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Former Aztec employee

Home Address: [REDACTED]

Home Telephone: [REDACTED]

can testify that in July 2003 and August 2003, he worked for Aztec on the Bldg 90333, HFLD, FL asbestos project. When he arrived at the project on July 21, 2003, Aztec workers discussed whether the ceiling contained friable asbestos. [REDACTED] claimed it was not asbestos. However, everyone working on the project suspected it was friable asbestos, yet no containment or decontamination structure was erected. In addition, workers did not wear their personal protective equipment or respirators. Aztec workers immediately began removing the inner contents of the building, which included the suspended ceiling tile. As the suspended ceiling was removed, friable asbestos fell everywhere and created a large cloud of dust/debris. The asbestos covered everything in the building, which included the carpet. Asbestos covered worker's clothes and equipment, and it filled their noses and mouths. On July 23, 2003, [REDACTED] and [REDACTED] arrived at Bldg 90333 to inform the Aztec crew that FDEP was coming to inspect. [REDACTED] screamed at Aztec workers to clean up the asbestos before the inspector arrived. Aztec employees worked diligently to clean up the asbestos by sweeping, shoveling, and throwing it into an open Aztec dumpster. Carpet rolls covered in asbestos were thrown into the same dumpster. In addition, they hid asbestos in the bathrooms and furnace room. Workers hepa-vacuumed the building's stairwell and the grass where asbestos spilled. After cleaning up the site, he and other Aztec workers were told to leave the site and wait in Aztec trailers located across from HFLD, FL. Eventually, [REDACTED] and the other Aztec workers came back to the site to finish it. Workers erected a containment structure, but they still did not handle asbestos properly. [REDACTED] believed they scraped the ceiling's remaining asbestos without wetting it first. In addition, a grinder was used on the dry ceiling in an attempt to make the building "look good" for inspection.

Can testify that [REDACTED] routinely illegally dumped friable asbestos into Big Wheel landfill. In September 2003, he worked with [REDACTED] to remove friable asbestos in motels on Panama City Beach, FL. Asbestos was commingled with mattresses and placed in Aztec dumpsters. He rode along with [REDACTED] while he transported this commingled asbestos debris to Big Wheel landfill. [REDACTED] intended to dump the material, but it started to storm so he left the trailer at Big Wheel so it could be buried after the storm.

~~Can testify that any person who worked for Aztec either knew or suspected that [REDACTED] hired illegal aliens. Aztec workers and supervisors regularly discussed the legal status of Aztec Hispanic employees. They frequently joked with these illegal aliens about calling immigration. [REDACTED] knew [REDACTED] regularly used illegal aliens for Aztec. [REDACTED] actually transported many of the illegal aliens to Aztec projects because they did not have vehicles or driver's licenses. Individuals, such as [REDACTED] and [REDACTED] liked using illegal aliens because they could work them long hours and underpay them. If the illegal aliens complained about safety or work conditions, [REDACTED] or [REDACTED] threatened to call immigration.~~

~~Can testify that in 2003, [REDACTED] told him to find American asbestos workers because she had problems getting the "Mexican" workers past security on military bases. [REDACTED] also asked him to find American workers because he got into trouble on Maxwell AFB, GA due to the use of illegal aliens. [REDACTED] owned trailers in Tallahassee, Panama City, and in Port St. Joe to allow illegal aliens to reside. Aztec supervisors routinely circumvented security to bring illegal aliens onto military bases. Aztec Supervisors had illegal aliens ride in the back of Aztec vans or trailers, where tools were located, to hide from base security. He witnessed the following: In July 2003, [REDACTED] hid at least one illegal alien so he could enter HFLD, FL. In April 2003, [REDACTED] hid illegal aliens so they could enter TAFB, FL. In April/May 2003, [REDACTED] hid illegal aliens so they could enter Maxwell AFB, MS. In May/June 2003, [REDACTED] hid illegal aliens so they could enter Keesler AFB, MS. [REDACTED] maintained several trailers on his Milton, FL property where he allowed illegal aliens to live. While working on a large asbestos project at the Tampa, FL airport, numerous illegal aliens obtained false identification documents from a Tampa, FL document vendor. All the Aztec project supervisors, including [REDACTED] were aware of this.~~

Exhibit 38: Written interview record of

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Former Aztec Employee

Home Address: [REDACTED]

Home Telephone: 8 [REDACTED]

[REDACTED] can testify that in February 2000 Big Wheel landfill was not run in accordance with state regulations. [REDACTED] can testify bags containing non-friable asbestos were buried all throughout the landfill as opposed to the designated area. [REDACTED] stated he often crushed the bags. [REDACTED] believed crushing the tiles would make the asbestos in the tiles friable. In 2002, [REDACTED] heard Aztec was conducting an asbestos project at Cove Gardens, Panama City, FL. [REDACTED] was told not to keep a log of truckloads coming into the landfill. [REDACTED] heard Aztec had made a deal with an unknown government official to overcharge the government.

