text messages. But to answer  
11          your question, no, I don't know why they were  
12          produced yesterday.

13          Q.     Okay. So you didn't recently pull these  
14          off your phone?

15          A.     No.

16          Q.     Okay. What did you do to prepare for  
17          you deposition today?

18          A.     I came to this office.

19          Q.     Did you look at any documents, any  
20          depositions?

21          A.     I saw those yesterday.

22          Q.     The text messages?

23          A.     I did.

24          Q.     Okay. Other than looking at the text  
25          messages, what else did you do yesterday in

1 preparation for your deposition?

2 A. I got through all my work for today so I  
3 could clear up my day for today.

4 Q. There were some depositions taken in  
5 litigation with the City of Kenner and produced in  
6 this case. Have you had an opportunity to read  
7 those --

8 A. No.

9 Q. -- depositions? I'm going to show you  
10 what I'm going to mark as Exhibit 6.

11 MR. MCGOEY:

12 And the reason I'm doing 6 is we  
13 used 5 in the first two depositions and  
14 I'll just keep them running.

15 MR. LITCHFIELD:

16 That's fine.

17 (Document marked for identification as  
18 Exhibit 6.)

19 EXAMINATION BY MR. MCGOEY:

20 Q. Exhibit 6 is a Reconventional Demand  
21 filed in this case on behalf of IV Waste against  
22 Ramelli Janitorial Services. And, specifically,  
23 it's a claim for unfair trade practices. Were you  
24 aware that IV Waste is suing Ramelli Janitorial in  
25 this case?

1 A. No.

2 Q. Okay. Have you ever seen this -- these  
3 claims?

4 A. No, not before now.

5 Q. If you go to page 4 -- actually,  
6 paragraph 3 -- I mean page 3. I'm sorry. The  
7 Jefferson Parish Incidents, do you see that  
8 heading?

9 A. No. Page 3? I'm sorry, what number?

10 Q. Page 3.

11 A. Can I read the first page so I see what  
12 this is?

13 Q. Oh, you can --

14 A. I don't know what this document is.

15 Q. You know, please read it all. Please,  
16 take your time.

17 A. (Reading document.)

18 Q. Okay. So under the Jefferson Parish  
19 Incident section there's some paragraphs, I guess  
20 13 through 25, that talk about two former  
21 employees of IV Waste, Jerome Rivera and Terry  
22 Johnson. Do you know Mr. Rivera?

23 A. I know both of them very well.

24 Q. How do you know them?

25 A. They both worked for me. They were

1 drivers.

2 Q. Okay. And they no longer work for IV?

3 A. Correct.

4 Q. Why do they no longer work? Were they  
5 fired or did they quit?

6 A. Which one? They were both fired.

7 Q. Okay. You fired them?

8 A. Yes.

9 Q. Why did you fire Mr. Rivera?

10 A. Because he did a hit-and-run and didn't  
11 report it. We got a call from the gentleman who  
12 owned the truck, pulled the footage, video  
13 footage, and saw that he hit the vehicle. And he  
14 pulled the truck in, didn't fuel it up, didn't  
15 dump it, and got out and went home. And part of  
16 his job is to bring the truck to the landfill and  
17 dump it, fuel the truck. So he went home and I  
18 fired him for not completing his duties and not  
19 reporting an accident.

20 Q. Before the incident which led you to  
21 fire him, was he a good employee or a bad  
22 employee?

23 A. He was very reckless, very mouthy, very  
24 sloppy, and his file is thicker than that binder  
25 with incidents and write-ups.

1 Q. What about Mr. Johnson, Terry Johnson?

2 A. Mr. Terry Johnson blew up an engine,  
3 \$60,000.

4 Q. That's why you fired Mr. Johnson?

5 A. I fired Mr. Johnson for hitting a human  
6 being and not reporting it.

7 Q. Tell me about that. He punched him or  
8 he drove a truck into him?

9 A. He hit him with a truck. He hit a human  
10 being with a truck.

11 Q. And where was that?

12 A. In New Orleans. And I found out because  
13 an agent came to the office and I had to  
14 investigate it and it was Mr. Johnson.

15 Q. All right. And other than the incident  
16 where Mr. Johnson hit a person and didn't tell you  
17 about it and blew up an engine, did you have any  
18 other issues with --

19 A. I had many issues.

20 Q. He has a thick file too?

21 A. He has a large file.

22 Q. And when you say they have a file,  
23 explain to me what that file is.

24 A. Of write-ups and incidents and  
25 infractions and --

1 Q. So IV maintains a file on every  
2 employee?

3 A. Correct. These are two very disgruntled  
4 ex-employees.

5 Q. That's how you would describe Mr.  
6 Johnson and Mr. Rivera?

7 A. Yes. Mr. Rivera more so. He's an angry  
8 man. Mr. Johnson is not angry, but he is out for  
9 money, anything for money. He'll do anything for  
10 a quick buck.

11 Q. Okay. In paragraph 17 of IV Waste's  
12 Reconventional Demand it says, "In July of 2020  
13 following IV Waste entering into the contractual  
14 arrangement with the City of Kenner, a former IV  
15 Waste employee, Terry Johnson, contacted a current  
16 employee of IV Waste, Jerome Rivera." Are you  
17 aware of what Mr. -- of Mr. Johnson contacting Mr.  
18 Rivera in July of 2020?

19 A. Am I aware of what he contacted him  
20 about, or am I aware that he did?

21 Q. Are you aware that he did?

22 A. No. I know that Mr. Johnson called many  
23 of our employees saying that he was working for  
24 Ramelli.

25 Q. Okay. So who told you that?



1           A.     Many of our drivers.

2           Q.     Which ones?

3           A.     No one who's listed.  They don't want to  
4 be named, but Luciano is one.  Who else?  I don't  
5 recall who else.  A few -- There was another  
6 driver.  I don't remember.  A few drivers said  
7 that Terry was following us and contacted the  
8 drivers and that Ramelli was paying him to do so,  
9 to get dirt on IV Waste.

10          Q.     And who told you that?

11          A.     The drivers, my employees.

12          Q.     Apparently, according to this, Mr.  
13 Johnson reached out to Mr. Rivera in July of 2020.  
14 Were you aware of that?

15          A.     I don't recall.  I remember talks about  
16 it.  I don't remember who all the employees were.  
17 I know Luciano was one.  It may have been Jerome.  
18 I don't recall.

19          Q.     Okay.  So paragraph 18 it says, "Johnson  
20 contacted Rivera requesting to meet him at the  
21 Kenner recycling yard so that Johnson could take  
22 pictures of the recycling operation."

23          A.     That sounds familiar, but I don't  
24 remember the time frame.

25          Q.     So did you -- in this -- In July 2020

1 Mr. Rivera worked for IV?

2 A. I believe so.

3 Q. Did you ever have a conversation with  
4 Mr. Rivera where he said Mr. Johnson is contacting  
5 me about X, Y, or Z?

6 A. I may have.

7 Q. What do you recall?

8 A. It's fuzzy, so I recall a few employees  
9 telling us -- telling me, not us, telling me that  
10 Terry Johnson was contacting them to get dirt on  
11 IV Waste for Ramelli. I do recall that. I don't  
12 remember who all the drivers were. I remember  
13 Luciano, but no one wanted to be involved.

14 Q. Okay. Paragraph 20 it says, "Johnson  
15 again contacted Rivera asking him to come to  
16 Ramelli's office to meet with David Starks." Do  
17 you have any knowledge about that?

18 A. I don't remember. That's two years ago.  
19 I really don't.

20 Q. Do you recall Mr. Rivera telling you  
21 that?

22 A. I don't remember the clear details, but  
23 I remember the vague talk about it.

24 Q. Would this have been something that if  
25 you would have been told, you would have put it in

1 Mr. Johnson's or Mr. Rivera's file?

2 A. Well, Mr. Johnson didn't work for us at  
3 that time, so no.

4 Q. What about Mr. Rivera's file?

5 A. No.

6 Q. It goes on to say, "Starks offered  
7 Rivera --" In paragraph 22, "Starks offered  
8 Rivera a job as a supervisor working for Ramelli  
9 on the east bank of Jefferson Parish." Did Mr.  
10 Rivera tell you that?

11 A. I don't remember that conversation, if  
12 there was one.

13 Q. Okay. This looks like it was filed  
14 in -- I don't have a date.

15 A. Which month was this? You said 2020,  
16 the summer?

17 Q. That's what it said, in July of 2020.

18 A. So this was right after we started  
19 Kenner.

20 Q. Who at IV would I talk to to find out  
21 about what -- these facts?

22 A. I don't know that there is anyone. Mr.  
23 Rivera would know, but he's since been let go.

24 Q. He was let go for hit-and-run?

25 A. Hit-and-run and not completing his

1 duties.

2 Q. Okay. It goes on on page 5 of the  
3 Reconventional Demand, paragraph 30. It says,  
4 "Ramelli has engaged in contact that offends  
5 established public policy with respect to its  
6 unlawful dumping of trash into the cans of IV  
7 Waste customers, surreptitious communications with  
8 IV Waste employees, and unlawful surveillance of  
9 IV Waste."

10 Do you have any knowledge of Ramelli  
11 dumping trash into the cans of IV Waste customers?

12 A. I saw this on the news, so I did see the  
13 video footage. I believe this was on the news.  
14 There was something on TV.

15 Q. Other than seeing an article about it on  
16 TV, do you have any knowledge of it, like --

17 A. I saw a video.

18 Q. Did you --

19 A. I saw a video of it.

20 Q. Was it an IV Waste video?

21 A. It was the video from whoever the  
22 customer was.

23 Q. Okay. Did you speak to the customer?

24 A. What year was this in?

25 Q. I don't know. It's IV Waste's lawsuit,

1 not mine.

2 A. I don't believe I was working here then.

3 Q. Got you. Okay. So other than seeing it  
4 on TV, you're not aware?

5 A. No. I saw it in our office from the  
6 customer. I have the tape. I've seen this tape.

7 Q. So you weren't working at the time it  
8 occurred for IV; is that correct?

9 A. Correct.

10 Q. But after you started working for IV  
11 you've see the tape from the customer?

12 A. Correct.

13 Q. Do you know what customer it is?

14 A. I don't. I know it's in the French  
15 Quarter. I don't know who the customer is.

16 Q. Where is the video maintained?

17 A. The customer would have it. I have a  
18 copy.

19 Q. Where is the copy at IV Waste's office?

20 A. In the computer.

21 Q. So if I'm going to ask for it, where  
22 would that be?

23 A. I don't know the file name.

24 Q. The next thing is "surreptitious  
25 communications with IV Waste employees." Do you

1 have any firsthand knowledge of Ramelli making  
2 surreptitious communications with IV Waste?

3 A. I don't know what that means. I really  
4 don't.

5 Q. Well, are you aware of Mr. Ramelli  
6 talking to any --

7 A. Where are you?

8 Q. -- IV Waste employees?

9 A. Mr. Ramelli, no.

10 Q. Are you aware of Mr. Starks talking to  
11 any IV Waste employees?

12 A. He spoke with me.

13 Q. Okay. What did Mr. Starks talk to you  
14 about?

15 A. Which time?

16 Q. Well, tell me all the times.

17 A. Oh, there's too many.

18 Q. Well, with respect to City of Kenner,  
19 what did Mr. Starks talk to you about?

20 A. Mr. Starks, who I think is a dear man,  
21 told me years ago the only reason -- No, not the  
22 only reason. That Ramelli will never lose the  
23 City of Kenner as long as Nick Nicolosi is working  
24 for them, and he is the reason they have the City  
25 of Kenner.

1 Q. Okay. When did Mr. Starks tell you that  
2 Mr. Ramelli would never lose the City of Kenner's  
3 contract as long as Nick Nicolosi was working for  
4 him?

5 A. When I was working for Progressive Waste  
6 and when I was at IV Waste prior to -- I would say  
7 around 2018.

8 Q. Okay. So as far back as 2018, you were  
9 aware that at least Mr. Starks was saying Bob  
10 Ramelli would never lose the contract with the  
11 City of Kenner as long as Nick Nicolosi worked for  
12 him?

13 A. Correct, but I didn't know who Nick  
14 Nicolosi was.

15 Q. So how do you remember that conversation  
16 so vividly for a person you didn't even know who  
17 he was?

18 A. Because Mr. Starks wanted to get out of  
19 the garbage business.

20 Q. So in 2018 Mr. Starks was talking to you  
21 about getting out of the business?

22 A. Correct.

23 Q. And he told you that as long as Mr.  
24 Nicolosi worked for Mr. Ramelli --

25 A. Correct.

1 Q. -- he'd keep Kenner. Why was Mr. Starks  
2 talking to you about wanting to get out of the  
3 business?

4 A. We were -- We are friends and we would  
5 talk about City of Kenner -- I mean the City of  
6 New Orleans' contract. And I gave him advice on  
7 how to deal with the administration or the best  
8 way to help himself. And I helped him with the  
9 French Quarter Festival bid, which I believe they  
10 won.

11 Q. This was in 2018?

12 A. This was prior to that. It may have  
13 been '17. I'm not sure.

14 Q. So Mr. Starks called you and told you  
15 that he wanted to get out of the business, but  
16 then asked your help to put in bids? That's what  
17 you recall?

18 A. Yes.

19 Q. Do you recall anything else Mr. Starks  
20 talking to you about about the City of Kenner  
21 contract?

22 A. He used to say there were more homes  
23 than they were picking up and billing for, that  
24 the City of Kenner had large piles. That's all I  
25 really remember.



1 Q. Okay. And do you recall any other  
2 conversations with Mr. Starks about the City of  
3 Kenner?

4 A. I'm sure there were others. I don't  
5 remember the details.

6 Q. So back to the --

7 A. Oh, I do. He came to our office one day  
8 with Eddie Witcham. I don't know his last name.  
9 It starts with a W. And they sat outside of our  
10 office, and I went and spoke to him. And I  
11 believe Eddie was videotaping me and they said  
12 that -- Well, David was very upset. They were  
13 upset that it was in motion that they were -- that  
14 Ramelli was, you know, on its way out in Kenner,  
15 and he had some choice words to say.

16 Q. Mr. Starks?

17 A. (Nods head affirmatively.)

18 Q. And so this was in the 2020 time period?

19 A. The spring. I don't know the date, but  
20 it was in the spring.

21 Q. And you said Mr. Witcham was recording  
22 you?

23 A. I believe so. His camera was like this  
24 when I was talking. I would think he was.

25 Q. And why were they outside IV Waste's

1 building?

2 A. Because we had -- or were talking to  
3 some of their drivers who were looking for  
4 employment, and the contract, I believe, was  
5 signed at that time. We were in a transition.

6 Q. Okay. So in the spring of 2020 you were  
7 meeting --

8 A. I don't know the date.

9 Q. Right. You said the spring of 2020.

10 A. Right. It could have been April. It  
11 could have been May. I don't know when it was.

12 Q. But at the time you recall this  
13 conversation with Mr. Starks in the spring of  
14 2020, at that time Ramelli had the contract with  
15 the City of Kenner?

16 A. We had signed a contract with them.

17 Q. Were you providing services yet?

18 A. They were finishing up. No.

19 Q. Okay. So at the time of this  
20 conversation with Mr. Starks in the spring of  
21 2020, Ramelli was servicing the City of Kenner; is  
22 that correct?

23 A. I believe it was a week or two -- If I  
24 think back, it was almost over, yes.

25 Q. So while Ramelli had the contract with

1 the City of Kenner --

2 A. I heard you repeating yourself.

3 Q. -- you were having meetings with Mr.  
4 Ramelli's employees?

5 A. There were a couple employees who came  
6 there, yes, looking for employment because they  
7 were losing their job.

8 Q. Would you call that a job fair?

9 A. I didn't call it a job fair.

10 Q. I saw in the texts about a job fair. I  
11 didn't know if that was what you were referring  
12 to.

13 A. I didn't call it a job fair, but it was  
14 a meeting.

15 Q. What City of Kenner employees -- I mean  
16 Ramelli employees do you recall meeting with in  
17 the spring of 2020? I'll show you what was  
18 previously marked as Exhibit 1 in another  
19 deposition which --

20 A. I may not know names.

21 Q. -- is a list of -- I'll represent to  
22 you that was produced to us in the litigation by  
23 IV Waste's counsel saying that that was a list of  
24 employees.

25 A. Gregory Howard was there.

1 Q. Do you recall anybody else at that  
2 meeting?

3 A. I don't remember. I do know Greg. I  
4 don't remember. Maybe Mr. Earl was there. I do  
5 know those two names. Earl Sylvester. A lot of  
6 these look like hoppers, but I don't know -- I  
7 don't really deal with the hoppers.

8 Q. Okay. Other than this day you recall  
9 Mr. Starks and Mr. Eddie coming to IV Waste's  
10 office, do you recall any other conversations you  
11 had with Ramelli employees in the spring of 2020?

12 A. I have text messages -- you may have  
13 copies -- with David Starks.

14 Q. What about any drivers or hoppers?

15 A. No. I don't -- No.

16 Q. In paragraph 30 it also talks about  
17 unlawful surveillance of IV Waste. What  
18 information do you have concerning Ramelli's  
19 unlawful surveillance of IV?

20 A. What -- I'm sorry. Repeat that. What  
21 information do I have?

22 Q. Yes.

23 A. I recall our drivers calling the office  
24 saying that we were being followed by Ramelli's  
25 employees trying to get us to dump one of their

1 cans or trying to catch us dump one of their cans  
2 because there was some kind of judgment where we  
3 couldn't touch Ramelli's cans.

4 And at that time residents of Kenner  
5 were calling our office saying that Ramelli is  
6 telling them to call us, that we're the waste  
7 provider, but we couldn't dump the garbage cans.  
8 But the garbage was out in a Ramelli container. I  
9 do recall that.

10 Q. Okay.

11 A. I do recall going to Republic on L and A  
12 Road off of Airline to dump recycling, and I met a  
13 garbage truck there because two of Ramelli's  
14 employees had followed them there. And I spoke  
15 with both of them, and they said they were paid to  
16 follow us to see what we were doing with the  
17 recycling. And it was a lady -- I don't remember  
18 her name -- in a white car and a gentleman in a  
19 white pickup truck.

20 Q. Okay. Do you recall the time period of  
21 that?

22 A. Right when we started.

23 Q. Right when you started.

24 A. The very beginning, so that would be, I  
25 believe, May.

1 Q. Okay.

2 A. And I have pictures of him on my phone.

3 Q. Did you produce those in these text  
4 messages or are they just text messages?

5 A. Pictures? Those are text -- Y'all asked  
6 for text messages. I have pictures of their --

7 Q. Of the lady and the gentleman that were  
8 following the recycle truck?

9 A. Our truck, right. And they were  
10 harassing our employees. My employee called me,  
11 who was actually Terry Johnson now that I think  
12 about it. Terry was the driver.

13 Q. What did Terry tell you?

14 A. That they were being harassed, to please  
15 come over here. Some Ramelli people are following  
16 them, and they are not letting them do their job.  
17 The lady was yelling at him and he didn't know to  
18 what to do, so I met him over there.

19 Q. That was the first day of the contract,  
20 right, May 1st?

21 A. I don't recall the day.

22 Q. If Terry Johnson were to say that was  
23 May 1st, would you have any evidence to --

24 A. I don't know the day. I can go -- I can  
25 figure it out for you, but I don't know the day.

1 I know it was in the beginning. It was in May.

2 Q. And you believe -- Do you believe the  
3 surveillance that you saw taking place to be  
4 unlawful?

5 A. Which one?

6 Q. Whatever you -- you said you saw a lady  
7 and a guy watching the truck at Republic, correct?

8 A. No. They were following and harassing.  
9 I do.

10 Q. Okay. So tell me what was -- you  
11 believe to be unlawful about that.

12 A. She was very hostile when I pulled up  
13 and argumentative. And I just pulled up to say,  
14 "Hey, what are you guys doing?" So, yeah, I think  
15 that's harassment.

16 Q. Was she in her car?

17 A. She was in, he was out. He was trying  
18 to calm her down.

19 Q. And why did she need calming down?

20 A. I missed the beginning, but she was very  
21 hostile. I don't know why.

22 Q. And that appeared to be some type of  
23 unlawful situation to you, or you just saw a guy  
24 and a lady standing in a -- sitting in a car and  
25 standing outside a car?

1           A.    No.  I think it was -- I think they were  
2 being -- They harassed our employees, and at this  
3 time we're being followed and photographs were  
4 being taken, and it was uncomfortable for our  
5 employees who were trying to pick up the garbage.  
6 I absolutely do.

7           Q.    Okay.  So do you believe it to be  
8 illegal or unlawful --

9           MR. LITCHFIELD:  
10                Let me just --

11          THE WITNESS:  
12                Yeah.  I'm not a --

13          MR. LITCHFIELD:  
14                Hold on.  I'm not sure, have you  
15 finished your question?

16          MR. MCGOEY:  
17                No.

18          MR. LITCHFIELD:  
19                All right.

20 EXAMINATION BY MR. MCGOEY:

21          Q.    Do you believe it to be illegal or  
22 unlawful to follow a truck?

23          MR. LITCHFIELD:  
24                Let me interject an objection.  
25                You're asking this witness what's



1 illegal and what's unlawful.

2 MR. MCGOEY:

3 I'm just asking her if she believes  
4 it.

5 MR. LITCHFIELD:

6 I got it. I want to make sure  
7 we're on the same page.

8 MR. MCGOEY:

9 I understand.

10 MR. LITCHFIELD:

11 To the extent that she's not a  
12 lawyer or a judge or a jury or anything  
13 else, I'm going to object. To the  
14 extent that she can tell you what her  
15 personal belief is, I'll let her answer.

16 Do you understand the question?

17 THE WITNESS:

18 I do understand the question, but  
19 I'll tell you what I don't understand is  
20 we're going back and forth from  
21 something that happened before I was  
22 employed to when I was there, and they  
23 are two different situations.

24 And I would appreciate it if we can  
25 stay on one topic because we're bouncing

1           around and that's difficult for me  
2           because I didn't work here when this  
3           happened.

4 EXAMINATION BY MR. MCGOEY:

5           Q.    May 1st of 2020 you didn't work at IV  
6 Waste?

7           A.    I was not involved with this.

8           MR. LITCHFIELD:

9                    When you say this, you have to tell  
10 him what you're talking about.

11           THE WITNESS:

12                    With this lawsuit we're talking  
13 about, this --

14           MR. LITCHFIELD:

15                    The Reconventional Demand she's  
16 talking about.

17           THE WITNESS:

18                    Right. I wasn't here. I feel like  
19 we're bouncing back and forth. If we  
20 could stick to one topic, that would be  
21 a little easier.

22           MR. MCGOEY:

23                    I don't -- Mike, you might have the  
24 date. For some reason this copy is not  
25 the stamped copy.

1 EXAMINATION BY MR. MCGOEY:

2 Q. But I believe this was filed in 2021.  
3 You worked for IV Waste in 2021?

4 A. Correct. But I've never seen this, and  
5 this did not happen in '21.

6 Q. Okay. It happened -- The surveillance  
7 of Mr. Johnson was in May of 2020, I think you  
8 said, when you started the contract in Kenner.

9 A. The surveillance -- Okay.

10 Q. Right. So that's what I was asking you  
11 about right now.

12 A. Okay. Okay.

13 Q. You worked for IV at that time, correct?

14 A. Right. This says '18. That's what's  
15 confusing me.

16 MR. LITCHFIELD:

17 When you say this --

18 THE WITNESS:

19 This document, this --

20 MR. LITCHFIELD:

21 Reconventional Demand.

22 THE WITNESS:

23 Thank you.

24 EXAMINATION BY MR. MCGOEY:

25 Q. I think it encompasses things from 2018

1 to 2021, and I'm asking you questions --

2 A. Right.

3 Q. -- about 2020 now when you-all -- IV  
4 took over the City of Kenner contract. And it's  
5 my understanding from your testimony that you got  
6 called by Mr. Johnson because he was being  
7 followed and harassed by people that Mr. Ramelli  
8 was paying to follow the truck.

9 A. Correct.

10 Q. Okay. And so you went out to Republic  
11 and you saw this person, this lady in a car and a  
12 man standing outside a car?

13 A. Correct.

14 Q. And my question is, what you saw, did  
15 you believe that to be something that was illegal?

16 A. I'm not a police officer. And do I  
17 think it was illegal, well, anyone can stand  
18 anywhere. That's not illegal. But was it  
19 harassment, in the form of harassment that was  
20 happening every single day we were being followed  
21 and taking pictures, yes, this was all part of  
22 that.

23 Q. So you believe following a truck is  
24 harassment?

25 A. And taking pictures and hollering and --

1 I believe that's harassment.

2 Q. Okay. Do you have any other information  
3 about what is alleged to be unlawful surveillance  
4 of IV Waste besides the incident with Mr. Johnson  
5 and having other drivers followed and  
6 photographed?

7 A. I can't think of any.

8 Q. Okay. Now, with respect to your  
9 conversations with Mr. Ramelli's employees, you  
10 admit to in the spring talking to his employees at  
11 IV Waste's office, right?

12 A. To -- I was there, yes.

13 Q. Did you call Mr. Ramelli and say, "Hey,  
14 I want to talk to your employees"?

15 A. No.

16 Q. So you didn't inform him that you were  
17 going to be talking to his employees?

18 A. No.

19 Q. What about surveillance, did you ever  
20 surveil Mr. Ramelli's trucks?

21 A. No.

22 Q. Did IV Waste ever --

23 A. No.

24 Q. -- surveil Mr. Ramelli's trucks? Did  
25 the City of Kenner ever surveil Mr. Ramelli's

1 trucks?

