



Motor Carrier Attachment – AGL Driver Interview*

Louisville, NY

HWY23FH005

(47 pages)

*The following transcript has been redacted to protect the identities of Whistleblower complainants who have filed a complaint with the Federal Motor Carrier Safety Administration (FMCSA). These redactions are consistent with FMCSA's statutory duty to protect the identities of Whistleblower complainants under 49 U.S.C. § 31143(b), and FOIA exemptions (b)(3) and (b)(7) (C and D). *See* 5 U.S.C. §552(b)(3) and (b)(7)(C and D).

UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

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Investigation of:

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FATAL CRASH OF A FREIGHTLINER BOX
TRUCK & BUS IN LOUISVILLE,
NEW YORK ON JANUARY 28, 2023

Accident No.: HWY23FH005

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Interview of: [REDACTED], Driver
Aero Global Logistics

Aero Global Logistics
2983 South Pleasant Valley Road
Winchester, Virginia

Tuesday,
February 7, 2023

APPEARANCES:

MICHAEL FOX, Investigator
National Transportation Safety Board

DONALD ORYE, Special Agent
United States Department of Transportation

I N D E X

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I N T E R V I E W

1
2 MR. ORYE: What I told them yesterday, hey, we just got this
3 complaint in because our people that's -- how the complaints get
4 filtered down, makes it to my office, and then my office calls me.
5 Hey, you're in there, now we got this one here. Now, the crash,
6 was it a box truck?

7 MR. FOX: Why don't we do -- I want to -- I've already
8 started the tape. So I wanted to just begin the interview. So
9 today is February 7, 2023. This is Michael Fox, investigator for
10 the NTSB out of the Washington, DC, office. We are located at the
11 Hilton Garden Inn in Winchester, Virginia, and we are going to be
12 interviewing a driver. And there are several folks in the room.
13 Go ahead and start off with one of the other investigators from
14 FMCSA Donald go ahead, please. And when I go around, state your
15 name, spell your last name, and then your title or what you do,
16 who you work for.

17 MR. ORYE: Donald Orye, Special Agent, United States
18 Department of Transportation, Federal Motor Carrier Safety
19 Administration.

20 [REDACTED]: [REDACTED], [REDACTED], driver at
21 Aero Global Logistics, a non-CDL box truck driver.

22 MR. FOX: Okay. Thank you.

23 INTERVIEW OF [REDACTED]

24 BY MR. FOX:

25 Q. So today we're reaching out to [REDACTED] because you had

1 initiated a complaint to the Federal DOT about some issues that
2 you were having with, I guess, your company or concerns. Can you
3 kind of go over what that was about? Or before I start with that,
4 let me, let me retract that. How long have you been employed at
5 Aero Logistic?

6 A. Over three years. About three years and three months.
7 September 2019 I started at Aero.

8 Q. Okay. And what, what are your duties and responsibilities?

9 A. I'm overnight auto parts delivery driver. I first started
10 out on a Pittsburgh route. The furthest location was Wexford, PA.
11 I did that route for two years. And then I'm currently on
12 [REDACTED] to [REDACTED] route and then back.

13 Q. Okay. And what kind of truck do you drive?

14 A. It's a 26-foot non-CDL box truck.

15 Q. Okay. And as I started the dialog, we were talking about why
16 you called up FMCSA to initiate a complaint. Can you elaborate
17 what, what motivated you to do that?

18 A. Yes. What motivated me was I know some companies are what
19 they call starter companies, and I kind of considered Aero that
20 type of company in the beginning. They were under new -- it was a
21 new company, but they had a solid contract with Ford. That's what
22 made me stay there. And I know companies starting out they have
23 rough patches, and they have to work out the kinks. And it got to
24 a point about a year, year in where I could see some of the kinks
25 starting to get worked out. So that's why I decided to stay

1 there.

2 And then the more I paid attention to the way the company was
3 ran, and the management, and the lack of maintenance on the
4 trucks, I realized that I wasn't going to be there that long.
5 That it was just a place that I was going to get a little bit of
6 experience, hopefully, get my CDL, and move on to another company.

7 Q. I see.

8 A. Yeah.

9 Q. And I forgot to mention that we're recording this video --

10 A. Yeah.

11 Q. -- interview. Is that okay with you?

12 A. Yes, sir.

13 Q. Okay, good. So in your complaint, you were mentioning a few
14 things that were, you felt, unsafe or concern. Can you elaborate
15 on that?

16 A. Yes. Well, first off, the maintenance on the trucks have
17 gone terribly downhill. During Covid they gave excuses that there
18 was parts delays and everything like that, but it's more than that
19 with the company. It's the fact that we do our DVRs. We'll write
20 up -- and this is starting from the very beginning, but I, I
21 didn't experience it 'till later on. We had a meeting where some
22 drivers had said that if they write up a DVR that the truck would
23 get passed off to someone else, or even passed from Ford building
24 over to Chrysler. Someone else over there would be driving it
25 with the same issue, and it would never get fixed. They just play

1 musical chairs with the trucks when you report it. And I didn't
2 understand that because at that point I had never experienced it.
3 But as time went on I started experiencing it where I would get a
4 truck one night, you know, things are wrong, air leaking from
5 under the seat, diaphragm broken on the brakes, tires bald. And,
6 you know, and then you write it up, and then the next night you
7 come in, and they just gave it to another driver. It's not even
8 at the shop.

9 Q. Is this -- you experienced this recently? And, if so, when?

10 A. Yes. Recently I have a truck right now, well, the brake
11 diaphragm was actually my truck. I only made it from -- and this
12 was about 30 days ago. It was ■ -- Truck ■. It was
13 serviced at ■, Penske. I'd only made it from Winchester
14 to ■ when I realized the brakes were going out. This
15 was the brake diaphragm.