Exhibit 24: Written interview record of [REDACTED]

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REPORT OF INVESTIGATIVE ACTIVITY

1. DATE OF INVESTIGATIVE ACTIVITY

10 Feb 04

2. PLACE

Holiday Inn Select, 2001 North Cove Boulevard, Room 323, Panama City, FL

3. ACTIVITY NUMBER

27836040402214

4. REMARKS

Witness Interview of:

Date/Place: 10 Feb 04/

Interviewers:

On 9 Feb 04, [redacted] was interviewed and provided the following. [redacted] indicated that although his complete name is [redacted] he goes by [redacted] stated that he illegally entered the United States sometime prior to March 2003. He paid \$40,000 in [redacted] currency to a coyote to be taken from [redacted] to Mexico. [redacted] entered the United States through an area of Mexico known as [redacted] He traveled through the desert and was taken to Atlanta, Georgia where a friend picked him up. [redacted] stated that the coyotes have a house in Aqua Prieta where they keep all the men and women before they take them to the United States. The house holds up to 200 people.

[redacted] stated that in Atlanta, Ga., he purchased a fraudulent social security card and Alien Registration Receipt Card (immigration card). He paid a total of \$125.00 for both cards. He used the name [redacted] on the cards. [redacted] does not know the Atlanta address where he purchased the fraudulent identification cards. While in Atlanta his friends provided him with a fraudulent asbestos training certificate using the name [redacted]

[redacted] began working for AZTEC Environmental (AZTEC) in March 2003 as a laborer removing mainly asbestos. [redacted] stated that he was not involved any demolition projects. The first asbestos abatement took place at the Tampa International Airport, Tampa, Florida. [redacted] stated that this project took approximately three months to complete. The work consisted of removing of ceilings that contained asbestos. [redacted] stated that they used water during the removal and that the asbestos was placed in double bags and subsequently identified as being as such. [redacted] stated that this job was done properly. After completing this job [redacted] returned to Atlanta. The next Aztec jobs took place in Tallahassee, Florida; Decatur, Alabama; Montgomery, Alabama; Panama City and Atlanta.

[redacted] explained that when he went to work for AZTEC in Tampa he told the company that he had lost his social security card, immigration card asbestos training certificate during the move. [redacted] stated that [redacted] an AZTEC supervisor, told him that he could work using the name of [redacted] According to [redacted] was an AZTEC worker who had failed to show up at all at the Tampa work site. [redacted] stated that co-workers told him that [redacted] had a fraudulent social security number. Although [redacted] never showed up for work he did contact AZTEC management to complain that an employee working for them was using his name. [redacted] stated that [redacted] the project supervisor at Tampa International Airport, told him later on that he had explained to management that he was a good worker and that he wanted to keep him. [redacted] recalls [redacted] telling him that he could continue working using the name of [redacted] until they could get him properly trained. [redacted] understands that [redacted] had taken the required asbestos training courses.

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4. REMARKS (Continued)

stated that he has never received any asbestos related training. believes that many of the other illegals who work at AZTEC took the required asbestos training in Atlanta. The training lasted four days. stated that the workers paid for their own training; AZTEC did not pay it for. Additionally, none of his undocumented co-workers ever received Aztec sponsored medical examinations. Instead, his co-workers had to pay for their own medical examinations. stated that they are getting their own certifications because they are not necessarily AZTEC employees, but temporary workers. In contrast, AZTEC selectively sends their non-Hispanic workers to AZTEC sponsored training and physicals. AZTEC sends them to training in Alabama. qualified his earlier statement by stating that AZTEC does send all their employees, including the temporary ones to the required annual asbestos refresher training. told the Reporting Agent that has a fraudulent asbestos training certificate, which he obtained in Atlanta.

said that he had never undergone a fit-test for his respirator mask. Aztec does provide respirator masks. explained that generally the workers would use the respirators only if they are finding it hard to breathe due to the amount of dust created during a dry removal. stated that the workers did use their respirators while working at Tampa International Airport.