2 A. Not that I know of. I don't know what  
3 they do.

4 Q. I'm going to show you what I'm going to  
5 mark as Exhibit 7. It's a February 7, 2020 email.

6 MR. LITCHFIELD:

7 Are you going to introduce these --  
8 attach these?

9 MR. MCGOEY:

10 I've attached -- I mean, we're  
11 going to attach all the ones that are --

12 MR. LITCHFIELD:

13 Right. I just want to make sure we  
14 get a separate stack here.

15 MR. MCGOEY:

16 What I typically do is I'll have --  
17 I'll take back the ones that we use  
18 today, Andi will scan them, email them  
19 to you-all and Connie so she has a copy,  
20 and that's why we're just using them. I  
21 wouldn't scan these 1 through 5, but I  
22 can have her email those to you.

23 MR. LITCHFIELD:

24 Yeah, that's fine. That would be  
25 good. As long as I have them, yeah.

1 (Document marked for identification as  
2 Exhibit 7.)

3 MR. LITCHFIELD:

4 He's asking you about this one  
5 right here.

6 MR. MCGOEY:

7 You want one too, huh?

8 MR. LITCHFIELD:

9 I'm very demanding.

10 EXAMINATION BY MR. MCGOEY:

11 Q. This is an email trail with an attached  
12 document. Take some time to look at it. I'm  
13 going to start asking you questions on the email  
14 trail at the back end, which is on page 2.

15 A. Is this the attachment? I don't know  
16 what this attachment is.

17 Q. I believe that's the attachment that's  
18 behind it.

19 A. Behind it.

20 MR. LITCHFIELD:

21 So you're representing that this,  
22 what appears to be unsigned, I guess  
23 it's an ordinance, is part of the email  
24 chain?

25 MR. MCGOEY:

1 I believe that is the attachment.

2 I think the production was not in a  
3 fashion where you could -- It was not a  
4 PDF, but that's my understanding.

5 MR. LITCHFIELD:

6 Just so the record is clear, there  
7 are actually two unsigned what appear to  
8 be ordinances.

9 MR. MCGOEY:

10 Yep.

11 MR. LITCHFIELD:

12 Not one.

13 MR. MCGOEY:

14 Yep.

15 EXAMINATION BY MR. MCGOEY:

16 Q. Have you had a chance to look at the  
17 email?

18 A. Yes.

19 Q. Okay. So it looks like on the second  
20 page you're sending an email which appears to have  
21 gone to Mr. Torres, Sidney Torres saying, "They  
22 just finished this battle," and there's a PDF to  
23 it. And then on the first page Mr. Torres on  
24 February 7th is responding to you and he says, "I  
25 need some information for Billy so he can do some



1 investigating. He's willing to go early in the  
2 morning to check on some of these trucks. Can you  
3 please put something together so he has something  
4 to follow? What time should he be at the yard?  
5 We need to get him a GoPro. What day is  
6 recycling? Maybe he should start where we know  
7 they have recycling bins and the days that they  
8 are supposed to be picked up and have him waiting  
9 by a house and then follow the truck to see if  
10 they grab trash and where they go."

11 Do you recall in February of 2020  
12 getting a GoPro for someone to surveil Ramelli's  
13 trucks?

14 A. I did not. No, I did not.

15 Q. Did IV -- Who's Billy?

16 A. Well, we have two Billys, so I'm not  
17 sure who this is.

18 Q. All right. Well, what are the names of  
19 the two Billys at IV?

20 A. Billy Good and Billy Fettis. Neither  
21 work -- Well, Billy Fettis, I don't know where he  
22 is. This didn't happen.

23 Q. What didn't happen?

24 A. I didn't -- "We need to get him a  
25 GoPro," I did not get him a GoPro.

1 Q. Okay. Did one of the Billys, either  
2 Billy Good or Billy Fettis surveil Mr. Ramelli's  
3 trucks?

4 A. Not to my knowledge.

5 Q. What was it that Mr. Torres was  
6 interested in seeing, if the recycle truck grabbed  
7 trash and where they go?

8 A. I'm not sure. You would have to ask  
9 him.

10 Q. You don't recall this?

11 A. No, I don't. I don't remember this at  
12 all.

13 Q. Okay. He says up at the top, "Please  
14 because I want to get this early next week as  
15 we're going to need it for ammunition." Do you  
16 know what he was referring to as ammunition?

17 A. No.

18 Q. At this time you were in negotiations  
19 with the City of Kenner to get the contract,  
20 right?

21 A. It was around this time. I don't -- I  
22 know it was in February. I don't know the dates.

23 Q. Did you -- In this email from Mr. Torres  
24 he says, "Can you please put something together so  
25 he has something to follow?" Did you put anything

1 together for Mr. Torres to give to Billy to follow  
2 Mr. Ramelli's trucks?

3 A. I put this email together.

4 Q. Do you recall putting anything else  
5 together?

6 A. No, I did not. I do not and I did not.

7 Q. Well, does this come as a surprise to  
8 you that in February of 2020 Mr. Torres was  
9 emailing you to start following Mr. Ramelli's  
10 trucks?

11 A. I don't know what you mean by surprise,  
12 but I don't remember this.

13 Q. So have you followed Mr. Ramelli's  
14 trucks --

15 A. No.

16 Q. -- on any time before the City of  
17 Kenner?

18 A. No, I have not. To my knowledge, we  
19 have not as a company.

20 Q. Followed any other competitors' trucks?

21 A. No.

22 Q. Well, did you do it for the City of  
23 Kenner, did you follow Mr. Ramelli's truck?

24 A. No.

25 Q. So then you're not aware of IV Waste

1 ever following Mr. Ramelli's trucks?

2 A. Correct.

3 Q. Or any competitors?

4 MR. LITCHFIELD:

5 Let the record reflect also,  
6 Patrick, that you're talking to her as  
7 an individual, not as a company  
8 representative.

9 MR. MCGOEY:

10 Fair enough.

11 EXAMINATION BY MR. MCGOEY:

12 Q. In addition to emailing you to say that  
13 he wanted Billy to start following Mr. Ramelli's  
14 trucks, did Mr. Torres also tell you to start  
15 looking into Mr. Ramelli's landfill tickets?

16 A. I don't remember that.

17 Q. You don't recall that?

18 A. No.

19 Q. You don't recall contacting River Birch  
20 and asking them to provide you a copy of Mr.  
21 Ramelli's tickets for the City of Kenner?

22 A. No.

23 Q. All right. Let's see if I can refresh  
24 your recollection.

25 (Discussion off the record.)

1 (Document marked for identification as  
2 Exhibit 8.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. I'll show you a February 12, 2020 email.  
5 Take a look at that. Does this email, Exhibit 8,  
6 refresh your recollection that in February 2020  
7 Mr. Torres asked you to get Ramelli's landfill  
8 tickets to see how many trucks they were running?

9 A. I see the email that I sent saying okay.

10 Q. So now do you remember him actually  
11 doing that, asking you to do that?

12 A. I don't remember him doing this.

13 Q. Do you remember whether or not IV Waste  
14 asked River Birch to provide them?

15 A. I don't recall.

16 Q. All right. I'll show you now what I'm  
17 going to mark as Exhibit No. 9, which is an email  
18 of February 13, 2020 from you to Sidney Torres.

19 (Document marked for identification as  
20 Exhibit 9.)

21 EXAMINATION BY MR. MCGOEY:

22 Q. In this email, Exhibit 9, you say, "I'll  
23 go through the invoices this morning to determine  
24 the number of trucks used, but don't see the  
25 recycling collection days and Ramelli's website

1 isn't working for me. I will ask about recycling  
2 days today in a subtle way." Do you recall trying  
3 to look into Ramelli's recycling days?

4 A. It appears to me -- No, I don't, but it  
5 appears to me that we were gearing up to purchase  
6 trucks or service a contract. This isn't about  
7 Ramelli. This is about our operations and how  
8 many trucks it takes.

9 Q. Okay. Well, if you go to the second  
10 page of this PDF, you email Mr. Torres saying,  
11 "This looks like seven trucks. I need to put it  
12 on a calendar to see if they run more in the  
13 beginning of the week. We really need to get  
14 something for the boom truck." And his response  
15 at the bottom is, "Please let me know so I can get  
16 Billy fed us to start doing surveillance."

17 This is the second email that Mr. Torres  
18 has sent you about Billy doing surveillance on  
19 Ramelli. Does that refresh your recollection?

20 A. No. And I understand the context  
21 though. It wasn't about what Ramelli is doing.  
22 It's about what IV needs to pick up garbage, just  
23 like we are doing now in New Orleans.

24 Q. You didn't have a contract at this time,  
25 did you?

1           A.    I thought we signed it in February, but  
2 I don't have the contract and I didn't review the  
3 dates. Did we sign it in February?

4           Q.    No. For a point of reference, March 5th  
5 was the council meeting, if that helps you. Do  
6 you recall what you meant by you were going to ask  
7 about recycle days in a subtle way?

8           A.    No. I don't know who I would ask.

9           Q.    Who is Brandon Parker?

10          A.    He is an employee.

11          Q.    Of IV Waste?

12          A.    Yes.

13          Q.    Did he work for Ramelli?

14          A.    Not to my knowledge.

15          Q.    Did you have him trying to find out  
16 information about Ramelli?

17          A.    I'm not sure. I know he worked for  
18 Pelican though. I have no idea if he worked for  
19 Ramelli.

20          Q.    Do you remember doing any investigation  
21 into looking to see whether Mr. Ramelli was  
22 dumping garbage from other contracts on the City  
23 of Kenner's code at the landfill?

24          A.    No.

25          Q.    Do you remember Mr. Torres being

1 interested in that?

2 A. No.

3 Q. Let's see if I can refresh your  
4 recollection. I'll show you what I'm going to  
5 mark as --

6 MR. MCGOEY:

7 What are we on, 10?

8 MR. LITCHFIELD:

9 Exhibit 10.

10 MR. MCGOEY:

11 10, which is a May 5, 2020 email  
12 from Mr. Torres to Stacey Trahan and  
13 copied you and Michele Chaisson.  
14 (Document marked for identification as  
15 Exhibit 10.)

16 EXAMINATION BY MR. MCGOEY:

17 Q. Who is Stacey Trahan?

18 A. She used to handle collections for IV  
19 Waste.

20 Q. And Michele Chaisson, "Chaisson," who is  
21 she?

22 A. She was handling operations in the  
23 beginning of the Kenner contract.

24 Q. Does she still work for IV?

25 A. No.



1 Q. In this email Mr. Torres says, "I want  
2 to see if they were dumping more trucks than us  
3 from other areas that had nothing to do with  
4 Kenner." Do you recall looking into that, IV or  
5 Mr. Torres looking into seeing whether Ramelli was  
6 dumping more trucks --

7 A. No. This was sent to Stacey and I was  
8 copied on it.

9 Q. So you don't recall this at all?

10 A. No. This was after we had started as  
11 well.

12 Q. All right. I'm going to show you now  
13 what I'm going to mark as Exhibit 11, which are  
14 excerpts from a large volume of spreadsheets  
15 produced with what we understood to be text  
16 messages from your cell phone. I'm going to mark  
17 this as Exhibit 11.

18 (Document marked for identification as  
19 Exhibit 11.)

20 EXAMINATION BY MR. MCGOEY:

21 Q. I'm interested in -- Well, probably the  
22 easiest way to find it is from the back. One,  
23 two, three, fourth page from the back of Exhibit  
24 11. On line -- I guess it's 124, this looks like  
25 a text message from maybe your gmail account to

1 Brandon Parker dated February 23, 2020 at 8:52  
2 A.M. You say, "I need copies of their routes.  
3 Can you get those?" Do you see that?

4 MR. LITCHFIELD:

5 Do you see it, Julie?

6 THE WITNESS:

7 Yes. Yes.

8 EXAMINATION BY MR. MCGOEY:

9 Q. And then Mr. Parker's response is right  
10 above it. He says, "I will do my best to try."  
11 And then you say, "Okay. I'm working on them too.  
12 Between the two of us we can get them." What did  
13 you do to get copies of Ramelli's routes?

14 A. I didn't do anything to get copies of  
15 their routes.

16 Q. What were you asking Mr. Parker to do?

17 A. It sounds like copies of their routes so  
18 we can pick up the garbage. You're saying -- I  
19 thought we signed this contract in February,  
20 but -- But it doesn't say whose routes we're  
21 talking about.

22 Q. So you think you were --

23 A. It says copies of their routes. I don't  
24 know what routes we're talking about.

25 Q. Got you. So you think you might have

1 been talking about some other routes with Mr.  
2 Parker?

3 A. Well, he works in St. Bernard, so I  
4 don't know. He's a lead driver in St. Bernard  
5 Parish. It very well could have been. I don't  
6 know.

7 Q. Okay.

8 A. I talked about a lot other things.  
9 Let's go down.

10 MR. LITCHFIELD:

11 Julie, just answer the question.

12 THE WITNESS:

13 Right. But it's taken out of  
14 context.

15 MR. LITCHFIELD:

16 I know, but that's his choice.  
17 Just answer his questions.

18 EXAMINATION BY MR. MCGOEY:

19 Q. So you don't know what routes you were  
20 talking about in that text message?

21 A. (Shakes head negatively.)

22 Q. You have to answer.

23 A. No.

24 Q. Okay. And with that day that you recall  
25 Mr. Starks and Mr. Eddie at IV Waste's office

1 where you were talking to the Ramelli employees,  
2 do you recall whether or not at that meeting --

3 A. I wasn't -- I wasn't in that meeting. I  
4 wasn't talking to them.

5 MR. LITCHFIELD:

6 Let him --

7 THE WITNESS:

8 I know but he's --

9 MR. LITCHFIELD:

10 I know that. I know it's a natural  
11 tendency, but let him finish his  
12 question.

13 THE WITNESS:

14 Okay.

15 EXAMINATION BY MR. MCGOEY:

16 Q. Who was running the meeting for IV with  
17 Ramelli's employees?

18 A. I don't know. I wasn't in the meeting.  
19 I don't know.

20 Q. Okay. Well, whose responsibility was it  
21 to find employees to work in Kenner?

22 A. Michele Chaisson.

23 Q. Okay. Do you recall that IV gave  
24 Ramelli's employees uniforms at that meeting?

25 A. No.

1 Q. You don't recall that?

2 A. No.

3 Q. But Ms. Chaisson would have been the  
4 person in charge of it?

5 A. Correct.

6 Q. Have you seen the affidavit Mr. Rivera  
7 gave in this case?

8 A. No.

9 Q. All right. I'm going to ask you to take  
10 a look at it, and I'll mark this as Exhibit 12.

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

13 THE WITNESS:

14 (Reading document.)

15 EXAMINATION BY MR. MCGOEY:

16 Q. Have you had a chance to review it?

17 A. Yes.

18 Q. Okay. I'm just going to go through the  
19 different numbers and ask you what you know. So  
20 in paragraph 2 he says, "I worked as a driver for  
21 IV Waste from 2016 to 2018 and 2020 to 2021." Now  
22 from '16 to '18 you didn't work for IV; is that  
23 correct?

24 A. I believe I was there in the  
25 beginning -- maybe '18 I was there.

1 Q. Okay. And you were there in '20 and  
2 '21.

3 A. '17 or '18 I started. Yes, I was there  
4 in '20 and '21.

5 Q. All right. Number 3 says, "My work for  
6 IV Waste included driving a garbage truck in the  
7 French Quarter." Did he do that?

8 A. Yes, but not -- That was not his main  
9 job. He did as a fill-in.

10 Q. What was his main job?

11 A. His main job was to do roll-off  
12 containers for commercial customers. He says the  
13 City of Kenner. It was commercial customers in  
14 St. Bernard Parish. He was a roll-off driver.

15 Q. Okay.

16 A. That's what he was hired for and that  
17 was his position.

18 Q. Okay. Do you dispute that he says in  
19 his affidavit that he drove a garbage truck in the  
20 French Quarter for IV?

21 A. I believe he did in the beginning, and  
22 then he did fill in when he was let go at the end  
23 when we had a driver who was out.

24 Q. Okay.

25 A. So he subbed as a driver.

1 Q. All right. Number 4 says, "Throughout  
2 my years driving trucks in the French Quarter for  
3 IV Waste I picked up residential garbage, as well  
4 as garbage and recyclables for IV Waste commercial  
5 accounts." Is that accurate?

6 A. Not the recycling. We don't have  
7 recycling in the French Quarter. We have  
8 commercial customers.

9 Q. So IV Waste doesn't do recycling in the  
10 French Quarter?

11 A. Correct.

12 Q. Does it do it in the Marigny?

13 A. I believe we used to have one stop in  
14 the Marigny.

15 Q. The Joint?

16 A. Uh-huh, that's it, yes.

17 Q. And when you were doing recycling for  
18 The Joint, what recycle facility was IV Waste  
19 using?

20 A. I don't know.

21 Q. Well, did you have a -- Did IV Waste  
22 have a contract with a MRF?

23 A. No.

24 Q. Did IV Waste have a drop-off site to  
25 drop off the recycling?

1 A. A drop site, no.

2 Q. Was, in fact, the recycling that IV  
3 Waste was doing at that time was putting the  
4 recycling in a garbage truck and taking it to the  
5 landfill?

6 A. I don't know.

7 Q. Well, that's what Mr. Rivera says in  
8 number 5. It says, "During my shifts in the  
9 French Quarter for IV Waste I never once picked up  
10 recycles from a commercial account and then took  
11 the recycles to a recycle facility. Instead, I  
12 always commingled recycling with garbage in a  
13 garbage truck and then dumped the truck at the  
14 River Birch Landfill."

15 Were you aware in 2017 and '18 when you  
16 were at IV Waste that Mr. Rivera was commingling  
17 recycling and garbage and taking it to the  
18 landfill?

19 A. No, he wasn't. He would bring  
20 contaminated garbage to the landfill, and we  
21 brought the recyclables to the MRF.

22 Q. Contaminated garbage?

23 A. Contaminated recycling with garbage,  
24 correct.

25 Q. Okay. So what was in 2017 and '18 IV



1 Waste's process to determine what was contaminated  
2 recycling versus uncontaminated?

3 A. '17 and '18, I wasn't in operations '17  
4 and '18.

5 Q. So you don't know?

6 A. No, I don't.

7 Q. Who would I ask to find that out?

8 A. Michele Chaisson.

9 Q. Okay. As you sit here today, you can't  
10 tell me any MRF that IV Waste had a contract with  
11 in 2017 and '18 to take recyclables?

12 A. Correct.

13 Q. Do you know where the recyclables were  
14 taken?

15 A. No. This statement isn't true. We  
16 have --

17 MR. LITCHFIELD:

18 Julie, let --

19 THE WITNESS:

20 Okay.

21 EXAMINATION BY MR. MCGOEY:

22 Q. Tell me why this statement in  
23 paragraph --

24 MR. LITCHFIELD:

25 See, this is what happens when

1           you -- I'll give you a hint.

2           THE WITNESS:

3                    Because he said recyclables, but  
4           it's a one --

5           MR. LITCHFIELD:

6                    We'll get out of here by Thursday  
7           of next week if you keep volunteering.

8           MR. MCGOEY:

9                    He's done this a lot longer than I  
10          have.

11          THE WITNESS:

12                    Okay. Next. And then I'll have  
13          water and use the restroom after the  
14          next one.

15          EXAMINATION BY MR. MCGOEY:

16           Q.     So you believe paragraph 5 to be  
17          incorrect, not true, is that your testimony?

18           A.     I was talking about before, but  
19          anyway -- Just Jerome is suing us.

20           Q.     For?

21           A.     Something that didn't happen. You can  
22          sue for anything these days.

23           Q.     I agree about that. What is the nature  
24          of his lawsuit?

25           A.     He's saying he's hurt, but he didn't

1 miss a day of work at his other company and he --  
2 I have photographs of him taking pictures of our  
3 trucks in the landfill, saying he was going to get  
4 us. And it all ties in with this because this was  
5 around the date.

6 Q. Okay. Well, do you dispute that he  
7 commingled -- while working for IV, he commingled  
8 garbage with recycling and took it to the  
9 landfill?

10 A. I don't know what he did in '16 and '18.  
11 As far as the French Quarter trucks, I don't know  
12 what he did.

13 Q. Does IV do recycling in St. Bernard?

14 A. No.

15 Q. So -- But IV does do recycling in the  
16 City of Kenner?

17 A. Correct.

18 Q. Okay. So at that contract --

19 A. We collected.

20 Q. -- you were the general manager, right?

21 A. Correct.

22 Q. So what did you do leading up to IV  
23 starting recycled collections in May of 2020 to  
24 arrange for recycling to go to a recycle facility?

25 A. We had an agreement with CW, and I was

1 told the day before we started the contract that  
2 Mr. Ramelli stopped us from going by the owner --  
3 I don't remember his name -- and that he had  
4 employees who worked there, and that he had to  
5 listen to Mr. Ramelli because he would shut down  
6 his facility.

7 And Mr. Ramelli stopped us from bringing  
8 our recyclables there, so I made arrangements with  
9 Republic on L and A Road to bring the recyclables  
10 from the City of Kenner there.

11 Q. So this agreement you had with CW, was  
12 that in writing?

13 A. No. I have notes on every conversation  
14 though.

15 Q. Okay. And where are those notes?

16 A. At my office.

17 Q. All right.

18 A. I may even have emails if you pulled  
19 them.

20 Q. I haven't seen those, but I'm happy to  
21 look at them if you have them. And what was the  
22 terms of the agreement you had with CW?

23 A. That we could bring Kenner's recyclables  
24 there, the same way Richard's Disposal and Metro  
25 Disposal was doing for the City of New Orleans.

1 Q. And did you have an agreed-to amount or  
2 rate?

3 A. We did. I don't recall what it was.

4 Q. But you would have that in emails  
5 confirmed?

6 A. I don't know if I have any emails or  
7 written notes.

8 Q. Okay. And who did you speak with that  
9 told you --

10 A. The owner. I don't recall his name. I  
11 want to say Andrew, but I might be wrong. I don't  
12 remember his name.

13 Q. And when -- If you started -- If you got  
14 this call, I guess, the end of April, right?

15 A. The day before we started.

16 Q. The last day of April.

17 A. He said that they had a change of heart.

18 Q. So when had you reached out and formed  
19 this agreement with CW for recycling?

20 A. Prior to that.

21 Q. Like that week or month?

22 A. I would have it in notes. I don't know.

23 Q. Did you reach out to any other recycle  
24 facilities to --

25 A. Republic.

1 Q. And what did Republic tell you? Did you  
2 have an agreement with them as well?

3 A. Yes, a verbal.

4 Q. And when did you have that verbal  
5 agreement?

6 A. When Mr. Ramelli stopped us from going  
7 to CW.

8 Q. So that was the day before you started  
9 picking up recycling?

10 A. Correct. It was literally the day  
11 before.

12 Q. So you hadn't reached out to Republic  
13 before the day before you --

14 A. I believe I did. The manager was -- his  
15 name was Luis Lizama. I believe I did. And I  
16 believe that their rate was more -- I don't  
17 remember -- than CW, so it made financial sense  
18 for us to go to CW.

19 Q. So when May 1st started and IV picked up  
20 recycling that day, right, in Kenner, May 1st?

21 A. I don't remember the day of the week. I  
22 don't know --

23 Q. It was a Friday.

24 A. It was a Friday, so yes.

25 Q. And that was -- Terry Johnson was

1 driving the recycle truck, right?

2 A. I don't know if that was the day. I  
3 don't remember who was driving it.

4 Q. But you do recall Terry Johnson driving  
5 a recycle truck being at the Republic yard were  
6 you saw a lady and a man that were, you thought,  
7 harassing him?

8 A. Correct. I believe it to be harassment.  
9 But I don't know that that was the first day.

10 Q. Got you. Got you. In fact, the first  
11 day that Mr. Johnson was driving the truck on May  
12 1st, hadn't you told him to take the recycling to  
13 the landfill?

14 A. No.

15 Q. You hadn't told him that?

16 A. No. The first day we brought it to  
17 Republic on L and A Road.

18 Q. Right. Do you recall Terry Johnson  
19 calling you and saying Mr. Ramelli's guys were  
20 following him and they were going to see him take  
21 the recycling to the landfill, and you told him  
22 take it to Republic?

23 A. No. And I don't know that Terry was  
24 driving that first day. I don't remember the time  
25 frame day by day. I know it was definitely in the

1 first month because we were being followed by  
2 other Ramelli employees, which drivers were  
3 calling on the radio saying that we're being  
4 followed and we're getting pictures taken and they  
5 are yelling at us. So all of that was build-up  
6 for a couple of weeks when they called, which is  
7 why I left the office.

8 Q. Okay. So then on May 1st when the  
9 recycling is being picked up in the City of  
10 Kenner, Republic in New Orleans was set up to take  
11 your recycling?

12 A. May 1st, I believe so.

13 Q. Do you not recall that the gates were  
14 locked and you had to call Luis and ask him to get  
15 somebody over there to open up the gates?

16 A. You seem to know more than me.

17 Q. I do.

18 A. I don't recall the day. I don't recall  
19 the day.

20 Q. But do you recall --

21 A. I do recall that happening.

22 Q. Tell me a little about that  
23 conversation. What did you call Mr. Luis about?

24 A. The gates were locked. I believe that  
25 day, I don't know when it was, we were out later



1 than we were supposed to be, and they closed at a  
2 certain time. I don't remember what time. So he  
3 sent his supervisor who had just left right back  
4 to open the gates.

