

AFFIDAVIT OF SGT. GERALD T. HATTON

1. I am currently employed by the Union County Department of Corrections as a Corrections Sergeant. I have held the rank of Sergeant for approximately fifteen (15) years.
2. As a Sergeant, I supervise officers employed by the Union County Department of Corrections.
3. On January 8, 2011 I arrived at work at approximately 10:50 p.m. for a scheduled 11 p.m. to 7 a.m. overtime shift. Upon exiting my vehicle, I noticed numerous pieces of 8 ½" x 11" pieces of paper scattered around the first level of the parking garage. It is well known around the Department that I have an assigned parking spot on the first level of the garage as Vice-President of the F.O.P. Additionally, my car is identifiable as it has visible F.O.P. license plates.
4. I retrieved one of the many papers and viewed it. To my dismay and shock, it was a photocopied photograph of me and my spouse at our wedding reception, with pornographic, offensive and gang-related language hand written on it. It appeared that there was at least 100 copies of that sheet scattered around the garage. A copy of the flyer is attached hereto as Exhibit A.
5. I proceeded to the front door of the jail where I was met by Officer William Burkert and Sgt. Kevin Burkert, who were standing at the door, blocking the entrance. I stepped between them and asked "what's up?" Officer William Burkert responded "You're what's up." I then walked inside the door and proceeded to my post. At the time, Officer William Burkert held the position of treasurer of P.B.A. Local 199, the association for