informed the Reporting Agent that the Tallahassee job consisted of removing asbestos at the university. The ceiling was removed without using any water. The pieces of ceiling were then placed into double bags dry without treating them with water. does not recall seeing any of the workers wearing a respirator. Neither did he see the supervisor, wearing one. Plastic was used to cover only the furniture within the rooms. added that plastic was also used on the walls. admitted that the cleanup at the end of the project was not done well. stated that they left the site very dirty.

stated that the supervisors have never advised the workers before a project if asbestos is present. The supervisors only tell them what they want done. stated that a project in Panama City consisted of removing the ceiling and sheet rock from rooms at a Ramada Inn. stated that they removed this very friable insulation that was located above the ceiling. stated that they should have used water during the abatement but that they did not. A worker who goes by the name was responsible for bringing drinking water as well as water to use during the abatement. an African-American who supervises when not present. The AZTEC workers waited for to arrive with the water, however, when he did not they decided to go ahead with the asbestos abatement. stated that is easier to remove asbestos when one uses water. stated that he, along with and other co-workers did not wear respirators during this removal. stated that has never commented on the workers lack of using respirators. recalls seeing an inspector leaving small boxes to monitor the air quality. commented that never addressed the issue of not wearing respirators while working or the issue of workers smoking in the abatement area. stated that the asbestos was placed into double bags but that at the end they just placed it into one bag. Additionally, some of the bags were not identified with a sticker that warned of asbestos because they ran out of stickers. described how during this removal they moved some filled bags from a clean area to an area that still have to be abated. Consequently, when the abatement began the clean bags became contaminated with asbestos. The outside of the bags were not cleaned before they were disposed of in a dumpster. stated that was very nervous about the abatement conducted at the Ramada Inn. stated that they completed the job so fast and so poorly that suspected they might get into trouble. Consequently, ordered the demolition to begin even before they were finished cleaning up to cover up the inadequate abatement.

advised that no water was used during the removal of asbestos from pipes at the Maxwell Air Force Base, Montgomery, Alabama. Additionally, stated that no respirators were used. stated that the cleanup at the end of the project was done really well because they were on a

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4. REMARKS (Continued)

stated that the showers that were set up for workers to decontaminate before they changed into every day clothes were not hooked up to a water supply. Additionally, no soap was provided. At best, workers would wash their hands. The only exception to this was the abatement at the Tampa International Plaza. The showers at that particular site were hooked up to water and were used. The reason why everything was done correctly at this location was due to an inspector who was very thorough and required that corrections be made.

stated that the abatement at Fort Walton was conducted properly, using water and respirators. The reason for this was that they had a strict supervisor named Clay on the job. stated that does not take short cuts but does the abatements according to regulations.

stated that the abatement in Decatur, Alabama was done properly in that water was used, the asbestos was double bagged and that the workers protected themselves using respirators. However, the workers failed to decontaminate by showering at the end of the day. Furthermore, the cleanup at the end was not done well; they left the site very dirty.

stated that in Atlanta and in Valdosta, Georgia he was involved with two projects removing tile flooring. stated that although AZTEC has available a machine to remove the tile by grinding it they never used it. The tile was instead removed using scrappers. The job in Valdosa took place in a church.

stated that he was never given a Certificate of Workers Acknowledgement of the hazards. stated that he does not know the difference between friable and non-friable asbestos. stated that he and his co-workers always wore tyvck suits, yet they would not use the head covering. stated that he does not know if something he is removing contains asbestos or not. It is not until the end when they start placing stickers on the bags that warn of asbestos that he knows. does not have any knowledge regarding what regulatory agencies inspect the work that AZTEC does. does not know who the Florida Department of Environmental Protection is.

does not know who is. stated that he met twice, once at a barbeque and another time at a job site. I identified as being the owner of AZTEC. AZTEC had him removing shrubbery and doing other yard work at a church when showed up. On that day was bragging how was going to give him a truck as a gift for getting so many jobs done so quickly. stated that did get a white truck from

stated that he gets paid by check for the hours that he works. Typically he is paid for 12-13 hours a day.

stated that he does not know anything about Big Wheel landfill. He has never heard of that place before. He added that he has only been to one landfill while working with AZTEC. He could not recall the name of the landfill but stated that it was located in Pensacola. stated that the bags of asbestos were just thrown from the truck onto the ground and left there.

stated that as far as he could tell every job that he was on there was some form of air monitoring taking place, to include stationary air monitors.