5 Q. And then you dropped off the recycling  
6 and took the truck?

7 A. I don't remember.

8 Q. You don't remember just parking the  
9 recycle truck there for the weekend?

10 A. Well, then there you go. You have my  
11 answers. I don't recall.

12 Q. You don't recall that?

13 A. No, I don't.

14 Q. What time do you think they closed up on  
15 May 1st?

16 A. I don't remember. If it's a Friday, I  
17 don't see why it would be early. I don't know.  
18 Most garbage companies stay open later than  
19 midday.

20 Q. I'll show you what I'm going to mark as  
21 Exhibit 13, which is a June 5 email between you  
22 and City of Kenner regarding May 1 through May 31,  
23 2020 recycling tickets and ask you to take a look  
24 at that.

25 (Document marked for identification as

1 Exhibit 13.)

2 EXAMINATION BY MR. MCGOEY:

3 Q. Do you recall sending the MRF tickets to  
4 the City of Kenner?

5 A. Yeah. I remember this response.

6 Q. All right. So it looks like the first  
7 ticket dated May 1, 2020 was at -- If you look a  
8 few pages in --

9 MR. LITCHFIELD:

10 But these are Bates stamped, so do  
11 you have a particular --

12 MR. MCGOEY:

13 Are these Bates stamped?

14 MR. LITCHFIELD:

15 The ones you gave me are Bates  
16 stamped. Some of them are.

17 MR. MCGOEY:

18 Yeah, but the attachment is not.  
19 So it would be the first page after the  
20 attachment.

21 EXAMINATION BY MR. MCGOEY:

22 Q. You see the May 1 -- You're familiar  
23 with MRF tickets, right?

24 A. Yes.

25 Q. So this is dated at May 1st at 2:56

1 p.m.; is that right?

2 A. Yes.

3 Q. All right. So your understanding is  
4 that the recycle facility had closed before 2:56  
5 p.m. that day?

6 A. Like I said, I don't know what time they  
7 closed. This is time stamped. I don't remember  
8 the day.

9 Q. Does IV have a certain truck that it  
10 handles recycling for Kenner?

11 A. Yes.

12 Q. What's the truck number?

13 A. We had rental trucks in the beginning,  
14 to get to your question, but the truck numbers, we  
15 have multiple trucks.

16 Q. Multiple recycle trucks?

17 A. Yes.

18 Q. What are those numbers?

19 A. 116 and 118.

20 Q. And it looks like for that first month  
21 of recycling you-all picked up around 55.9 tons of  
22 recycling? I'll show you what I'm going to mark  
23 as Exhibit 14, and just confirm that for me. It's  
24 an email you sent.

25 (Discussion off the record.)

1 (Document marked for identification as  
2 Exhibit 14.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. So is this a June 5 email from you to  
5 Deborah Foshee, the City of Kenner?

6 A. Yes.

7 Q. You say, "Please know that IV Waste  
8 picked up 55.9 tons of commingled recycling in May  
9 of 2020 from the City of Kenner."

10 A. Yes.

11 Q. And that's reflected in those MRF  
12 tickets that we just looked at in Exhibit 13?

13 A. Is that your question?

14 Q. Yes.

15 A. Yes, I believe so.

16 Q. Just checking. So did IV have any  
17 issues with contaminated recycling that first  
18 month of May?

19 A. I don't remember, no. I don't recall.

20 Q. And for that month of May, IV was  
21 picking up the recycling and taking the truck  
22 directly to Republic's MRF in New Orleans?

23 A. Yes. It may be in Metairie, though, not  
24 New Orleans.

25 Q. I'm going to show you what I'm going to

1 mark as exhibit --

2 THE WITNESS:

3 May I use the restroom --

4 MR. MCGOEY:

5 Yeah. Sure.

6 THE WITNESS:

7 -- when you're done with this?

8 This part, we can finish this.

9 MR. MCGOEY:

10 Okay. Great. What number is that,  
11 14?

12 EXAMINATION BY MR. MCGOEY:

13 Q. I'll show you what I'm going to mark as  
14 15, which is some annual reporting for recycling.  
15 (Document marked for identification as  
16 Exhibit 15.)

17 EXAMINATION BY MR. MCGOEY:

18 Q. Have you ever seen this before?

19 A. It looks familiar. I don't know what's  
20 at the bottom.

21 Q. Who would have prepared this for IV?

22 A. Possibly me. I'm not sure. I don't  
23 know if it was me or Michele. I wouldn't have put  
24 this graph on the bottom, though, so not me.

25 Q. Okay.

1           A.     Was this part of yours or ours, this  
2 little graph.

3           Q.     That was on the document.

4           A.     Okay.

5           Q.     Can you tell me why the tonnage of  
6 recycling went dramatically down after June of  
7 2020?

8           A.     No, I can't tell you why.

9           Q.     Did IV change how it picked up recycling  
10 in the City of Kenner after June of 2020?

11          A.     I know we changed drivers.

12          Q.     Other than changing drivers?

13          A.     I'm assuming we had changed hoppers.  
14 I'm not certain if we changed the routes or not.

15          Q.     And you believe changing drivers and  
16 hoppers affects the amount of recycling that IV  
17 was able to do for the City of Kenner?

18          A.     No. You just said that. You asked me  
19 if anything had changed and I stated what changed.

20          Q.     Okay. So but you don't think the change  
21 of drivers and hoppers had any effect --

22          A.     I don't know. I'm telling you what  
23 changed. I can't pinpoint it. I don't know.

24          Q.     Did IV in July of 2020 change how it  
25 processed recycling for the City of Kenner?

1           A.    I don't recall, but I'll be happy to  
2 look at the documents.

3           THE WITNESS:

4                    Can I use the restroom while you --

5           MR. MCGOEY:

6                    Sure. Absolutely. You want to  
7 take a break, absolutely.

8           THE VIDEOGRAPHER:

9                    We're going off the record. The  
10 time is 11:43.

11                   (Break taken.)

12           THE VIDEOGRAPHER:

13                    Returning to the record. The time  
14 is 11:52.

15           EXAMINATION BY MR. MCGOEY:

16           Q.    All right. I want to talk about the  
17 difference between your commercial accounts and  
18 your municipal accounts. It's my understanding  
19 that IV for its commercial accounts pays the  
20 tipping fee at River Birch; is that right?

21           A.    Yes.

22           Q.    But for the municipal accounts like City  
23 of Kenner or St. Bernard they pay the tipping fees  
24 for their residential garbage?

25           A.    For their residential garbage, yes.

1 Q. All right. So IV doesn't get the bill  
2 for the City of Kenner or St. Bernard's  
3 residential waste at the landfill?

4 A. Correct.

5 Q. That goes directly to them?

6 A. Correct.

7 Q. All right. Does IV commingle its  
8 commercial account waste with its municipal  
9 waste --

10 A. No.

11 Q. -- when they take it to the River Birch  
12 Landfill?

13 A. No.

14 Q. As you sit here today, do you ever  
15 recall doing that?

16 A. No.

17 Q. The contract that IV has with River  
18 Birch for its commercial waste, does it have a  
19 tonnage amount that if it gets over a certain  
20 tonnage per month, it gets a reduced rate on its  
21 tipping fee for its commercial accounts?

22 A. Yes. All do.

23 Q. And that's 3,000 tons a month?

24 A. I don't know what the number is offhand.

25 Q. Okay. Do you ever recall using City of



1 Kenner residential waste to the St. Bernard  
2 residential waste on IV's commercial account so  
3 you could get a reduced rate --

4 A. No.

5 Q. -- with River Birch?

6 A. No.

7 Q. You don't recall that. Would that be  
8 allowed?

9 A. No. You're talking about municipal  
10 solid waste from the curb, curbside waste?

11 Q. Yes.

12 A. No.

13 Q. All right. Let me show you what I'm  
14 going to mark as Exhibit 16, which is a July 10,  
15 2020 email. You're on there. I just want to make  
16 sure.

17 (Document marked for identification as  
18 Exhibit 16.)

19 EXAMINATION BY MR. MCGOEY:

20 Q. So this is about two months, two and a  
21 half months after you started in the City of  
22 Kenner, right? And so it looks like Dana McKee  
23 with River Birch is emailing you a list of  
24 outstanding invoices?

25 A. Let me read it and I'll --

1 (Reading document.)

2 In May of '20 Dana sent us invoices. I  
3 asked her to charge it to the credit card. And  
4 then I asked her two months later to send us a  
5 statement so we can make a payment, and she sent a  
6 list of invoices, yes.

7 Q. Okay. So on July 10, customer number  
8 5606, is that IV Waste's commercial customer  
9 account with River Birch?

10 A. I don't know the customer number, but it  
11 appears to be.

12 Q. All right. So it looks like on July 10  
13 River Birch is saying that IV has \$265,418.69 of  
14 unpaid invoices?

15 A. Correct.

16 Q. And that would be for commercial  
17 accounts?

18 A. And I believe construction as well.

19 Q. Okay. And you say construction.  
20 Construction of what?

21 A. Construction account, it appears that  
22 these smaller amounts are construction invoices,  
23 but I'm not certain without looking at the  
24 invoices, seeing this is a statement.

25 Q. I'm now going to show you what I'm going

1 to mark as Exhibit 17, which is a July 28, 2020  
2 email.

3 (Document marked for identification as  
4 Exhibit 17.)

5 THE WITNESS:

6 (Reviewing document.)

7 EXAMINATION BY MR. MCGOEY:

8 Q. Have you had a chance to review it?

9 A. Yes.

10 Q. All right. So on the second page it  
11 looks like Mr. Torres is emailing -- No. It looks  
12 like you're emailing Mr. Torres and Bryan Clarey.  
13 Who is Mr. Clarey?

14 A. He was the controller of IV Waste.

15 Q. And his email address is at  
16 sdtivcapital?

17 A. Correct.

18 Q. What is that company?

19 A. He has an IV Capital and an IV Waste --  
20 had an IV Waste email. IV Capital is Mr. Torres's  
21 other company.

22 Q. So does Mr. Clarey work for IV Waste or  
23 IV Capital?

24 A. Neither.

25 Q. Who did he used to work for?

1 A. He used to work for both.

2 Q. But he's no longer there?

3 A. Correct.

4 Q. So he was an employee of IV Waste?

5 A. Yes.

6 Q. And Chuck Brechtel, was he also an  
7 employee of IV Waste?

8 A. He worked for Mr. Torres's companies.  
9 I'm not sure officially, but, yes, he did work for  
10 IV Waste. We went over that. He was the CFO.

11 Q. The Re line is Landfill Tonnage. It  
12 says, "As of today, we're at 2802.44 tons at River  
13 Birch for July, and we need to bring 3,000 tons to  
14 capitalize our discount this month."

15 Does that refresh your recollection as  
16 to the amount of tonnage that IV Waste needs to  
17 obtain on a monthly basis --

18 A. Yes.

19 Q. -- to get a discount?

20 A. Yes.

21 Q. What discount does IV recover or get  
22 from River Birch if it meets its tonnage?

23 A. I don't know the exact. A dollar or two  
24 per ton I would assume, but I don't have a  
25 contract in front of me.

1 Q. Okay. You then go on to say, "Jenny  
2 will give us a total tomorrow so we can determine  
3 if any of the bulk Kenner cans need to go to RB on  
4 Thursday." What are the bulk Kenner cans?

5 A. I would assume this is the Kenner  
6 transfer station cans that we paid for. This is  
7 us managing our contract in tonnage.

8 Q. So what are the bulk Kenner cans? Where  
9 are those?

10 A. On the Kenner transfer station.

11 Q. The four that are on the side of the --

12 A. There are six. On the side of the ramp?

13 Q. Yes.

14 A. Uh-huh.

15 Q. So the four on the side of the ramp,  
16 those get billed to IV's commercial account?

17 A. Correct.

18 Q. And what about the two that are in the  
19 pen for recycling?

20 A. The two that are in the pen for  
21 recycling go to the recycling MRF. If they are  
22 contaminated they wouldn't.

23 Q. And whose account do those go on?

24 A. They would go -- IV Waste would pay for  
25 anything inside the Kenner Yard. That's the way

1 our contract reads. Anything outside the Kenner  
2 Yard, the City pays for, and outside of the  
3 yard -- they call it the Kenner Yard, it's in the  
4 back. The Kenner transfer station is inside the  
5 gate, which is what you're calling the pen, and  
6 the transfer station ramp where there's six cans.

7 Q. Okay. So those six cans that are in the  
8 Kenner -- we'll call it Kenner transfer station,  
9 those get billed to IV Waste?

10 A. We pay the tonnage, yes.

11 Q. The tonnage. Got you. The tipping fee?

12 A. Correct.

13 Q. I'll show you what I'm going to mark as  
14 Exhibit 18 and ask you to take a look at that.

15 (Document marked for identification as  
16 Exhibit 18.)

17 EXAMINATION BY MR. MCGOEY:

18 Q. This is an email down at the bottom to  
19 you from IV Waste AP. Who is that?

20 A. I'm not sure who it was at the time, but  
21 it's accounts payable email.

22 Q. Okay. And it reflects that for August  
23 or July you had 3283.07 tons at the River Birch  
24 Landfill, and then you say, "This melts my heart."  
25 What does that mean?

1           A.     Well, in January of '20 we were at close  
2     to 4,000, and COVID hit, a lot of our commercial  
3     businesses shut down. And we weren't receiving  
4     payment from our commercial businesses because  
5     they were struggling with closing down and not  
6     being able to support their business.

7           So you can see from January pre-COVID to  
8     May our commercial numbers dropped significantly,  
9     and we took on the burden of paying a higher  
10    tipping rate and also didn't have the income from  
11    our commercial customers. So it was nice after  
12    one, two, three, four, five, six, seven, eight,  
13    seven months to see that the city was coming back  
14    somewhat from the commercial garbage that we were  
15    collecting.

16          Q.     Did IV Waste do the cleanup for the Isis  
17    parade in Kenner 2020?

18          A.     Yes.

19          Q.     All right. I'll show you what I'm going  
20    to mark as Exhibit 19, which was previously marked  
21    Exhibit 120 in a different case in deposition, so  
22    I'll just put it over that. I'll ask you to take  
23    a look at this January 30 email.

24                   (Document marked for identification as  
25                   Exhibit 19.)

1 EXAMINATION BY MR. MCGOEY:

2 Q. It looks like you're sending on  
3 Thursday, January 30th at 7:45 p.m. a proposal to  
4 Chad Pitfield --

5 A. Yes.

6 Q. -- is that correct? How did you come  
7 about preparing this proposal?

8 A. I believe I had a conversation with Mr.  
9 Pitfield about the requirements for the parade.

10 Q. And did you prepare the attached January  
11 30, 2020 proposal?

12 A. Yes.

13 Q. What involvement did Sidney Torres have  
14 in preparation of the January 30, 2020 proposal?

15 A. I don't recall which part.

16 Q. Well, did you have -- Did you give him a  
17 copy of it before you sent it to the City of  
18 Kenner?

19 A. Well, he signed it, so yes. He signed  
20 it, but I don't remember if he helped acquire  
21 the -- I'm sure he helped acquire the labor and  
22 the sweeper.

23 Q. So where did you get -- This has got  
24 like four bullet points of what y'all were going  
25 to be offering to do. Where did you find that



1 scope of what you were being asked to give a bid  
2 on?

3 A. I believe Mr. Pitfield told us what was  
4 required and asked for a sweeper, if I remember  
5 correctly, which wasn't used previously.

6 Q. What do you mean, you say it wasn't used  
7 previously?

8 A. In the previous year by the former  
9 contractor. That's the way I recall it, but I'm  
10 not 100 percent. This was two and a half years  
11 ago.

12 Q. So you think that there was an Isis  
13 parade in 2019?

14 A. Yes. I don't know that it was called  
15 Isis. I know that there was a parade.

16 Q. Okay. All right. And how did IV arrive  
17 at the price of 15,250?

18 A. I don't recall.

19 Q. Did -- Mr. Torres obviously agreed to  
20 that because he signed it?

21 A. He signed it, yes.

22 Q. Do you recall any discussions with Mr.  
23 Torres regarding the price?

24 A. I'm sure we had a discussion if I typed  
25 a letter. I don't recall the context.

1 Q. Were you aware that Ramelli was bidding  
2 on this work?

3 A. No.

4 Q. No one ever told you that?

5 A. No.

6 Q. How did it come to your attention that  
7 there was this parade that you could give a  
8 proposal to?

9 A. I believe Mr. Pitfield had a  
10 conversation with the company about putting in a  
11 bid.

12 Q. What company?

13 A. IV Waste.

14 Q. Who did Mr. Pitfield talk to at IV  
15 Waste?

16 A. I'm not sure.

17 Q. Okay. So who told you -- It wasn't you?

18 A. I don't remember.

19 Q. Okay.

20 A. I don't remember. I don't know how  
21 it --

22 Q. Did someone tell you to prepare this  
23 proposal?

24 A. I don't remember. I know this is mine.  
25 I own this. I definitely typed this. I can tell

1 by the letterhead. But I don't recall how this  
2 came to us.

3 Q. Okay. You think Mr. Pitfield called  
4 someone at IV and told them about this, but you  
5 don't know who that was?

6 A. I don't know if it was Mr. Pitfield or  
7 if it was someone from the administration. I  
8 don't know.

9 Q. Is it fair to say before January 30,  
10 2021 -- 2020 at 7:45 p.m. when you sent this  
11 proposal, that you hadn't spoken to anyone at the  
12 City of Kenner about it before this?

13 A. I may have. I really don't recall.

14 Q. You just don't recall?

15 A. I don't recall how this came about.

16 Q. Fair enough. I'll show you what I'm  
17 going to mark as Exhibit 20, which is an email  
18 that same day from Mr. Pitfield back to you. I'll  
19 ask you to take a look at that.

20 (Document marked for identification as  
21 Exhibit 20.)

22 EXAMINATION BY MR. MCGOEY:

23 Q. It looks like he's responding back to  
24 you at 10:05 p.m. I'll represent to you that  
25 January 30th was a Thursday night. And he says,

1 "Thank you. We are definitely looking forward to  
2 working together. Can we chat sometime next week  
3 just to ensure we're on the same page with  
4 everything needed?" Were you aware that -- Who  
5 did you understand had the authority to hire IV to  
6 clean up for the parade, Mr. Pitfield or somebody  
7 else at Kenner?

8 A. I didn't ask. I don't --

9 Q. Before you sent the proposal, weren't  
10 you already told that you were going to get the  
11 job?

12 A. No. We were asked to submit a proposal  
13 for a bid for a parade, and I don't know who -- I  
14 don't know who runs this parade. Till today I  
15 don't know who runs this parade.

16 Q. Okay. Did you think it was odd that  
17 he's writing you back three hours later on a  
18 Thursday night and says I look forward to working  
19 together, like you got the job?

20 A. No.

21 Q. Did you understand that that's what he  
22 was saying, you got the job?

23 A. This is a receipt that he received it,  
24 "Thank you," and a response that he received it.  
25 He worked at Parks and Recreation at the time per

1 his signature, so I don't know if this was under  
2 him. I don't know. I don't know how to answer  
3 your question.

4 Q. Well, how did you take it when he said,  
5 "We are definitely looking forward to working  
6 together"? Did you take that to mean that you had  
7 the job?

8 A. It appears so, but nothing was signed.  
9 I don't remember this the way you're asking.

10 Q. Okay.

11 A. "We can chat sometime next week."

12 Q. "Just to ensure we're on the same page  
13 with everything needed."

14 A. Right.

15 Q. Do you recall chatting with Mr. Pitfield  
16 the next week?

17 A. No. I'm sure I did, but I don't recall.

18 Q. Now, what was needed in the scope of the  
19 work for this proposal?

20 A. Well, the proposal states "Street  
21 sweeper, 20 laborers, two garbage trucks with  
22 hoppers, and trash boxes." And we had additional  
23 equipment.

24 Q. So does IV have a street sweeper?

25 A. Yes.

1 Q. Who were the laborers?

2 A. I don't recall.

3 Q. Were they IV hoppers or drivers or --

4 A. I do not recall who worked.

5 Q. Did you use IV laborers for the job?

6 A. I do not recall. I don't set up the  
7 labor for this.

8 Q. Who sets up the labor for this for IV?

9 A. I don't know if it was Ms. Chaisson or  
10 the hopper supervisor or Mr. Torres, but it was  
11 not me.

12 Q. Was it Earline Torres?

13 A. I don't know.

14 Q. Would she have any involvement in this?

15 A. I don't know.

16 Q. Well, I mean, does -- She doesn't work  
17 for IV, right?

18 A. Correct.

19 Q. So --

20 A. She does have a labor company, but I  
21 don't know who worked this.

22 Q. Do you recall her being involved at all  
23 with this?

24 A. I remember her being at the parade, as  
25 was I.

1 Q. All right. I'll show you what I'm going  
2 to mark as Exhibit 21, which is an email. You  
3 respond back to Mr. Pitfield at 10:23 p.m. on  
4 that --

5 A. That's the same number that you used  
6 already.

7 MR. LITCHFIELD:

8 That was 21. This is --

9 THE WITNESS:

10 Oh, that's an old 21?

11 MR. LITCHFIELD:

12 Yes, that's an old 21.

13 THE WITNESS:

14 Okay.

15 (Document marked for identification as  
16 Exhibit 21.)

17 EXAMINATION BY MR. MCGOEY:

18 Q. So you respond back to Mr. Pitfield  
19 saying, "Absolutely. I'll call you tomorrow.  
20 Thank you, sir." Do you recall calling him after  
21 that?

22 A. No.

23 Q. Now, were you aware, when you had  
24 submitted the proposal on January 30th, that, in  
25 fact, Mr. Torres had already been given Mr.

1 Ramelli's bid?

2 A. No. I don't know what Sidney was given.

3 Q. Okay. I'm going to show you what I'm  
4 going to mark as Exhibit 22 and ask you to take a  
5 look at that.

6 (Document marked for identification as  
7 Exhibit 22.)

8 THE WITNESS:

9 (Reviewing document.)

10 EXAMINATION BY MR. MCGOEY:

11 Q. Have you had a chance to look at that?

12 A. Yes.

13 Q. Had you ever seen before today this  
14 December 15, 2019 Ramelli Group proposal?

15 A. It looks familiar.

16 Q. Where did you see it?

17 A. I don't remember, but it sure looks  
18 familiar.

19 Q. Do you recall seeing it before you  
20 submitted the proposal on January 30th to the City  
21 of Kenner?

22 A. I don't remember, but I believe I've  
23 seen this before.

24 Q. You just don't recall the date you first  
25 saw it?



1           A.    No, I don't.

2           Q.    Do you ever recall talking to Mr. Torres  
3 about the Ramelli proposal that Mr. Pitfield sent  
4 them?

5           A.    No.

6           Q.    In your experience in bidding for jobs  
7 with public entities, has any other public entity  
8 or employee ever given you your competitor's bid  
9 before you submitted your proposal?

10          A.    I've done public records requests, but  
11 on previous contracts.

12          Q.    You think this bid was for a previous  
13 contract?

14          A.    No. I didn't look at the date. Does it  
15 say '19?

16          Q.    It's dated December 15th, 2019, but it's  
17 for cleanup for the Isis parade in February of  
18 2020 for a total of \$16,000. You see that?

19          A.    Yes.

20          Q.    Did you not realize that this proposal  
21 was the proposal you were competing -- trying to  
22 get when you sent your proposal on January 30th?

23          A.    Well, it's for a different scope of  
24 work. It's for a sweeper and twice as many  
25 laborers.

1 Q. So you think there were two Isis parades  
2 that Kenner was getting bids for to clean up?

3 A. No. The scope of work is different.  
4 Our scope of work has additional labor and a  
5 street sweeper. This one has half the labor and  
6 no street sweeper.

7 Q. Can we both agree that you were both  
8 giving proposals to clean up in Kenner after the  
9 parade?

10 A. Correct.

11 Q. And I think you said --

12 A. Yes.

13 Q. And the scope of your proposal, you  
14 don't recall where you got that scope, right?

15 A. No.

16 Q. But you typed it up?

17 A. I did type it, yes.

18 Q. City of Kenner didn't give you anything  
19 in writing as to the scope that they wanted?

20 A. No, not that I believe. Not that I  
21 recall.

22 Q. But the City of Kenner did provide Mr.  
23 Torres with Mr. Ramelli's proposal?

24 A. That's what you just showed me.

25 Q. And my question was, in all the work

1 you've done over the years for public  
2 municipalities, has anyone with the City or Parish  
3 ever given you your competitor's bid before you  
4 submitted a proposal?

5 A. No, but what I don't understand is this  
6 is a parade cleanup. This isn't a municipal bid.  
7 There's a difference. I feel like you're asking  
8 two different questions.

9 Q. Got you. Okay. So what is that  
10 difference?

11 A. Well, this is a parade cleanup. I  
12 believe this is a private entity, which is  
13 different.

14 Q. Okay. So what private entity were you  
15 making the proposal to?

16 A. Well, he's the director of Parks and  
17 Recreation.

18 Q. Yeah.

19 A. He was. I'm sorry. He was.

20 Q. So you sent a proposal to someone at the  
21 City of Kenner, right, Mr. Pitfield?

22 A. He was the director of Parks and  
23 Recreation, so it wasn't the City of Kenner. The  
24 City of Kenner would have been the administration.

