

## INDEPENDENT DISCIPLINARY OFFICERS

17 Battery Place, Suite #331  
New York, NY 10004  
(202) 434-8080  
Corruption Hotline (800) CALL472

Independent Review Officer  
Hon. Barbara S. Jones

Independent Investigations Officer  
Hon. Joseph E. diGenova

### SENT VIA E-MAIL AND FIRST CLASS MAIL

December 8, 2017

Roger Greenberg, Esq.  
Lazzaro Law Firm, P.C.  
360 Court Street, Suite 3  
Brooklyn, NY 11231  
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Hon. Joseph diGenova, Esq.  
Independent Investigations Officer  
diGenova & Toensing, LLP  
1776 K Street, N.W., Suite 737  
Washington, DC 20006  
[jd@digenovatoensing.com](mailto:jd@digenovatoensing.com)

Re: In the Matter of Anthony Castelle

Dear Counsel:

Enclosed please find a signed and executed Affidavit and Agreement resolving the charges against Anthony Castelle.

Very truly yours,

/s/ Barbara S. Jones  
Hon. Barbara S. Jones (Ret.)  
Independent Review Officer

Cc: Charles Carberry, Esq. (via email)  
Bradley T. Raymond, Esq. (via email)

Pursuant to the Consent Order of the United States District Court of the S.D.N.Y.  
United States v. International Brotherhood of Teamsters, 88 CIV. 4486 (LAP)

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 In the Matter of :  
 ANTHONY CASTELLE :  
 :  
 before the :  
 INDEPENDENT REVIEW OFFICER :  
 :  
 -----x

AFFIDAVIT AND  
AGREEMENT

STATE OF NEW YORK )  
 ) ss.:  
 COUNTY OF Kings )

ANTHONY CASTELLE, being duly sworn, deposes and says,  
 and agrees as follows:

1. On or about September 8, 2017, the Independent Investigations Officer ("IIO"), appointed pursuant to the Final Order, dated February 17, 2015, in United States v. International Brotherhood of Teamsters, 88 Civ. 4486 (DNE) (SDNY) (the "Final Order"), recommended that the following charges be filed against me for having brought reproach upon the IBT (a) in violation of my membership oath while a member of Local 831, by being a member of the Luchese Organized Crime family, and associating with members of Organized Crime, and (b) by obstructing, interfering and unreasonably failing to cooperate with the Independent Investigations Officer.

2. General President Hoffa subsequently adopted these recommended charges and referred them back to the Independent Review Officer ("IRO") for adjudication.

3. I make this Affidavit and Agreement (the "Agreement") to resolve the IIO recommended charges described in paragraph 1, and to permanently resign from the International Brotherhood of Teamsters ("IBT"). This Agreement does not constitute an admission or denial of the wrongdoing alleged in these charges.

4. I represent and agree to the following:

(a) I was a member of the International Brotherhood of Teamsters and a member of IBT Local 831. Other than the foregoing, I have held no other elected or appointed positions or offices of any kind with the IBT, Local 831 or any of their affiliated entities, including any other locals, superior bodies, inferior bodies, conferences, councils, committees, division, pension, health, welfare, severance plans or other such entities ("IBT entities");

(b) I resigned from membership in the IBT and Local 831 on August 31, 2017. The effective date of this Agreement is the date it is approved by the IRO ("the effective date"). From the effective date forward, I agree never to hold membership in the IBT. From the effective date forward, I further agree never to hold any position with Local 831 or any employment, office, position or consulting or similar relationship, whether paid or unpaid, with Local 831 and any IBT Entities.

5. From the effective date of this Agreement forward, Local 831 and any other IBT Entities shall not pay to me, nor

shall I accept, any salary, allowance, fee or compensation of any kind, except that I may receive any fully vested pension benefits.

6. From the effective date of this Agreement forward, Local 831 and any other IBT Entities shall not make, nor shall I accept, any contributions on my behalf to any pension, health and welfare, severance or other benefit fund. From the effective date of this Agreement forward, I will receive no gratuities, severance payments or gifts of any kind whatsoever from Local 831 or IBT Entities.

7. From the effective date of this Agreement forward, I shall not participate in any manner in any of the activities or affairs of Local 831 or any other IBT Entities, including, but not limited to, meetings, discussions, consultations, negotiations, votes or any other business or activity of Local 831 and IBT Entities.

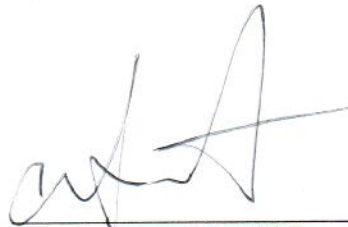
8. This Agreement is permanent.

9. I understand and agree that this Agreement will be submitted to the Independent Review Officer ("IRO") for her review. Approval by the IRO makes this agreement final and binding.

10. I make this Agreement freely, under no duress or coercion of any kind.

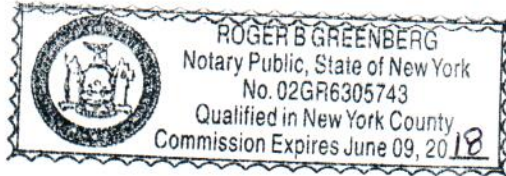
11. I will transmit this Agreement, signed by me, to the

IIO.

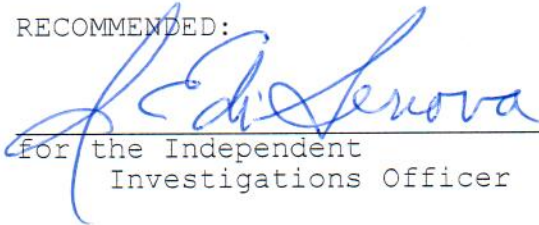


ANTHONY CASTELLE

Sworn to before me this 4  
day of ~~November~~ December 2017

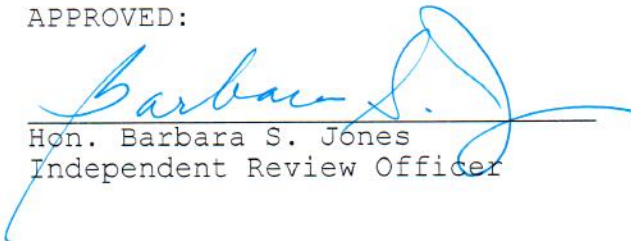
  
Notary Public

RECOMMENDED:

  
for the Independent  
Investigations Officer

Dated: 12-6-17

APPROVED:

  
Hon. Barbara S. Jones  
Independent Review Officer

Dated: 12-8-17