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4. REMARKS (Continued)

\_\_\_\_\_ recalls working at the Tyndall AFB on three separate occasions. \_\_\_\_\_ stated that the ceiling tiles were to be removed in certain buildings. \_\_\_\_\_ was not assigned to perform the abatement but instead he just prepped the area before the abatement. \_\_\_\_\_ entered Tyndall AFB with a supervisor named \_\_\_\_\_. The other times he was responsible for clean up the project site.

\_\_\_\_\_ believes that AZTEC's main office is located in \_\_\_\_\_. That is where all personnel files, medical exams and other paperwork like the asbestos training certificates are maintained. \_\_\_\_\_ stated that Knight brings the asbestos training certificates to every job site. \_\_\_\_\_ keeps the certificates in his truck.

\_\_\_\_\_ stated that he believes management knows that they are hiring undocumented individuals. \_\_\_\_\_ was unable to articulate why he thinks they know that they are hiring illegal aliens.

\_\_\_\_\_ stated that workers will gather at Sherman Avenue in Panama City and get picked up for work by AZTEC. On other occasions AZTEC will pay for the workers, at a job site in another state, to stay in a hotel. \_\_\_\_\_ does not know whom AZTEC contacts in Atlanta when they need workers.

\_\_\_\_\_ stated that Tyndall and Montgomery are the only two military bases that he has worked at.

\_\_\_\_\_ stated that on March 4, 2003, he purchased a fraudulent social security card and alien registration receipt card from an individual named \_\_\_\_\_ for \$130.00. \_\_\_\_\_ lives in an apartment located in Panama City. \_\_\_\_\_ stated that he did not know the address but that he could take the Reporting Agent to the apartment complex. \_\_\_\_\_ stated that \_\_\_\_\_ also known for selling marijuana.

\_\_\_\_\_ mentioned that while he was working at the Ramada Inn an incident occurred between a female named \_\_\_\_\_, and \_\_\_\_\_ an AZTEC employee, warned \_\_\_\_\_ that \_\_\_\_\_ had not received any asbestos training and should not be conducting abatements. Afterward, \_\_\_\_\_ told \_\_\_\_\_ that he should keep his mouth shut otherwise \_\_\_\_\_ could lose his job.

\_\_\_\_\_ provided \_\_\_\_\_ with his pay stubs that are made out to \_\_\_\_\_ stated that he cashes the checks at a store near the beach in Panama City.

\_\_\_\_\_ provided the Reporting Agent with his fraudulent social security card and alien registration receipt card. The name on both documents is \_\_\_\_\_

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# REPORT OF INVESTIGATIVE ACTIVITY

1. DATE OF INVESTIGATIVE ACTIVITY

6 May 04

2. PLACE

3. ACTIVITY NUMBER

27880041311538

## 4. REMARKS

Witness Interview of:

Date/Place: 6 May 04/ [REDACTED]

Interviewers: [REDACTED]

On 6 May 04, [REDACTED] was interviewed, and he provided the following. [REDACTED] worked as an Aztec Environmental, Inc (AZTEC) asbestos worker for approximately [REDACTED] years. He quit AZTEC in Jan 04 because of health and safety concerns. [REDACTED] worked in Jul and Aug 03 on the Hurlburt Field (HFLD) Bldg 90333 asbestos project. When [REDACTED] arrived at the project on 21 Jul 03, AZTEC workers discussed and believed the ceiling contained friable asbestos, including [REDACTED] AZTEC supervisor. From [REDACTED] experience of working around asbestos, he thought it looked like asbestos. Ultimately, [REDACTED] told AZTEC workers it was not asbestos. ~~AZTEC workers did not contain the building or build a decontamination structure. In addition, workers did not wear their personal protective equipment or respirators.~~ AZTEC workers immediately began removing the inner contents of the building, which included the suspended ceiling tile. As the suspended ceiling was removed, friable asbestos fell everywhere and created a large cloud of dust/debris. The asbestos covered everything in the building, which included the carpet. Asbestos also covered worker's clothes and equipment, and it filled their noses and mouths. [REDACTED] threw away his clothes for fear of exposing his family to asbestos. A few days after starting the project, [REDACTED] AZTEC Vice President, arrived at Bldg 90333 to inform the AZTEC crew that Florida Department of Environmental Protection (FDEP) was coming to inspect. [REDACTED] told AZTEC workers to clean up the asbestos before inspectors arrived. By the time FDEP arrived, approximately half the ceiling's asbestos was removed. Carpet rolls covered in asbestos were commingled with the ceiling tile and bags of friable asbestos. All the asbestos material was thrown into an open AZTEC dumpster sitting outside Bldg 90333. When [REDACTED] found out he was exposed to such a large amount of asbestos, he requested to work another job. [REDACTED] continued to work on Bldg 90333 for another four days constructing a containment and decontamination structure until he was transferred. [REDACTED] never observed any air monitoring performed while he was on the project.

