

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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|---|---------------------------|
| The National Post Office Collaborate, : | Case No. 3:13CV1406 (JBA) |
| Center for Art and Mindfulness, Inc., : |                           |
| Formerly known as the Lower :           |                           |
| Fairfield Art Center, Inc., and :       |                           |
| Kaysay H. Abrha, an Individual, :       |                           |
| <i>Plaintiffs</i> :                     |                           |
| v. :                                    |                           |
| :                                       |                           |
| Patrick R. Donahoe, Postmaster :        |                           |
| General of the United States Postal :   |                           |
| Service, and The United States :        |                           |
| Postal Service :                        |                           |
| <i>Defendants</i> :                     |                           |

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**Declaration of Anthony J. Basso II**

I, Anthony J. Basso II, pursuant to 28 U.S.C. § 1746 declare as follows:

1. I am a Safety Specialist with the Connecticut District Safety Office for the United States Postal Service (USPS) in Hartford, Connecticut. I have held this position for approximately 7 years. My duties and responsibilities in this position involve performing safety inspections and investigations of facilities within the Connecticut District for USPS. I am also involved with OSHA compliance. Prior to 2006, I was a Safety Specialist with the Northeast Area Office of USPS. My duties and responsibilities in that position were similar to that of my current position.
  
2. On August 30, 2013, the Postmaster of the Stamford, Connecticut Main Post Office, Jeffrey Salamon, called me to request a special safety inspection of the Atlantic Street Station, located at 421 Atlantic Avenue, Stamford, Connecticut.

3. On September 4, 2013, I completed an inspection of the Atlantic Street Station. I completed a written report, which is attached as Exhibit A, and I took many pictures, which are also attached. As shown in the pictures, the conditions at the Atlantic Street Station were deplorable. There were many potential risks to the safety and health of the employees, including lead paint, plaster falling off the walls, no hot running water, and mold and mildew smell throughout the facility. I submitted my report to Jeffrey Salamon; Roger Twerion, Manager of Safety for the Connecticut Valley District, of the United States Postal Service; Theresa Brusco, Manager of Human Resources for the Connecticut Valley District; Tatiana Roy, Manager of Marketing for the Connecticut Valley District; and Charlotte Parrish, Facilities Environmental Specialist. It is my understanding that based on the deplorable conditions and the potential risks to safety and health of the employees at the Atlantic Street Station, the USPS moved out of the Atlantic Street Station on Friday, September 20, 2013.

I declare under penalty of perjury of the laws of the United States that the above statements are true.

Dated: 10/10/13

  
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Anthony J. Basso II

### **Outside of building**

- PVC outer storm window is breaking away from the window frame
- Window wooden frame is dry rotting and flaking lead paint on the south side of the building
- South side sidewalk is deteriorating and uneven. (Possible slip trip fall issue)
- South side main entry way granite stairs cracked and sinking slightly.
- North side main entry way railing by granite stairs is broken.

### **Front Entry Way into PO**

- Flag Pole base in front of post office is rusting out
- Customer Entry way on eastern side of building wooden center door is dry rotting and flaking paint. Hole is visible on the bottom half of the wooden door. Door inoperative
- Customer Entry way on eastern side right metal door is not properly secured to jam. Framing is coming off door way. Door inoperative.

### **Indoor Customer Lobby**

- Inside Customer entry way, eastern side above wooden center door ceiling plaster is crumbling away where the wall meets with the ceiling.
- Junction box mounted on floor near the center wooden door, possible trip hazard to customers.
- Photo Eye electrical junction box face plate missing above customer entry way door. Electrical wires exposed but protected by height.
- Wall mounted Mail deposit boxes are pulling away from the wall. Deposit boxes not secured properly.

### **Break Room**

- Lead Paint is chipping off walls
- Fire alarm wire not properly enclosed in conduit wire casing.
- Facility has no warm water

### **Loading Dock Area Outside**

- The center of the dock area, junction box is open with exposed wire.
- Hole in overhang of roof ( possible birds nest)
- Conduit casing cut not capped or removed on north side of once old outer shed connecting to building.
- Retaining wall crumbling by the north side of building near employee stair way.
- Completely rotted wood floor on north side of old shed staging area by swing doors.
- South side Railing by employee stair way has crumbled and no longer anchored.
- Under side of Concrete overhang for loading and unloading concrete is breaking apart from structure.
- Dock wooden roof is rotting away and paint is flacking off. Water intrusion into electrical box also.
- Above, electrical face plate missing by support beam 2 in the center of the dock.
- Wooden plank edge is pulling away from center of dock.
- Romex wiring improperly encased in cement by south side employee stairs.

### **Vestibule for Dock Area**

- Plaster is crumbling off indoor ceiling on north left corner of vestibule.

### **Workroom Floor**

- Plywood floor deteriorating from normal wear and tear of equipment moving over floor.
- Hole in ceiling with overhead tarp catching water and plaster from falling to the floor
- Ceiling tiles missing and stained throughout the facility
- Northwest back room wood floor and asbestos tiles are warping from water intrusion from roof coming down wall. Plaster is crumbling off roof in this room also. Wire mesh is used to catch falling plaster.
- Asbestos Floor tiles warped and wood flooring is rotting around nonfunctioning AC unit #6
- Electrical knockout is open on functioning outlet by southwest corner of building by drainpipe.
- Blocked electrical panels on workroom floor
- All emergency lighting is not working
- Monthly and yearly fire inspections are not being done
- Emergency phone number missing

- Flaking lead paint and crumbling plaster on wall covered by tarp to protect employees by unisex bathroom and storage area near customer window.
- Post master room and rooms 109 and 110 water intrusion and plaster breaking away from ceiling.

### **Basement**

- Entering basement stairwell had a strong musty smell from mold and mildew. Plasters on walls are collapsing away.
- Emergency lighting does not work
- Mold on walls from leaking and steaming pipes and from water intrusion and flooding.
- East side men's locker room water intrusion and flooding and plaster crumbling off walls
- Boiler room piping is rusted.
- Old coal room has mildew on walls.