16 Q. Sure.

17 A. The reason why I made it that far is because it -- the tank
18 was full when I left, and I probably had only hit the brakes maybe
19 three or four times because it was -- I was on the highway. And
20 then I normally stop in ■ to get fuel at the Quarles,
21 and as I'm going down off the ramp I start realizing I'm losing
22 way more pressure than what I'm supposed to. And I couldn't
23 understand. I called roads -- I mean, I called back to Aero, and
24 I told them what the situation was. At that point they, they
25 asked, well, can you make it to ■ or call roadside? And

1 I said, well let me, let me see if I can get the pressure to go
2 back in the tank. So I drove it to -- at this point I didn't know
3 it was that serious. So I did make it to Hagerstown, and they
4 took an hour and a half, about two hours, to repair it. That it
5 was a hole in the brake diaphragm. Someone had just used that
6 truck the night before, and put it in my door that day. So I
7 couldn't understand why there was never a DVR written up on it,
8 how they didn't notice it just driving it --

9 Q. Sure.

10 A. -- earlier that day. Because there's some routes that go out
11 before we come in. It's really not -- I'll get to the routes
12 later. But it's -- I know someone had used that truck earlier
13 that day because there was less fuel in it than the night before.
14 You could tell there was trash in the truck, and it wasn't parked
15 where -- like I said, it was in the door already. It wasn't --

16 Q. I see.

17 A. -- like in the parking space.

18 Q. Who do you report to? Who is your boss?

19 A. We report to Roberto which is another issue.

20 Q. What's his last name?

21 A. I can't -- I don't know his last name.

22 Q. Is it Fergadia (ph.), Fergadia?

23 A. Yes.

24 Q. Is it the same gentleman associated with AK --

25 A. AKDI, right. He owns the three box trucks, and runs the --

1 he started out when I first started there three years ago Amy ran
2 the company. And at that point, I'm a W-2 from Aero. She
3 explained that Roberto was an independent contractor, and he had
4 three routes, and basically three drivers of his own, and it was
5 like that before Aero took over when he was with the other
6 company. He kind of got grandfathered in. Then over time within
7 about a year he starts being more like a supervisor on nightshift,
8 bossing people around, telling them what to do. Came in one
9 night, slammed the door, told me to go home. And I basically told
10 him at that point I don't work for you. I work for Amy. I'm
11 going to call Amy. So he said, I don't care what she says. So I
12 called Amy, and Amy said give me 15 minutes. So she calls back
13 and says you know what, just run your route. Don't worry about
14 what he said. We'll talk about it tomorrow. So she -- when I
15 come in the next day she said I'm going to tell him to leave my
16 drivers alone. So when I first started three years ago there was
17 a separation. He was like a bully and a boss from the very
18 beginning trying to be, but Amy kept it separated. Then when she
19 left and Miranda came in, the second terminal manager, he started
20 gradually getting more responsibility in the company, and a lot of
21 the other drivers were wondering does he own part of the company?
22 Because -- and then we found out that he has warehouse workers
23 that he pays. Like the -- basically, it's kind of like segregated
24 by race at this company. And it was kind of -- when you looked at
25 it, it's kind of confusing because it's, like, he, he hires and

1 pays the Mexicans that work there. And, you know, we -- drivers
2 talk at the company. So some of us, we didn't actually have proof
3 of it, but we were whispering, like, hey, maybe some of them are
4 illegal; the reason he pays them and he had control over the
5 hiring of them. But it didn't really become our problem until he
6 started bossing the W-2 employees, and basically -- and now it's
7 to the point where anything that needs done it has to go through
8 Roberto. Stacey tells us to -- she has to check with Roberto. We
9 ask her something, she says, oh, I got to check with Roberto. And
10 no one has ever had a meeting and said, hey, Roberto is your boss
11 or Roberto is a partner or anything. But he had -- seems like he
12 has more power than even Stacey at the company. And like he fixes
13 the trucks. He hires and fires. He fired a couple drivers. They
14 were Aero's drivers.

15 Q. Is he working at night with you?

16 A. Yeah.

17 Q. Is he on the nightshift?

18 A. Yeah. He tells us --

19 Q. He's physically at the warehouse --

20 A. Yeah.

21 Q. -- in the evenings?

22 A. He's physically in there, and sometimes he's in the office in
23 the daytime at the desk. Stacey's office when you go in her desk
24 is, I think, to the right. Christy is right here, and there's
25 another desk back here. It's either Brando or Roberto that will

1 be at that desk sometimes in the daytime. And so we've, we've
2 been talking because we're, like, we really feel, like, just from
3 -- I mean I wasn't born yesterday. It seems like he has
4 ownership in the company. I don't know to what extent, but --

5 Q. Right.

6 A. -- because we've gone to Tony. This is why we feel that way.
7 Because we've gone to Tony. I've never met Shawn.

8 Q. Tony Ramdass?

9 A. Right, right. He's supposed to be like a partner or
10 something. Him and Shawn are supposed to be the owners of the
11 company. That's the way it was relayed to me.

12 Q. Right.

13 A. I've never seen Shawn. But I've gone to Tony about issues
14 with Roberto being a bully, being domineering. Basically if
15 there's a problem with someone else in the warehouse because now
16 most of the warehouse workers are Mexican.

17 Q. Right.

18 A. So if there's any type of discrepancy or altercation has to
19 do with one of them and one of the drivers he'll always take their
20 side. And we -- some of the drivers have gone to Tony about it,
21 like, and I've gone to Jake about it. We've done up through the
22 management. And Roberto's even gone to the extent of being a
23 bully and texting me which I saved text messages. I saved them.

24 Q. Pull some up --

25 A. Yeah. He kind of tried to retaliate through a text message.

1 Because I went to Jake about him, and I went to Stacey about him,
2 and they told him what I said. Well, not Jake, but Stacey
3 supposedly had told him what I said. And he sends me a text
4 message one nights saying you need to talk to Jake about whatever
5 I needed to talk about. At that point I kind of -- I was, like, I
6 couldn't remember who Jake was because I had only met Jake once.
7 I was, like, who is that? He's, like, oh, yeah, you know the guy
8 you went and told on me about. So nothing ever gets done.

9 And there was a manager there named Matt. He knows about
10 Roberto, how he runs the company or how nothing ever gets done.
11 Let me pull up the content, and then I can get to the messages.

12 Q. Sure. Take your time.

13 A. But he, he has power. Like he, he runs the routes.

14 Q. Roberto you're --

15 A. Right. If you need a truck. I wanted -- because my truck's
16 in the shop. [REDACTED]

[REDACTED].

18 Q. Oh, my goodness.

19 A. So there's no way that I can use a lift gate without the lift
20 style.

21 Q. Sure.

22 A. I'm trying to hold onto the cage and go up and down on it.

23 Q. Okay

24 A. So I had to go ask them for a truck. I went to them. They
25 said, oh, you've got to talk to Roberto. So he makes all the

1 decisions. I'll start at the beginning of what I have saved.
2 May 6, 2022, is as far back as I have saved. That's
3 correspondence between me and him on text message.

