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INVESTIGATIONS OFFICER, :

Claimant :

- v -

: AFFIDAVIT AND AGREEMENT

CAMILLO LOMBARDOZZI :

Local 282

Respondent :

-----X

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

CAMILLO LOMBARDOZZI, 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 282;

(b) I was an on-site steward in Local Union 282.

(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 282, 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 on the day this agreement is approved by the Independent Administrator, as a member of Local 282 and as a member of the IBT.

(f) I will receive no benefits, gratuities or gifts of any kind from the Local. No further contributions may be made on my behalf from Local 282 or any IBT Entity to any pension, health and welfare or other benefit plan. I may, however, claim pension or health and welfare benefits that are (i) prepaid and vested as of the effective date of my resignation, or (ii) that I may pay for from my own money.

(g) 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. From the effective date of my resignation forward, I will not seek or accept membership in the IBT.

(h) 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 IBF or Local 282, 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.

Camillo Lombardozzi
CAMILLO LOMBARDOZZI

Sworn to before me ^{23rd}
this day of March 23, 1992

Annunziata Voiglio
NOTARY PUBLIC

ANNUNZIATA VOIGLIO
Notary Public, State of New York
No. 2201V04750077
Qualified in Kings County
Commission Expires 8/31, 1993

Charles M. Carberry
Attorney for Camillo Lombardozzi

Agreed:

Charles M. Carberry
Charles M. Carberry
Investigations Officer

Dated: 3/23/92

Approved:

Frederick B. Lacey
Frederick B. Lacey
Independent Administrator

Dated: 3/26/92

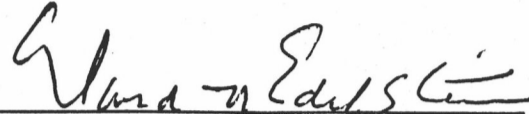
SO ORDERED:

David N. Edelstein
United States District Judge

Dated:

SO ORDERED

DATED: March 27, 1992
New York, New York


U.S.D.J.

(5)

-----X
INVESTIGATIONS OFFICER, :
 Claimant :
 - v - : AFFIDAVIT AND AGREEMENT
SALVATORE BARBATO :
Local 282 :
 Respondent :
-----X

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

SALVATORE BARBATO, 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 282;

(b) I was a shop steward in Local Union 282.

(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 282, 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 on the day this agreement is approved by the Independent Administrator, as a member of Local 282 and as a member of the IBT.

(f) I will receive no benefits, gratuities or gifts of any kind from the Local. No further contributions may be made on my behalf from Local 282 or any IBT Entity to any pension, health and welfare or other benefit plan. I may, however, claim pension or health and welfare benefits that are (i) prepaid and vested as of the effective date of my resignation, or (ii) that I may pay for from my own money.

(g) 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. From the effective date of my resignation forward, I will not seek or accept membership in the IBT.

(h) 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 282, 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.



SALVATORE BARBATO


Sworn to before me
this day of November, 1991

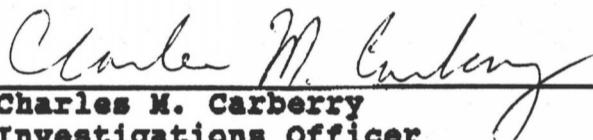
NOTARY PUBLIC, State of New York
No. 43-4689551
Qualified in Richmond County
Commission Expires March 30, 1993

NOTARY PUBLIC



Attorney for Salvatore Barbato

Agreed:



Charles M. Carberry
Investigations Officer

Dated: 3/25/92

Approved:



Frederick B. Lacey
Independent Administrator

Dated: 3/26/92

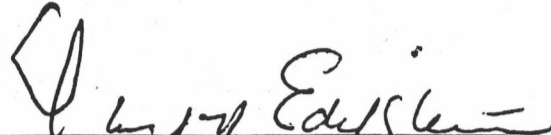
SO ORDERED:

David N. Edelstein
United States District Judge

Dated:

SO ORDERED

DATED: March 27, 1992
New York, New York



U.S.D.J.

(5)