25 Q. Okay. So it's your belief that the

1 Kenner Parks and Recreation Department is a  
2 private company?

3 A. I don't know how it works. I don't --

4 Q. Okay. So how did you come to submit a  
5 bid to the Department of Kenner Parks and  
6 Recreation?

7 A. I was asked to type a bid and send to  
8 Mr. Pitfield.

9 Q. And you didn't understand that you were  
10 sending that proposal to the City of Kenner?

11 A. I understood that I was sending it to  
12 Parks and Recreation of Kenner, yes.

13 Q. So my question was, in your experience  
14 had you ever received a copy of your competitor's  
15 bid before you submitted your bid to a  
16 municipality or a parish. Your response was well,  
17 this wasn't -- there's a difference between a  
18 municipality and a private company?

19 A. Correct.

20 Q. Right. But you didn't submit your  
21 proposal to a private company, right?

22 A. I sent it to Parks and Recreation  
23 Department, right.

24 Q. Okay. So --

25 A. But it's a Department of Kenner.

1 Q. So let's break this down. In your  
2 experience have you ever submitted a bid to a  
3 private company where the private company provided  
4 you your competitor's bid before you gave your  
5 proposal?

6 A. Yes.

7 Q. Okay. Can you give me examples of that?

8 A. I'd rather not incriminate our  
9 customers, but, yes, that happens. That's common  
10 in garbage.

11 Q. Oh, so it's common for IV Waste to get  
12 its competitors' bids before it submits a  
13 proposal?

14 MR. LITCHFIELD:

15 That's not what she --

16 THE WITNESS:

17 I didn't say that.

18 MR. LITCHFIELD:

19 She didn't say that.

20 THE WITNESS:

21 I didn't say that. I've worked at  
22 Progressive Waste, ISI, Waste  
23 Connection. Yes, it's common.

24 EXAMINATION BY MR. MCGOEY:

25 Q. So tell me what contracts you have

1 received for IV Waste where you got a copy of your  
2 competitor's bid before submitting your bid?

3 A. Tell you what contracts that IV Waste  
4 have what? Would you repeat that?

5 Q. Can you tell me what contracts IV Waste  
6 has received where your customer, the IV Waste  
7 customer, gave you your competitors' bids before  
8 you submitted your bid so that you could get the  
9 job?

10 A. Loyola University.

11 Q. Okay. What did you do for Loyola  
12 University?

13 A. We pick up their garbage.

14 Q. And whose bid did you --

15 A. They submitted all competitors' bids and  
16 asked me to beat it, which is quite common.

17 Q. Okay. Is it common -- Can you think of  
18 any other private entities, companies you've done  
19 that?

20 A. I'm sure I could. I don't want to  
21 incriminate.

22 Q. Well, why would that be incriminating if  
23 it's --

24 A. Because they have nothing to do with  
25 this. I don't understand what they have to do

1 with this.

2 MR. LITCHFIELD:

3 They don't. He's just asking for  
4 an example. You gave him an example.

5 THE WITNESS:

6 I gave him an example, right.

7 EXAMINATION BY MR. MCGOEY:

8 Q. Can you give me any examples of public  
9 contracts where you've gotten a copy of your  
10 competitor's proposal before you submitted your  
11 proposal?

12 A. Not that I recall.

13 Q. Do you think it's fair to Mr. Ramelli to  
14 try to compete with IV Waste on the contract when  
15 IV Waste has got a copy of his proposal but he  
16 doesn't have a copy of theirs?

17 A. I don't think it was fair when -- I'm  
18 going to be honest with you. When we were the  
19 lowest bid the time before this and the mayor gave  
20 him our number. So do I think it's fair?

21 Q. I'm not familiar with that. Can you  
22 please explain.

23 A. We bid on this contract with SDT in 2007  
24 and we were the lowest bidder. And that's when Ed  
25 Muniz was the mayor.

1 Q. Okay.

2 A. And Ramelli was higher than us and won  
3 the contract. So is it fair? Was that fair?

4 Q. Are you saying that Ed Muniz gave you --

5 A. I'm saying we were the lowest bidder and  
6 we didn't win the contract, 2007.

7 Q. Did Mr. Muniz do something that you  
8 believe is inappropriate?

9 A. I don't know -- I believe Ramelli had a  
10 copy of our contract and they won the bid.

11 Q. So it was your understanding in 2007  
12 that Mr. Ramelli was given a copy of SDT's bid  
13 before he submitted his bid. And when he saw  
14 SDT's bid, he decided to make a bid that was a  
15 higher price than SDT's?

16 A. His was higher and they lowered their  
17 price to win the contract in 2007. This was when  
18 all of this started. Mr. Ramelli knows that.

19 Q. All of this started --

20 A. With Kenner.

21 Q. Okay. So what did -- Explain that to me  
22 because I'm --

23 A. We were the lowest bidder and it was a  
24 municipal contract and we didn't win.

25 Q. Okay. Was it an RFP or was it a public



1 bid?

2 A. It was a public bid. I don't know if it  
3 was an RFP or an RFQ.

4 Q. And was there any litigation over this?

5 A. No. We turned around. We're gracious  
6 losers.

7 Q. Okay. So because of what happened to  
8 SDT in 2007, how was that tied to this Isis parade  
9 bid and the fact that --

10 A. It's not, but you asked me if it was  
11 fair, so I'm giving you an example of how it's not  
12 fair.

13 Q. Okay. So you --

14 A. That's a municipal contract that was  
15 given to a competitor who's in the room.

16 Q. Got you. So do we agree that it was  
17 unfair to Mr. Ramelli to not get the Isis proposal  
18 because Mr. Torres got a copy of his bid before it  
19 was decided, or are you just saying I'm not going  
20 to answer that question whether it's fair to Mr.  
21 Ramelli. I'm just going to give you an example of  
22 how something has been unfair to SDT?

23 A. I'm not following what you're saying.

24 Q. Okay. I apologize. That was a bad  
25 question. Do you believe it was fair to Mr.

1 Ramelli for IV to have a copy of his proposal  
2 before IV submitted its proposal?

3 MR. LITCHFIELD:

4 Let me just -- Before you answer,  
5 Julie, let me just object to the form of  
6 the question because it takes it out of  
7 context. We don't know all the  
8 circumstances. And when somebody says  
9 or tries to characterize something as  
10 fair or unfair, I think it's unfair to  
11 do that without all the circumstances.

12 So with that objection being there,  
13 with the limited information you have,  
14 Julie, you can try to answer the  
15 question if you can.

16 THE WITNESS:

17 Thank you. I said I don't know.

18 EXAMINATION BY MR. MCGOEY:

19 Q. Who do you think was responsible for  
20 deciding who got the parade cleanup?

21 A. I don't know.

22 Q. Well, you were at the March 5, 2020  
23 Kenner City Council meeting when IV's contract was  
24 approved by the City Council, weren't you?

25 A. Yes.

1 Q. Do you not remember the mayor standing  
2 up in that council or talking at that council  
3 meeting and saying he was responsible for getting  
4 IV the contract to clean up after the Isis parade?

5 A. I don't remember the details. I  
6 remember binders of complaints. I remember Mr.  
7 Ramelli talking. I remember -- I don't remember  
8 the details of the conversation that happened.

9 Q. All right. I'll going to show you what  
10 I'm going to mark as Exhibit 23, which is on a big  
11 piece of paper, but it's some selected text  
12 messages that were produced in the case.

13 (Document marked for identification as  
14 Exhibit 23.)

15 EXAMINATION BY MR. MCGOEY:

16 Q. It looks like on January 30th, the same  
17 day that you submitted the bid for the Isis  
18 proposal, you had some text messages with number  
19 488 -- No, no, 884-2660, and the one in the middle  
20 says, "Hi, Julie. This is Leigh Roussel with  
21 Mayor Zahn's office. Thanks for sending your  
22 contact card." And then you wrote back, "Thank  
23 you."

24 Do you recall why you were sending Leigh  
25 Roussel with the mayor's office your contact card?

1           A.     I don't recall why, but I do know I had  
2 met her at our office prior to that or around that  
3 time, let me say. It was around that time, so I  
4 don't know if it was before or after, but it  
5 was -- She was my initial contact at Kenner, so it  
6 appears that I'm sending her my information.

7           Q.     It didn't have to do with the proposal  
8 that you submitted later that day to Mr. Pitfield?

9           A.     I don't believe so. I don't know.

10          Q.     All right. I'll show you what I'm  
11 marking as Exhibit 24, which is a Kenner parade  
12 meeting invite that looks like you're the  
13 organizer of. I'll ask you to take a look at  
14 that.

15                   (Document marked for identification as  
16                   Exhibit 24.)

17 EXAMINATION BY MR. MCGOEY:

18          Q.     It looks like on February 17, 2020  
19 you're sending out a meeting invite to Chad  
20 Pitfield and Earline Torres regarding Kenner  
21 parade meeting?

22          A.     Correct.

23          Q.     And it was -- the meeting was to take  
24 place at the Esplanade Mall, Recreational  
25 Department?

1           A.    Yes.

2           Q.    All right.  Why were you requiring Ms.  
3 Torres to be at that meeting?

4           A.    I assume to help coordinate with the  
5 parade.

6           Q.    So what did she have to do with the  
7 cleanup of the parade?

8           A.    Well, she has a labor company, but I  
9 don't -- I don't recall with the details.  I  
10 believe -- I didn't attend this meeting, but I  
11 believe they were discussing the parade route.

12          Q.    Who attended this meeting that you set  
13 up?

14          A.    Earline Torres and Chad Pitfield are on  
15 the attendees.  I don't know if anyone else  
16 attended.

17          Q.    So why were you setting up a meeting  
18 between Ms. Torres and Mr. Pitfield?

19          A.    To organize the meeting -- the parade  
20 cleanup for the route, to go over the route and  
21 what was expected.

22          Q.    So at least with respect to the Isis  
23 parade, Ms. Torres was doing something for IV?

24          A.    Yes.  Yes.

25          Q.    So what was she doing?

1           A.     I don't know.  You'd have to ask her.  
2  She's setting up the parade.

3           MR. MCGOEY:

4                     It's 12:30.  We're probably at a  
5  stopping point.  You want to stop for  
6  lunch?

7           THE VIDEOGRAPHER:

8                     We're going off the record.  The  
9  time is 12:31.

10                    (Break taken.)

11           THE VIDEOGRAPHER:

12                     Returning to the record.  The time  
13  is 1:27.

14  EXAMINATION BY MR. MCGOEY:

15           Q.     All right.  Ms. Tufaro, I want to talk  
16  to you about your involvement with the City of  
17  Kenner and the meetings leading up to getting the  
18  contract.  So I think you said earlier before  
19  lunch that the first time you met Mr. Nicolosi was  
20  at that meeting in the mayor's office --

21           A.     The first --

22           Q.     -- the mayor's conference room?

23           A.     -- time I was introduced to him was  
24  then.  But he later told me that we met at St.  
25  Bernard Parish pre-bid, which I don't recall

1 knowing him or seeing him or talking to him.

2 Q. And --

3 A. He said he knew who I was basically.

4 Q. And so at that first meeting he said  
5 after everybody stopped talking or towards the end  
6 of the meeting that he was actually working for  
7 Mr. Ramelli?

8 A. Correct.

9 Q. Did anyone ask him why he was there?

10 A. No. It was -- No.

11 Q. Did you find it weird?

12 A. Yes. But, I mean, I find it weird that  
13 other things happened, so I don't know how I was  
14 supposed to handle that.

15 Q. No one asked him did he have any input  
16 into telling people what Ramelli had been doing  
17 under the contract?

18 A. There was no discussion about that other  
19 than the administration was unhappy with Ramelli's  
20 service and they were fed up I believe was the  
21 word.

22 Q. All right.

23 A. And they had tried to work with them,  
24 but for whatever reason they were not fulfilling  
25 their obligation as a contractor.

1 Q. And did Mr. Nicolosi say, hey, I agree  
2 that Ramelli is not doing this or --

3 A. I don't remember --

4 Q. -- disagree?

5 A. I don't remember him talking much --

6 Q. Okay.

7 A. -- in that meeting.

8 Q. Were any -- Other than the problems the  
9 City had with Mr. Ramelli, were any of the  
10 potential contract terms discussed?

11 A. I don't recall. I remember the  
12 conversation being we are meeting with three  
13 vendors, three waste haulers. I believe three  
14 were named in addition to us, so that would have  
15 been four. But they planned on meeting three and  
16 those were the names I had given you previously.

17 It was mentioned something about  
18 Christmas trees not getting recycling and  
19 something with carts. I don't remember if it was  
20 recycling or garbage, but something with Ramelli  
21 not providing or distributing carts to Kenner the  
22 way the contract read. And they had been given  
23 multiple chances and it was time for a new vendor.

24 Q. And how was it left at that meeting at  
25 the end of the meeting?



1           A.     They were meeting with other vendors,  
2     and they were going to make a decision on  
3     switching waste providers for Kenner.

4           Q.     Did you-all discuss what rates the City  
5     could pay or the rates that IV would supply the  
6     services for?

7           A.     I don't remember seeing the -- No, we  
8     didn't. No, we did not at that time.

9           Q.     Okay. All right.

10          A.     We didn't know the number of homes or  
11     the scope of service.

12          Q.     So at that time of that first meeting --

13          A.     I hadn't --

14          Q.     -- you didn't really know what --

15          A.     No.

16          Q.     -- the City of Kenner's work involved?

17          A.     Right. We didn't know the number of  
18     homes and --

19          Q.     How did you go about finding information  
20     as to what you needed to do to provide services to  
21     the City of Kenner?

22          A.     Well, at some point our next meeting Mr.  
23     Litchfield was with us. I believe that was the  
24     meeting where we started talking about contract  
25     negotiations.

1 Q. Okay.

2 A. So that's when it started. And I don't  
3 remember if it was before that meeting or after  
4 where the city officials came to our office with  
5 some of the council. And I believe Mr. Pitfield  
6 was the driver and a couple of the council members  
7 and some of the administration.

8 Q. Did you speak to Mr. Nicolosi at all  
9 after that first meeting with respect to what IV  
10 Waste would need to do to provide services to the  
11 City of Kenner?

12 A. I didn't talk to Nicky -- is what he's  
13 called in that; I call him Nick -- much. And the  
14 couple of times I did talk to him, he didn't  
15 know -- You know, I'm more worried about  
16 operations, how much trucks, how many routes.

17 He didn't know -- He didn't have answers  
18 to anything, so he was of no use to me at any  
19 point. We didn't -- We may have sent a text here  
20 and there, and I know he was, in my opinion,  
21 auditioning for a job, but he serves no use to me.

22 Q. Okay. So after that initial meeting,  
23 you asked Mr. Nicolosi questions that you thought  
24 would help you from an operations standpoint?

25 A. No, not after that initial meeting. At

1 some point in the spring I'm sure we had a  
2 conversation. I don't remember when.

3 Q. Okay. So after the initial meeting did  
4 you have any conversations with Mr. Nicolosi  
5 during the negotiating process for the contract?

6 A. I don't believe I had his phone number,  
7 so no.

8 Q. Okay. But at some point you asked him  
9 specifics about Ramelli's operations and he didn't  
10 know them?

11 A. I don't know that I asked him. I  
12 believe I was present when Mr. Torres may have  
13 asked him, and he didn't have answers, and I  
14 remember that being alarming.

15 Q. And when was that, that Mr. Torres was  
16 asking him questions?

17 A. I don't know when.

18 Q. Would that have been meetings with the  
19 City of Kenner officials or --

20 A. He came to our office one time.

21 Q. All right. Before or after --

22 A. It was in late spring. He came  
23 uninvited, knocked on the door, and was, I felt  
24 like, pleading for a job with IV Waste, and said  
25 that he and Mr. Ramelli had a falling out. And he

1 was so depressed, he didn't know what he was going  
2 to do, and I don't know anything about that.

3 Q. Okay.

4 A. Other than what he said.

5 Q. And who was at that meeting when he  
6 was --

7 A. Well, it wasn't a meeting. He showed up  
8 unannounced, but he came in our kitchen with Mr.  
9 Torres and I.

10 Q. Okay. Was anybody else there or just  
11 you three?

12 A. Just us three.

13 Q. Okay. And you thought he was pleading  
14 for a job?

15 A. I feel like he was auditioning for a  
16 job.

17 Q. And would that have been before the  
18 council meeting that was in --

19 A. That was after.

20 Q. So it was after the council meeting?

21 A. After we had been awarded the contract.

22 Q. Got you. So before IV was awarded the  
23 contract, so that would have been -- I'm looking  
24 at the time frame of January 17th, I think is when  
25 y'all met, and March 5th. What involvement did

1 Mr. Nicolosi have at all with IV?

2 A. He was there at the initial meeting. I  
3 don't remember if he was at the council meeting.  
4 He didn't come to our office, but, you know, I  
5 don't know of any.

6 Q. All right. I'm going to show you what  
7 I'm going to mark as -- that will help us with a  
8 time period. It's a January 17, 2020 email to you  
9 from Ed Rapier, just to give you some context.

10 (Document marked for identification as  
11 Exhibit 25.)

12 EXAMINATION BY MR. MCGOEY:

13 Q. So Mr. Rapier says, "Pleasure meeting  
14 you today. Here's my contact info. If you can  
15 send me a copy of the St. Bernard contract, that  
16 would be most helpful, Ed." When you-all met for  
17 the first time Mr. Rapier, was that your first  
18 meeting in the City of Kenner?

19 A. Yes.

20 Q. So what was discussed about your  
21 contract with St. Bernard at that meeting?

22 A. I don't know that this was after that  
23 meeting or after they came to our office. I  
24 honestly don't know when this was. But what was  
25 discussed -- The question was, what was discussed

1 at the initial meeting?

2 Q. Yeah. Do you recall anything being  
3 discussed about your contract with St. Bernard?

4 A. No.

5 Q. Okay. Let's see if I can refresh your  
6 recollection. I'll show you what I'm going to  
7 mark as Exhibit 26.

8 MR. LITCHFIELD:

9 Is this one 25?

10 MR. MCGOEY:

11 Yes.

12 EXAMINATION BY MR. MCGOEY:

13 Q. Which is an email later that day from  
14 you to Mr. Rapier sending him a copy of the final  
15 IV Waste contract.

16 (Document marked for identification as  
17 Exhibit 26.)

18 THE WITNESS:

19 "Near to."

20 EXAMINATION BY MR. MCGOEY:

21 Q. Correct. I was reading the "Re" line or  
22 the name of the attachment, but you're right. In  
23 the body of the email it says it's "near to  
24 final." So at this time in January 2020, you  
25 didn't have a -- you weren't -- IV wasn't working

1 for St. Bernard yet?

2 A. Correct.

3 Q. You were still negotiating terms to the  
4 contract?

5 A. I don't know about negotiating terms.  
6 Negotiating the contract though. The terms were  
7 set in the RFP.

8 Q. Okay. And you respond to Ed saying, "It  
9 was great meeting you and your team today.  
10 Attached is the 'near to' final agreement with St.  
11 Bernard." Does that refresh your recollection  
12 that at that first meeting with Mr. Rapier and the  
13 City of Kenner somehow the topic of your St.  
14 Bernard contract came up?

15 A. Yes.

16 Q. And what was it, do you recall?

17 A. I don't.

18 Q. All right. But in any event, you sent  
19 him your proposal or the draft of the contract?

20 A. Yes. I'm sorry. I didn't know that was  
21 a question.

22 Q. I notice on page 7 the price per  
23 residential unit for St. Bernard was \$12.86 per  
24 month?

25 A. Yes.

1 Q. That was higher than what the City of  
2 Kenner was willing to pay. Do you recall that?

3 A. No. I don't remember the pricing.

4 Q. Okay.

5 A. And I don't know what they were willing  
6 to pay either. I can't say what they were willing  
7 to pay.

8 Q. So you weren't involved with the back  
9 and forth over the prices in IV's contract with  
10 the City of Kenner?

11 A. No.

12 Q. Did the City of Kenner and IV then use  
13 this draft contract with St. Bernard for like a  
14 template or something for the IV contract?

15 A. I think you'd have to ask them. I don't  
16 know how the attorneys typed the contract.

17 Q. Okay. You don't recall that's why it  
18 was being sent or if that's the reason why it was  
19 being sent?

20 A. Correct. It says on the front page why  
21 it was being sent, though. If you read the email,  
22 it says what they were interested in. I don't  
23 remember that, but --

24 Q. Your email to them?

25 A. Yes, sir, the one you handed me.



1 Q. All right. So what specific provision  
2 are you talking about?

3 A. Well, there's one, two, three that I had  
4 typed.

5 Q. So they had asked you what issues  
6 remained with your agreement with St. Bernard?

7 A. No, I don't know that. It says that we  
8 inserted a two-hour time limitation on a spare  
9 truck, and we were asking for four hours.

10 Q. So with that first meeting you-all were  
11 talking specifics with the City of Kenner  
12 concerning time limitations on the spare truck?

13 A. I don't recall the conversation from two  
14 and a half years ago, but you gave me this  
15 attachment and this email.

16 Q. And you think specifically --

17 A. I don't know specifically.

18 Q. Okay. So but do you recall generally  
19 that these three items you listed on this email on  
20 Exhibit 26 were items that you-all had discussed  
21 at that meeting or that they had asked for?

22 A. It appears to be because it's saying the  
23 concern about a 24-hour complaint is received.  
24 And if they were having service issues, we're  
25 telling -- it appears to me, and I don't recall

1 this conversation -- that this is how you ensure  
2 that there isn't service issues.

3 Q. Got you. Okay. So you think these  
4 three items were at least items generally  
5 discussed at the meeting that you were following  
6 up on?

7 A. Yes.

8 Q. Thank you. So that's January 17. Now  
9 I'm going to show you what I'm going to mark as  
10 Exhibit 27, which is an email from Mr. Rapier to  
11 you and others.

12 (Document marked for identification as  
13 Exhibit 27.)

14 THE WITNESS:

15 I don't see my name on this email.  
16 I'm sorry.

17 MR. LITCHFIELD:

18 It looks like it's to Beck.

19 THE WITNESS:

20 It's not to me. It's to our  
21 attorney and I'm not copied.

22 EXAMINATION BY MR. MCGOEY:

23 Q. You're right. You're right. Well, let  
24 me ask you. Ms. Beck forwarded you this contract,  
25 right?

1           A.    I don't know what she forwarded me.  I  
2 don't know offhand what was sent to me.

3           Q.    Okay.  See how this "Re" line says,  
4 "Proposed Contract," Exhibit 27 that you weren't  
5 on, right?  You noticed you weren't on it, right?

6                    I'm going to show an email trail, which  
7 I'm going to mark as Exhibit 28.  And confirm for  
8 me on the second page Ms. Beck is sending you the  
9 proposed contract.

10                   (Document marked for identification as  
11 Exhibit 28.)

12 EXAMINATION BY MR. MCGOEY:

13           Q.    It looks like she sent it to you --  
14 about a minute and ten seconds after she received  
15 it she sent it to you?

16           A.    No, sir.  That's the next day.  This was  
17 on the 6th and this is on the 7th.

18           Q.    I asked you to look at the second page  
19 of the deposition -- of the exhibit, but I  
20 apologize if I didn't.  Up at the top she flips  
21 you the proposed contract at 10:04 a.m. on  
22 February 6th, which is about a minute and ten  
23 seconds after she received it.  Do you recall that  
24 now?

25           A.    I see it, yes.

1 Q. Okay. Great. So back to the  
2 proposed -- the email that you said you weren't on  
3 but was forwarded to you a minute later. It was  
4 sent to Erica Beck. I noticed you had said  
5 earlier that Mr. Litchfield was involved, but I  
6 don't see that Mr. Litchfield is on this email at  
7 this time.

8 MR. LITCHFIELD:

9 I don't think -- let me just  
10 object. She didn't say I was involved  
11 at that time. I think what she said was  
12 at the first meeting Ms. Beck was there.  
13 At the second meeting I was there.

14 MR. MCGOEY:

15 Okay.

16 MR. LITCHFIELD:

17 And apparently this is between the  
18 two meetings.

19 MR. MCGOEY:

20 That's what I -- That's the only  
21 thing I was trying to get to, but I  
22 appreciate that.

23 EXAMINATION BY MR. MCGOEY:

24 Q. So by February 6th the City of Kenner is  
25 sending IV's lawyer a proposed contract; is that

1 right?

2 A. The City of Kenner -- Repeat that if you  
3 don't mind.

4 Q. Yes. Exhibit 27, on February 6th Ed  
5 Rapier with the City of Kenner is sending to  
6 ebeck@torreslaw -- that was IV's lawyer, right?

7 A. Yes, sir.

8 Q. -- the proposed contract?

9 A. Yes, sir.

10 Q. All right. So we've got January 17th to  
11 February 6th, that's about three weeks. What  
12 involvement did you have in those three weeks with  
13 the City of Kenner concerning this draft contract?

14 A. I don't believe any. Our attorneys were  
15 meeting with Kenner.

16 Q. Okay. All right. On this email from Ed  
17 Rapier, Nick Nicolosi is copied. Do you know why  
18 he was copied?

19 A. You would have to ask whoever sent it to  
20 him.

21 Q. So your answer is no, you don't know why  
22 he is copied?

23 A. No, I don't know why he is copied.

24 Q. All right. And then if you go back to  
25 number 28, Exhibit 28 on the first page, the email

1 at the bottom is from you to Ed Rapier on February  
2 7, 2020 at 6:36 p.m. So it looks like the next  
3 day, the next night, 36 hours later, you're  
4 saying, "Good evening, Ed. Please let us know if  
5 you have time to meet with Sidney, John  
6 Litchfield, Nick, and I on Tuesday, February 11th,  
7 early afternoon around 12:30." What Nick were you  
8 referring to?

