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INVESTIGATIONS OFFICER, :

Claimant :

- v -

: AFFIDAVIT AND AGREEMENT

CHARLES MEYER :

Respondent :

-----X

STATE OF NEW YORK )  
 ) SS.:  
COUNTY OF NEW YORK )

CHARLES MEYER, being duly sworn, deposes and says, and agrees as follows:

1. The Investigations Officer, Charles M. Carberry, appointed pursuant to the Consent Order entered March 14, 1989 in United States v. International Brotherhood of Teamsters, 88 Civ. 4486 (DNE) (SDNY) (the "Consent Order") has filed charges against me pursuant to the Consent Order (the "charges"). A copy of the charges is annexed as Exhibit A and incorporated herein by reference.

2. I make this affidavit and agreement (the "agreement") to resolve the charges. This agreement does not constitute an admission or denial of the charges.

3. I represent and agree to the following:

(a) I am a member of the International Brotherhood of Teamsters ("IBT") and a member of IBT Local Union 1111;

(b) I was a member of the Executive Board of Local 1111 and held the office of Trustee of Local 1111;

(c) I currently hold no other elected or appointed offices of any kind, paid or unpaid, in the IBT or any of its affiliated entities including Local 1111, or with any pension, health and welfare or other benefit funds or other such entities affiliated with the IBT (collectively "IBT Entities");

(d) I currently receive no salary, allowances, or remuneration of any kind from any IBT Entities.

(e) I shall resign effective immediately, as an officer of Local 1111, and from any other positions as an officer or employee of any IBT Entity.

(f) From the effective date of my resignation forward, I will not hold, seek or accept election or appointment to any office, paid or unpaid, in any IBT Entities nor will I hold, seek or accept any employment, consulting or other similar relationship of any kind with any IBT Entity.

(g) This agreement is permanent.

4. I have entered into this agreement on the understanding the Investigations Officer agrees he will not pursue the charges.

5. I understand the Investigations Officer's agreement is limited to the charges annexed as Exhibit A and he expressly reserves the right to pursue charges against any other officer or entity of the IBT or Local 1111, arising out of the allegations contained in the charges or any other investigations.

6. I agree this agreement will be submitted to the Independent Administrator for his review and approval. If approved by the Independent Administrator, I understand he will submit it to the United States District Court for the Southern District of New York for review and approval and, if approved by the court, to be entered as an order.

7. I understand the Investigations Officer makes no representation as to the determination of the Independent Administrator or the court with respect to this agreement.

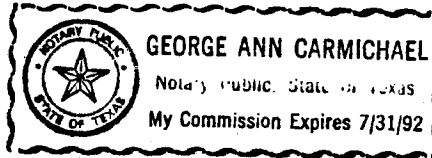
8. I make this agreement after consultation with my attorney and I fully understand its terms.

9. I have authorized my attorney to transmit this agreement, signed by me, to the Investigations Officer . When it is signed by the Investigations Officer, he will submit it to the Independent Administrator for approval.

*Charles Meyer*  
\_\_\_\_\_  
CHARLES MEYER

Sworn to before me  
this 9 day of April , 1992

*George Ann Carmichael*  
\_\_\_\_\_  
NOTARY PUBLIC



*J. B. Kuhn*  
\_\_\_\_\_  
Attorney for Charles Meyer

Agreed:

*Charles M. Carberry*  
\_\_\_\_\_  
Charles M. Carberry  
Investigations Officer

Dated: *4/17/92*

Approved:

*Frederick B. Lacey*  
\_\_\_\_\_  
Frederick B. Lacey  
Independent Administrator

Dated: *4/21/92*

SO ORDERED:

\_\_\_\_\_  
David N. Edelstein  
United States District Judge

Dated:

INVESTIGATIONS OFFICER,	X
Claimant,	:
- v -	:
	<u>CHARGE</u>
Charles Meyer	:
Trustee	:
Local 1111	:
Houston, Texas	:
	X

SIR:

You are hereby advised that the Investigations Officer has charged you with the violations listed below in accordance with the powers granted to him pursuant to Section F. (COURT APPOINTED OFFICERS), Paragraph 12(A) of the order entered in United States v. International Brotherhood of Teamsters, et al., 88 CIV. 4486 (DNE) (SDNY) on March 14, 1989 ("the Consent Order"). A copy of the consent order is enclosed.

The time and place of the hearing of this matter will be set by the Independent Administrator, Frederick B. Lacey, and he will notify you accordingly.

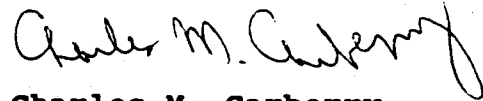
CHARGE

You are charged with acting in a manner to bring reproach upon the IBT, violating your oath and your fiduciary duties, embezzling money from Local 1111 and converting it to the use of others, in violation of Article II, Section 2(a) and Article XIX, Section 6(b)(1)(2) and (3) of the IBT Constitution

and the bylaws of Local 1111. To wit, you and your fellow Executive Board members on or about March 23, 1991 transferred property owned by Local 1111 valued in excess of \$15,000 to Lynn Wells, the then President of Local 1111. Through this mechanism you allowed Wells to embezzle the local's property. This transfer was in explicit violation of Section 14(A)(9) of Local 1111's bylaws in that it was not presented for approval at a membership meeting before the transfer. In addition, you violated Section 14(A)(8) of Local 1111's bylaws in March of 1985 when you caused the authorization of the purchase of the subject real property for which the union had no use and was solely to warehouse it for Wells whose son owned the adjacent lot without obtaining the specific authorization of the membership before the purchase.

Dated: New York, New York  
February 28, 1992

Very truly yours,



Charles M. Carberry  
Investigations Officer

cc: Frederick B. Lacey, Esq.  
Richard Gilberg, Esq.  
Steven Bennett, Esq.