

**EXHIBIT T**

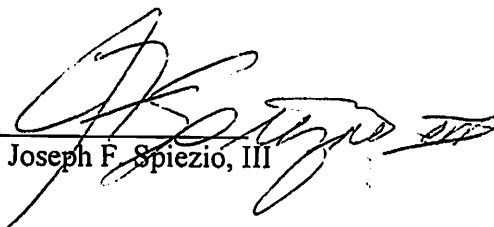
I, Joseph F. Spiezio, III, being duly sworn depose and state the following;

1. I am over the age of 18 and make this affidavit of my own free will.
2. I feel the need to assist and explain certain matters in the resolution of the charges filed against R& S Waste Services, LLC and presently being investigated by the NRLB.
3. I am the sole owner and managing member of R&S Waste Services, LLC
4. I am also the sole owner and managing member of Pinnacle Equity Group, LLC.
5. I am not the owner of Industrial Recycling Systems, Inc. and never have had any ownership interest.
6. I am not the owner of Rogan Brothers Sanitation, Inc. ("Rogan Brothers") and never have had any ownership interest.
7. Peter Liguori is an employee of R&S Waste Services, LLC.
8. Mike Vetrano is an employee of R&S Waste Services, LLC.
9. The facts surrounding my entrance into the sanitation field have been provided to Region 2 and if needed I will supplement this affidavit.
10. My core business is real estate and has been for 31 years. I have never been in the sanitation business prior to R & S Waster Services, LLC.
11. I have known James M. Rogan for over 10 years. I have done business with him and all transactions were done at arm's length.
12. The frivolous charges filed by Local 813 are not only retaliatory, but discriminatory and is a desperate attempt by a union to strong arm a businessman in my opinion.
13. The information if any provided by Local 813 is false and based upon unreliable hearsay information. There is no basis for this to continue because the presumption is "innocence" until proving guilty in this society.

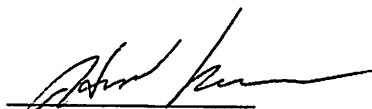
14. I was a business consultant to Rogan Brothers.
15. I had no authority to bind Rogan Brothers Sanitations, Inc. in any matter. I was strictly a consultant. I have provided the consulting agreement that clearly defined my role and lack of authority. In fact I appeared before the NRLB and provided an affidavit in charges filed by Rogan against Local 813.
16. The final decision to go into the waste removal business was solely based upon the default by Rogan Brothers to Pinnacle.
17. I have no family relationship with James Rogan.
18. There is no common ownership or control between R & S Waste Services LLC and Rogan Brothers.
19. There is no common ownership or control between Pinnacle Equity Group, LLC and Rogan Brothers.
20. There is no common ownership, common control or sharing of property or revenue between R &S Waste Services, LLC and Industrial Recycling Systems, Inc.
21. R & S Waste Services, LLC leases property at 1018 Saw Mill River Road, Yonkers, NY on a month to month basis from Leighton Construction. There is no lease.
22. As the affidavit of Peter Liguori that has been provided shows, there is no common ownership, common control or sharing of property or revenue between Rogan Brothers and Industrial Recycling Systems, Inc.
23. Peter Liguori is a full time employee of R&S Waste Services, LLC and operates a Roll Off service.
24. Peter Liguori is a lead person like Michael Vetrano. Liguori and Vetrano do not have binding authority on behalf of R&S Waste Services, LLC. They do not have the authority to discipline employees or direct them in their duties. They are conduits of information between the drivers and me. I retain the sole authority in hiring and firing and disciplining and directing all employees.

25. Peter Liguori is the designated shop steward of the company on behalf of Local 726.
26. Vetrano was hired by R&S Waste at a rate of pay that was exactly the same as Rogan. I agreed to pay the rate because I believe his decade's long experience in the industry would be a great value to my company and also because I know he'll be retiring soon and did not want him to be at a disadvantage in his retirement planning.
27. I did not direct or order Vetrano, Liguori or anyone else to threaten or coerce employees into signing authorization cards for Local 726, IUJAT.
28. I did not direct or order Vetrano, Liguori or anyone else to threaten or coerce members of Local 813 to withdraw their membership.
29. R&S Waste Services, LLC is not the alter ego or successor of Rogan Brothers and for those to throw out allegations is reckless and harmful to my organization.
30. The loan to Rogan Brothers went bad and I had an opportunity to reduce the impact to Pinnacle caused by f Rogan Brothers inability to repay Pinnacle. I am an entrepreneur and it is my goal to operate R & S Waste Services, LLC to its maximum and grow the business for my family as I did with my real estate portfolio.
31. James Troy was well aware that R & S Waste Services, LLC was not a continuation of Rogan Brothers in another form because he met with me on several occasions to discuss whether R & S Waste Services, LLC would sign a collective bargaining agreement with Local 813.
32. I met with James Troy and discussed R&S Waste Services, LLC. Troy presented a comparison of terms it was prepared to give R & S Waste Services, LLC that differed from Local 813's terms with Rogan Brothers. James Troy did not present any authorization cards to me from any employee of R & S to indicate that Local 813 had been designated to ask that R & S Waste Services, LLC recognize Local 813 and begin bargaining.
33. James Troy knows that Rogan Brothers and R&S Waste Services, LLC are not related entities as was discussed many times.

34. James Troy could have done the same that Local 726 accomplished by making the union's case to the employees of R & S Waste Services, LLC rather than utilize the government to do its work.
35. I have invested millions of dollars into R&S Waste Services, LLC and will achieve what I set out to do and to distract someone with these false charges is improper.
36. As far as I am aware, James Troy, the business delegate, never contacted the employees of R&S Waste Services, LLC to organize them.
37. I have never threatened any employee of Rogan Brothers to withdraw their membership from Local 813.
38. I never pressured, coerced or threatened any employee of R & S Waste Services LLC to join Local 726, IUJAT.
39. I never told employees of Rogan Brothers or R & S Waste Services, LLC that if they signed Local 813 cards they would be discharged.
40. I never discussed R&S Waste Services with any Rogan Local 813 employee.
41. All employees of R&S Waste Services, LLC, were nonunion when they were hired. Local 813 is in possession of that information and either refuses to provide the NRLB with it or is obstructing this investigation.

  
Joseph F. Spiezio, III

Sworn to before me this 19<sup>th</sup> day  
Of December 2011

  
Notary Public

HOWARD KASSMAN  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01KA6112367  
Qualified in Suffolk County  
My Commission Expires July 06, 2012