## **AFFIDAVIT**

## PARISH OF ST. TAMMANY

## STATE OF LOUISIANA

Before me personally appeared JAKE GROBY who did state as follows:

- I am a Councilman for St Tammany Parish. As part of my sworn duties I attended a council meeting to discuss the case of Terri Stevens.
- Kelly Rabalais, a staff attorney in the D.A's office made a presentation to the council. During the presentation of Miss Terri Louis Stevens case, I asked Miss Rabalais clarification on the Parish's responsibility in regards to raw sewage in our Parish ditches.
- Miss Kelly Rabalais informed the entire Parish Council it was Miss Stevens
  responsibilty to identify the raw sewage source, not the Parish's
  responsibilty.
- 4. As a state licensed water and waste water treatment operator and a councilman I know that it is the Parish's obligation once notified by a resident of an alleged illegal discharge to go out in a timely manner and determine whether there is an illegal discharge and then to notify the property owner that is the source of the illegal discharge to make sure that condition is remedied.
- 5. Whether the incorrect statement by Miss Rabalais to the Parish Council was intentional deception or not ,the result was the same, in providing misleading and wrong information the Council which ultimately led to a vote to hire an outside attorney and defend the Stevens lawsuit.
- 6. Clearly if Miss Rabalais had correctly stated the Parish policy and the obligation of the Parish under the Louisiana DEQ permit LADEQMS4, It is my distinct opinion the Council would have directed the Parish to take care of the illegal discharge and not authorized defending the Improper and illegal actions of the Parish in the Stevens lawsuit.
- 7. It is the sworn duty of every Parish employee to protect the HEALTH, SAFETY AND WELFARE of the citizens of this Parish. I am absolutely horrified to see the Parish spend the resources of this Parish in defending a lawsuit that never should have been filed, if only the Parish and Kelly Rabalais had performed their sworn duty of correcting and not flowing Illegal discharge across Private citizens land in violation of Federal, State and Parish law.

JAKE GROBY

SWORN TO AND SUBSCRIBED BEFORE ME THIS 23- DAY OF AUGUST, 2018