9 A. Nick Nicolosi.

10 Q. Okay. So why were you asking Ed Rapier  
11 to meet with you, Mr. Torres, and Mr. Litchfield?

12 A. I was asked to set up a meeting by Mr.  
13 Torres with Mr. Litchfield, Mr. Nicolosi, and Mr.  
14 Torres.

15 Q. Okay. Why did you understand Mr. -- Why  
16 did you understand Mr. Torres wanted Nick to be  
17 there?

18 A. I don't.

19 Q. You don't know?

20 A. I don't know.

21 Q. You hadn't had any conversations at this  
22 point with Mr. Nicolosi --

23 A. No.

24 Q. -- concerning this contract?

25 A. No, sir.

1 Q. All right. So you met with Mr. Nicolosi  
2 on the 17th of January when he told you he worked  
3 for Mr. Ramelli, and then three weeks later your  
4 boss is telling you to include Nick in a meeting  
5 with you, him, and Kenner?

6 A. Yes, sir.

7 Q. All right. Did you understand Nick was  
8 going to be there representing IV or the City of  
9 Kenner or Ramelli?

10 A. He was part of the initial meeting, so I  
11 didn't think there was a defined representative  
12 for who he worked for. But we certainly didn't  
13 hire him and we didn't pay him, so I don't know  
14 who he worked for. Kenner, I assume.

15 Q. Okay.

16 A. He was there with the City of Kenner  
17 when we first met.

18 Q. Okay. So Mr. Torres asked you to set up  
19 a meeting with -- and invite Nick?

20 A. Correct.

21 Q. And Mr. Rapiere responds back and says,  
22 "I believe that a meeting to work out the  
23 agreement is a good idea, but I am the only one  
24 there from Kenner. You would not have all the  
25 necessary decisionmakers present. Let me get with

1 Ben, Deborah, and Leigh to figure out the best  
2 time for everyone's schedule."

3 Now, it doesn't appear that Mr. Rapier  
4 is writing you back saying that Nick is part of  
5 the Kenner team. Would you agree with that?

6 A. Yes.

7 Q. Okay. But at the time you sent this  
8 email on February 7th, you thought he was there  
9 representing -- he was going to be at the meeting  
10 representing the City of Kenner?

11 A. He was at the initial meeting, so he was  
12 invited to this meeting. I was asked to send an  
13 invitation or to set up a meeting with Mr.  
14 Litchfield, Mr. Torres, and Mr. Nicolosi. I  
15 didn't think any further into who was representing  
16 who.

17 Q. Okay. All right. Then there was a  
18 second meeting where I think you said Mr.  
19 Litchfield was present?

20 A. Yes.

21 Q. Were you there?

22 A. Yes.

23 Q. Was Mr. Torres there?

24 A. Yes.

25 Q. Was Mr. Nicolosi there?



1           A.    I don't remember him.

2           Q.    Do you recall that this meeting was in  
3 the Esplanade Mall?

4           A.    I don't remember where it was.

5           Q.    Okay.

6           A.    I really don't.

7           Q.    I'm going to show you what I'm going to  
8 mark as Exhibit 29, which is a February 10 email  
9 from you to Ed Rapier, and ask you to take a look  
10 at that.

11                   (Document marked for identification as  
12 Exhibit 29.)

13 EXAMINATION BY MR. MCGOEY:

14           Q.    So this is three days after your email  
15 trying to set up the meeting with Nick. You send  
16 Mr. Rapier -- or you accept a meeting from Mr.  
17 Rapier; is that right?

18           A.    Yes.

19           Q.    And then you say, "I added both Sidney  
20 and John to this invitation, Julie." Is that the  
21 next meeting you recall?

22           A.    Yes.

23           Q.    All right. And as you sit here today,  
24 do you recall whether or not Mr. Nicolosi was at  
25 that meeting?

1 A. I don't remember.

2 Q. All right. And I think we talked about  
3 earlier that council meeting where IV got the  
4 contract or was approved, the mayor negotiated the  
5 contract with IV was on March 5th, right?

6 A. The council meeting when the council  
7 voted, that was on May 5th?

8 Q. March 5th.

9 A. March 5th, right.

10 Q. Yeah. Now I'm going to show you an  
11 email that was three days or two days before that.  
12 It's an email exchange between you and Mr. Torres.  
13 I'll ask you to take a look at that. And when  
14 you're finished reading it, let me know.

15 (Document marked for identification as  
16 Exhibit 30.)

17 THE WITNESS:

18 (Reading document.)

19 EXAMINATION BY MR. MCGOEY:

20 Q. Are you done reading it?

21 A. I skimmed through it.

22 Q. Okay. Do you recall this email from Mr.  
23 Buisson?

24 A. I remember Greg sending a press release  
25 because he was the gentleman who called us in

1 January. I was standing outside Mr. Torres's  
2 office and he stated that Kenner wanted to meet  
3 with us. He was the person who introduced us to  
4 Kenner. So he was trying to do PR for Mr. Torres  
5 and assist with getting the contract by  
6 introducing us. So he typed this press release  
7 and my response was questioning why Nick Nicolosi  
8 is included.

9 Q. Okay.

10 A. I remember this.

11 Q. So did Mr. Torres ask Mr. Buisson to  
12 prepare a press release?

13 A. I don't know.

14 Q. So --

15 A. I don't know. It was sent to Mr. Torres  
16 and he forwarded it to me.

17 Q. So you never had any conversation with  
18 Mr. Torres about where this press release came  
19 from?

20 A. No. I know where it came from, but I  
21 don't know how it was derived, if that's what  
22 you're asking.

23 Q. Yes. And it says, "Regarding Nicolosi,"  
24 in this press release. "When I learned that he  
25 was no longer affiliated with another waste

1 management company, I brought him in as a  
2 consultant to help us identify ways that we could  
3 provide services that would exceed the expectation  
4 of the government leaders, and more importantly,  
5 residents and business owners in Kenner. His  
6 hiring came after my discussions with Mayor Zahn  
7 and I look forward to Nicky helping my team better  
8 understand the neighborhoods of Kenner."

9           When, if at all, did you learn that Mr.  
10 Nicolosi was no longer affiliated with another  
11 waste management company?

12           A. Well, I believe I questioned here, "Are  
13 we stating he's employed with us?" I didn't know  
14 he was employed by us. And Mr. Torres responded,  
15 "To answer your question, he came to our office  
16 one day and was upset because he and Mr. Ramelli  
17 had a falling out." So that's when I learned that  
18 he was no longer working for Mr. Ramelli.

19           Q. Got you.

20           A. He came to our office unannounced and  
21 knocked on the door.

22           Q. I thought you had told me, and I could  
23 be wrong, that that was after you-all -- IV had  
24 the contract?

25           A. It was sometime in the spring. It was

1 definitely after the two meetings, but I don't  
2 know the time frame.

3 Q. Got you. Okay. So it could have been  
4 before the council meeting?

5 A. I don't know when we signed the  
6 contract, to be honest with you, so I don't -- I'm  
7 seeing all these papers. I know everything  
8 happened in the spring. I thought we signed in  
9 February, but you said we didn't.

10 Q. And so when he says in here, "His hiring  
11 came after my discussions with Mayor Zahn," did  
12 you have any discussions with Mr. Torres about  
13 whether he hired Nicky Nicolosi?

14 A. No, but I asked in this email.

15 Q. Other than this email exchange, did you  
16 have any conversations outside of the email  
17 exchange I guess is my question?

18 A. No. And he said he's not hired.

19 Q. You say, "We are stating that Nick is  
20 employed here because he isn't on payroll."

21 A. Correct.

22 MR. LITCHFIELD:

23 Are you saying, excuse me, "are  
24 we."

25 MR. MCGOEY:

1 "Are we." I apologize.

2 THE WITNESS:

3 "Are we."

4 EXAMINATION BY MR. MCGOEY:

5 Q. So what payroll were you looking at to  
6 make that -- to ask that question?

7 A. Well, we don't -- We never did pay Nick  
8 ever.

9 Q. So you have a payroll list?

10 A. Yes.

11 Q. Okay. So is that what you were looking  
12 at, IV's payroll list?

13 A. I wasn't looking at it at the time, but  
14 I review it weekly.

15 Q. Okay. And so you knew at that point on  
16 March 3rd, Nick Nicolosi wasn't listed on an IV  
17 Waste payroll?

18 A. Correct.

19 Q. Mr. Torres says, "He's not hired yet and  
20 we will see." Did you understand that to mean  
21 that he might be hiring Mr. Nicolosi?

22 A. I'm understanding for him saying he's  
23 not hired yet and we will see.

24 Q. So my question is, after March 3rd did  
25 you have any conversations with Mr. Torres about

1 whether who were going to hire -- IV was going to  
2 hire Mr. Nicolosi?

3 A. I know that he had come by the office, I  
4 don't know when, and to me he was pleading for a  
5 job. So, yes, he was part of that conversation  
6 with Mr. Torres and Mr. Nicolosi and myself.

7 Q. Do you remember at the March 5th council  
8 meeting Mr. Torres getting up and I think you said  
9 you recalled him speaking?

10 A. Uh-huh.

11 Q. And you recall Mr. Ramelli speaking?

12 A. I do.

13 Q. Do you recall Mr. Torres saying he  
14 resented the suggestion this was a backroom deal  
15 and Nick Nicolosi didn't work for him?

16 A. Oh, that was -- Yeah, that's garbage  
17 talk, yes.

18 Q. So you remember that?

19 A. Yes.

20 Q. So by March 5th Mr. Torres had made the  
21 decision not to hire Mr. Nicolosi. Would that be  
22 right?

23 A. I don't know the date.

24 Q. Well, that was the date of the council  
25 meeting.

1 A. Yeah, I don't -- If that's what he said,  
2 yes.

3 Q. Well, after the council meeting, what  
4 involvement did Mr. Nicolosi have, given the fact  
5 that IV Waste wasn't going to be hiring him?

6 A. He came to our office once, like I  
7 stated. He was -- And I didn't go to Kenner, I  
8 stated at the office, but he always seemed to be  
9 around Kenner. So in what capacity, I don't know.  
10 I can't answer that. But he was always around. I  
11 think he went to the Kenner parade.

12 Q. Okay. So your understanding was after  
13 the council meeting, Nicky just was hanging out in  
14 Kenner, and that was his only involvement with IV  
15 Waste?

16 A. (Nods head affirmatively.)

17 Q. You have to verbalize.

18 A. Yes. Sorry.

19 Q. I'm going to show you what was  
20 previously marked as Nicolosi 18. Are you aware  
21 Mr. Nicolosi gave a deposition in another case?

22 A. No.

23 Q. You haven't seen that?

24 A. No.

25 Q. I'm going to show you a series --



1           A.    Oh, I did.  I'm sorry.  I saw something  
2 on the Lee Zurich story with him.  Yes, I did.

3           Q.    Okay.  I'm going to show you what was  
4 previously marked as Nicolosi 18, which I'm going  
5 to mark as Exhibit 31, which is a Facebook posting  
6 by Mr. Nicolosi.

7                   (Document marked for identification as  
8                   Exhibit 31.)

9           EXAMINATION BY MR. MCGOEY:

10          Q.    And I'll represent to you that this  
11 posting was done on March 4th, the day after Mr.  
12 Torres said, "We'll see if we'll hire him."  And  
13 he's posting a picture of an IV Waste truck  
14 "Coming to a Neighborhood Near You Soon."  Were  
15 you aware that Mr. Nicolosi posted this?

16          A.    No.

17          Q.    Did you provide him with any photographs  
18 of IV trucks?

19          A.    Not that I know of.  I believe that's on  
20 our website though.

21          Q.    If you look on the series of posts on  
22 the second page or on the bottom of the first one,  
23 someone says, "In Kenner.  I can't wait."  Someone  
24 else says "In Kenner," and Mr. Nicolosi writes  
25 back, "I'm talking about St. Bernard Parish.

1 Starts next month."

2 Now, did you have any conversations with  
3 Mr. Nicolosi before March 4th, 2020, regarding IV  
4 Waste business in St. Bernard?

5 A. No, not that I know of, no. And if it  
6 was, it was in passing. If he asked a question, I  
7 answered it.

8 Q. So you didn't give him any inside  
9 information on your work in St. Bernard?

10 A. I don't know what you mean by inside  
11 information.

12 Q. Well, did you tell him when you were  
13 starting in St. Bernard?

14 A. I don't know that I did. It should have  
15 been public knowledge by then.

16 Q. Okay. So now we're at March 5th is the  
17 council meeting, and you-all start picking up  
18 garbage in Kenner on May 1st, 2020; is that right?

19 A. May 1st, yes. We had already started  
20 St. Bernard when this post came out.

21 Q. Oh, when did y'all start St. Bernard?

22 A. March 1st, I believe. So he's saying,  
23 "Coming to a neighborhood near you." We were  
24 there. IV Waste was there.

25 Q. So you think he was talking about

1 Kenner?

2 A. I don't know what he was talking about,  
3 but it says St. Bernard.

4 Q. Well, he hadn't been included on the  
5 emails with the IV Waste contract, right?

6 A. This says welcome to Kenner and this  
7 says St. Bernard. I don't do Facebook. I can't  
8 follow this. This is a lot of people's personal  
9 opinions.

10 Q. All right. So focusing back on what IV  
11 Waste had to do between March 5th, 2020, when the  
12 council approved the contract, and May 1st, 2020  
13 when IV Waste starting picking up garbage in  
14 Kenner, what did IV Waste have to do to start  
15 picking up garbage on May 1st?

16 A. For Kenner, rent garbage trucks.

17 Q. Okay.

18 A. Hire employees.

19 Q. Okay.

20 A. Hire supervisors, put together routes,  
21 put together employee packets and pay structures,  
22 hire a mechanic.

23 Q. And get roll-out carts?

24 A. And purchase residential containers and,  
25 yes, and recycling containers.

1 Q. As general manager did all of those  
2 items fall under you to oversee?

3 A. No.

4 Q. Okay. Which ones were you responsible  
5 for?

6 A. I wasn't very much involved with Kenner  
7 in the beginning. Which ones fell under me,  
8 hiring a dispatcher, making sure drivers were in  
9 compliance with their driving record and their  
10 medical cards, hiring a mechanic, customer service  
11 in setting up all the Kenner addresses in our  
12 system for complaints or concerns, handling the  
13 monthly billing, and working with our CFO on our  
14 P&Ls for Kenner.

15 Q. All right. So you weren't in charge of  
16 helping them get information on the routes?

17 A. I was not in charge of -- We're all  
18 helping -- No. No. To answer your question, no.

19 Q. We did see those emails earlier. And  
20 what about the roll-out carts, what was your  
21 involvement there?

22 A. I know I was copied on emails. My  
23 involvement was minimal.

24 Q. As I understand the process to get the  
25 roll-out carts in Kenner was, Cascade would bring

1     them to a staging yard in Kenner, and then from  
2     there they would go out to be delivered to the  
3     houses.  Is that what you understood?

4             A.     Yes.

5             Q.     And the staging yard that was used in  
6     Kenner for the roll-out carts, that was the City  
7     of Kenner's site?

8             A.     I believe so.

9             Q.     And you said earlier that Cascade was  
10    responsible for getting the cans to the staging  
11    area and then getting them scanned and put in  
12    front of each home?

13            A.     Yes.

14            Q.     All right.  And who was responsible at  
15    IV for overseeing Cascade?

16            A.     I believe Michele Chaisson.

17            Q.     Did Nick Nicolosi have any involvement  
18    in the staging area and the placement of carts for  
19    residents?

20            A.     I don't know his involvement, so I don't  
21    know the answer to that.

22            Q.     Okay.  Do you recall him being involved  
23    at all?

24            A.     I remember seeing something on TV about  
25    him being out there, but I wasn't out there, so I

1 don't remembering seeing him, though, or talking  
2 to him.

3 A. I'll show you what I'm going to mark as  
4 Exhibit 32, which is an April 20, '20 email, and  
5 ask you to take a look at that.

6 (Document marked for identification as  
7 Exhibit 32.)

8 EXAMINATION BY MR. MCGOEY:

9 Q. This is an email from Mr. Torres to  
10 Pierre Richardson. That's the guy that you said  
11 was with Cascade?

12 A. Yes.

13 Q. And you're copied on this email?

14 A. Correct.

15 Q. David Carimi is copied on this email.  
16 What involvement did David Carimi have in the  
17 Kenner staging yard?

18 A. He's our contractor. He built out the  
19 yard in Kenner.

20 Q. So at the time that you were having the  
21 roll-out carts staged in that area, you-all were  
22 also proceeding with constructing the drop site?

23 A. Let me read this. I don't know the time  
24 frame, but let's see.

25 (Reading document.)

1           I don't know when he started, to answer  
2 your question, with the construction of the Kenner  
3 yard.

4           Q.    Okay.  In any event, Mr. Carimi is  
5 copied on this email, and Mr. Richardson at the  
6 bottom is saying, "Sidney, just an FYI.  I made a  
7 couple of changes this morning at the yard."  
8 Under attachment number -- the 1st Attachment  
9 says, "Is where we are staging the carts for the  
10 roll-outs?  This prevents carts being muddied from  
11 the original staging area, as well as easier  
12 maneuverability and efficiency getting the  
13 truckers unloaded and out.  Nick was cool with  
14 this."  Was Nick Nicolosi involved with staging of  
15 the carts for the roll-outs?

16          A.    I don't know.  You'd have to ask them.  
17 I'm copied on the next email, and I just literally  
18 read this.  This is the first time I've seen this.  
19 I don't know.  I wasn't in Kenner.

20          Q.    So that's a surprise to you, as you sit  
21 here today, that Mr. Nicolosi was involved in the  
22 staging area?

23          A.    I didn't say it was a surprise.  I just  
24 don't know about it.  I have no feeling about  
25 this.  I read this first part, "David, can you

1 please help out," and I'm copied.

2 Q. Do you know why David Carimi would be  
3 helping out with the staging area for the roll-out  
4 carts?

5 A. He's our contractor. He does all of our  
6 construction.

7 Q. He does all of IV Waste's construction?

8 A. Yes, sir.

9 Q. Okay. I'm going to show you --

10 A. We have other contractors. I can't say  
11 all. He does a lot, I should say.

12 Q. Fair enough. I'll show you what I'm  
13 going to mark as Exhibit 33, which is a May 5,  
14 2020 email, again from Pierre Richardson, and you  
15 appear to be copied. No, this is to you and  
16 others.

17 (Document marked for identification as  
18 Exhibit 33.)

19 EXAMINATION BY MR. MCGOEY:

20 Q. It says, "IV Waste, per Nick, since the  
21 residents have Ramelli carts, they should get IV  
22 Waste carts delivered to them. I can coordinate  
23 for this to happen. Approved, thanks."

24 And then below that says, "Sidney, I  
25 will get with Nick in the morning. Ask him to



1 drive me to the 105 units that I audited on  
2 Tammany Drive, Taffy Drive, and 34th Street and  
3 Kentucky Avenue. None of these addresses are in  
4 the data. And we discussed, these units have  
5 Ramelli carts at them. No dumpsters in site.  
6 Keep you posted on the outcome." Do you recall in  
7 May of 2020, Mr. Nicolosi being involved with  
8 getting IV Waste carts delivered to him?

9 A. No.

10 Q. What was your role in that, getting the  
11 IV Waste carts delivered?

12 A. You already asked me that. It was  
13 minimal. I wasn't involved with this. I thought  
14 Mr. Pierre was handling this.

15 MR. MCGOEY:

16 You want a break?

17 THE WITNESS:

18 No, I'm okay. My back is hurting.  
19 (Discussion off the record.)

20 THE VIDEOGRAPHER:

21 We're going off the record. The  
22 time is 2:12.

23 (Break taken.)

24 THE VIDEOGRAPHER:

25 Returning to the record. The time

1 is 2:21.

2 EXAMINATION BY MR. MCGOEY:

3 Q. All right. Ms. Tufaro, I'm going to  
4 show you what I'm going to mark as Exhibit 34,  
5 which is a May 1 City of Kenner Government  
6 Facebook post.

7 (Document marked for identification as  
8 Exhibit 34.)

9 MR. LITCHFIELD:

10 What number is this one?

11 THE WITNESS:

12 34.

13 MR. MCGOEY:

14 34.

15 EXAMINATION BY MR. MCGOEY:

16 Q. It says, "Beginning today, May 1,  
17 Kenner's new garbage contractor is IV Waste."  
18 That's what it says in the first paragraph. The  
19 second paragraph says, "Residents who have  
20 received the IV Waste garbage containers should  
21 use those; however, the Ramelli containers can be  
22 used until all IV Waste containers have been  
23 distributed, a process that will be completed by  
24 June 1."

25 Do you recall that before IV Waste took

1 over on May 1st, IV Waste knew that it wasn't  
2 going to get all of its roll-out carts distributed  
3 to residents in Kenner before June -- by May 1?

4 A. I don't recall the dates. I know that  
5 we had ordered carts from Cascade. And I remember  
6 Mr. Jurgen telling us that there was an issue at  
7 the plant because of COVID, and there was a delay,  
8 but I don't remember the dates of when that  
9 happened.

10 Q. Okay. So a delay at the plant. Do you  
11 recall whether or not Mr. Jurgen had ever said  
12 that he was going to get you all 22,000 cans by  
13 May 1st?

14 A. I don't remember.

15 Q. In fact, do you recall Mr. Jurgen  
16 telling Mr. Torres the exact opposite, that he  
17 could not get all 22,000 cans by May 1st?

18 A. I don't know what he told him. I can go  
19 through documents.

20 Q. Okay. But you weren't --

21 A. I don't --

22 Q. You weren't part of any of those  
23 conversations?

24 A. No. I may have been copied, but I don't  
25 recall that.

1 Q. Do you ever recall any conversations  
2 with Mr. Torres where he told you we're not going  
3 to get all the cans placed by May 1st?

4 A. I remember -- Like I said, I remember  
5 there being delay in the plant. I don't remember  
6 when the date was --

7 Q. Okay.

8 A. -- with the containers.

9 Q. What was -- When you learned that there  
10 was a delay in the cans, what was IV Waste's plan  
11 as to how to service the houses in Kenner without  
12 garbage cans?

13 A. I don't remember.

14 Q. Was that something that fell under your  
15 responsibility as a general manager?

16 A. No, not -- No, not necessarily.

17 Q. Who should I talk to at IV Waste as to  
18 what the plan was once IV Waste knew --

19 A. Mr. Torres.

20 Q. So Mr. Torres -- You don't recall, as  
21 you sit here today, what the plan was on May 1st  
22 if you didn't have enough carts out?

23 A. I don't remember the timeline. I do  
24 recall there was some kind of judgment where IV  
25 Waste could not pick up garbage out of Ramelli

1 containers. I don't remember the timeline. I do  
2 know we complied with that.

3 Q. Okay.

4 A. But I don't know what happened first and  
5 what happened next.

6 Q. Okay. I'm going to show you what I'm  
7 going to mark as Exhibit 35, which is a May 4th  
8 email from Mr. Torres to Mr. Richardson, and  
9 you're copied on it. I'll ask you to take a look  
10 at that.

11 (Document marked for identification as  
12 Exhibit 35.)

13 MR. LITCHFIELD:

14 Can you read that?

15 THE WITNESS:

16 I can read it. I know, I'm  
17 starting to need glasses.

18 MR. LITCHFIELD:

19 It's awfully small. I can read it  
20 but --

21 THE WITNESS:

22 I can read it.

23 EXAMINATION BY MR. MCGOEY:

24 Q. So on May 4th, that email, Mr.  
25 Richardson is saying, "IV Waste, please see

1 attached daily report of addresses delivered and  
2 coded out for the day." Do you recall that  
3 Cascade would provide IV Waste with a list of  
4 addresses every day?

5 A. I don't remember if it was daily, but I  
6 do remember the list. They did give us a house  
7 count.

8 Q. And on the second page of this email it  
9 looks like there is a plan amount as to how many  
10 carts it would put out per day, and then there was  
11 an actual amount of carts that is delivered every  
12 day. And then it's a summary and notes, and  
13 there's a total of trash and recycling that we'll  
14 put out. Is that what that is?

15 A. Yes.

16 Q. All right. And who was responsible for  
17 producing these plans and the actual deliveries?  
18 Is this Cascade?

19 A. Yes.

20 Q. All right. So Mr. Torres responds back,  
21 "Thanks for the update. Please let Nick know how  
22 many cans we're going to need to finish up this  
23 job if we do this. Let's discuss in the morning.  
24 I just want to confirm that you said we'll be  
25 finished delivering 95-gallon carts at the end of

1 next week."

2           There's Nick again on an email dealing  
3 with carts. Do you know what his involvement was  
4 for this?

5           A. No. I don't see him on the attached --  
6 on the -- The email wasn't sent to him. I see him  
7 mentioned.

8           Q. Okay. Well, let's look at the  
9 attachment, which is of the plan and then the  
10 actual delivery. So the plan, it looks like they  
11 had 23,200 roll-out carts in production. Do you  
12 recall that?

13          A. Yes, that sounds right.

14          Q. All right. And by May 1st it looks like  
15 there were -- it looks like the in-transit number  
16 kind of goes down. By May 1st there was still  
17 11,600 carts in transit to Kenner. Am I reading  
18 that right?

19          A. It appears so, yes.

20          Q. So by May 1st you-all were roughly  
21 11,600 roll-out carts short, according to the  
22 plan?

23          A. According to the -- Yes.

24          Q. So my question is, what was your plan as  
25 to how IV Waste was going to service those 11,000

1 homes that didn't have IV Waste roll-out carts?

2 A. I don't know the plan, and I also don't  
3 understand the plan how on May 1st it says they  
4 received 1160 delivered 8/24, but on the second,  
5 the number doesn't decrease, so I don't know the  
6 plan.