4 Q. Roberto?

5 A. Yeah.

6 Q. You can maybe forward them to me. That would be the easy way
7 to do it.

8 BY UNIDENTIFIED SPEAKER:

9 Q. [REDACTED]

10 A. 2011.

11 Q. 2011. [REDACTED] ?

12 A. Yeah.

13 Q. [REDACTED]

14 A. Yeah.

15 Q. [REDACTED]

16 A. [REDACTED].

17 Q. Sorry to hear about your --

18 (Crosstalk)

19 UNIDENTIFIED SPEAKER: I know. I hear you.

20 MR. ROBINSON: Yeah. This one night he wanted me to take a
21 picture of my gas card to send to him because I was having an
22 issue with that. So anything that has to do with the operations
23 of the company goes through him.

24 BY MR. FOX:

25 Q. Okay. One of the things that we were talking about on the

1 phone last night was you had made mention that Roberto had gone up
2 to drivers after they, Aero drivers had run their routes, and say
3 can you run another route for me.

4 A. Yeah.

5 Q. Can you elaborate on that?

6 A. Yeah. He's -- normally if someone calls off, and it's mainly
7 happened maybe like on a Thursday or Friday night. He'll say,
8 hey, you want -- can you do me a favor? And we all know that any
9 time Roberto wants a favor it's not going to be a good one. And
10 he said -- what he's asked is can you run a extra route or can
11 you, can you do these extra stops? His drivers -- when I say his
12 drivers, I mean the ones that are tied to the routes that he's
13 been given by Aero or whatever. They'll do whatever for him. He
14 has floater drivers. The one guy's name is -- or backup drivers.
15 Fernando and -- guy name start with a M. I want to say --

16 Q. Miguel?

17 A. Mickey? Not Mickey. But he has, like, two -- Fernando is
18 the main one. That's like the one that's with him all the time.
19 And then there's another guy that works under Roberto that's a
20 backup driver. Like they'll come in on a Friday, like, if they --
21 if we're behind or the route didn't go out on Friday, someone
22 called off or on vacation, he'll do a route, and then come back
23 and run another route.

24 Q. Who will?

25 A. Either Fernando or -- those are his go-to guys. I'm trying

1 to think of the other guy's name.

2 Q. So they'll run two full routes back-to-back?

3 A. Yes, yeah, yeah.

4 Q. Okay.

5 A. And what I think they're doing now because last night on
6 sixteen one route -- but I'm not sure how long sixteen one route
7 takes. sixteen one is one of his, Roberto's routes. Mexican
8 driver, I can't think of his name. Might be Christian. I'm not
9 sure if that's who it is. But the dispatcher asked him after he
10 grabbed his route bag are you doing any extra? He said, yeah,
11 give me -- I actually have it in my phone. Give me SD8 and give
12 me SD something else. But I have it in my phone. I actually made
13 sure I recorded it because I -- she knows. The dispatcher knows
14 because me and her had a conversation about some of the guys doing
15 double routes. So I don't know whether she tried to be slick in
16 front of me, and didn't want to make it that noticeable. Because
17 normally you can see them carrying two bags you know what I mean?
18 Two route bags. But last night she just handed him the extra
19 paperwork. And I don't know if he's back yet or not because I
20 didn't drive around the back of the building. I didn't see
21 whether there's any AKDI trucks. Because he actually drove a AKDI
22 truck last night.

23 Q. Do they park their trucks there?

24 A. That's another thing. I don't think his brother does. See
25 his brother -- and his brother runs two routes most of the time,

1 but he doesn't bring the truck back to Aero.

2 Q. Roberto's brother?

3 A. Roberto's brother.

4 Q. What's his name or do you know?

5 A. He leaves, he leaves at night the same time I do, but I can't
6 think of his name. But he loads out of the door a couple doors
7 down. But it's mainly Roberto's -- he'll ask the other drivers.
8 Like there's a guy used to work here named Reggie, and I tried --
9 and he was like one of Roberto's go-to guys too, but he was --
10 like Roberto knows that you'll do things like that then you're his
11 buddy. I'm not his buddy because I told him from the very
12 beginning that I don't want to do it. So he stopped asking me.
13 But I'm very observant. So I see when he's asking certain people
14 to do extra things or run extra routes or they're carrying two
15 bags out to their -- to the truck at night. But like I said last
16 night I heard her ask -- he was taking sixteen one route, and she
17 said are you doing any extra? And he said, yeah. He gave her the
18 two numbers.

19 Q. So to be clear, these routes are running like 8 to 10 hours a
20 day something like that?

21 A. Yeah. Nine --

22 Q. And so these drivers --

23 A. -- to 10 some of them.

24 Q. Nine to 10.

25 A. Yeah.

1 Q. So they'd be running like a 16-hour or a 20-hour day
2 potentially?

3 A. Potentially at least a 16 hours.

4 Q. Okay.

5 A. Yeah.

6 Q. Do you know when this last took place? I mean, has it
7 happened this week or last week?

8 A. I think it happens sporadically every week.

9 Q. Every week?

10 A. Yeah. I think it sporadically happens every week.

11 Q. Do you --

12 A. That's the only way they're going to get all the routes --

13 Q. Can you identify any drivers where this happened recently?

14 A. Like I said, last night I believe sixteen one was --

15 Q. Do you know who that driver is?

16 A. I want to believe -- I want to say his name is Christian, but
17 see the thing of it is I don't know whether they showed you this
18 is our trip sheets --

19 Q. Yes.

20 A. -- for a route. They showed you these?

21 Q. Yes.

22 A. Okay. So if he did extra, it's not going to be on this trip
23 sheet, but it would be on the paperwork copies that you have to
24 sign --

25 Q. Would it be under, would it be under an -- would it be under

1 a Global, Aero Global?

2 A. Yeah.

3 Q. Trip sheet that he's doing two?

4 A. Yeah.

5 Q. Like if he ran his regular route, and he came back, it would
6 still be under that paperwork and not under ADKI paperwork?

7 A. No. There is no AKDI paperwork.

8 BY MR. ORYE:

9 Q. Everything is Aero Global?

10 A. Everything is Aero Global.

11 Q. Is there any way to identify an AKDI route on a paper? Is
12 there anything on a different paper that would say AKDI or is --

13 A. Not --

14 Q. -- all look like that?

15 A. Yeah. It all looks like this. Not on the paperwork. Only
16 on the phone. Like when you log into the phone because us drivers
17 have to log in, it will say, it will say company driver or lease
18 driver.

19 Q. Okay. I'm going to read some names to you, and if you can
20 just tell me if they sound familiar or if you know who these
21 people are. Eduardo Chavez (ph.).