[REDACTED] stated illegal activity occurred on nearly every AZTEC asbestos project. [REDACTED] AZTEC supervisor, was the worst offender and was called "the devil." [REDACTED] pushed crews to work quickly and take shortcuts. Asbestos was often removed dry, but [REDACTED] sprayed water on the bags as an appearance of wetting the asbestos. For example, [REDACTED] recalled a project in 2002 on Tyndall AFB where no asbestos prep or air monitoring was performed. Pipes covered with friable asbestos were dry removed from the building. [REDACTED] emphasized that air monitoring was also bogus. AZTEC collected its own air samples, including clearance samples, from locations outside containment. This ensured the project always passed the final clearance inspection. When AZTEC was closely supervised and required to use an air monitoring consultant, supervisors such as [REDACTED] requested air monitoring consultants who helped them pass their inspection. [REDACTED] would say lets use Southern Earth Sciences, because we can get away with not taking real air samples.

[REDACTED] said [REDACTED] regularly illegally dumped friable asbestos into Big Wheel Recycling (Big Wheel) landfill. Sometime in 2002, [REDACTED] was at Big Wheel Recycling (Big Wheel) landfill, Section 388, whereupon he observed [REDACTED] dump a load of friable asbestos in the landfill. The landfill operator (NFI) covered the asbestos with a layer of sand and then another layer of garbage. \*

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4. REMARKS (Continued)

and . AZTEC President, routinely manipulated AZTEC employees to keep them quiet about illegal activity. and bought their employees vehicles and houses so they would not leave the company. After quit AZTEC, asked him to come back to the company, and they would give him a house. and exploited and overworked illegal aliens and then threatened to call immigration if they complained.

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# REPORT OF INVESTIGATIVE ACTIVITY

1. DATE OF INVESTIGATIVE ACTIVITY

16 Dec 03

2. PLACE

AFOSI Detachment 309, 223 Cody Ave Ste 1,  
Hurlburt Field, FL 32544-5310

3. ACTIVITY NUMBER

27880033501433

## 4. REMARKS

Review of: Social Security Administration Check of Aztec Environmental Inc Social Security Numbers  
Date of Review: 16 Dec 03  
Reviewer(s): [REDACTED] AFOSI DET 309

On 16 Dec 03, a review of Social Security Administration-Office of Inspector General (SSA-OIG) check of Aztec Environmental, Inc (AZTEC) employees was performed (TAB A). During 2002 and most of 2003, AZTEC employed approximately two hundred and eighty-five (285) individuals. Approximately, ninety (90) of the 285 employees were flagged by SSA-OIG as using false Social Security Numbers (SSN). Of these 90, sixteen (16) had an invalid SSN (the number was never issued), while seventy-four (74) were using a not verified SSN (number was issued to a different person).

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Other Investigative Activities

Coordination/Consultation

1. On August 12, 2003, [redacted] AFOSI Region 3, provided the following guidance concerning the Aztec case. Continue to work with the EPA-CID but do not stretch the case beyond AFOSI's purview. Check all local landfills certified to handle friable asbestos without alerting Aztec of an AFOSI investigation to confirm whether Aztec disposed asbestos at their landfill. Identify SSNs documented on asbestos training certifications and abatement project entry logs for possible fraudulent identification. Base Security Forces Pass and Identification will likely have documentation of Aztec employees for present and near future projects. Determine if Volkert & Associates was the contracted Licensed Asbestos Consultant for the Bldg 90333, HFLD, FL asbestos abatement project and confirm the location of asbestos in Bldg 90333. If necessary, contact [redacted] HQ AFOSI, to run a FINCEN report on Aztec and Big Wheel.