7 Q. Okay. Well, in the City of Kenner  
8 Facebook post they say you can keep -- it says,  
9 "However, the Ramelli containers can be used until  
10 all IV Waste containers have been distributed, a  
11 process that will be completed by June 1." Did  
12 you have any discussions with the City of Kenner  
13 regarding using Ramelli's cans until IV Waste  
14 would get all of its cans out?

15 A. I don't remember. I don't know what  
16 their contract said, if who owned the cans or what  
17 at this point on May 1st -- on June 1st.

18 Q. That's fine. So you weren't the person  
19 that would have talked to Mr. Ben Zahn about this?

20 A. No.

21 Q. That would have been Mr. Torres?

22 A. Yes, sir.

23 Q. In any event, that's what you-all  
24 started -- That's what IV Waste did. On May 1st  
25 for houses that didn't have IV Waste cans, you



1 just started picking up the Ramelli cans, right?

2 A. I don't recall when the transition  
3 happened. I wasn't involved with these carts.

4 Q. Okay.

5 A. I can --

6 Q. I'm not asking about carts now. I'm  
7 talking about operations?

8 A. Right.

9 Q. May 1.

10 A. Picking up.

11 Q. Picking up.

12 A. Right.

13 Q. On May 1 you sent out IV Waste trucks,  
14 drivers, and hoppers to pick up garbage in Kenner.  
15 And garbage was in Ramelli cans, right?

16 A. Right.

17 Q. So was the plan for IV Waste to dump the  
18 garbage out of the Ramelli cans?

19 A. I don't remember. I really don't  
20 remember.

21 Q. Do you remember on May 1st, when Mr.  
22 Ramelli found out that IV Waste was dumping his  
23 cans, that he sent IV Waste a letter saying, "Stop  
24 touching my cans"?

25 A. I don't remember it being on May 1st,

1 but I do remember there being a letter asking us  
2 not to touch the cans, yes.

3 Q. All right. So I'm going to show you  
4 what I'm going to mark as Exhibit 36, which is a  
5 letter from me to Mr. Litchfield. I know you're  
6 not on it. I'm just going to ask you if you've  
7 seen it, if you ever saw it back then.

8 (Document marked for identification as  
9 Exhibit 36.)

10 EXAMINATION BY MR. MCGOEY:

11 Q. It says down at the bottom of this  
12 letter, "Please consider this letter a formal  
13 request to your client that they immediately cease  
14 and desist any further use, access, or  
15 interference with any roll-out carts or other  
16 garbage receptacles or dumpsters that are the  
17 property of Ramelli."

18 Do you recall learning on or around May  
19 1st, once you started picking up garbage in  
20 Kenner, that Mr. Ramelli was taking the position  
21 IV Waste could not touch his cans?

22 A. I remember hearing that there was some  
23 type of lawsuit for IV Waste not to pick up  
24 Kenner's garbage out of Ramelli's containers, yes.

25 A. This is not the lawsuit. This is a week

1 before the lawsuit.

2 A. Okay, I didn't see this. I'm seeing  
3 this now.

4 Q. Got you. So between May 1st, when this  
5 letter was sent, and the lawsuit, which I'll show  
6 you which was filed on May 7th, you weren't  
7 informed that Ramelli had said to IV Waste "stop  
8 touching my cans"?

9 A. I don't remember the dates. I don't. I  
10 know there was mention that we are not to pick  
11 up -- IV was not to pick up Kenner's garbage out  
12 of Ramelli's cans. I don't know the time frame  
13 the way you do.

14 Q. Okay. I'll show you what I'm going to  
15 mark as Exhibit 37, which is a temporary  
16 restraining order that was issued in this case.

17 (Document marked for identification as  
18 Exhibit 37.)

19 EXAMINATION BY MR. MCGOEY:

20 Q. Have you ever seen this temporary  
21 restraining order before?

22 A. No. But this must be what this was  
23 referring to.

24 Q. It says in the second paragraph, "It is  
25 hereby ordered, adjudged, and decreed that

1 defendant, IV Waste, be and is hereby enjoined,  
2 restrained, and prohibited from using, accessing,  
3 or interfering with any and all Ramelli-owned  
4 roll-out carts, dumpsters, or other garbage  
5 containers."

6           Were you made aware that the Court had  
7 ordered IV Waste to stop using, accessing, or  
8 interfering with any Ramelli-owned roll-out carts?

9           A.    Yes.

10          Q.    And did IV Waste comply with the Court's  
11 order and stop interfering, accessing, or using  
12 Ramelli-owned roll-out carts?

13          A.    Yes.

14          Q.    How did you go about making sure that  
15 violations of that TRO did not occur?

16          A.    We informed all the drivers and hoppers  
17 not to pick up any garbage in a Ramelli-owned or  
18 labeled garbage container, which is when our  
19 phones started ringing because residents had  
20 garbage in there and they didn't care whose  
21 container it was. They just wanted the garbage  
22 picked up. And many of those residents said they  
23 had purchased them and they owned them.

24          Q.    So you made it clear to IV Waste  
25 employees to stop touching Ramelli's cans?

1 A. Correct.

2 Q. Did IV go about paying other people to  
3 go pick up Ramelli's cans?

4 A. No.

5 Q. No?

6 A. No.

7 Q. Do you remember the Kenner hit crew?

8 A. No, I don't know what --

9 Q. You never heard of the Kenner hit crew?

10 A. No.

11 Q. Were you aware that citizens from the  
12 City of Kenner went around picking up Ramelli's  
13 cans?

14 A. I do remember hearing that, getting -- I  
15 answered the telephones quite a bit.

16 Q. And were you not aware that IV Waste  
17 made a list of residents that wanted their cans  
18 picked up, their Ramelli cans picked up, and IV  
19 Waste would provide that list to the hit crew to  
20 go pick the cans up?

21 A. I didn't make that list.

22 Q. My question is, were you aware that that  
23 did occur?

24 A. No.

25 Q. Okay. Were you aware that IV Waste then

1 paid the hit crew to go pick up Ramelli's cans?

2 A. Why is it called a hit crew?

3 Q. I don't know. Have you ever heard that  
4 term?

5 A. No.

6 Q. All right.

7 A. So IV Waste, what was the question?

8 Q. Were you aware that IV Waste paid Kenner  
9 residents to go pick up Mr. Ramelli's cans after  
10 you had been ordered by a Court to stop  
11 interfering and accessing and using their cans?

12 A. No. I know that we wanted to pick up  
13 the garbage, and residents were calling us very  
14 mad.

15 Q. Was Mr. Pitfield involved in picking up  
16 Mr. Ramelli's cans?

17 A. Yes. He was involved with a staging  
18 area of where they went, where they all went  
19 afterwards.

20 Q. He wasn't involved in going and picking  
21 up the cans themselves?

22 A. I don't know if he physically picked up  
23 the containers.

24 Q. Let's see if I can refresh your  
25 recollection on the Kenner hit crew. I'll show

1 you what I'm going to mark as Exhibit 38, which is  
2 a May 14, 2020 email with Mr. Torres and various  
3 people at IV, including you. I'll ask you to take  
4 a look at that one and then I'll ask you some  
5 questions.

6 (Document marked for identification as  
7 Exhibit 38.)

8 THE WITNESS:

9 (Reading document.)

10 EXAMINATION BY MR. MCGOEY:

11 Q. Okay. Have you had a chance to read it?

12 A. Yes.

13 Q. So it looks like the email trail starts  
14 with Mr. Torres telling you and others at IV that,  
15 "Please know Jenny is making a list daily for the  
16 people that are complaining with trash in their  
17 can that we can't touch. Can we make a list on  
18 the server so she can send it to the hit crew that  
19 the City has running around with trailers picking  
20 up every day. Jenny is the one who is dealing  
21 directly with the City on this, so let's try to  
22 make sure we knock it out as they come in." Who  
23 is Jenny?

24 A. Jenny works in customer service.

25 Q. For IV?

1 A. Yes.

2 Q. So does this refresh your recollection  
3 that Jenny was making a list of people that were  
4 complaining and giving it to the hit crew?

5 A. I know I'm copied, but I don't -- I  
6 don't read every email I'm copied on.

7 A. I understand.

8 Q. It wasn't directed to me.

9 Q. All right. Then Michele Chaisson  
10 responds back, "Yes, I will create a spreadsheet  
11 everyone can get to on the server. It will be  
12 saved in the IV Waste, City of Kenner, hit crew."  
13 Have you ever seen a spreadsheet on the IV Waste  
14 server called the City of Kenner hit crew?

15 A. No.

16 Q. And it looks, up at the top, Mr. Torres  
17 is saying, "Please make sure you're marking them  
18 off as the City hits them. Chad would be really  
19 good on working with us with this list as he's  
20 already doing with the messages you're sending him  
21 by text." Was someone at IV Waste sending texts  
22 to Mr. Pitfield telling him what cans to go pick  
23 up?

24 A. It wasn't -- I don't know.

25 Q. You don't know. You weren't involved in



1 that?

2 A. No.

3 Q. But did you -- Were you aware that Chad  
4 Pitfield was working on picking up the cans and --  
5 for the people that were on the hit crew list?

6 A. I do know he did get involved at some  
7 point, yes.

8 Q. Now, at that time was Mr. Pitfield  
9 working for IV Waste?

10 A. No.

11 Q. Do you recall -- I think you said you  
12 don't recall IV Waste paying the hit crew members;  
13 is that right?

14 A. No. We haven't spoken about that, the  
15 hit crew.

16 Q. Well, do you recall IV Waste paying the  
17 guys that were going around the city picking up  
18 Ramelli's cans?

19 A. I recall us giving, I believe, a few  
20 people checks, yes, to pick up containers because  
21 Ramelli wasn't removing their containers and  
22 garbage had been out for weeks.

23 Q. What kind of containers?

24 A. The garbage containers.

25 Q. Just the 96-gallon roll-out carts?

1           A.    Correct.

2           Q.    Okay.  Who did IV Waste pay to pick up  
3 Ramelli roll-out carts?

4           A.    I believe we paid Michele's son, and  
5 Michele would call them the kids.  I don't know  
6 who the kids are.  I believe it was a group of  
7 Kenner kids, but I don't know who they are.

8           Q.    Does Michele live in Kenner?

9           A.    No.

10          Q.    But her son does?

11          A.    No.

12          Q.    All right.  The kids, though, were from  
13 Kenner?

14          A.    I believe so.

15          Q.    So Michele's son got a crew of kids that  
16 lived in Kenner?

17          A.    I don't know that he got the crew of  
18 kids, but I know that her son helped with carts.  
19 And there was a group of kids that she called  
20 kids.  I don't believe they were children.

21          Q.    Okay.  And how long did Michele's son  
22 work with the kids to go pick up Ramelli cans?

23          A.    I don't know that he worked with them.  
24 I know he did do part of that.

25          Q.    So Michele's son was separate and apart

1 from the people in Kenner picking up cans?

2 A. I believe so.

3 Q. Got you. And IV paid --

4 A. Or he may have worked with them. I  
5 don't know. I don't know. I should just say I  
6 don't know who worked with who.

7 Q. But you do know that IV Waste paid  
8 Michele's son to pick up Ramelli cans?

9 A. To pick up cans in Kenner, yes.

10 Q. Okay. How long did that go on?

11 A. I don't know.

12 Q. What's Michele's son's name?

13 A. Devin.

14 Q. Was Devin on the payroll for IV?

15 A. I don't know. I don't know if he was.

16 Q. Has he ever been an employee of IV  
17 Waste?

18 A. Yes.

19 Q. All right. So there would be a record  
20 if a payroll check was used to pay Michele's son  
21 to pick up the cans?

22 A. I'm trying to think if it was through  
23 ADP. Would there be a record somewhere, yes.  
24 Yes, there's a record.

25 Q. Where would that record be?

1           A.    I don't know where that record is.  I  
2 was thinking of your next question.

3           Q.    It could be ADP payroll?

4           A.    I don't know.

5           Q.    What about the kids in Kenner, did IV  
6 Waste pay them to pick up Ramelli cans?

7           A.    I believe we paid Mr. Pitfield for that.

8           Q.    And then Mr. Pitfield paid the kids in  
9 Kenner?

10          A.    Correct.

11          Q.    So you didn't think it was a violation  
12 of the Court's temporary restraining order to go  
13 hire people to go do what IV Waste was ordered not  
14 to do?

15          A.    I don't think my opinion matters.

16          Q.    So did you believe you were violating  
17 the TRO by doing that?

18          A.    No.  We weren't, no.

19          Q.    All right.  So you believed by paying  
20 someone to go pick up Mr. Ramelli's carts, that  
21 was not a violation of the TRO?

22          A.    They were volunteers who did it as well.  
23 There's a group of Kenner citizens.

24          Q.    So volunteers you believe picking up Mr.  
25 Ramelli's cans was not a violation of TRO, but

1 paying people to pick up Mr. Ramelli's cans was a  
2 violation of the TRO?

3 A. No. I'm confused by what you're saying.

4 Q. Well, I'm confused. I'm just trying to  
5 understand what your understanding was.

6 A. There were different groups that picked  
7 up the containers.

8 Q. Right. So for the group -- Let's start  
9 with Michele's son.

10 A. Right.

11 Q. You paid -- IV paid him to go pick up  
12 Mr. Ramelli's cans?

13 A. We paid him to deliver and pick up  
14 containers, yes.

15 Q. Okay. I'm not talking about the new  
16 roll-out carts.

17 A. Right.

18 Q. I'm talking about Ramelli's carts.

19 A. I know he was paid to do carts. I'm not  
20 sure which ones, so let's be clear about that. I  
21 don't have records in front, and I haven't seen  
22 this or was really involved with this.

23 Q. Okay.

24 A. I'm trying to help you the best I can,  
25 but I don't know the details.

1 Q. And I'm just trying to get --

2 MR. LITCHFIELD:

3 But he's not asking you to guess.

4 MR. MCGOEY:

5 No, I'm not.

6 THE WITNESS:

7 So I don't know. I should just say  
8 I don't know.

9 MR. LITCHFIELD:

10 Let me just say on the record, I  
11 think, I don't want to interfere with  
12 the deposition, but some things are  
13 confused here and I think it's coming to  
14 light. So I want to make sure --

15 MR. MCGOEY:

16 I got it.

17 MR. LITCHFIELD:

18 I don't want to hijack your  
19 deposition, but I want the record to  
20 reflect that some things are very  
21 confused here.

22 I'm going to ask you, Ms. Tufaro,  
23 please to listen to the man's  
24 question --

25 THE WITNESS:

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Okay.

MR. LITCHFIELD:

-- and please answer the question.

THE WITNESS:

Sometimes it's a statement.

MR. LITCHFIELD:

I understand.

THE WITNESS:

And it's a --

MR. LITCHFIELD:

I understand.

EXAMINATION BY MR. MCGOEY:

Q. All right. In May of 2020 when IV Waste was paying people to pick up Ramelli's cans, did you believe that that was a violation of the TRO or not?

MR. LITCHFIELD:

Let me just assume -- Let me just object to the form of the question, and note that's what you're taking based upon this testimony.

MR. MCGOEY:

Right. But you think the facts are different?

MR. LITCHFIELD:

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Exactly.

MR. MCGOEY:

Fair enough.

THE WITNESS:

And I don't -- I hadn't seen this.

MR. LITCHFIELD:

You're talking about the TRO?

THE WITNESS:

Right. And I'm not an attorney,  
so --

MR. LITCHFIELD:

That's why he's not asking you to  
guess. Just answer the questions to the  
extent you can.

THE WITNESS:

No. No.

EXAMINATION BY MR. MCGOEY:

Q. Okay. Now I'm going to show you what  
I'm going to mark as Exhibit 39, which is a May  
11, 2020 email from Michele Chaisson to Mr.  
Torres, Lisa Schehr, and you, copied you.

(Document marked for identification as  
Exhibit 39.)

EXAMINATION BY MR. MCGOEY:

Q. The Re line of this email is "Kenner Can



1 Pick Up Money." It says, "Lisa, we will be  
2 needing some money to donate to the City of  
3 Kenner's residents for helping them with the  
4 removal of Ramelli cans. Sidney, please let Lisa  
5 know how much she could cut the check for." What  
6 was this about?

7 A. You'd have to ask Michele and everybody  
8 involved. I'm copied. I don't know.

9 Q. Well, does this refresh your  
10 recollection that IV did, in fact, pay Kenner  
11 residents for helping remove Ramelli cans?

12 A. Well, I don't know who the City of  
13 Kenner residents are, but this email does state,  
14 yes.

15 Q. And who's Lisa Schehr?

16 A. She works for Sidney's Capital Company.

17 Q. SDT Capital?

18 A. IV Capital.

19 Q. Or IV Capital. Got you. Did Mr. Torres  
20 have IV Capital pay money to residents of Kenner  
21 to remove Ramelli cans?

22 A. I don't know. Show me the check. I'm  
23 not an accountant.

24 Q. Do you recall asking Carimi Construction  
25 or IV Waste asking Carimi Construction to pay the

1 residents of Kenner to pick up Ramelli cans?

2 A. No.

3 Q. All right. I'll show you what I'm going  
4 to mark as Exhibit 40. It's another May 11 email  
5 that you're copied on.

6 (Document marked for identification as  
7 Exhibit 40.)

8 EXAMINATION BY MR. MCGOEY:

9 Q. At the bottom is the email we just read  
10 and up at the top it says, "Sorry. Disregard this  
11 email. It was meant for Carimi Construction."  
12 You don't recall IV Waste asking Carimi  
13 Construction to pay to pick up City of Kenner --  
14 pay City of Kenner residents for helping pick up  
15 Ramelli cans?

16 A. No.

17 Q. You don't dispute that that was an email  
18 you received at the time, though, right?

19 A. I'm copied on it, so I did receive it.

20 Q. Now, you -- Now, I'm not talking about  
21 paying people to remove Mr. Ramelli's cans. I  
22 want to talk about IV Waste paying people to  
23 deliver IV Waste cans. IV Waste did pay Mr.  
24 Pitfield to deliver IV Waste cans to the City of  
25 Kenner, correct?

1           A.    I don't know.

2           Q.    You're not aware of that?

3           A.    I'm not aware of that.

4           Q.    Okay.  I'm going to show you what I'm  
5 going to mark as Exhibit 41, which is a, I  
6 believe, a WWL TV report from February 21, 2022.  
7 Take a look at that and let me know if you've ever  
8 seen that before.

9                   (Document marked for identification as  
10                   Exhibit 41.)

11   EXAMINATION BY MR. MCGOEY:

12           Q.    Have you seen this?

13           A.    No.

14           Q.    The headline says, "Torres confirmed on  
15 Monday that he paid Kenner -- former Kenner Chief  
16 Administrative Officer Chad Pitfield more than  
17 \$4,000 for delivering new IV Waste trash cans to  
18 customers."  Is this the first time you're  
19 learning of this?

20           A.    I remember when the Lee Zurich reports  
21 were happening, and he said that you were feeding  
22 him information.  He said you specifically were.  
23 I didn't read this, so I don't know what this  
24 says.

25           Q.    Mr. Zurich works for FOX.  This is WWL

1 TV.

2 A. Okay. Well, I remember there being  
3 things in the paper.

4 Q. Do you remember this?

5 A. No.

6 Q. So as you sit here today, you were  
7 unaware that IV Waste had, in fact, paid Mr.  
8 Pitfield \$4,000 or more than \$4,000 to deliver IV  
9 Waste trash cans?

10 MR. LITCHFIELD:

11 Hold on. Let me object. She just  
12 said she saw -- had information about  
13 that from the Zurich report but not the  
14 WWL report. Then you asked her so she  
15 was not aware. She said she was aware  
16 because of the Zurich report.

17 MR. MCGOEY:

18 Okay.

19 THE WITNESS:

20 I've never seen this article.

21 MR. LITCHFIELD:

22 But she's never seen the WWL  
23 report.

24 THE WITNESS:

25 Right.

1 MR. MCGOEY:

2 All right.

3 EXAMINATION BY MR. MCGOEY:

4 Q. All right. In this article it says,  
5 "Pitfield also used an IV Waste email address in  
6 correspondence with Torres around that time,  
7 though Torres says he never employed Pitfield."

8 A. That's correct.

9 Q. So Mr. Pitfield had an IV Waste email  
10 address?

11 A. Yes.

12 Q. How did that come about?

13 A. He -- When he worked for Parks and  
14 Parkways for Kenner, he was talking about  
15 switching positions and talking to Mr. Torres  
16 about working for IV Waste. So we provided him  
17 with an email address, but he was never hired.

18 Q. When did Mr. Pitfield have discussions  
19 about coming to work for IV Waste?

20 A. I don't know. I don't know.

21 Q. Were you involved in those discussions?

22 A. I heard mentions of them, but, no, I was  
23 not involved with the discussions.

24 Q. Okay. So based upon discussions to come  
25 work for IV, that didn't materialize, though,

1 right? He never came and worked for IV, Mr.  
2 Pitfield?

3 A. Correct.

4 Q. So why would IV open up an IV Waste  
5 email account for Mr. Pitfield when he wasn't  
6 hired as an employee?

7 A. Because they were talking about it and  
8 it was done. I don't know the reason why.

9 Q. How do you go about getting an IV Waste  
10 email address? What do you have to do? Who  
11 handles that?

12 A. A number of employees can send an email  
13 to our IT department.

14 Q. And then the IT department just makes  
15 the email address?

16 A. Correct.

17 Q. So do you know who at IV requested an  
18 email address for Mr. Pitfield?

19 A. I don't.

20 Q. Who was the head of the IT department if  
21 I wanted to ask them?

22 A. Robert LeBlanc.

23 Q. Did you ever copy -- Did you send emails  
24 to Mr. Pitfield's IV Waste's email address?

25 A. I may have.

1 Q. Why was he using an IV Waste email  
2 address?

3 A. I'm not sure. I don't know which ones  
4 were sent or what the contexts were.

5 Q. In this WWL article it says, "In June  
6 2020, Pitfield used an IV Waste email account in  
7 his name to request that Torres reimburse him for  
8 more than \$4,000 in expenses he incurred in  
9 helping get IV Waste established in the City."

10 Have you ever seen an email from Mr.  
11 Pitfield requesting payment for over \$4,000 in  
12 expenses?

13 A. Not that I recall.

14 Q. Who at IV is responsible for paying  
15 expense reimbursements?

16 A. Now?

17 Q. Or back then.

18 A. Bryan Clarey.

19 Q. Where does he work now, do you know?

20 A. No. I believe he's unemployed. He has  
21 health issues.

22 Q. The article then says, "About \$500 of  
23 the sum was for printing door hangers." Do you  
24 know what these door hangers were?

25 A. Yeah. They were door hangers for -- as

1 part of our contract. I don't remember what they  
2 said, but they were door hangers regarding the  
3 do's and don'ts of garbage pick-up basically.

4 Q. Okay. And who printed those for IV?

5 A. I don't know the name of the company.

6 Q. IV handled that or Mr. Pitfield?

7 A. Mr. Pitfield did.

8 Q. And then it says, "3,500 was so Pitfield  
9 could pay workers to help deliver about 1,000 IV  
10 Waste cans to Kenner residents." Why was IV Waste  
11 using Kenner residents to deliver its cans?

12 A. You'd have to ask whoever set that up.  
13 I don't know the answer.

14 Q. So who set that up?

15 A. I don't know.

16 Q. Well, before you told me it was Cascade  
17 was responsible for delivering the cans.

18 A. Right.

19 Q. So I need to talk to someone at Cascade?

20 A. Well, Cascade had an issue with their  
21 plant, I do recall that, with production from  
22 COVID at some point. So this sounds like this was  
23 after that.

24 Q. The article goes on to say that, "Mr.  
25 Torres hired Carimi Construction to build the drop



1 site, and Carimi turned around and hired Nicolosi  
2 to help him get the necessary permits. Torres  
3 confirmed Carimi paid Nicolosi about \$5,000 per  
4 month."

5           Were you aware that Mr. Nicolosi was  
6 involved in getting Carimi Construction permits to  
7 build the drop site for IV Waste?

8           A. No. I wasn't involved with this.

9           Q. So when did you learn that that  
10 occurred, when these articles came out?

11          A. I believe so.

12          Q. So you were not aware before 2022 that  
13 Mr. Nicolosi was being paid by Carimi  
14 Construction?

15          A. No, I did not.

16          Q. Have you had any conversations with Mr.  
17 Torres, since you learned that Mr. Nicolosi was  
18 being paid by Carimi --

19          A. No.

20          Q. -- about what Mr. Nicolosi does for  
21 Carimi?

22          A. No.

23          Q. You hadn't had any conversations with  
24 Mr. Torres about it?

25          A. No.

1 Q. Have you spoken to Mr. Carimi about it?

2 A. No.

3 Q. Getting back to when Mr. Pitfield worked  
4 for Parks and Recreation, was it your  
5 understanding that he was looking to stop working  
6 for the City of Kenner and go work for IV Waste?

7 A. Yes. He was looking for other  
8 employment.

9 Q. And what was the position he was trying  
10 to get at IV Waste?

11 A. Something in operations.

12 Q. So that would have been under you?

13 A. Essentially, yes.

14 Q. Did you interview him for that job?

15 A. No.

16 Q. Did you speak to him about what he  
17 wanted to do or what he was qualified to do?

18 A. He mentioned where he could help, yes,  
19 but it wasn't a formal interview. It was in  
20 passing.

21 Q. And who was there, just you and him, or  
22 was Mr. Torres there?

23 A. I believe it may have been just he and  
24 I.

25 Q. Do you know whether or not he talked to

1 Mr. Torres about getting a job with IV?

2 A. No, I don't know.

3 Q. Okay. So if you were the only person at  
4 IV that talked to Mr. Pitfield about him coming to  
5 work there, how did an email account for Mr.  
6 Pitfield for IV Waste get set up?