22 A. Eduardo.

23 Q. Eduardo Chavez.

24 A. Yeah. I don't know him personally. Yeah, he works there,
25 yeah, Eduardo.

1 Q. Is he an Aero employee or do you know him through AKDI?

2 A. I believe that -- I would almost say all the Spanish drivers
3 are AKDI.

4 Q. Guillermo Molina (ph.)?

5 A. Guillermo, yeah, I've heard that name.

6 Q. Nelson Aguilar?

7 A. Yeah, Nelson's at night too. I believe Nelson's one of his
8 drivers.

9 Q. Okay.

10 A. Nelson loads at the same time I do.

11 Q. And then --

12 A. He might have been -- Nelson, I believe Nelson was the one
13 that did sixteen one last night.

14 Q. You believe he did it?

15 A. Yeah, Nelson.

16 Q. So he would have ran a double route last night?

17 A. Not a completely double.

18 Q. Okay.

19 A. He did his route, and like when she said are you doing any
20 extra she handed him two more, two more delivery slips.

21 Q. And then of course Roberto. Does Roberto drive or does he
22 solely stay in the warehouse?

23 A. He solely stays in the warehouse unless he has the jockey.
24 He was jockeying without a CDL going over to Ford for the longest,
25 and we actually complained because we knew our score is bad, and

1 we said stuff to Stacey, like, hey, if he gets caught you know
2 we're going to -- people are going to lose their jobs. You know
3 what I mean? And so I think they just now hired someone, but it
4 doesn't stop them. Like if we need -- if the jockey lady calls
5 off tonight he'll, he'll be jockeying the trailer.

6 BY MR. FOX:

7 Q. Can you see -- I don't see Christian, but you were talking
8 about Christian. Can you see? That's the first names. Does any
9 of those names ring a bell, the last name? This says --

10 A. Driver last name. Yeah, Freddie doesn't work here anymore,
11 but he, he would have been a good person to talk to. I'm trying
12 to see if I see --

13 Q. Well (indiscernible) so we can pull it up that way. So going
14 back, you said 16 0 1 was a potential route that was --

15 MR. ORYE: 16 1.

16 BY MR. FOX:

17 Q. 16 1?

18 A. Yeah. And I can give you the two extra ones she gave him.
19 What I think they're -- what I think he's doing now is like
20 splitting routes. So instead of having someone do a complete
21 double he'll just say, hey, we'll give you four off of this one,
22 and give another guy four off of this one.

23 Q. Talk half --

24 A. Right.

25 Q. -- the other half over there.

- 1 A. SDO8 and SDO2.
- 2 Q. SDO --
- 3 A. That's the extra ones she gave him paperwork for.
- 4 Q. SDE what?
- 5 A. SD zero eight and SD zero two.
- 6 Q. Do you know where they go?
- 7 A. I believe 16 1 goes to Manassas, Virginia. I don't know
- 8 where the other two stops go.
- 9 Q. Going back to your encounter with Roberto. He's asked you
- 10 to, you know, can you run some extra routes.
- 11 A. Um-hmm.
- 12 Q. And how did that, how did that go about? I mean, did you
- 13 say, hey, I'm already at the end of my hours of service?
- 14 A. Yeah. I told him -- it was before I left on my route. He
- 15 asked me I wanted to come back and run an extra route or do an
- 16 extra route when I come back in on Friday. And so I -- if I went
- 17 out Friday night, I wouldn't get back 'till Saturday morning. So
- 18 he wanted me to run another route Saturday morning, and I told
- 19 him, no, I'd be over my hours. And he said so. I said, no, I'm
- 20 not doing that. You know what I mean?
- 21 Q. Has he forced any drivers to run extra routes, do you know?
- 22 Have you seen him do that?
- 23 A. I haven't seen him force anyone, but he always says I'll pay
- 24 you extra. You know what I mean? Like, he'll throw you extra
- 25 money on top of what the route pays.

1 Q. Cash money or on the clock money?

2 A. Yeah, cash, cash money.

3 Q. So when -- if a driver runs an extra route is that just -- is
4 that paid cash then?

5 A. I'm -- well, the route pay would be on the check. That's
6 what he did say. The route pay would be on the check. But I
7 guess when he says I'll pay you extra, it's like I'll throw you
8 extra 30, 40 dollars or something for doing me a favor.

9 Q. I see.

10 MR. ORYE: -- the driver --

11 MR. FOX: Yeah, I saw that.

12 (Crosstalk)

13 BY UNIDENTIFIED SPEAKER:

14 Q. When you, when you're finished your route, this is the form
15 that gets turned in. Who do you hand this to?

16 A. I leave it in the route bag, and the person now that takes
17 care of the route bag is Brando, and he -- no. I'm sorry. One of
18 the office girls will be the one to take the trip sheets out.
19 Whoever enters -- whichever office girl enters the stuff, one of
20 the administration girls. Brando does the DVR reports. He takes
21 the DVRs for the truck maintenance.

22 Q. Are there other drivers that are feeling uncomfortable like
23 you are about some of these things that you're --

24 A. Yes. Howard, he, he's one that I can speak of that's still
25 there. See a lot of, lot -- there's been a big turnover. A lot

1 of people -- there's not that many people there that are -- that
2 were still there when I first started because like I said a lot of
3 people getting fed up over time. And there's a couple people like
4 me that stay thinking it's going to get better. But when the
5 equipment started going downhill that's when we knew. And then
6 they just, like, soon as one manager leaves, they just slide
7 anybody up into the spot. It's just like, okay, well, we need to
8 fill this spot. So you're here. Now you're the new manager. And
9 at this point I mean Stacey is lost. I don't deal with Jake too
10 much because he's over at Chrysler. But she just refers
11 everything to Roberto. You know what I mean?

12 Q. Is it Howard White?

13 A. He's a CDL driver. I believe his last name is White.

14 Q. Yeah. He's the only Howard on the --

15 A. There might be two Howards. I know there's two Howards.

16 (Crosstalk)

17 A. He's the CDL. The other Howard is not a CDL driver.

18 Q. Okay. And you say he's complained or is upset about --

19 A. Oh, yeah, yeah. They'll give him a trailer at night with no
20 lights. Any type of maintenance that needs to be done he'll write
21 it up, and he said he's just stopped writing some of the stuff up
22 because they, they won't fix it.

