

AFFIDAVIT OF JEROME RIVERA

STATE OF LOUISIANA

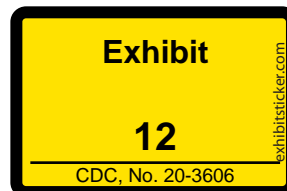
PARISH OF ORLEANS

BEFORE ME, the undersigned authority, personally came and appeared:

JEROME RIVERA

who, after being duly sworn, did depose and say:

1. I have personal knowledge of the statements made in this Affidavit.
2. I worked as a driver for IV Waste from 2016 to 2018 and 2020 to 2021.
3. My work for IV Waste included driving a garbage truck in the French Quarter and driving a 40 yard roll-off container truck in the City of Kenner.
4. Throughout my years driving trucks in the French Quarter for IV Waste, I picked up residential garbage, as well as garbage and recyclables for IV Waste commercial accounts.
5. During my shifts driving in the French Quarter for IV Waste, I never once picked up recyclables from a commercial account and then took the recyclables to a recycling facility. Instead, I always co-mingled recycling with garbage in a garbage truck and then dumped the truck at the River Birch landfill.
6. In 2020 and 2021, on a weekly basis, I picked up recycling from the City of Kenner's yard off Williams Blvd. and dumped it at the River Birch landfill.
7. The process that IV Waste used to pick-up and dump Kenner's recyclables in the River Birch landfill was as follows: IV Waste has two 40 yard containers in a pen behind locked gates within Kenner's yard just off Williams Blvd. After the IV Waste truck picks up recyclables from homes in Kenner, it dumps the recyclables in the pen at the Kenner yard on the ground. IV Waste employees do not attempt to sort the recycling to determine if the recycling is contaminated



or not contaminated. Instead, IV Waste employees use a Bobcat or Boom Truck to pick-up and place all of the recyclables in the two 40 yard containers. IV Waste roll off trucks then pick up the containers containing recyclables and bring the recyclables either to the River Birch landfill or BFI recycle facility in Baton Rouge. There is no difference between the recyclables that IV Waste brought to BFI and River Birch.

8. Kevin White, a/k/a "Country" was the IV Waste employee in charge of the Kenner lot. Country instructed me to take the Kenner recyclables and dump them in the River Birch landfill. I was ~~never~~ instructed to take the Kenner recyclables to BFI in Baton Rouge.

only once
JR

RN

Jerome Rivera

JEROME RIVERA

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 18th DAY OF AUGUST, 2021.

[Signature]

NOTARY PUBLIC
PRINT NAME: *Stephan McGary*
NOTARY NO. _____