7 A. I don't remember. I don't know who set  
8 it up.

9 Q. You didn't tell somebody to set it up  
10 for him?

11 A. I may have. I don't recall.

12 Q. Okay. It's also been reported that Mr.  
13 Pitfield set up an Instagram account for IV Waste.

14 A. He did.

15 Q. How did that come about?

16 A. He and Mr. Torres were talking about  
17 promoting the company. He set up an Instagram  
18 account.

19 Q. And when did he do that?

20 A. I don't know. I could look on the  
21 account and see when it started.

22 Q. And was this before or after you-all let  
23 him know that there wasn't a position for him at  
24 IV?

25 A. I don't know the timeline.

1 Q. Did IV pay Mr. Pitfield for setting up  
2 the Instagram account?

3 A. No. That's funny.

4 Q. I'm not on social media, so I don't know  
5 what that involved. At what point did Mr.  
6 Pitfield become the person responsible for  
7 approving IV Waste invoices with the City of  
8 Kenner?

9 A. I believe when he took the position as  
10 CAO. He may have been Deputy CAO, but he was  
11 eventually hired on to the administration.

12 Q. And there's a difference, I guess,  
13 between Parks and Recreation and the  
14 administration in your mind? I'm just asking. I  
15 don't know.

16 A. You're the lawyer. Yes, sir.

17 Q. So what's the -- Was he an employee of  
18 the City of Kenner?

19 A. It seems as though one is over Parks and  
20 Recreation and one is on the administration.

21 Q. But both for the City of Kenner?

22 A. Yes.

23 Q. All right. I'm going to show you what  
24 I'm going to mark as Exhibit 42. It's a May 19  
25 email from you to Michele Chaisson. I'll ask you

1 to take a look at that.

2 (Document marked for identification as  
3 Exhibit 42.)

4 THE WITNESS:

5 (Reviewing document.)

6 EXAMINATION BY MR. MCGOEY:

7 Q. Have you had a chance to look at 42?

8 A. Yes.

9 Q. Do you recall this?

10 A. I remember this era of people calling  
11 and complaining that we weren't picking up their  
12 containers. I don't see the attachment on what  
13 the picture was though.

14 Q. Okay.

15 A. So I don't recall what the picture was.

16 Q. And it says in here, "Brittani said  
17 scratch Ramelli's name off or something" and "She  
18 didn't send that pic."

19 A. "Brittani said they scratched Ramelli's  
20 name off or something. She didn't send that pic."  
21 Okay.

22 Q. And then Michele says, "Ramelli's not on  
23 it. That's what she just told me. Do you want  
24 them to go dump it?" Who is Brittani?

25 A. Brittani was the Kenner dispatcher at

1 the time.

2 Q. Okay. And then you respond back to  
3 Michele saying, "Check your texts."

4 A. Maybe she sent me a picture. I don't  
5 know. If you had the picture I could review it.

6 Q. Okay. So --

7 A. We were trying not to pick up their cans  
8 and comply with that lawsuit.

9 Q. Okay.

10 A. That's a great example.

11 Q. So why didn't -- what did you text her?

12 A. I have no idea.

13 Q. How long have you known David Carimi?

14 A. Since 2006 I believe.

15 Q. How did you come to meet him?

16 A. He was Mr. Torres's contractor.

17 Q. So Mr. Carimi has worked for Mr. Torres  
18 going back at least to 2006?

19 A. Yes.

20 Q. All right. Are they business partners?

21 A. I don't know.

22 Q. Did they both own Trep's?

23 A. No.

24 Q. Do you know who owns Trep's?

25 A. Trep's doesn't exist.

1 Q. Do you know who owned it?

2 A. Mr. Torres.

3 Q. And you didn't -- You weren't aware that  
4 Mr. Carimi owned it?

5 A. No. He built it. He was the  
6 contractor.

7 Q. So you're unaware of any businesses they  
8 jointly own?

9 A. Correct.

10 Q. Does Mr. Carimi do commercials for Mr.  
11 Torres?

12 A. What do you mean by do commercials?

13 Q. Has he done IV Waste --

14 A. He's been featured in a commercial  
15 for -- I believe his sign was on one, Carimi  
16 Construction.

17 Q. And did Carimi work on the St. Bernard  
18 drop site for IV?

19 A. I don't know.

20 Q. But the Kenner, they did build that?

21 A. Yes. He probably -- He may have. I  
22 don't know. I don't know about St. Bernard.

23 Q. I'll show you a text message. Again,  
24 this came from a big spreadsheet, so this is just  
25 one of the pages.

1 (Document marked for identification as  
2 Exhibit 43.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. It looks like down at the bottom of --  
5 MR. LITCHFIELD:

6 Is this 43?

7 MR. MCGOEY:

8 43, yes.

9 EXAMINATION BY MR. MCGOEY:

10 Q. At the bottom of Exhibit 43 there's a  
11 February 24, 2020 maybe text from David Carimi to  
12 jtufaro@gmail.com. Is that your personal email?

13 A. Yes.

14 Q. And you say, "David, please repair this  
15 floor under this dispatch desk when you cut a hole  
16 in the bathroom." What is that? Is that work at  
17 IV Waste's office?

18 A. Yes.

19 Q. So Carimi built out IV Waste's office?

20 A. Yes.

21 Q. Okay. Then up at the top David Carimi  
22 says, "Anytime you need anything done, email  
23 Daniel and cc me. Daniel will be the project  
24 manager in charge of any needed work at IV Waste.  
25 Mark will handle anything for IV Capital." Who's



1 Daniel?

2 A. Daniel was Mr. Carimi's employee.

3 Q. So --

4 A. He was a project manager for IV Waste.

5 Q. So was he the project manger for the  
6 renovation of IV Waste's offices or all work for  
7 IV Waste?

8 A. He was the project manager for cutting a  
9 hole in the bathroom and building out a room in  
10 the dispatch office for if there's a leak in the  
11 roof, small things that -- or if I needed a  
12 plumber, he'll call the plumber for me.

13 Q. Got you. Wasn't he also the project  
14 manager on the drop site in Kenner?

15 A. I don't know.

16 Q. I'll show you what I'm going to mark as  
17 Exhibit 44. It's an email from Daniel Johnson at  
18 Carimi Construction to you and others, and I'll  
19 ask you to take a look at that.

20 (Document marked for identification as  
21 Exhibit 44.)

22 EXAMINATION BY MR. MCGOEY:

23 Q. So it looks like in January of 2021  
24 Daniel Johnson is sending you permit work, permit  
25 items for the Kenner drop site?

1 A. Yes.

2 Q. Why was he sending this to you in 2021?

3 A. I don't know. It was issued in 2020. I  
4 don't know why he was sending it.

5 Q. You hadn't asked him for it?

6 A. I don't know. I don't know if I did.

7 Q. Okay. It says. "Julie, see attached.  
8 All the work we did out in Kenner was done under  
9 one permit. The application was submitted after  
10 we had the permit for the recycling slab and the  
11 permit was added in order to reflect the  
12 additional work. Thanks."

13 What involvement did you have in  
14 obtaining a permit?

15 A. None.

16 Q. Okay. This is -- On Carimi 3 this is a  
17 permit to perform the following work:  
18 Construction trailer, City of Kenner waste site,  
19 trailer and site prep, req. inspection,  
20 electrical, plumbing, flat, final inspection. Do  
21 you know who signed this permit for the City of  
22 Kenner?

23 A. No.

24 Q. And you didn't have any involvement in  
25 its issuance?

1 A. No.

2 Q. Did IV Waste have any plans prepared for  
3 this drop site in order to get this permit?

4 A. I don't know.

5 Q. What did Carimi build on this site for  
6 IV?

7 A. It's on this next page.

8 Q. What is that?

9 A. A ramp, transfer station ramp.

10 Q. Okay.

11 A. And I do know that I was told that that  
12 yard was a pigsty.

13 Q. Okay. This permit says a trailer. Did  
14 they put a trailer on the site?

15 A. Oh, this says dumpster pad. Are we  
16 looking at the same thing?

17 Q. No. This permit on Carimi 3 that we  
18 just looked at. I asked you what was done out  
19 there and you said look at page 4 which was the  
20 ramp.

21 A. Correct. Oh, I don't know about the  
22 trailer. We do have a trailer there, but I don't  
23 know who put it there or anything about this  
24 permit.

25 Q. But it does say that the permit is for

1 the trailer and site prep?

2 A. Construction trailers, yes, it does.

3 Q. So does the trailer have electrical?

4 A. Yes.

5 Q. And this is where IV Waste employees go?

6 A. That's where they clock in and use the  
7 restroom, yes.

8 Q. So there's plumbing?

9 A. Correct.

10 Q. Is there -- Is it wheelchair accessible,  
11 ADA?

12 A. I don't know.

13 Q. Were there any plans done for how they  
14 were going to run the electrical, the plumbing?

15 A. I don't know.

16 Q. You hadn't seen any of that?

17 A. No. And I wasn't involved with this.

18 Q. Got you. We know from that article that  
19 we just looked at earlier, Mr. Torres said, at  
20 least, that Mr. Nicolosi helped Mr. Carimi get the  
21 permit?

22 A. If that's what -- I don't know. I  
23 wasn't involved with this. I don't know how else  
24 to say it.

25 Q. In the email he mentions, "We had the

1 permit for the recycling --" After we had the  
2 permit -- "The application was submitted after we  
3 had the permit for the recycling slab." What's  
4 the recycling slab?

5 A. There's a pad on the Kenner yard where  
6 the recycling is -- the commingled recycling is  
7 dropped.

8 Q. And so that wasn't something that was in  
9 the original plans?

10 A. Was that something?

11 Q. Yeah, was that something?

12 A. I don't know.

13 Q. That wasn't added after?

14 A. I don't know. I think you're asking the  
15 wrong person these questions.

16 Q. Who would I -- Who do I need to ask that  
17 person at IV?

18 A. I don't know.

19 Q. Would that be Carimi do I need to ask  
20 for that?

21 A. I don't know.

22 Q. He's the one who built it?

23 A. Yes.

24 Q. Now, did -- Does IV extend credit to  
25 Carimi more than it does to other customers?

1 A. What do you mean by customers?

2 Q. Well, do you-all do --

3 A. Do you mean vendors?

4 Q. Do you-all do waste services for Carimi?  
5 Do you supply them with garbage carts and  
6 containers for their construction projects?

7 A. Roll-off containers, yes. More than  
8 other customers, no.

9 Q. All right. I'm going to show you what  
10 I'm going to mark as Exhibit 45, which is an email  
11 that you sent on May 21, 2020, and I'll ask you to  
12 take a look at that.

13 (Document marked for identification as  
14 Exhibit 45.)

15 EXAMINATION BY MR. MCGOEY:

16 Q. It's titled Auto Credit Hold/Ebilling.  
17 You say in this email, "All of our customers who  
18 have past due balances over 31 days with a balance  
19 over 25.01 will be automatically placed on credit  
20 hold through Tower. This excludes the deferral  
21 customers who were placed on their own billing  
22 cycle."

23 And you say, "The following customers  
24 are excluded," and one of which is Carimi. Why is  
25 Carimi excluded from being automatically placed on

1 a credit hold?

2 A. The same reason these other people are.

3 Q. And what's that?

4 A. They are customers that I would not stop  
5 their service and they are good to pay the bill.

6 I would not put the City of Kenner on credit hold.

7 I would not put any of these customers on credit  
8 hold.

9 Q. Is that -- Are you the person at Kenner  
10 that decides who to extend credit to, or is this  
11 Mr. Torres tells you who to extend and not to  
12 extend --

13 A. No, I decided this because I'm  
14 ultimately responsible for the receivables.

15 Q. And so why is Carimi -- are you not  
16 worried about them being overdue?

17 A. No, the same way I'm not worried about  
18 the other commercial customers on this list.

19 Q. How many customers that are not on this  
20 list that IV would have been placing on a credit  
21 hold if they had past due balances?

22 A. I don't know from two years ago.

23 Q. Basically all your commercial customers  
24 would be on a credit hold other than your two  
25 municipal contracts, Associated Terminals, and

1 First Lake --

2 A. And Tonti.

3 Q. -- and Tonti.

4 A. Right.

5 Q. And Carimi. Approximately how many  
6 other commercial accounts do y'all have?

7 A. Oh, I don't know. I don't know in two  
8 years ago either.

9 Q. But as you sit here today, the reason  
10 you recall for extending this credit to Carimi and  
11 not others is because you believe that they would  
12 pay?

13 A. Correct.

14 Q. Do you recall whether Carimi helped  
15 you-all get pricing for loaders in Kenner?

16 A. No. I don't know. What type of  
17 loaders? I don't know any of this.

18 Q. Okay. Let me show you an email from  
19 David Carimi to you in July of 2020. It's also to  
20 Mr. Torres. I take it back. That's not the whole  
21 email. This should help you.

22 (Document marked for identification as  
23 Exhibit 46.)

24 THE WITNESS:

25 (Reviewing document.)



1 EXAMINATION BY MR. MCGOEY:

2 Q. Now that you've had a chance to look at  
3 Exhibit 46, do you recall what this loader for  
4 Kenner was that Mr. Carimi was getting prices for?

5 A. No.

6 MR. MARSIGLIA:

7 Patrick, you marked this as 46?

8 MR. MCGOEY:

9 46, yes.

10 EXAMINATION BY MR. MCGOEY:

11 Q. Does IV use a loader like this in  
12 Kenner?

13 A. Do we use a loader, a front end loader,  
14 yes. Is it like this, it's similar but different.

15 Q. So why would Carimi Construction be  
16 looking for equipment for IV Waste?

17 A. I don't know.

18 Q. You didn't ask them to do that?

19 A. No.

20 Q. I'm going to show you what I marked as  
21 Exhibit 47, which is a document marked Carimi 93.

22 (Document marked for identification as  
23 Exhibit 47.)

24 EXAMINATION BY MR. MCGOEY:

25 Q. This looks to be a series of

1 transactions between Carimi Construction and NBN  
2 Services, LLC. Do you know what NBN Services, LLC  
3 is?

4 A. No.

5 Q. And you're not aware of Carimi paying  
6 NBN Services?

7 A. I read or saw something in all of those  
8 news articles, but I don't -- this is -- are you  
9 saying this is Carimi's records?

10 Q. Yes.

11 A. I don't -- I've never seen this.

12 Q. Okay. Now, we looked earlier at the  
13 recycle records for the month of May of 2020. Do  
14 you recall those, the MRFs we looked at?

15 A. Yes.

16 Q. Was it -- After one month were the costs  
17 associated with recycling more, less, or what you  
18 projected them to be?

19 A. Well, it was more because we originally  
20 were going to work with CW.

21 Q. And CW's costs were cheaper than  
22 Republic's?

23 A. Oh, significantly.

24 Q. Like what?

25 A. I don't remember the number, but it was

1 night and day.

2 Q. I mean you had billed out projections of  
3 the costs of what it was going to cost you for  
4 recycling?

5 A. Correct.

6 Q. And so in those projections you included  
7 amounts from CW?

8 A. I don't remember if they are in the  
9 projections. I do remember having called  
10 recyclers. I don't remember what the projections  
11 say.

12 Q. Okay. In any event, after one month is  
13 it fair to say that the costs for recycling were a  
14 lot more than you anticipated?

15 A. Yes.

16 Q. So what did IV do to try to reduce its  
17 costs associated with recycling?

18 A. We -- I don't know when this happened,  
19 but I know we built the slab and started taking  
20 recycling to the other Republic, and we also  
21 called Stranco. I don't remember the gentleman --  
22 Bill Beau is his name, Bill Beau with Stranco to  
23 see if he could haul it for us directly.

24 Q. And how was building that pad and  
25 dropping the recycling off, how does that save IV

1 Waste money?

2 A. Well, we drop it off and then haul it  
3 ourselves to Baton Rouge instead of paying for it  
4 twice.

5 Q. Well, you-all would haul it to Republic  
6 or Baton Rouge before you had the pen, right?

7 A. I don't remember the timeline, but we  
8 did.

9 Q. So you're hauling it one way or the  
10 other, so how does building a drop site and  
11 dropping it save you money?

12 A. Because it's a different vehicle that  
13 can hold more material.

14 Q. Okay. So how much do you save by using  
15 a roll-out cart as opposed to --

16 A. I don't know the dollars.

17 Q. You didn't do a calculation to figure  
18 that out?

19 A. I don't know the dollars offhand.

20 Q. Is it 10 percent, 50 percent, 100 -- 80  
21 percent cheaper?

22 A. I don't know.

23 Q. I'm not asking you -- I'm just asking  
24 you ballpark.

25 A. I don't know.

1 Q. You don't know. Fair enough.

2 MR. LITCHFIELD:

3 Julie, you want to take a break?

4 THE WITNESS:

5 Sure.

6 MR. MCGOEY:

7 Let's take a break.

8 (Break taken at 3:23 p.m.)

9 THE VIDEOGRAPHER:

10 Returning to the record. The time  
11 is 3:31.

12 EXAMINATION BY MR. MCGOEY:

13 Q. All right. When we stopped for the  
14 break we were talking about the recycling costs  
15 after the first month being more than you-all  
16 expected in the City of Kenner. I'm going to show  
17 you an email that I marked as Exhibit 48, which is  
18 a June 6th email exchange between you and Mr.  
19 Torres.

20 (Document marked for identification as  
21 Exhibit 48.)

22 THE WITNESS:

23 (Reading document.)

24 EXAMINATION BY MR. MCGOEY:

25 Q. All right. Have you had a chance to

1 read it?

2 A. Yes.

3 Q. Okay. So your e-mail down at the bottom  
4 on June 6th, I just want to go through that so I  
5 can understand what this was. You say, "Could be  
6 worse as I told -- as I was told we would be  
7 billed as follows: \$165/ton plus." What is \$165  
8 a ton?

9 A. What's the subject of this email? MRF  
10 invoice for May. I don't know if this was Stranco  
11 or not, if I was referring to Stranco because we  
12 did call Stranco to haul recycling for us.

13 Q. Okay.

14 A. But I don't recall if that's what I was  
15 referring to.

16 Q. Did the May recycling get hauled to  
17 Baton Rouge for the -- and were you charged for  
18 that?

19 A. No. No.

20 Q. You just went straight to Republic in  
21 New Orleans?

22 A. Every time, yes, even if a truck wasn't  
23 full, and they paid us per -- I mean they charge  
24 us per truck even if it was a smaller amount.

25 Q. And why a month later were you deciding

1 to send it to Baton Rouge?

2 A. Because all the charges -- Well, like I  
3 just said, they charge us -- and I don't recall  
4 the dollar amount, so don't ask. But they charge  
5 us every time we brought a truck there. So if it  
6 had one ton of recycling in it, they charge us per  
7 load. And then they charge us to reload it no  
8 matter what the dollar amount was. So we were  
9 looking for other options.

10 Q. Okay. And so an option was to take it  
11 to Baton Rouge?

12 A. An option was to take it to Baton Rouge,  
13 yes.

14 Q. And so that's what you're talking to Mr.  
15 Torres about? It says, "Plus \$580 haul to BR."

16 A. To Baton Rouge, yes.

17 Q. So then it says, "It appears as though  
18 they are only charging the haul to Baton Rouge fee  
19 for each time we dump a load there, however, I  
20 need to match the tickets to verify."

21 A. Correct.

22 Q. So at this time on June 6th are you  
23 already shipping it to Baton Rouge?

24 A. I don't know. And I don't know if we  
25 received an invoice from Republic at this time

1 either.

2 Q. Okay. Then you say, "Moving forward I  
3 feel we should minimize the trips to the MRF until  
4 we find a better solution." How would you  
5 minimize the trips to the MRF?

6 A. Well, if a garbage -- if we have a light  
7 recycling day, minimize, use the truck again the  
8 next day.

9 Q. Got you. Then you say, "I will meet  
10 with CW Recycling in person next week with the  
11 intention of working something out with them if  
12 that doesn't pan out or we need to work on a  
13 compactor so we can haul to Baton Rouge  
14 ourselves." Did you meet with CW about that?

15 A. No. And I don't remember his name, but  
16 he blew me off and, like I said earlier, he ended  
17 up saying that Mr. Ramelli didn't want us to go  
18 there. And he supplied his Hispanic employees and  
19 I asked him --

20 He said at first he didn't have the  
21 capacity. And then when I talked to him later he  
22 wasn't taking -- He changed his story quite a bit.  
23 Let me just say that. It was --

24 Q. But even though he changed his story a  
25 month before, you still wanted to follow up with



1 him the next month to try to work something out?

2 A. He would say, "We'll see. Maybe if  
3 something changes." He seemed like he wanted to  
4 do it, but then he was -- something else was  
5 preventing it from happening. I had spoke with  
6 him a few times.

7 Q. And then you did -- another suggestion  
8 was work on a compactor so we can haul to Baton  
9 Rouge ourselves. What does a compactor do?

10 A. Compacts waste.

11 Q. And so how does that help you save  
12 costs?

13 A. Well, you haul more material in one  
14 trip.

15 Q. Got it. All right. But in the meantime  
16 in June you didn't have the recycle pad built yet  
17 in Kenner?

18 A. I don't remember when it was built, but  
19 I don't believe so, not in June.

20 Q. All right. All right. I'm going to  
21 show you an email late June, June 25, a series of  
22 emails. I'll ask you to take a look at those.

23 (Document marked for identification as  
24 Exhibit 49.)

25 THE WITNESS:

1 (Reviewing documents.)

2 EXAMINATION BY MR. MCGOEY:

3 Q. So it looks like by June 25th, 2020  
4 you-all have built a recycling drop at the Kenner  
5 yard?

6 A. Yes.

7 Q. Okay. How did you go about getting  
8 Kenner to agree to that?

9 A. I don't know.

10 Q. You weren't involved in that?

11 A. No.

12 Q. Who was responsible then, Mr. Torres?

13 A. Yes.

14 Q. And Mr. Torres says, "Yes, it's going to  
15 also make it financially easier on IV." And how,  
16 again, did it make it financially easier on IV?

17 A. Well, instead of taking a garbage  
18 truck -- I'm sorry, multiple garbage trucks to  
19 Baton Rouge, we can take one roll-off truck with  
20 two 30-yard containers and fit more material in  
21 one haul.

22 Q. Okay. So it would save on the \$580 haul  
23 cost to Baton Rouge?

24 A. It would save on the hauling cost. I  
25 don't know about the 580. That appeared to be a

1 quote from someone, but it would save on the  
2 hauling cost.

3 Q. And did you-all doing the hauling  
4 yourself?

5 A. Yes.

6 Q. Did Jerome Rivera actually haul  
7 recycling to Baton Rouge for you-all?

8 A. I don't know.

9 Q. Who is the IV waste employee responsible  
10 for the recycle corral in St. Bernard?

11 A. What do you -- In St. Bernard?

12 Q. I'm sorry, in Kenner.

13 A. So what do you mean by who's  
14 responsible?

15 Q. Well, I think Mr. Rivera said something  
16 about a guy named Country?

17 A. Oh, he was an employee for a brief  
18 period.

19 Q. He doesn't work there anymore?

20 A. No.

21 Q. What was his role?

22 A. He was a supervisor.

23 Q. I'm going to show you what I'm going to  
24 mark as Exhibit 50, which is just a picture. I  
25 just want to confirm what I'm looking at here.

1 (Document marked for identification as  
2 Exhibit 50.)

3 EXAMINATION BY MR. MCGOEY:

4 Q. What is this picture in Exhibit 50?

5 A. That is the recycling pad in Kenner.

6 Q. And so where does this picture come  
7 from? You-all installed cameras?

8 A. Yes.

9 Q. So how do you -- Do you have a running  
10 live feed?

11 A. I had a TV screen in my office at the  
12 time.

13 Q. And so the roll-off trucks bring the  
14 recycle and they just dump it in the corral, or  
15 they put it in the roll-off containers?

16 A. No. The residential trucks dump in the  
17 corral.

18 Q. Residential recycle trucks?

19 A. Correct.

20 Q. And then how do you get the recycling  
21 into the roll-out cart?

22 A. That machine that's in the picture --

23 Q. Uh-huh.

24 A. -- loads the material.

25 Q. Is that a Bobcat?

1 A. I don't know what that is.

2 Q. All right. Do y'all have any way that  
3 you try to sort out the recycling in this pen?

4 A. Yes. We try to put the garbage to one  
5 side and the recycling to another. It's not  
6 scientific, but sometimes there's piles of  
7 garbage.

8 Q. So you-all are dumping garbage in the  
9 corral pen too?

10 A. No. We're dumping commingled recycling  
11 that we pick up in recycling containers.

12 Q. Okay. And --

13 A. Which can be contaminated.

14 Q. Got you. So you have someone at the  
15 drop site that goes through the recycling to  
16 determine what is contaminated and what is not  
17 contaminated?

18 A. They don't go through. They try best to  
19 sort. They don't hand sort. They go through --  
20 They do their best with that machine to not dump  
21 garbage.

22 Q. Okay. And then what do they do with --  
23 And who's the guy that makes the determination  
24 what's contaminated or not, the guy driving the  
25 Bobcat?

1 A. Yes.

2 Q. All right. And who was that person?

3 A. Who was that then?

4 Q. Yes.

5 A. I don't know. We've had multiple people  
6 do that.

7 Q. And so when someone driving the Bobcat  
8 decides that some of the recycling is  
9 contaminated, what do they do with the  
10 contaminated recycle?