23 Q. Has he been asked to run extra routes too?

24 A. Oh, yeah, yeah, he has. He told me.

25 Q. Has he run any or --

1 A. No, no. He has a son that he gets off to school in the
2 morning. So there's no way that he can do --

3 Q. Oh. But he's been asked to --

4 A. Yeah --

5 (Crosstalk)

6 Q. -- routes?

7 A. Yeah.

8 Q. And did you talk to him about our, our dialog? I mean, is
9 he --

10 A. I told him that if he had anything to add that he could call
11 the number.

12 Q. Okay.

13 A. He said he would.

14 Q. Okay. Are there any other drivers?

15 A. I don't talk to too many of them that are still there. I was
16 trying to get in touch with some that weren't with the company any
17 more that could give a, a back history. But like I said, I don't
18 really trust too many of the ones. And I don't really see the
19 ones that leave at 8:30 anymore. The other issue I had with the
20 company was when I was, when I was one three one route that goes
21 out to Pittsburgh, 30 minutes from Ohio line, I had a problem with
22 the -- that's when I knew the managers were incompetent because I
23 had a problem with my 14-hour clock. You come in some nights,
24 your truck's not loaded, DC is slow. Then you get up on the
25 turnpike. You're starting to hit snow. So if I come back at

1 12:30 they didn't want me to get my 10 hours of sleep. They
2 wanted me to be back in at 8:30. And we had -- that's why I got
3 off of three one. I told her one night I said I'm not doing it
4 anymore. I said I'm getting like five hours of sleep running this
5 route. I said I can't do it anymore. And that's why they put me
6 on a shorter route. And --

7 Q. What route was that?

8 A. That's three one. That's 480 miles roundtrip from the -- I
9 believe it's 488 I remember.

10 Q. And did you -- when you ran that route were you using an
11 electronic log at that time?

12 A. No.

13 Q. How were you logging your hours?

14 A. The same way with this trip sheet.

15 Q. Trip sheet?

16 A. Yeah.

17 Q. Was that -- where was it going from and to?

18 A. It leaves Winchester. The first stop -- I changed the way we
19 deliver it because I found a more consistent way. But it goes --
20 they wanted me to run it where I go to [REDACTED] first. Then I
21 would go to -- from Wexford I would go to Kittanning. Then I
22 would go to -- what's that other little town in there? [REDACTED],
23 [REDACTED] down in there. Then I would go to [REDACTED] and
24 [REDACTED], and then --

25 Q. So you're all right off the turnpike. Most of your stops

1 are --

2 A. Except for [REDACTED] and --

3 Q. [REDACTED] goes up a --

4 (Crosstalk)

5 Q. But it would start here in Winchester?

6 A. Yeah, it will start.

7 Q. Are the trucks equipped with an EZ pass for you to get on and
8 off the turnpike?

9 A. The ones that go on the turnpike are. Yeah.

10 Q. Okay. When was the last time you were in that route?

11 A. Over a year ago. Because I've been on this route for a year,
12 the York route.

13 Q. Any idea who is running it now or does that route still
14 exist?

15 A. Yeah, yeah, it still exists, yeah.

16 Q. Who is on it now? Do you know?

17 A. I know what he drives. I don't know his name. A Spanish
18 guy. Yeah. I don't, I don't know his name.

19 Q. Okay. You were mentioning yesterday that Roberto kind of he
20 oversees the Spanish people. Is that the way you were referring
21 to it?

22 A. Yeah.

23 Q. So is that the dock workers and the drivers too?

24 A. Yes. It's the night dock workers. And the reason I found
25 that out is because sometimes they use my phone to scan the

1 in-bounds. And I saw the person's name, and it said lease, lease
2 dock. And so I asked the dispatcher. I said what does that mean?
3 And she was, like, oh, that's one of Roberto's workers. I said,
4 oh, he, he has, he actually has workers that are on the dock too?
5 And then that's when me and Howard -- she said, yeah. That's when
6 me and Howard were talking. We were, like, that's why when we
7 complain about whatever any of the dock workers do nothing happens
8 because those -- they're protected under Roberto too.

9 Q. Does he also control the, the Spanish drivers too?

10 A. Yeah, yeah.

11 Q. Okay. And is he the whole company? You know what --

12 A. It's almost like the company is split into two halves; the
13 daytime administration seems like it's Aero; and then soon as four
14 o'clock hits the company is Roberto. He tells us to call him with
15 anything; not to call Stacey or anybody. Stacey actually defers
16 everything to Roberto if we call her that has to do with truck
17 maintenance, has to do with truck -- which driver drives which
18 truck. If a truck's in the shop, and we need -- a driver needs a
19 truck, it's got to go through Roberto. So all the operations go
20 through Roberto.

21 Q. So along those same lines does he control drivers that are,
22 like, our driver up in New York? Would he have controlled him do
23 you think? Because he was --

24 A. I don't --

25 Q. -- he was a Spanish driver. That's why I'm asking.

1 A. I wouldn't think, but I'm not positive, but I wouldn't think.
2 I think he just has control over Winchester.

3 BY MR. ORYE:

4 Q. Is Stacey's last name is it Givens?

5 A. Yeah.

6 MR. FOX: Yeah, I saw that on --

7 MR. ORYE: So she's the --

8 MR. FOX: Yeah, she's the one that sent that e-mail.

9 BY MR. FOX:

10 Q. So you're not sure if he's --

11 A. I'm not sure if he controls New York, but I would -- I don't
12 think so.

13 Q. All right. Well, along those same lines, Roberto is here
14 locally asking drivers to run extra runs. Do you think up in New
15 York they're doing the same type of work? I mean, I know it's the
16 same similar --

17 A. I think the culture is the same. Because Tony and them have
18 to know what Roberto is doing. Because we've complained about so
19 much over the last three years regarding Roberto that if it wasn't
20 sanctioned by Tony and Tony wasn't giving Roberto the okay, I
21 think the bottom line is get the routes done. They're worried
22 about the money. You know what I mean? Please Ford. If the
23 routes don't get out, then Ford is going to be looking for a new
24 contractor. You know what I mean? So I think whatever they have
25 to do including breaking the rules, breaking hours of service,

1 whatever they have to do it's going to get done. He's got the
2 okay to do it and --

3 Q. Have you ever -- I'm sorry to cut you off. But just talking
4 about the hours of service. Have you ever been on a route where
5 you physically under the federal rules were unable to complete
6 that route, but was told keep running?

7 A. Yeah, yeah. I was actually stopped by DOT officer coming
8 through the turnpike turnstile when I was on the three one route.
9 It was probably, like, two months before I told him I wanted off
10 of it. Because he actually told me he was going to wait there
11 because he looked -- he held me there for 30 minutes. He looked
12 and saw the accidents the company was having. He came back, asked
13 me if I had any accidents, and I told him no. And as long as I've
14 been with the company I haven't had any tickets or accidents. And
15 so I told him no, and he said -- he apologized for being a little
16 irate at me in the beginning, but he said I looked at your time
17 sheet and there's no way you have enough time to get back. And I
18 said I know. I said that's how they set this route up.

