

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

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INTERNATIONAL UNIONS, SECURITY POLICE
AND FIRE PROFESSIONALS OF AMERICA
(SPFPA), AN INTERNATIONAL UNION, AND
DAVID L. HICKEY, THE INTERNATIONAL
PRESIDENT OF THE SECURITY POLICE
AND FIRE PROFESSIONALS OF AMERICA

Index No: 2:19-cv-10743-AC-MKM

Plaintiffs,

**DEFENDANT LAW
ENFORCEMENT OFFICERS
SECURITY UNIONS'
AFFIDAVIT IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS**

-against-

STEVE MARITAS, AN INDIVIDUAL, CALVIN
WELLS, AN INDIVIDUAL, JAMES BURKE, AN
INDIVIDUAL, BRIKENER JEAN-GILLES, AN
INDIVIDUAL AND LAW ENFORCEMENT
OFFICERS SECURITY UNIONS, AN
UNINCORPORATED UNION,

Defendants.

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COUNTY OF NASSAU)
) ss
STATE OF NEW YORK)

STEVE MARITAS, being duly sworn, deposes and says:

1. That the Law Enforcement Security Officers Unions ("LEOSU") a named Defendant herein and I make this Affidavit in support of LEOSU's Motion to Dismiss for lack of minimum contacts or, in the alternative, transfer venue to the United States District Court for the Eastern District of New York.

2. That I am the Organizing Director of LEOSU and I am authorized to act on LEOSU's behalf.

3. LEOSU is an organized labor union representing law enforcement officers, Security Police Officers, Special Police Officers, security officers and security guards.
4. That LEOSU currently operates and represents employees throughout New York, Maryland, Virginia, Massachusetts, Rhode Island, and Washington D.C.
5. That LEOSU maintains an office in New York and Washington D.C.
6. That LEOSU has never been involved with any employees of Michigan.
7. LEOSU has never been involved in elections in Michigan.
8. LEOSU represents no employees within Michigan.
9. LEOSU has no members in Michigan.
10. LEOSU receives no dues revenue from Michigan.
11. LEOSU never had an unfair labor charge filed by a member in Michigan.
12. LEOSU has never attempted to open an office in Michigan.
13. LEOSU has never hired an employee in Michigan, nor does it have any employees in Michigan.
14. That Everything posted in the union organizing videos regarding the Plaintiff, SPFPA, was researched and documented as true:
 - a. SPFPA executives have been convicted of criminal conduct, such as embezzlement of union funds. (See National Legal & Policy Center News Articles attached as Exhibit "A").
 - b. SPFPA lost union representation elections in Georgetown University, the United States Department of Transportation, Catholic University, MGM Grand National Harbor, Hana Industries, and many more. (See National Labor Relations Board Reports).

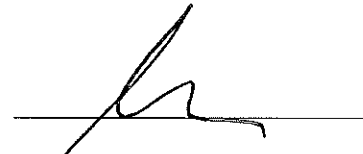
- c. The Federal Bureau of Investigation did investigate and raid the home and SPFPA offices of the Plaintiff, David Hickey. (Admitted to by David Hickey).
- d. Officers and representatives of the Plaintiff SPFPA union have been caught and prosecuted for stealing money from the union. (See attachments)

15. The above statements cannot be defamatory because they are true.

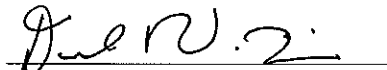
16. The only connection LEOSU has with Michigan is as a named Defendant in this lawsuit.

WHEREFORE, I respectfully request that this Court grant Defendants' Motion to Dismiss for lack of minimum contacts or, in the alternative, transfer this matter to the Eastern District of New York.

Dated: May 8, 2019


Steve Maritas

Sworn to before me on this
8 day of May, 2019


Notary Public

DEBORAH NIRMALA MISIR
NOTARY PUBLIC-STATE OF NEW YORK
No. 02MI6232493
Qualified in Suffolk County
My Commission Expires 