11 A. They put it in one container.

12 Q. In this pen?

13 A. Yes.

14 Q. So one of the containers is for  
15 recycling and one is for --

16 A. Sometimes.

17 Q. -- garbage?

18 A. We have four containers like this in  
19 Kenner.

20 Q. Well, you have four around the --

21 A. No. Other than these two we have  
22 others. So two go out, two go in, two go out, two  
23 go in.

24 Q. Got you. So there's always two in the  
25 pen. There's not four?

1           A.    Not always.  I can't say always.  Yes,  
2  sometimes.

3           Q.    All right.  So whoever is operating the  
4  Bobcat and determines that there's contaminated  
5  recycling, he'll put that in one of the containers  
6  and recycling in the other?

7           A.    Yes.  If they are contaminated, yes.

8           Q.    Who at Kenner determines whether or not  
9  the recycling is contaminated?

10          A.    I don't know.

11          Q.    Does anybody oversee it?

12          A.    I see a Kenner truck on the transfer  
13  station though.

14          Q.    Okay.  So do you know if someone at  
15  Kenner is responsible for --

16          A.    I don't know their operation.

17          Q.    And for the contaminated recycling, you  
18  then take that roll-off container to the landfill?

19          A.    If it's contaminated with more than 10  
20  percent, yes.

21          Q.    And who makes that determination?

22          A.    The person whose feet are on the ground.

23          Q.    And back in 2020, July, after you-all  
24  opened the pen, who was it at IV Waste, do you  
25  know?

1 A. I don't know.

2 Q. I did notice when we looked earlier at  
3 the monthly tonnage, Exhibit 15, after the pen was  
4 open in July, the tonnage that went to MRF went  
5 down. Like for what, July, there was only four  
6 tons. You see that?

7 A. Yes.

8 Q. Why was it so low that month?

9 A. I don't know. Did you see the  
10 contaminated pictures that I sent to Kenner  
11 through my emails?

12 Q. I didn't. You went and took pictures?

13 A. There's plenty. And we notified Kenner  
14 of the contamination problem, and we sent out  
15 blast emails and notified them.

16 Q. So --

17 A. I don't know when that was sent, but I  
18 know there are many of them.

19 Q. So when you picked up the recycling in  
20 the truck and then took the truck directly to a  
21 MRF in May, you had 55 tons of recycling, correct?

22 A. No.

23 Q. That's not what that chart says?

24 A. No, it's not what it says.

25 Q. It says 64, but actually the MRF tickets



1 add up to 55?

2 A. Oh, I don't know what it was then.

3 Q. Okay. But other than coming up with  
4 this pen or corral, what else caused the recycling  
5 to go down so dramatically?

6 A. The contamination.

7 Q. Okay. So you didn't have a problem in  
8 May, but the contamination started in July?

9 A. No. I think the criteria was different  
10 when we moved it. I think the MRF is a little  
11 looser than the transfer station or vice versa. I  
12 don't know. That's a question for them.

13 But when we bring things to Baton Rouge,  
14 they tell us if there's a contamination issue.  
15 When we were bringing it to L and A Road, they  
16 took everything. But I do remember there being a  
17 big contamination problem, and I do have emails on  
18 that. I documented that and sent that to the City  
19 of Kenner with photographs of how we were  
20 struggling.

21 Q. Have you ever gotten a roll-off  
22 container to Baton Rouge with recycling and they  
23 refused to accept it?

24 A. No. But I've gotten a roll-off  
25 container to Baton Rouge where I received a phone

1 call that it was highly contaminated. And if it  
2 continued, then they would stop accepting it.

3 Q. So you-all do the sorting on the front  
4 end before you put it in the container?

5 A. It's not technical, so I don't know if  
6 you'd call it sorting. It's not -- True sorting  
7 is going through piece by piece.

8 Q. All right. Let me show you what I'm  
9 going to mark as Exhibit 51, which was previously  
10 marked as 61 in another deposition. It's an email  
11 August 4, 2020 from you to Deborah Foshee, Re line  
12 "Kenner July 2020 MRF tickets."

13 (Document marked for identification as  
14 Exhibit 51.)

15 EXAMINATION BY MR. MCGOEY:

16 Q. And you say, "Deborah, attached please  
17 find our open top invoice for July 2020 and our  
18 recycling MRF tickets." What's an open top  
19 invoice?

20 A. It's the roll-off boxes that we were  
21 just --

22 Q. Got you. That we were looking at in the  
23 picture?

24 A. -- referring to.

25 Q. All right. So then this invoice, the

1 first section is \$16,800 for Kenner transfer  
2 station roll-off swap. I guess it's 1462-01.  
3 What does that mean?

4 A. 1462-01, that's their customer number.

5 Q. Okay. Well, the next one is  
6 contaminated recycling and it's 1462-02.

7 A. It's the second site on the same  
8 customer.

9 Q. Okay. So where are the roll-off carts  
10 that are identified under 01? Are those the carts  
11 next to the ramp?

12 A. Yes.

13 Q. Okay. And then what is the contaminated  
14 recycling, the ones 002 like total \$6,300?

15 A. Those are the ones with garbage in them  
16 that are contaminated.

17 Q. So 002 are roll-out containers that are  
18 inside the pen we just looked at that are sorted,  
19 and garbage is put in one and recycling in the  
20 other, and the contaminated recycle is taken to  
21 the landfill?

22 A. Correct.

23 Q. And you bill the City of Kenner \$350 for  
24 each one of those?

25 A. Yes.

1 Q. How did that come about?

2 A. I believe that's the way our contract is  
3 written.

4 Q. Okay. I'll show you what was previously  
5 marked as Exhibit 44. I'll mark it as Exhibit 52.  
6 It's a copy of Kenner's contract with IV Waste.

7 (Document marked for identification as  
8 Exhibit 52.)

9 EXAMINATION BY MR. MCGOEY:

10 Q. Can you show me where you say that's  
11 what your contract provided you to get paid, \$350  
12 per roll-off for contaminated recycling?

13 A. No. That's a question for the lawyers.  
14 I do know the contract says inside the fence that  
15 we bill them, and outside the fence -- I'm sorry.  
16 We pay for the contamination, the weight inside  
17 the fence. Outside the fence the City of Kenner  
18 pays for the tonnage. I don't know where in this  
19 contract. I'd have to go through 53 pages.

20 Q. Okay. Well, you said it was in the  
21 contract. That's why I just had a copy of it and  
22 I thought I'd ask you. As you sit here today, you  
23 can't -- You don't know what provision --

24 A. I don't know where it is.

25 Q. And then the next one 1462-03, Kenner

1 City Park on Loyola Drive, what is that?

2 A. That's a site in Kenner. They have a  
3 city park.

4 Q. And you have roll-off carts there?

5 A. Roll-off containers, yes.

6 Q. Containers.

7 A. I don't know that we do now. Apparently  
8 we did.

9 Q. So then it looks like after the invoice  
10 you have three MRF tickets for the -- Actually  
11 there are three tickets but only two are in the  
12 month of July. One is July 22nd and one is July  
13 27th; is that right?

14 A. I'm not sure. July 27th?

15 Q. And 22nd, and there's one dated August  
16 4th where it says July recycling. So does this  
17 mean that all of the recycling picked up before  
18 July 22nd was contaminated?

19 A. No. Because May we went -- It wasn't  
20 before, no.

21 Q. I'm talking about for the month of July.

22 A. Yes.

23 Q. So the first three weeks of July all the  
24 recycling you got you didn't have enough to send  
25 it to the MRF?

1 A. Correct.

2 Q. It was all contaminated?

3 A. Correct.

4 Q. And who would have been making that call  
5 in July?

6 A. I don't know who it was.

7 Q. Do you know who does that today?

8 A. Yes.

9 Q. Who is that?

10 A. Raymond Williams.

11 Q. All right. I'm going to show you what  
12 I'm going to mark as Exhibit 53, which is a series  
13 of invoices and payments from the City of Kenner  
14 for July 2020.

15 (Document marked for identification as  
16 Exhibit 53.)

17 THE WITNESS:

18 (Reviewing document.)

19 EXAMINATION BY MR. MCGOEY:

20 Q. So the first one is a charge of \$45,832  
21 for recycling; is that right?

22 A. Yes.

23 Q. And if I look at the invoice from IV, it  
24 reflects that it's for 22,916 quantities or homes?

25 A. Yes.

1 Q. All right. How many homes do you-all  
2 pick up recycling from?

3 A. I don't know.

4 Q. Is it 22,000?

5 A. I don't know. I would assume it's less.  
6 That's the way our contract is written.

7 Q. In July of 2020 you only had 6,271  
8 residents signed up for recycling. Does that  
9 sound about right?

10 A. Yes.

11 Q. Is it still around that number or is it  
12 a lot more?

13 A. I don't know the number.

14 Q. So --

15 A. I know it's more. I don't know the  
16 number.

17 Q. Less than 10,000?

18 A. I don't know.

19 Q. All right. But so you charge the City  
20 \$45,000 for recycling. And then the next page  
21 1462-01, that is for the roll-off carts that are  
22 around the ramp, right?

23 A. Dumpsters, yes.

24 Q. Dumpsters. And then 1462-02,  
25 contaminated recycling, those are the ones that

1 are filled up in the corral that are determined to  
2 be contaminated?

3 A. Correct.

4 Q. And then this one has got another  
5 heading, 1462-005 Kenner yard. What would that  
6 be?

7 A. That's in the back of the --

8 MR. LITCHFIELD:

9 Excuse me. What page are you  
10 looking at for that one?

11 MR. MCGOEY:

12 Page 5 down on the bottom.

13 THE WITNESS:

14 It's the Kenner yard.

15 EXAMINATION BY MR. MCGOEY:

16 Q. Is that different than the ramps?

17 A. Yes.

18 Q. How is that different, different yards?

19 A. It's fenced off, yes.

20 Q. And what's in the Kenner yard?

21 A. Oh, it's a whole lot of debris.

22 Q. Okay. And so these are roll-offs that  
23 you-all fill up with debris?

24 A. Yes.

25 Q. And take to the C and D or to the



1 landfill?

2 A. It depends what's in it.

3 Q. All right. And then I go to page 7.  
4 There's a Kenner maintenance charge, 1462-06?

5 A. Yes.

6 Q. So that's a different location?

7 A. Correct. That's in the front.

8 Q. All right. And then there's a 1462-07  
9 which is a lake town --

10 A. Correct.

11 Q. -- charge. What is that?

12 A. A different location.

13 Q. All right. And then there's the City  
14 Park and then there's 1462-011, recycling MRF.  
15 What is that?

16 A. That's containers that went to the  
17 recycling MRF.

18 Q. So in addition to charging the City of  
19 Kenner \$45,000 for picking up recycling, when you  
20 take it contaminated and take it to the landfill,  
21 you charge them 350 for a roll-off cart?

22 A. Yes.

23 Q. And when you take it to a MRF, you also  
24 charge them 350 for a roll-off cart?

25 A. Yes.

1 Q. And you believe that's provided for in  
2 your contract?

3 A. Yes.

4 Q. Have you ever discussed that with anyone  
5 at the City of Kenner, that you're to be paid for  
6 delivering the recycle material to a MRF?

7 A. No. Discussed it, no.

8 Q. You just sent the bill and do they pay  
9 it?

10 A. You gave me the EFT payment saying they  
11 paid it.

12 Q. Well, in July of 2021, those bills --  
13 Mr. Pitfield used to approve those bills, but I  
14 think at that time he was gone from the City of  
15 Kenner. He might have still been there.

16 A. When was this?

17 Q. July of 2021.

18 A. I don't know.

19 Q. Now, Mr. Pitfield, are you familiar with  
20 something called CartLogic?

21 A. I'm not Mr. Pitfield.

22 Q. No, no, I'm sorry.

23 A. Sorry.

24 Q. Are you familiar with CartLogic?

25 A. Yes.

1 Q. What is CartLogic?

2 A. It's a software system that stores the  
3 serial numbers for the containers, the waste  
4 removal containers, curbside, the household  
5 containers.

6 Q. And did you ask that Cascade provide Mr.  
7 Pitfield with access to the CartLogic?

8 A. No.

9 Q. You didn't ask him for that?

10 A. No.

11 Q. Okay. Can you think of any reason why  
12 Mr. Pitfield would have that information?

13 A. No.

14 Q. Or need that information?

15 A. No.

16 Q. All right. So I'm going to show you  
17 what I'm going to mark as Exhibit 54, which is an  
18 email from you to Bob Durdin on May 21, 2020.

19 (Document marked for identification as  
20 Exhibit 54.)

21 THE WITNESS:

22 (Reviewing document.)

23 EXAMINATION BY MR. MCGOEY:

24 Q. And attached to it appears to be a text  
25 message from Chad Pitfield to you saying, "I just

1 talked with Sidney. Can you set up me with a read  
2 only for CartLogic so we can try and stay after  
3 Luke in getting cans delivered to some of these  
4 duplexes and four-plexes."

5 Sidney writes back, "I approve." And  
6 then you email Bob Durdin and say, "Hi, Bob.  
7 Please provide read only access to CartLogic to  
8 Chad Pitfield." Do you remember now asking to add  
9 Chad Pitfield to --

10 A. I don't, but I wrote this.

11 Q. Okay. When Mr. Ramelli filed suit  
12 against IV, what was Mr. Pitfield's involvement  
13 with responding to the lawsuit and the  
14 allegations?

15 A. What was his involvement? Well, he  
16 worked for Kenner at the time. I don't remember  
17 in what capacity when the lawsuit was. I know you  
18 showed it to me. I think it was in May. He was  
19 instrumental in helping Kenner get their  
20 containers, the proper containers from their  
21 garbage pick-up. That was his concern. And he  
22 resides in Kenner, so I'm sure he heard a lot of  
23 slack.

24 Q. So did he work with IV Waste in  
25 responding to the lawsuit?

1           A.    No.

2           Q.    He wasn't working for IV at that time?

3           A.    In responding to the lawsuit was the  
4 question.  No, he doesn't respond.  I hadn't seen  
5 that lawsuit.  He didn't see that lawsuit, to my  
6 knowledge.

7           Q.    All right.  Was there a problem with the  
8 roll-out carts from Cascade of the wheels falling  
9 off?

10          A.    Yes.  You seem to know about that.  
11 There's still a problem.

12          Q.    What are the problems?

13          A.    They were manufactured during COVID, and  
14 there was an issue with the axle, I believe, and  
15 the wheels falling off the carts.  And Mr. Durdin  
16 and the group at Cascade -- I don't know  
17 everyone's name -- has admittedly -- they have  
18 admitted to us that there were problems with the  
19 containers being faulty, on top of everything  
20 else.

21          Q.    So did they supply replacement wheels to  
22 try to fix the containers?

23          A.    They did supply -- Yes, they did.

24          Q.    And as a result of that, has IV refused  
25 to pay for the roll-out carts?

1           A.    I know we paid for some.  I don't know  
2 what parts we didn't.

3           Q.    Are you aware that some parts haven't  
4 been -- that IV hadn't paid for all of them?

5           A.    Yes, correct.

6           Q.    Is that in litigation or anything?

7           A.    We're talking about buying them for the  
8 City of New Orleans' contract with them.  They are  
9 proposing to work with us again.  So, no, that's  
10 not in litigation.

11          Q.    All right.  I'm going to show you an  
12 email written by Bob Durdin to you, Mr. Torres,  
13 and Mr. Pitfield, and Chuck Brechtel.

14                   (Document marked for identification as  
15                   Exhibit 55.)

16 EXAMINATION BY MR. MCGOEY:

17          Q.    Who was Chuck Brechtel?

18          A.    I don't feel so bad about my memory.  
19 For the third time he was the CFO.

20          Q.    CFO.  So it looks like --

21                   MR. LITCHFIELD:

22                           Mine's got yellow on it.

23                   MR. MCGOEY:

24                           I think that's the way it was.

25 EXAMINATION BY MR. MCGOEY:

1 Q. Oh, yeah, it says, "Please see the  
2 corrected grammar in the original email." So it  
3 looks like Bob Durdin --

4 A. He sent it.

5 Q. He sends an email to three people at IV  
6 and Chad Pitfield saying, "I hope all finds you  
7 well." It goes on talking about the audit and the  
8 wheel replacement. He says, "Please let me know  
9 when we can expect this payment, Bob Durdin." And  
10 he e-mailed chadpitfield@ivwaste.com. What was  
11 Chad's role in making sure payment was made to  
12 Cascade?

13 A. He had no role.

14 Q. Well, you asked Cascade to put him on  
15 CartLogic, access to CartLogic, right?

16 A. Correct.

17 Q. And now a month later when Cascade  
18 hasn't been paid, they are asking Sidney, you,  
19 Chuck, and Mr. Pitfield when they can expect  
20 payment?

21 A. That's what I'm reading.

22 Q. Okay. But you don't know what Mr.  
23 Pitfield's involvement was?

24 A. He didn't have involvement with payment  
25 to Cascade.

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MR. MCGOEY:

All right. Give me a quick break.  
We're really close to wrapping up.  
(Discussion off the record.)  
(Break taken at 4:07 p.m.)

THE VIDEOGRAPHER:

Returning to the record. The time  
is 4:13.

EXAMINATION BY MR. MCGOEY:

Q. Okay. Just a few follow-up questions.  
Last night I got a bunch of texts that I just  
printed out. I don't have copies for everybody.  
Literally, it was 6:30 at night I was walking out,  
but this is one set. And I don't know if I have  
it in here some tabbed, but I recall seeing some  
text messages with Deborah Foshee regarding an  
audit that was being done and you-all coming in to  
talk to the City Council about maybe the result of  
the audit was that City Council -- the City of  
Kenner owed IV money. Does that sound familiar at  
all?

A. Let me look for that.

Q. Let me see if I tabbed that.

A. April 6th.

Q. You see something on -- I'm sorry.



1 These aren't numbered, so I don't have it. Can  
2 you just tell me what that was about?

3 A. It is a text message -- Let me see where  
4 it started -- from Mr. Torres asking Ms. Foshee or  
5 stating that, "We'll be sending a residential can  
6 count with addresses, and we're looking to set up  
7 a meeting with all of you sometime next week to  
8 get this finalized and put it to bed. I want to  
9 thank you guys so much for getting everything that  
10 we requested so far as it has made the audit  
11 process over the last three weeks a lot easier by  
12 getting that information. Thank you."

13 Q. Got you. So this was in 2021 an audit  
14 was done?

15 A. It doesn't say. It just says April 6th.  
16 It doesn't say when. The other text messages say  
17 '20, so I don't know when this is.

18 Q. Right. But in '20, April 6 of 2020,  
19 you-all didn't even have a contract with Kenner,  
20 so I'm thinking this must be 2021.

21 A. I'm not sure. The one before that was  
22 2020, but you're right, we didn't -- We had a  
23 contract in April of 2020 though.

24 Q. But you just weren't picking up -- you  
25 didn't have any bills or any payments. And then a

1 few pages back, here it is, what I was thinking,  
2 May 5, I believe this is 2021 between --

3 A. It doesn't say the year though.

4 Q. Deborah Foshee, Mr. Torres, B -- is that  
5 Ben Zahn?

6 A. Ben Z.

7 Q. Yeah. It says, "Can you guys come to  
8 the next council meeting and talk to the council?  
9 We are getting beat up about recycling. Lots of  
10 questions about contamination, and we overpaid you  
11 by 500K, et cetera, et cetera. Great opportunity  
12 for you to reveal that we owe you! Branigan will  
13 probably reach out as well."

14 A. Oh, this was in 2021. This was after  
15 the Lee Zurich story and whatever you just showed  
16 me.

17 Q. Okay. So you-all did some type of audit  
18 to determine that the City of Kenner actually, in  
19 fact, owed IV money?

20 A. Correct.

21 Q. All right. What was your involvement in  
22 that?

23 A. Well, the City of Kenner has the audit.

24 Q. Who performed the audit?

25 A. Oh, Harold Asher's, I believe, office.

1 There was a CPA firm, a forensic CPA office.

2 Q. Okay. And that revealed that -- What do  
3 you recall that it revealed, the audit?

4 A. That IV Waste paid for the Kenner  
5 transfer station out of its own funds, and our  
6 contract states that City of Kenner was supposed  
7 to fund that and never did.

8 It also determined that IV Waste is  
9 employing and has continued to employ the  
10 attendant at the transfer station, and that in our  
11 contract it states that Kenner is supposed to  
12 supply the employee.

13 All of the waste that's brought to the  
14 Kenner yard by city contractors, we haven't been  
15 paid for since mid-January of this year. And all  
16 of the Ida --

17 Q. What haven't you been paid for?

18 A. The Ida debris, the tree service  
19 companies who bring their debris back there. The  
20 Hurricane Ida debris removal in our contract,  
21 there's a fee for that, and we haven't billed for  
22 that or been paid for that. But we have given  
23 them a bill. We haven't been paid for it. I  
24 should correct that.

25 Q. All right. A little further along in

1 the text it's like, I don't know, seven pages to  
2 the back or whatever, there's a picture of the  
3 corral again, the recycle corral. It's dated  
4 September 4. You see that?

5 A. Yes.

6 Q. It says, "Raymond, Ben from Carimi asked  
7 to use our skid steer. Please give him the key.  
8 Thanks." Who's Raymond?

9 A. Raymond Williams.

10 Q. What does he do?

11 A. He's the gentleman who loads the  
12 containers.

13 Q. Okay. So he's the guy that operates the  
14 skid steer?

15 A. Yes.

16 Q. And he's the gentleman that's  
17 responsible for deciding what's contaminated and  
18 what's not contaminated?

19 A. Correct.

20 Q. And so it looks like in this September  
21 4th photo there's only one container in there, and  
22 there's a lot of material on the ground. Does  
23 that mean that that material is contaminated or it  
24 hasn't been determined yet?

25 A. That means that Ben from Carimi wants to

1 use our skid steer to move the material back so we  
2 can put another container.

3 Q. Is Carimi responsible for moving the  
4 roll-offs?

5 A. No.

6 Q. So why would they be doing that?

7 A. I don't know if he was out there doing  
8 repairs. I'm not sure.

9 Q. Okay. And on the -- towards the front,  
10 maybe the fifth or sixth page there is a text with  
11 Tyrone the IV?

12 A. That's Tyrone IV.

13 Q. Oh, Tyrone. Sorry.

14 A. That's where -- He was an employee.

15 MR. LITCHFIELD:

16 Mr. McGoey is getting tired.

17 MR. MCGOEY:

18 Yeah.

19 THE WITNESS:

20 Right around the fourth.

21 MR. MARSIGLIA:

22 In the beginning.

23 THE WITNESS:

24 Oh, in the beginning. I'm sorry.

25 What page?

1 EXAMINATION BY MR. MCGOEY:

2 Q. I'm sorry. It's one, two, three, four,  
3 five, six pages in. So it says, "Latine Williams  
4 is a friend of mine. Didn't she work at Ramelli?  
5 Yes. She told us she wanted to stay at Ramelli  
6 when we did the job fair. She had a change of  
7 heart." So it looks like on May 26th you-all are  
8 talking about hiring her?

9 A. No. He asked me if I was hiring, hiring  
10 rear loader drivers, and I said, "I'm pretty  
11 stacked right now at the moment."

12 Q. Okay. And that talks about a job fair.  
13 That was when you told us earlier about when Mr.  
14 Starks came out to IV's office?

15 A. Correct.

16 Q. IV also bills the City of Kenner for  
17 street sweeping; is that right?

18 A. Yes.

19 Q. Is there a contract that provides for  
20 that, or is that just --

21 A. I'm not sure.

22 MR. MCGOEY:

23 That's all the questions. I  
24 appreciate it.

25 THE WITNESS:

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Thank you.

MR. LITCHFIELD:

I have some questions. I'm just teasing.

THE VIDEOGRAPHER:

That concludes this deposition.  
The time is 4:24.  
(Deposition concluded.)

## 1 REPORTER'S CERTIFICATE

2  
3 This certification is valid only for a  
4 transcript accompanied by my original signature  
5 and original required seal on this page.

6 I, CONNIE M. FINESCHI, Certified Court  
7 Reporter, in and for the State of Louisiana, as  
8 the officer before whom this testimony was taken,  
9 do hereby certify that JULIE TUFARO, after having  
10 been duly sworn by me upon authority of R.S.  
11 37:2554, did testify as hereinabove set forth in  
12 the foregoing 247 pages;

13 That this testimony was reported by me in  
14 the stenotype reporting method, was prepared and  
15 transcribed by me or under my personal direction  
16 and supervision, and is a true and correct  
17 transcript to the best of my ability and  
18 understanding;

19 That the transcript has been prepared in  
20 compliance with transcript format guidelines  
21 required by statute or by rules of the board, and  
22 that I am informed about the complete arrangement,  
23 financial or otherwise, with the person or entity  
24 making arrangements for deposition services;

25 That I have acted in compliance with the



1 prohibition on contractual relationships, as  
2 defined by Louisiana Code of Civil Procedure  
3 Article 1434 and in rules and advisory opinions of  
4 the board;

5           That I have no actual knowledge of any  
6 prohibited employment or contractual relationship,  
7 direct or indirect, between a court reporting firm  
8 and any party litigant in this matter, nor is  
9 there any such relationship between myself and a  
10 party litigant in this matter. I am not related  
11 to counsel, nor the parties herein, nor am I  
12 otherwise interested in the outcome of this  
13 matter.

14  
15 \_\_\_\_\_  
16 CONNIE M. FINESCHI, CCR  
17 CERTIFIED COURT REPORTER  
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<b>A</b>				
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