19 Q. This was on a roadside inspection?

20 A. Yeah, yeah, yeah.

21 Q. Where was that?

22 A. What month is this? This is February.

23 MR. ORYE: We're in February of '23. When did you come off
24 the three one route?

25 MR. FOX: He said about a year ago.

- 1 MR. ROBINSON: Yeah, it would have been --
- 2 BY MR. FOX:
- 3 Q. But it was Pennsylvania Turnpike?
- 4 A. Yeah, Pennsylvania.
- 5 MR. ORYE: Pennsylvania Turnpike.
- 6 MR. ROBINSON: Yeah, Pennsylvania.
- 7 BY MR. ORYE:
- 8 Q. Okay, all right, well --
- 9 A. It was coming through -- what's that -- is that Greensburg
- 10 right there or above [REDACTED].
- 11 Q. Going towards Pittsburgh or coming back towards Winchester?
- 12 A. No. Coming back. I was, I was leaving --
- 13 Q. So you've got [REDACTED], then you've got -- what is that --
- 14 Valley? I'm a former driver. I drove [REDACTED] every day for,
- 15 like, five years. So I know--
- 16 A. I was coming, I was coming from [REDACTED], and I was coming
- 17 down, and I catch the -- I would catch the turnpike right there,
- 18 like, in, like, it would loop around to, like, New Stanton. But
- 19 it was before the New Stanton turnstile. There's another one
- 20 right there.
- 21 Q. Yeah. Because it's two close to it.
- 22 A. Yeah.
- 23 Q. And if you get confused, you'll take the one --
- 24 A. Right.
- 25 Q. -- and not the other one for where 70 splits off --

1 A. Yeah.

2 Q. -- at [REDACTED]. Give me a second. I'll find it. I know
3 exactly what you're talking --

4 A. Because once I go through the New Stanton, I loop around, and
5 I'm right on, right on the turnpike.

6 Q. Yes.

7 A. So it was, it was the one, the turnstile before that New
8 Stanton if I'm coming down that, that road right there. It was
9 Pennsylvania. He wasn't too happy.

10 BY MR. FOX:

11 Q. Okay. Well, we can probably cross-reference that in our
12 system. Besides Howard are there other drives that you've talked
13 to that they've said, hey, you know, Roberto has asked me to run
14 extra routes, and I told him no?

15 A. Reggie for sure. Because Reggie used to, used to do whatever
16 Roberto asked him. That was one of his go-to guys until he didn't
17 need him no more, and he fired him.

18 Q. Roberto fired him or Stacey?

19 A. Roberto fired him, yeah.

20 Q. So Roberto has, has --

21 A. Firing.

22 Q. -- the power --

23 A. Right.

24 Q. -- termination power?

25 A. Yeah.

1 Q. Let me see.

2 A. And that was like -- Reggie's been gone for like a year and a
3 half two years.

4 Q. Did you know or hear about anything about our -- the driver
5 that was involved in the accident in New York?

6 A. The only thing they told us was there was a fatal accident
7 from a driver from Chrysler, and Stacey said that it could have
8 been avoided.

9 MR. ORYE: I'm just trying to get on the --

10 MR. FOX: Oh, it's 521.

11 MR. ROBINSON: Stacey said it could have been avoided, and
12 that's all she said. I didn't know anything.

13 BY MR. FOX:

14 Q. But you hadn't heard anything about that driver? The drivers
15 haven't talked about him?

16 A. No. We were talking, but we -- no one knows. We -- some of
17 the drivers would be, like, hey, did you hear about it? Yeah, I
18 heard about it. What happened? I don't know. That's how it is.
19 Like no one -- they haven't given us any information. They just
20 had to sign that paper, and we kind of laughed amongst ourselves,
21 like, didn't I just call off a couple of weeks ago, and they
22 didn't -- they gave me a hard time because I was on cold medicine,
23 but now that's something you want to put on the sheet. Like now
24 it's okay to call off. Before they would always give you a hard
25 time, like, we need you tonight. You can't call off. Or you're

1 going to lose your bonus for a month if you called off.

2 Q. What paper? What paper did --

3 A. They had us sign a paper stating that if you're tired, if
4 you're on cold medicine, if you're just not feeling up to it,
5 basically any reason under the sun that you don't feel like you're
6 up to driving that night you're allowed to call off.

7 Q. Okay. And you actually signed a document about that?

8 A. Yeah.

9 UNIDENTIFIED SPEAKER: We haven't seen that in his --

10 BY MR. ORYE:

11 Q. Mount Pleasant; is that the exit? Mount Pleasant or
12 Youngwood?

13 A. No. I don't think Youngwood --

14 Q. There's where 70 splits off the --

15 A. Yeah. You pass -- I crossed 30 --

16 Q. Okay.

17 A. -- and kept going down, and the next turnstile right there.
18 I guess that is Greensburg.

19 Q. Donegal.

20 A. Donegal.

21 Q. Because that's the one right before Summerset. Donegal is
22 the -- that's the only --

23 A. No. I wasn't that far yet. I wasn't on the turnpike.

24 Q. Donegal -- oh, you wasn't on the turnpike?

25 A. I wasn't on the turnpike yet. I was heading to the turnpike.

1 Q. You were still on 70?

2 A. If that's 70, yeah. I crossed 30. I would have crossed 30.
3 I rely on GPS so much.

4 Q. I know. That's all the New Stanton area right there --

5 A. Yeah.

6 Q. -- where 70 crosses 30, and then --

7 MR. FOX: You mean there's scales or something there that you
8 got pulled over?

9 MR. ROBINSON: No, there's the --

10 (Crosstalk)

11 MR. FOX: Okay. I got it. I got you.

12 MR. ORYE: Trust me.

13 BY MR. FOX:

14 Q. All right. So going back to folks that may be treated the
15 same way you are. We've got Howard, and then we got Reggie who is
16 no longer there, right?

17 A. Right. And it would have been Freddie. Freddie is no longer
18 there. Matt's a manager that was fired. He knows the --
19 everything from the administration down about how everything
20 works. He's been -- we, me and him used to have conversations
21 about Roberto, and why Tony doesn't --

22 Q. How long has he been gone?

23 A. He's been gone about four months.

24 MR. ORYE: Matt.

25 BY MR. FOX:

1 Q. Was he a driver also?

2 A. No. He was a dock supervisor daytime.

3 Q. Is his name on here? There's several Matthews. I don't know
4 if he was listed as a driver as well.

5 A. Matt, Matt, Marvin. No, I don't think he's -- but that
6 Marvin, I'm trying to think. Marvin Garcia, I think he might be
7 the guy on three one now, Marvin.

