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INVESTIGATIONS OFFICER,	:	
Claimant,	:	
	:	
- v. -	:	<u>Charge</u>
	:	
ROBERT SASSO,	:	
President	:	
Local 282	:	
Lake Success, New York,	:	
Respondent.	:	
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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 One

You are charged with violating Article II, section 2(a) and Article XIX, subsection 6(b) (1) and (2) of the International Brotherhood of Teamsters (IBT) constitution, by conducting yourself in a manner to bring reproach upon the IBT and by violating your oath,

TO WIT; While a member of and an officer for IBT Local 282 you knowingly associated with members of organized crime including Salvatore Gravano, Robert DiBernardo, Thomas Bilotti, Alphonse "Funzi" Mosca, Edward Garafola, Frank Fappiano and Michael DiLeonardo.

Charge Two

You are charged with bringing reproach upon the IBT, in violation of IBT constitution, Article II, section 2(a) and Article XIX, subsection 6(b)(1) and (2) and with breaching your fiduciary duties to the members.

TO WIT; on June 7, 1982, a federal grand jury indicted John Cody, then President of Local 282, for, among other things, knowingly conducting the affairs of Local 282 through a pattern of racketeering activity in violation of U.S.C. § 962(B). On December 1, 1982, Cody was convicted of seven federal felony counts including RICO and receiving illegal benefits from employees. Cody was sentenced to a term of incarceration of 17 years and fined \$80,000 on December 1, 1982. On November 28, 1983, the United States Court of Appeals for the Second Circuit upheld this decision. Cody was incarcerated on January 20, 1984.

On July 21, 1983, despite Cody's proven gross betrayal of the members and his criminal convictions, you and other members of Local 282 Executive Board voted Cody a raise of

\$1,021.78 a week in salary which you made retroactive to June 23, 1983. You and the board never took any disciplinary steps against Cody. This raise enabled Cody to take an additional \$30,660.00 out of the local's general fund until he was jailed for betraying the members.

Charge Three

While an officer of Local 282, you are charged with acting in a manner to bring reproach to IBT, violating your oath, in violation of Article II, section 2(a) and Article XIX, subsection 6(b)(1) and (2) of the IBT Constitution, and violating your fiduciary duties to the members.

TO WIT; you deliberately failed to investigate and act in face of public allegations known to you that John Cody, while the principal officer of Local 282, knowingly associated with members of organized crime including Carlo Gambino.

Dated: New York, New York  
December 18, 1991

Very truly yours,

*Charles M. Carberry*  
Charles M. Carberry  
Investigations Officer

cc.: Frederick B. Lacey, Esq.  
James Grady, Esq.  
Edward Ferguson, III, Esq.  
Gary P. Naftalis, Esq.

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