

**FILED**

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TAMARA CHARLES  
CLERK OF THE COURT

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS**

GOVERNMENT OF THE VIRGIN ISLANDS,  
VIRGIN ISLANDS POLICE DEPARTMENT,

Plaintiffs,

V.

POLICE BENEVOLENT ASSOCIATION, LOCAL  
816 AND ALL THOSE UNNAMED MEMBERS  
OF THE BARGAINING UNIT WHO ARE  
PARTICIPATING IN UNLAWFUL JOB ACTIONS,

Defendants.

CIVIL NO. ST \_\_\_\_\_

**ACTION FOR: BREACH OF  
CONTRACT; TEMPORARY  
RESTRAINING ORDER;  
PRELIMINARY AND PERMANENT  
INJUNCTION; and VIOLATION OF  
TITLE 24, CHAPTER 24**

**AFFIDAVIT**

**TERRITORY OF THE VIRGIN ISLANDS**

**DIVISION OF ST. THOMAS**

I, **MARIO BROOKS**, an adult resident of St. Thomas, U.S. Virgin Islands do hereby  
affirm and state as follows:

1. I am employed by the Government of the Virgin Islands as  
Commissioner of the Virgin Islands Police Department ("GVI" or "VIPD") located at  
5400 Veterans Drive St, Thomas, VI 00802.

2. I have been employed with VIPD since 1994. As Commissioner, I assure  
you that the institution is run appropriately on a daily basis and ensure that there is  
sufficient staffing, scheduling, and the mandates of VIPD are being implemented.

3. I have practiced in law enforcement since 1994 as a police officer. Then,  
I worked in supervisory roles in 2008 as a sergeant, and 2012 as a lieutenant. I have

**EXHIBIT B**

also served in administration since 2020 as Assistant Commissioner and Commissioner of VIPD.

4. VIPD which is the primary law enforcement agency within the executive branch which is responsible for the safety and protection of the public.

5. VIPD employs approximately one hundred ten (110) police officers in the St. Thomas/St. John district who are members of the Police Benevolent Association ("PBA").

6. Most police officers in the VIPD St. Thomas/St. John district work in the patrol division.

7. Daily, VIPD St. Thomas/St. John district responds to approximately one hundred (100) calls for service, vehicle collisions, shots fired, domestic disputes, assaults, robberies and the like.

8. Currently, VIPD has eleven (11) police officers in mandatory annual National Guard training.

9. On June 15, 2025, on the island of St. Thomas, three (3) police officers were assigned to work the 8am to 6pm shift. All three called out "sick."

10. The VIPD was severely handicapped because the 8am to 6pm shift had three other police officers on military leave, two on annual leave and one had the day off.

11. On June 15, 2025, on St. John there are five police officers assigned to the 7 a.m. to 5 p.m. shift: Two called out "sick", one had the day-off, one used a vacation day and only one reported to work.

12. On June 15, 2025, on St. Thomas, for the 2 p.m. to 10 p.m. shift, four officers had the day off, two officers called out "sick", one officer was on vacation leave, and one on military leave.

13. Typically, when the patrol division is short-staffed, VIPD will reach out to police officers in specialized units to assist specifically the Criminal Investigations Bureau and the Special Operations Bureau.

14. However, on June 15, 2025, on the island of St. Thomas during the 8 a.m. to 6 p.m. shift, six officers in the Criminal Investigations Bureau called out "sick."

15. On June 15, 2025, six police officers from the Specials Operations Bureau called out "sick." The Special Operations Bureau officers were assigned to the festival village at Frenchtown during the weekend June 13-15, 2025.

16. Additionally, two officers from the downtown patrol assignment who were reassigned to the Frenchtown Village also called out "sick."

17. Consequently, there was no police officer presence at the festival, only supervisors.

18. Additionally, today June 16, 2025, all seven school security officers called out "sick." Consequently, there are no police officers at the Police Athletic League ("PAL") which is the VIPD summer camp and Department of Education summer school.

19. Moreover, VIPD responds to approximately sixty (60) vehicle collisions weekly.

20. On June 16, 2025, all five officers in the Traffic Investigations Bureau called out "sick."


21. Since the Officers of the PBA striked, the VIPD is forced to require police supervisors and peace officers in other agencies to assist in covering shifts to prevent complete catastrophe because of inadequate staffing.

22. Having supervisors work double shifts impacts the health and safety of the supervisor and public since it may affect the alertness of the supervisors.

23. This strike also financially impacts VIPD in that the agency will have to pay overtime at a higher rate for the supervisors to take the shift.

FURTHERMORE, AFFIANT SAYETH NAUGHT.

Dated: 06/16/2025

  
\_\_\_\_\_  
MARIO BROOKS, Commissioner  
Virgin Islands Police Department

SUBSCRIBED AND SWORN to before me  
This 16 day of June, 2025

  
\_\_\_\_\_  
NOTARY PUBLIC

[Seal]

Carla Challenger  
Notary Public  
St. John, U.S. Virgin Islands  
NP-536-22  
Commission Expires: April 14, 2026