8 Q. All right. We can find out.

9 BY MR. ORYE:

10 Q. Do you have a phone number for Matt?

11 BY MR. FOX:

12 Q. And is it Freddie Delyard (ph.)?

13 A. Yeah, I believe that -- he was the only Freddie there.

14 Q. Freddie Delyard?

15 A. Yeah.

16 Q. I don't see Reggie on there.

17 A. I don't have -- actually, Reggie only lives a little ways
18 down the street. I was going to stop by there when I leave here,
19 and see if I can get his new number.

20 Q. Okay. All right.

21 A. I had his number. I don't have Matt's number. I tried to
22 call Reggie before I came here.

23 Q. Well, if you, if you are able to find that out, maybe you
24 could call or text me.

25 A. Yeah.

1 Q. That would be great and --

2 A. I have Howard's number -- Howard.

3 Q. Howard White? Yeah, we think we have his number too.

4 MR. ORYE: If he's on the driver's license --

5 MR. FOX: Yeah, I thought so.

6 MR. ROBINSON: Oh, okay.

7 MR. FOX: Howard. Yeah, I got his number. Okay.

8 BY MR. ORYE:

9 Q. The three one route, that's a box truck route?

10 A. Yeah. There's a couple of routes that go up that way that,
11 but three one is pretty much one of the longest ones. Like I said
12 488 miles. It's probably Altoona or State College that's pretty
13 far too, but just -- see but they don't take in consideration this
14 is the time from us loading when we get there waiting on
15 paperwork. Sometimes the Ford DC's late. Like last night we
16 didn't get out 'till 1:15.

17 Q. And what time did you report to work?

18 A. 12 o'clock. I was running a little late, but so that's like
19 an hour and 15 minutes waiting. So everybody was late last night.
20 So the ones that left at 8:30 or supposed to leave at 8:30 they
21 probably didn't leave 'till 9:30, 10 o'clock. So a route like --
22 when something like that happens then one of them three one routes
23 could easily, you could easily be over 14 hours if you hit snow up
24 there.

25 BY MR. FOX:

1 Q. Do you know -- so you said three one is a long route. Are
2 there any other routes that you know off the top of your head that
3 are super long?

4 A. There's a Virginia Beach route. One that goes to the Eastern
5 Shore.

6 BY MR. ORYE:

7 Q. Over in Maryland?

8 A. Right, right. Virginia Beach and Eastern Shore they're two,
9 two separate routes, but those are pretty long too.

10 MR. FOX: Okay.

11 MR. ORYE: (Indiscernible).

12 MR. FOX: Yeah. Do you have any other questions?

13 BY MR. ORYE:

14 Q. Are you -- how are you paid, hourly, salary? What is --

15 A. By route.

16 Q. By route.

17 A. It's paid by route, yeah.

18 Q. Is it calculated by the mile then or by the time?

19 A. No. We've been trying to figure that out too. Each route
20 pays different, and sometimes it doesn't seem like it's equal.
21 They just have a set price, set pay for each route. That's what
22 they say.

23 Q. And when you come to work, when you physically report in do
24 you punch a time clock? Do you --

25 A. And I asked them to do that before, and Stacey was about to

1 do it. And the reason why I wanted to have a timecard is because
2 they would come up with any reason to take your bonus. And the
3 main reason was, oh, you reported to work late. Well, how did I
4 report to work late if my freight wasn't even here when I got to
5 work? So I realized it was just one of Roberto's ways of -- or
6 the company, either the company's way of taking money or Roberto's
7 way of getting back at certain drivers by saying, hey, he's late,
8 he's going to lose his -- so Stacey was about to give me the
9 timecard. Then at the last minute because I told her I want proof
10 at what time I come in, at the last minute she says, no, I can't
11 do it. Tony told me not to. So that's when I went to Tony, and I
12 was, like, Tony, what do you mean I can't have a timecard? And he
13 was, like, well you should be logging in on your phone when you
14 get here. I said, well, I can't log in on the phone because the
15 warehouse uses the phone. He's, like, oh, okay. Well, I have to
16 figure something else out. You never hear back from him.

17 BY MR. FOX:

18 Q. So along those lines you said last night you got in around
19 12.

20 A. Yeah, 12 o'clock.

21 Q. But your freight wasn't ready 'till 1:15.

22 A. We weren't loaded 'till 1:15.

23 Q. So that's your timesheet from last night?

24 A. Yeah.

25 Q. Does it say --

1 MR. ORYE: I scanned it, and e-mailed it to you.

2 MR. FOX: Oh, you already did.

3 BY MR. FOX:

4 Q. So does it show --

5 A. Well, no. We write that in. See, I write the time that I
6 come in, but not everyone else does that. Like there's --

7 Q. Time then you put in 12 o'clock?

8 A. Yeah.

9 Q. And time out is 1:20.

10 BY MR. ORYE:

11 Q. That's when I left -- that's when you left the warehouse?

12 A. Warehouse, right.

13 MR. FOX: Yeah, but that's when he was loaded.

14 BY MR. ORYE:

15 Q. So your end time was at 8:15 this morning? When did you get
16 back to the warehouse?

17 A. The last number there at 10:30.

18 Q. 10:30.

19 A. The very bottom.

20 Q. I don't see 10:30. All I see is 8:25.

21 A. Oh, I'm sorry. I didn't write my end time. Yeah.

22 Q. So 8:15 you're at (indiscernible). Where is that at?

23 A. York, PA.

24 Q. That's in York, PA?

25 A. Yeah. That's when I left there.

1 Q. And then once you've hit there you come straight --

2 A. Straight back.

3 Q. Okay.

4 UNIDENTIFIED SPEAKER: You already got that?

5 UNIDENTIFIED SPEAKER: Yeah, I scanned it.

6 MR. ROBINSON: Well, there's, there's a jockey driver. I
7 forgot about that. The jockey driver comes in, and for I think at
8 two or three o'clock. But then they run a route at the end of the
9 night. They run two stops to Chantilly. And I don't see how they
10 have enough hours to do that not on duty.

11 BY MR. FOX:

12 Q. And who are those? Who are those people?

13 A. Right now it's the new jockey driver. We had -- the main,
14 the -- we go through -- they can't keep a jockey driver. The one
15 guy left and went to Penske, Anthony. I don't know whether his
16 name is on there. Anthony used to do that route, and he, and he,
17 he understands how the company works.

