

**GOVERNMENT OF THE VIRGIN ISLANDS
DEPARTMENT OF LABOR
HEARINGS AND APPEALS UNIT**

MANUEL GONZALEZ,)	
)	
Complainant,)	
)	
v.)	CASE NO. WD-061-2012-STT
)	
LSJ EMPLOYEES, LLC,)	
)	
<hr/> Respondent.)	

AFFIDAVIT OF MELVIN FLORES

I, Melvin Flores, being first duly sworn, do hereby depose and state as follows:

1. I am a resident of the United States Virgin Islands and I am of legal age and competent to make and execute this Affidavit.

2. At the times that the matters discussed in this Affidavit took place, I was employed on Little St. James Island ("LSJ"), where my brother, Irvin Flores, and Manuel Gonzalez were also employed at the same time. Because of my employment on LSJ at those times, my close relationship with my brother, Irvin Flores, and my working relationship with Mr. Gonzalez, I have personal knowledge of the matters discussed in this Affidavit.

3. In 2011, Mr. Gonzalez purchased a Rock Crusher from the owner of LSJ for \$1,000.

4. Although Mr. Gonzalez told the managers on LSJ that the Rock Crusher was in very bad condition, was not worth fixing and was worth only a very small amount, he had planned to have my brother, Irvin Flores, fix the Rock Crusher, so Mr. Gonzalez could then resell it for a much greater price than the price which he paid to the owner of LSJ.

5. In fact, Mr. Gonzalez promised to pay my brother \$10,000 to fix the Rock Crusher, once Mr. Gonzalez resold the Rock Crusher.

6. After Mr. Gonzalez purchased the Rock Crusher, the Rock Crusher was delivered by flat bed truck to Mr. Gonzalez's home on St. Thomas in the Virgin

Islands. My brother went to Mr. Gonzalez's home and worked to repair the Rock Crusher and expected to be paid the \$10,000 Mr. Gonzalez promised to pay him to fix the Rock Crusher.

7. I have learned that after re-selling the Rock Crusher, Mr. Gonzalez purchased a very expensive boat. However, he refused to pay my brother, Irvin Flores, the \$10,000 that he promised to my brother.

8. LSJ Employees, LLC terminated Mr. Gonzalez for cause based on his misconduct described in this Affidavit. Based on my personal knowledge, there was good reason to terminate Mr. Gonzalez, who robbed the owner of LSJ of the opportunity to have my brother and other mechanics employed on LSJ repair the Rock Crusher on LSJ, so that the Owner of LSJ could then sell the Rock Crusher for more money. Mr. Gonzalez convinced by brother, Irvin Flores, to repair the Rock Crusher at Mr. Gonzalez's home by promising to pay him \$10,000 and then cheated my brother out the money that was promised to him.

FURTHER SAYETH AFFIANT NOT.

Jeanne Brennan

SUBSCRIBED AND SWORN before me on this the ____ day of August, 2012.

Notary Public