2. On August 13, 2003, [redacted] AFOSI, made contact with [redacted] Resident-Agent-in-Charge (RAC), EPA-CID, Tampa, Florida. [redacted] briefed [redacted] on AFOSI's investigation of Aztec and the events surrounding an asbestos abatement of Bldg 90333, HFLD, FL. [redacted] related his organization previously maintained derogatory information about Aztec, and a journalist published a series of articles in The Insider about the company. The article indicated Aztec had ties with a funeral home and a local hospital and was improperly disposing of asbestos and bio-hazardous material in Big Wheel landfill, owned by Aztec. [redacted] said his office did not have an open investigation against Aztec because the article's journalist had not produced the sources of information. [redacted] related [redacted] EPA-CID, had more detailed information concerning Aztec.

INSIDER - MAGAZINE

3. On August 14, 2003, [redacted] contacted [redacted] to discuss Aztec. [redacted] stated Aztec and Big Wheel landfill were owned by the same person, [redacted] and were the subjects of numerous allegations. [redacted] provided [redacted] with a FDEP report of Aztec and Big Wheel. On October 21, 2002, Bay County Solid Waste Code Enforcement Officer, Panama City, FL, observed heavy equipment running over non-friable asbestos material, making it friable asbestos. However, Big Wheel is not certified to handle friable asbestos. On October 24, 2002, FDEP, inspected Big Wheel and identified a significant amount of 1/4 inch to 3 inch pieces of asbestos containing material exposed in the landfill's non-friable asbestos area. In addition, [redacted] faxed [redacted] a June 2003 article in the Emerald Coast Insider. The article mentioned Aztec crushed asbestos to compact it for improved disposal in the landfill, which caused asbestos to become airborne. [redacted] stated [redacted] was an excellent source of information regarding Aztec and Big Wheel. [redacted] related EPA-CID was very interested in an investigation of Aztec. On September 8, 2003, [redacted] opened a joint investigation of Aztec with AFOSI acting as the lead agency.

4. On August 19, 2003, a check of the following Bldg 90333 Aztec employees in 16th Security Force Squadron (SFS) Pass and Identification's, HFLD, FL database was performed:

None of the individuals appeared in the database, and it was determined the only way for these individuals to enter HFLD, FL was through temporary base passes. Consequently, no biographical information was available for these individuals.

5. On August 27, 2003, [redacted] contacted AUSA [redacted] Florida Northern Federal Judicial District, Pensacola, FL regarding the Aztec investigation. AUSA [redacted] stated the investigation sounded like a case the US Attorney's Office would accept. However, AUSA [redacted] requested [redacted] and [redacted] send him a case synopsis, and he would forward it to his supervisor, [redacted] Register, Florida Northern Federal Judicial District, Pensacola, FL. On September 16, 2003, [redacted] provided AUSA Swaim with a case synopsis. On September 17, 2003, AUSA [redacted] reviewed the synopsis and requested answers to several questions before he sent it to MAUSA Register for case declination or acceptance. On September 18, 2003, [redacted] and [redacted] supplied AUSA [redacted] with answers to his questions. On October 17, 2003, MAUSA Register assigned the Aztec case to AUSA [redacted] Senior Litigation Counsel, Florida Northern Federal Judicial District, Pensacola, FL.

picture, and he was extremely certain

was not residing at this

14. On October 23, 2003, [redacted] coordinated with [redacted] FDEP Environmental Coordinator, Tallahassee, FL. [redacted] stated Aztec was performing construction and demolition of Bldg 1142, TAFB, FL, from October 15, 2003 to November 30, 2003. [redacted] emphasized no asbestos work was being performed on Bldg 1142. In addition, the TAFB project was Aztec's only current Federal project in Florida.

15. On October 31, 2003, AFOSI met with the JTTF regarding the Aztec case. [redacted] delineated three major areas to focus investigative efforts: Bldg 90333, HFLD, FL witness interviews; JTTF illegal alien initiative; and a search warrant of Aztec's corporate office. It was determined AFOSI and EPA-CID would pursue witness interviews of Aztec employees from the Bldg 90333, HFLD, FL asbestos project. [redacted] and [redacted] would continue to provide the JTTF with all Aztec employee information to create a large database of information to identify trends in Aztec's use of illegal aliens and false SSNs. The JTTF would use the information to surveil Aztec project sites and residences. Ultimately, the JTTF planned to perform a major arrest of Aztec employees who were undocumented in the U.S. AFOSI planned to be involved with interviewing Aztec employees after the JTTF arrests them. The final major investigative activity involved a search warrant of Aztec's corporate office. The search warrant would encompass seizing Aztec's personnel records, to include employee withholdings and distributions, employee applications, and I-9 Employee Verifications. All three major investigative areas would be synched together to not compromise any investigative activities.