18 Q. So say again, the jockey drivers --

19 A. She's a girl now. She just got hired like a couple days ago.

20 Q. And she has to work on the dock then moving -- shuttling --

21 A. She, yeah, she shuttles the trailers from Ford back and
22 forth, and then she runs -- then at 12 o'clock she leaves -- or
23 12:30. Well, last night it wouldn't have been 'till one o'clock.
24 But once all the freight's there for -- because we're the last box
25 trucks that leave. So she can't leave to do her route until all,

1 all of the freight's there. So then she goes to Chantilly, and
2 does two; Chantilly Ford, and then there's a Chantilly warehouse
3 down there about four, five miles apart, four miles apart. And
4 she does that. But I was adding that up, and I was, like, well,
5 she jockeys for eight hours.

6 BY MR. ORYE:

7 Q. That's going to be --

8 A. She doesn't get --

9 Q. -- my next question. What time --

10 A. -- back --

11 Q. -- does she report to work to start her jockey position?

12 A. I believe it's like three or four o'clock.

13 BY MR. FOX:

14 Q. In the afternoon?

15 A. It could be --

16 Q. A.M.?

17 A. P.M., P.M. I think. I think she comes in at 3 P.M., 3 or 4

18 P.M.

19 BY MR. ORYE:

20 Q. And then she'll run down to the distribution, the Ford
21 distribution plant, warehouse?

22 A. Yeah, back and forth from --

23 Q. Which is where? Where is the actual distribution warehouse
24 at?

25 A. It's five miles. Because I've GPS'd it. It's five miles

- 1 from -- four miles. It's --
- 2 Q. I'm familiar with Winchester.
- 3 A. Yeah. So if you drive out the back of, of Aero Global --
- 4 Q. Um-hmm.
- 5 A. -- sure, you'll be facing tracks.
- 6 Q. Go out by the tracks.
- 7 A. You make a right.
- 8 Q. Yeah. Go out to Route 11.
- 9 A. And then you -- yeah. You go out to Route 11 across the
- 10 railroad tracks, and you'll be facing the 7-Eleven.
- 11 Q. Yeah.
- 12 A. Okay. You make a left. You go down, I think, maybe two
- 13 stoplights, and make a right.
- 14 Q. Back there where the old GE Light Warehouse was? When you
- 15 make the right, right there, there's a car dealership --
- 16 A. Yeah.
- 17 Q. -- and there's a trailer dealership or --
- 18 A. Yeah, yeah. And make a right.
- 19 Q. Make that right. And then how far back do you go?
- 20 A. Not far, not far. Maybe --
- 21 Q. And it's on the left?
- 22 A. Yeah, it's on the left.
- 23 Q. Okay. I think I know where it's at.
- 24 BY MR. FOX:
- 25 Q. What is this, what is this female's name?

1 A. She just started.

2 Q. Do you know her name?

3 A. No. No, I don't. She just started.

4 Q. And that route would be called what number? Chantilly run.

5 A. I don't even know if -- yeah, I don't know if -- I know it
6 goes to Chantilly because he, he had me do it in a box truck one
7 night because we didn't have a person, a jockey driver. He was
8 doing the jockeying because we couldn't find -- we hadn't been
9 have an employee for it. So he, he asked me to do it the one
10 night.

11 Q. How long did it take you?

12 A. I got back like six in the morning, six-thirty in the
13 morning. So about six and a half hours.

14 Q. Six and a half hour?

15 A. Yeah.

16 MR. FOX: Okay. You have any other questions?

17 MR. ORYE: Not for right now.

18 BY MR. FOX:

19 Q. You've been very helpful. Is there any questions that we did
20 not ask you that you feel that you need to let us know about?
21 Anything else that's on your mind?

22 A. Just the safety of the equipment. It's not getting repaired.
23 Like I said, I had air line under the seat went out. I had the
24 diaphragm on the brakes go out. Seems like all the trucks pull to
25 the right. There was a girl out of our Ford office that rolled a

1 box truck, and she was reporting the same issue with the, with the
2 steering pulling to the right. They come to -- known that I'm the
3 person now that, that is, you know, putting my foot down with
4 certain things because once I found out that my truck was pulling
5 to the right at that point I told them I wasn't driving it no
6 more. So for the most part they, they know that I'm -- I kind of,
7 I guess, they think that I'm kind of, like, a problem, but I'm
8 not. I just want a truck that works.

9 Q. Of course.

10 A. You know what I mean?

11 BY MR. ORYE:

12 Q. This paper that you said they had you sign, would you be able
13 to take a picture of it, and text it to Mike? Do you have a copy
14 of it?

15 A. No. I don't have a copy.

16 Q. You didn't have a copy?

17 BY MR. FOX:

18 Q. They didn't give you a copy?

19 A. Huh-uh.

20 Q. Okay. All right, well, that's, that's fine. Well, listen,
21 we've taken up a lot of your time. You've been super helpful. If
22 there's something that you think of in the future, just give me a
23 call or a text, and then we can talk again.

24 A. Okay.

25 MR. ORYE: And (indiscernible) see my business card, and what

1 I'm going to do is I'm going to put my cell phone number on the
2 back, and if you speak to another driver that's willing to step
3 forward, they can contact me or Mike directly, and you can explain
4 to them the same thing; that their information will be protected.

5 MR. ROBINSON: Okay.

6 MR. ORYE: We don't go back, and say this person told me
7 this, and this person told me that. We keep it in the highest of
8 confidence.

9 MR. ROBINSON: Yeah. I definitely have two other ones in
10 mind that I know. I just didn't get a chance to talk to them.

11 MR. FOX: Okay. Well, if you, if you're able to talk to them
12 or have a conversation with them, if you'll encourage them to give
13 us a call, that would be wonderful.

14 MR. ROBINSON: Okay.

15 MR. FOX: But at this point we're going to go ahead and
16 conclude the interview, and the time now is 12:12 p.m.

17 Thank you again, sir.

18 (Whereupon, at 12:12 p.m., the interview was concluded.)
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CERTIFICATE

This is to certify that the attached proceeding before the
NATIONAL TRANSPORTATION SAFETY BOARD

IN THE MATTER OF: FATAL CRASH OF A FREIGHTLINER BOX
TRUCK & BUS IN LOUISVILLE, NEW YORK
ON JANUARY 28, 2023
Interview of [REDACTED]

ACCIDENT NO.: HWY23FH005

PLACE: Winchester, Virginia

DATE: February 7, 2023

was held according to the record, and that this is the original,
complete, true and accurate transcript which has been transcribed
to the best of my skill and ability.

[REDACTED]
Katherine Motley
Transcriber