

DECLARATION OF ALBERTO ZAMORA


ALBERTO ZAMORA, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Alberto Zamora. I am over the age of twenty-one (21) years, and otherwise sui juris. I am currently employed by the City of Miami Beach ("City") as the Director of the Sanitation Division. I have been in the Sanitation Division since 1999.
2. The Sanitation Division is responsible for the collection and disposal of residential garbage, trash, the residential recycling program, sanitation inspections, street sweeping on the public right-of-ways, and collection and disposal of litter from public litterbins.
3. The sanitation needs are very different in residential areas and areas that permit entertainment.
4. I specifically compared the South of Fifth Neighborhood to the Entertainment District, and the data revealed that the City spends exponentially more resources in the Entertainment District than in the South of Fifth Neighborhood.
5. The South of Fifth Neighborhood requires a dedicated five (5)-person crew, seven (7) days a week. In 2016, the City spent \$321,500.00 on sanitation services in the South of Fifth Neighborhood. Services include, but are not limited to, cleanup of the streets, emptying garbage cans, and emptying the recycling cans.
6. The need for sanitation services is exponential greater in the Entertainment District than in the South of Fifth Neighborhood due to the amount of tourists in the Entertainment District as well as the nature of the activities in the district.
7. The Entertainment District requires a designated thirty-three (33)-person crew, seven (7) days a week. In addition to the dedicated day crew, the Entertainment District requires a night crew, of ten (10) persons.

8. Notably, in the past years, the Entertainment District has required additional sanitation services due to the increase of tourists and visitors to the City.

Under penalty of perjury, I hereby attest to the veracity and accuracy of the facts as stated herein.

Executed on May 10, 2017.



Alberto Zamora