16. On November 3, 2003, [redacted] provided a verbal update on the Aztec case to [redacted] determined [redacted] was doing a good job with the case, and there were no apparent investigative steps missing.

17. On November 20, 2003, AFOSI met with the JTTF regarding the Aztec case. The following issues were discussed. [redacted] U.S. Attorney's Office, provided the group with updated intelligence analysis of Aztec. [redacted] identified each Aztec employees' work history by tax quarter. In addition, [redacted] planned to run all Aztec employee SSNs through the SSA-OIG for a valid certification. While [redacted] continues with intelligence analysis, other JTTF members would surveil Aztec employees using false SSNs. After SSA-OIG certification was completed, an affidavit would be submitted to a U.S. Magistrate to search Aztec's corporate personnel records.

18. On January 12, 2004, Senior Trial Attorney [redacted] DOJ-ECS, Washington D.C., contacted [redacted] and advised he was assisting AUSA [redacted] with the case, specifically focusing on asbestos violations.

19. On February 6, 2004, AFOSI requested Defense Contract Audit Agency's (DCAA) assistance with this case. On February 10, 2004, DCAA opened case file no. 1101-2004R48600006, and they assigned [redacted] Senior Auditor, to assist with the investigation.

20. On February 13, 2004 [redacted] and GS-12 [redacted] reviewed costs associated with the Bldg 90346, HFLD, FL asbestos abatement project. 16 CONS awarded the Bldg 90346 asbestos abatement contract, No. F08620-02-M-7010, to Aztec. In 2002, HFLD, FL authorized payment of \$15,000 to Aztec for the asbestos abatement of Bldg 90346.

21. On June 28, 2004, a review of [redacted] documents relating to records checks of the Central Index System (CIS), Deported Alien Control System (DACS), and Identification and Enforcement database was performed. On June 28, 2004 [redacted] AFOSI, contacted [redacted] and requested records checks of twenty-six (26) Aztec employee's names found on a hand-written note above [redacted] Aztec office Worker desk. Of the 26 names listed on [redacted] note, seven (7) names were identified as individuals previously deported for illegally entering the U.S.

nineteen (19) names were not listed in CIS and DACS so [redacted] and [redacted] The remaining [redacted] could not ascertain their legal status in the U.S.

22. On June 29, 2004, [redacted] was unable to provide specific information involving the oil/water separator contract held by Aztec. [redacted] conducted a review of the contract folder and found it did not contain documentation pertaining to waste disposal facilities used by Aztec to dispose oil and grease collected from TAFB, FL. In addition, [redacted] advised there was no record found of [redacted]

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surveillances or progress meetings on file. believed the contract did not require strict quality control because it was under \$100,000. found a filed letter that stated Port St. Joe Wastewater Treatment Plant authorized Aztec to dump septic waste at their facility. However, the authorization strictly prohibited the dumping of grease trap waste.

Briefs

1. On August 19, 2003, on the details of the Aztec case. Although the base does not have sovereign immunity in environmental cases. believed the base should not be held liable for the actions of Aztec as long as immediate and corrective remedies were taken to ensure the safety and well-being of base members.

2. On August 21, 2003, was briefed on the Aztec investigation. Also present at the meeting were and emphasized base members' health and safety was his primary concern, and he requested 16<sup>th</sup> Bioenvironmental Engineering perform air monitoring of Bldg 90333, HFLD, FL to ensure it was safe for base personnel to occupy.

3. On October 29, 2003, AUSA was briefed on the current status of the Aztec case. previously informed the JTTF of Aztec's history of using employees with false SSN to perform asbestos abatement on military bases. Thus, AUSA combined the JTTF initiative to target AZTEC for using undocumented workers on DoD bases and the Bldg 90333, HFLD, FL asbestos violations into one case against Aztec. AUSA determined a historical search of Aztec false documents was the strongest aspect of the case. AUSA requested the past three years of Aztec employee names, associated projects, and their SSNs. AUSA requested documentation from the SSA-OIG certifying which AZTEC employees used false SSNs. AUSA requested and provide further information regarding asbestos violations obtained from Bldg 90333, HFLD witness interviews. AUSA believed could be material witnesses for the case. AUSA asked to prepare an affidavit to formally request these individuals be transferred from custody to DOJ custody. AUSA requested the case agents look into tax violations because of the high number of invalid SSNs. AUSA felt the case could culminate with a search warrant of Aztec's corporate office, specifically focusing on Aztec personnel records.

