

AFFIDAVIT OF PATRICIA E MAUKO

Patricia E Mauko, being duly sworn, upon her oath deposes and says:

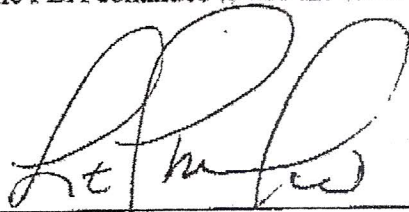
1. I am employed as a Lieutenant by the Union County Department of Corrections. I have been employed by them since I was hired off a Civil Service List in 1988. I became a Lieutenant on May 3, 2011.
2. In addition, since May 2010, I was the Secretary of FOP Lodge 213, which represents the Superior Officers employed at the Union County Jail. Upon the resignation of Jim Rinaldo as President, I assumed the Presidency in the beginning of September 2011. Accordingly, I am currently the President of FOP Lodge 213.
3. I have been advised by our attorney that the FOP must submit Affidavits in support of our claim that the Petition filed by the PBA with PERC for an election must be blocked due to the Unfair Labor Practice Charge which we filed months ago. Many of the events pertain to past President, Jim Rinaldo; however, Lieutenant Rinaldo's wife is having surgery so he cannot provide an Affidavit by the time they are due at PERC.
4. I will address the First Count of the ULP first. I have personal knowledge that as recently as a few years ago Director Riordan in writing informed the Board of Freeholders that he absolutely needed four Captains to run the Jail. The Freeholders agreed and since then we have had four Captains. Jim was the number one candidate on the existing promotional list for Captain at the Jail. Captain John Staba retired in or about May 2011 and Jim would have been the next person to be promoted. However, rather than promote Jim, he was advised by Mr. Riordan that he (Riordan) had determined all of a sudden that he only needed three Captains. He

claimed this was because of finances. However, rather than promote Jim, Mr. Riordan has now increased the number of Sergeants from 33 to 38, and the number of Lieutenants from 8 to 10. Any alleged cost savings from not promoting Jim is insignificant in terms of the increased cost with the seven new Superior Officers. In addition, the County also called for a new Captain's test. Why would there be a necessity for a new test; if there were to be no new Captains? I believe it was called for in hopes that Jim would no longer be the number one eligible. We were also told that in all likelihood Mr. Riordan had determined to further reduce the number of Captains to two from three if another one retired. However, since Jim finished third in the new list, so the County need not promote him, we have now been told the number of Captains may stay at three. Incidentally, all three current Captains are PBA members.

5. I am a Floor Lieutenant. As such, I am personally aware of what is happening in terms of discipline. I have witnessed many occasions where I am surprised, to say the least, that a FOP member makes an allegation against a PBA subordinate, but the County doesn't do any investigation. On the other hand, any allegation against a FOP member is immediately investigated. Further, the amount of discipline given to FOP members is vastly disproportionate, with the FOP member being subject to much greater discipline.
6. The case involving Gerry Hatton is illustrative. After what William Burkert did to Gerry, one would have assumed he'd be suspended for a long period of time or terminated. Instead, he was suspended on paper for only five days, allowed to use his personal or vacation time rather than actually being suspended and was promoted


to Sergeant. Jim Rinaldo, who sent an overtime list to a handwriting expert, was removed from the position of Administrative Lieutenant. He had been in administration for the past 15 years. It should be noted that Lieutenant Rinaldo was acting as FOP President and had nothing to do with his administrative duties.

- 7. Further, as per paragraph 14 of the Charge, we have lost our FOP office. We now have a cubicle with no privacy, or equipment. The PBA continues to use the same office it always used.



Lieutenant Patricia E Mauko

Sworn and subscribed before me this
7th day of October 2011.



Donna Dei Sokolowski

DONNA DEI SOKOLOWSKI
 NOTARY PUBLIC OF NEW JERSEY
 COMMISSION EXPIRES 7/6/2014