

(b) I am a member of the Executive Board of Local 507, and hold the office of Secretary-Treasurer of Local 507 and am an elected delegate to the IBT convention..

(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 507.

(d) I agree to period of suspension as Secretary-Treasurer and as an executive board member of Local 507 for a period of one year, beginning May 1, 1991 and ending April 30, 1992. During that period I will receive no salary as an officer of Local 507 and attend no board meetings. During that period, I may work as office manager for Local 507 at the salary I received in that post before obtaining a post on the executive board.

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

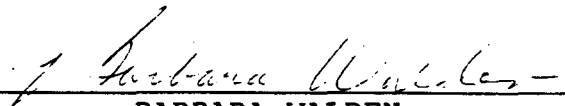
5. I understand that the Investigations Officer's agreement is limited to the charges attached and that he expressly reserves the right to pursue charges against any other officer or entity of the IBT or Local 507, arising out of the allegations contained in the charges or any other investigations.

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 district court for that court to enter as an order.

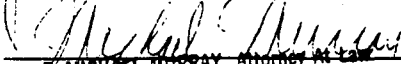
7. I understand the Investigations Officer makes no representation as to the determination of the Independent Administrator or the court with respect to this agreement. In the event that either the court or the Independent Administrator do not approve this agreement, I may elect to proceed with a hearing on the charges.

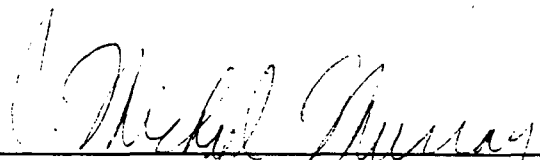
8. I make this agreement freely, under no duress or coercion of any kind, after consultation with my attorney.

9. This Agreement is not effective until it has been signed below by the Investigations Officer and the Independent Administrator.

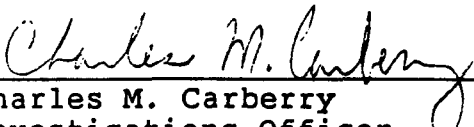

BARBARA WALDEN

Sworn to before me
this 29th day of March 1991

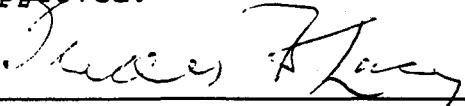

MICHAEL MURRAY, Attorney at Law
Notary Public
My commission has no expiration date
Section 1000.00


Attorney for Barbara Walden

Agreed:


Charles M. Carberry
Investigations Officer

Approved:


Frederick B. Lacey
Independent Administrator

SO ORDERED:

Hon. David N. Edelstein
United States District Judge

-----X

INVESTIGATIONS OFFICER, :

 Claimant : CHARGE

 -against- :

BARBARA WALDEN, : :

Secretary-Treasurer, : :

Local 507, : :

Cleveland, Ohio : :

 Respondent. :

-----X

MADAM:

You are hereby advised that the Investigations Officer has charged you with the violations listed below in accordance with the powers granted in 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) on March 14, 1989 (the "Consent Order") A copy of the Consent Order is enclosed.

The time and place for the hearing will be determined 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, breaching your fiduciary duties to the members of Local 507, violating its bylaws and embezzling from Local 507

while a member of its executive board in violation of Article II, section 2(a) and Article XIX, section 6(b)(1), (2) and (3), by fraudulently appropriating and converting to the use of another at least \$142,289 of Local 507 money.

TO WIT, you and other members of the Local 507 executive board embezzled and converted to the personal use of Harold Friedman, former President of Local 507 ("Friedman"), at least \$142,289 from the general fund of Local 507 to pay the attorneys representing Friedman in his defense of charges filed against him under the Consent Order by the Investigations Officer (the "charges").

On or about July 26, 1989 Friedman was charged by the Investigations Officer with violating Article II, section 2(a) of the IBT Constitution. The charges arose out of Friedman's conviction on July 13, 1989 after a jury trial in the United States District Court for the Northern District of Ohio for embezzling union funds, labor racketeering and filing a false Form LM-2 with the United States Department of Labor in United States v. Harold Friedman, 86 Cr. 114.

On January 11, 1990 the Independent Administrator issued his decision after a hearing on the charges. He found, based on the evidence adduced at the hearing, that Friedman had brought reproach on the union as charged and he suspended Friedman from all IBT-related offices for one year. The Administrator submitted his decision to the United States

District Court for the Southern District of New York (the "district court"). The district court affirmed the Independent Administrator's decision in an opinion issued March 14, 1990.


Friedman appealed the district court's decision to the United States Court of Appeals for the Second Circuit. The Court of Appeals affirmed the decision of the district court in an opinion issued on June 1, 1990. Throughout the proceedings, Friedman filed multiple motions and appeals to the Administrator, the district court and the Court of Appeals.

Beginning or or about December 28, 1989 and continuing through at least February 5, 1990 you and other members of the executive board caused to be paid to Friedman's personal attorneys at least \$142,289 from the general fund. This union money was used to pay the legal fees and costs incurred by Friedman in his personal defense of the charges and the litigation related to the charges. This was despite the fact that the core conduct of the charges was Freidman's embezzlement from the the Local for which he had already been convicted under the beyond a reasonable doubt standard.

These payments of Friedman's personal legal fees and expenses were not in the interest of the members of Local 507 and were solely for the personal benefit of Friedman. You and other officers of Local 507 caused these improper payments to be made although you conducted no inquiry into the facts upon

which the charges, and Friedman's conviction, were based and you had full knowledge of Friedman's conviction for embezzlement of union funds, racketeering and filing a false form with the United States Department of Labor.