4. On October 30, 2003, was briefed on the Aztec case. stated Aztec had at least two upcoming asbestos abatement projects on HFLD, FL. said the base could debar Aztec if AFOSI supplied substantive criminal information against Aztec. and AFOSI agreed the base must monitor Aztec very closely until they were suspended or debarred. If Aztec failed to perform adequately, a new asbestos abatement contractor would immediately be sought.

5. On November 12, 2003, was briefed on the current status of the investigation. provided with a copy of the updated investigative plan, which included future investigative steps/operations. was satisfied with the current investigation, but emphasized the USAF's interest should revolve around the issues on HFLD, FL, specifically environmental violations and fraudulent documentation.

6. On November 21, 2003, was briefed on the Aztec case. stated HFLD, FL could temporarily suspend Aztec from doing work on base. The standard for suspension is adequate information of wrongdoing, which a Federal indictment clearly fulfilled. The suspension would affect Aztec on all Federal executive government projects. Once AFOSI finished its investigation, the Report of Investigation would be forwarded to a Debarment Official at the Secretary of the Air Force, General Counsel, Remedies (SAF/GCR), Washington, D.C. This person is an objective party not directly affiliated with HFLD, FL who would determine whether Aztec should be placed on a Federal government debarment list for at least three years. emphasized specific Aztec employees should be listed as Subjects to ensure they are also placed on the debarment list.

7. On June 10, 2004, coordinated with to finalize the debarment memorandum for the SAF/GCR. provided investigative information to place the following organizations and individuals on the debarment memorandum: Aztec Environmental, Inc, Big

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Former Aztec Employee

Home Address: [REDACTED]

Home Telephone: [REDACTED]

can testify Aztec employed several illegal aliens. Many of these illegal aliens were relatives of Aztec Supervisor. Aztec illegal aliens had fictitious identification cards and occasionally disappeared for up to fourteen (14) days to obtain new identification cards. said the alien identification cards were "obviously fake" because it looked like they were made with a typewriter and did not look authentic. Illegal aliens were "switched out" and hid under the seats of a company van to access military installations. overheard [military installations]." Aztec President, tell Aztec Supervisor, to "do whatever it takes to get them on aliens because used to house the illegal aliens and other employees. knew Aztec hired illegal for the illegal aliens. met with (LNU), Aztec office worker, about obtaining U.S. citizenship

Can testify that a created "adjusted" time sheets to reflect employees and drivers working no more than eight-hour days. Any time beyond eight hours, paid employees "under the table" with "per diem" checks. made shred all original and "adjusted" timesheets in case the IRS or Florida Department of Transportation (DOT) audited Aztec. told that adjusting the time sheets was against the law. When confronted about illegally "adjusting" employee timesheets, replied, "It's my company." quit working for Aztec the first time because of "personal problems." quit working for Aztec the second time because she did not want to be a part of any illegal activity.

Can testify Aztec illegally removed and disposed of grease from grease traps on TAFB, FL by using a permit authorized to pump water overflow drainage. Aztec was denied Florida State permits to service grease traps because Aztec lacked proper certifications. pumped grease from the traps into a truck containing raw sewage and disposed of it at a facility on Industrial Drive, Panama City, FL. The facility denied further attempts to dump the grease because it was mixed with raw sewage. The raw sewage/grease mixture was also dumped in Big Wheel landfill and an additional location in Port St Joe, FL. The location in Port St. Joe accepted the mixture once and would only accept cash payment. knew Aztec dumped TAFB, FL sludge illegally because she heard and argue about dumping the sludge illegally. could not recall the specifics of the argument, but she knew they mentioned illegal disposal. Later, told that illegally accepted mixtures of sludge and sewage at Big Wheel landfill. only wrote a check to Gulf Coast Grease Corp, Industrial Drive, Panama City, FL one-time to dispose grease and sewage mixture.

Exhibit 46: Written interview record of

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Aztec Truck Driver

Home Address: [REDACTED]

Home Telephone: [REDACTED]

[REDACTED] can testify he disposed of the oil/water separator waste collected from TAFB, FL at the Big Wheel compacting/transfer station located at Port St. Joe, FL. [REDACTED] stated [REDACTED] told him to dispose of the waste at Port St Joe. [REDACTED] stated he began to properly dispose of grease trap and oil waste after federal agents searched Aztec's main office on April 7, 2004.

Exhibit 23: Written interview record of

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