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INVESTIGATIONS OFFICER, :
 :
 Claimant :
 -v- :
 JOHN SPADA :
 Respondent. :
-----X

AFFIDAVIT AND AGREEMENT

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

JOHN SPADA, 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 was until May 31, 1990 a member of the International Brotherhood of Teamsters ("IBT") and a member of IBT Local Union 239;

(b) I was until May 31, 1990 a member of the Executive Board of Local 239, and held the office of Secretary Treasurer of Local 239;

(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 239, or with any pension, health and welfare or other benefit plans or such other entities (collectively "IBT Entities");

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

(e) I have resigned, effective May 31, 1990, as an officer and business agent of Local 239;

(f) I have withdrawn as a member of the International Brotherhood of Teamsters, and all other IBT Entities, including Local 239, effective May 31, 1990;

(g) From the date of this agreement forward, I will not hold, seek or accept election or appointment to any membership or 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 Entities;

(h) This agreement is permanent.

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

pursue the charges.

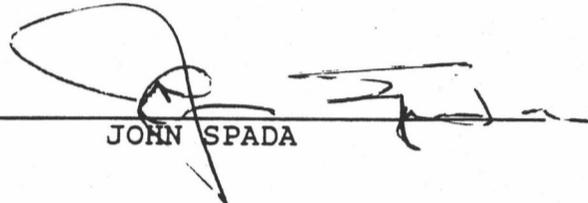
5. I understand the Investigations Officer's agreement is limited to the charges and that he expressly reserves the right to pursue charges against any other officer or entity of the IBT or Local 239 arising out of the allegations contained in the charges or any other investigations.

6. I agree that 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 that court to enter 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 freely, under no duress or coercion of any kind and after consultation with my attorney.

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.



JOHN SPADA

Sworn to before me ^{December}
this 4th day of ~~November~~ 1990



NOTARY PUBLIC

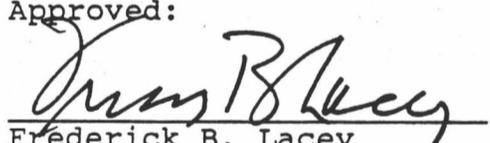
FRANCES MART
NOTARY PUBLIC, State of New York
No. 30-2552910
Qualified in Nassau County
Certified in Queens County
Expires March 30, 1992

Agreed:



Charles M. Carberry
Investigations Officer

Approved:



Frédéric B. Lacey
Independent Administrator

SO ORDERED:

David N. Edelstein
United States District Judge