Very truly yours,



Charles M. Carberry
Investigations Officer
30th Floor
599 Lexington Avenue
New York, New York 10022

Dated: New York, New York
February 7, 1991

Enclosure

cc: Federick B. Lacey, Esq.
James T. Grady, Esq.
Edward T. Ferguson, III, Esq.

7549S

----- x
 INVESTIGATIONS OFFICER, :
 Claimant, :
 -v- : AFFIDAVIT & AGREEMENT
 PAUL LABUDA, :
 Trustee, :
 GERALD YONTEK, :
 Trustee, :
 and :
 WILLIAM JUREVICIUS, :
 Trustee, :
 Local 507, :
 Respondents. :
 ----- x

PAUL LABUDA, GERALD YONTEK AND WILLIAM JUREVICIUS,
 depose and say, and agree as follows:

1. We make this affidavit and agreement (the "agreement") to resolve charges filed against us on February 3, 1991 (the "charges") by 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"). Copies of the charges are annexed as Exhibit A and are incorporated herein by reference.

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

3. Paul Labuda is currently Recording Secretary and a business agent of Local 507. Gerald Yontek is currently President and a business agent of Local 507. William

Jurevicius is currently a trustee and business agent of Local 507.

4. We will take steps to recover the \$142,289, paid for Harold Friedman's legal fees and have the money paid to the Local. If we are unable to have the money repaid, we agree to pay the amount ourselves by October 1, 1991. Each of us understand we are jointly and severally liable for this amount. Failure to pay any money required by the specified date shall be deemed a material breach of this agreement. Upon such material breach, we shall resign from any and all offices in Local 507 and shall thereafter neither seek nor accept any paid or unpaid office in Local 507. Upon payment date we will notify the Investigations Officer of the payment being made.

5. We also agree that each of us will be suspended without pay for a period of one month from all positions of Local 507. During that period we will have no contact with the Local. Our suspensions will be done on a rotating basis every other month beginning May 1. The periods of suspension will then begin May 1, July 1 and September 1, 1991. We will notify the Investigations Officer at the beginning and end of each period for each respondent.

6. We have entered into this agreement on the understanding that the Investigations Officer will not pursue the attached charges against us.

We understand that the Investigations Officer's agreement is limited to the charges attached and that he expressly reserves the right to pursue charges against any other officer or entity of the IBT or Local 507, arising out of the allegations contained in the charges or any other investigations.

7. We agree that this agreement will be submitted to the Independent Administrator for his review and approval. If approved by the Independent Administrator, we understand he will submit it to the district court for that court to enter it as an order.

8. The Investigations Officer makes no representation as to any action that may be taken by the Independent Administrator or the court with respect to this agreement. In the event that either the court or the Independent Administrator do not approve this agreement, we may individually elect to proceed with a hearing on the charges.

9. We make this agreement freely, under no duress or coercion of any kind, and after consultation with our attorney.

10. This Agreement is not effective until it has been signed below by the Investigations Officer and the Independent Administrator.

Paul Labuda

Paul Labuda
Trustee

Gerald Yontek

Gerald Yontek
Trustee

William Jurevicius

William Jurevicius
Trustee

Sworn to before me
this 29th day of March, 1991

Michael Murray
NOTARY PUBLIC, At Law
MICHAEL MURRAY, At Law
Notary Public State of Ohio
My commission has no expiration date.
Section 147.03 R. C.

Michael Murray
Counsel for Respondents

Agreed: Charles M. Carberry
Investigations Officer

Approved: Mary B. [Signature]
Independent Administrator

SO ORDERED: _____
Hon. David N. Edelstein
U.S. District Judge

7126S

-----X

INVESTIGATIONS OFFICER, :

Claimant :

CHARGE

-against- :

PAUL LABUDA, :

Trustee, :

Local 507, :

Cleveland, Ohio :

Respondent. :

-----X

SIR:

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while a member of its executive board in violation of Article II, section 2(a) and Article XIX, section 6(b)(1), (2) and (3), by fraudulently appropriating and converting to the use of another at least \$142,289 of Local 507 money.

TO WIT, you and other members of the Local 507 executive board embezzled and converted to the personal use of Harold Friedman, former President of Local 507 ("Friedman"), at least \$142,289 from the general fund of Local 507 to pay the attorneys representing Friedman in his defense of charges filed against him under the Consent Order by the Investigations Officer (the "charges").

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On January 11, 1990 the Independent Administrator issued his decision after a hearing on the charges. He found, based on the evidence adduced at the hearing, that Friedman had brought reproach on the union as charged and he suspended Friedman from all IBT-related offices for one year. The Administrator submitted his decision to the United States

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These payments of Friedman's personal legal fees and expenses were not in the interest of the members of Local 507 and were solely for the personal benefit of Friedman. You and other officers of Local 507 caused these improper payments to be made although you conducted no inquiry into the facts upon

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Very truly yours,

Charles M. Carberry

Charles M. Carberry
Investigations Officer
30th Floor
599 Lexington Avenue
New York, New York 10022

Dated: New York, New York
February 7, 1991

Enclosure

cc: Federick B. Lacey, Esq.
James T. Grady, Esq.
Edward T. Ferguson, III, Esq.

7622S

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Dated: New York, New York
February 7, 1991

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James T. Grady, Esq.
Edward T. Ferguson, III, Esq.

7620S

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Charles M. Carberry
Investigations Officer
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599 Lexington Avenue
New York, New York 10022

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February 7, 1991

Enclosure

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James T. Grady, Esq.
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