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INVESTIGATIONS OFFICER, :

Claimant : AFFIDAVIT AND AGREEMENT
- v - :
WILLIAM A. FEENEY, :
LOCAL 11 :
Respondent. :
_____ X

STATE OF NEW JERSEY)
) SS.:
COUNTY OF ESSEX)

WILLIAM A. FEENEY being duly sworn, depose and say,
and agree 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 herin.

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 President of Local 11, employed by Local 11 as a Business Agent, and a Trustee of the Local 11 Welfare and Pension Fund;

(b) I shall resign as President of Local 11, Trustee of the Local 11 Welfare and Pension Fund and all other elected or appointed offices, paid or unpaid, in any IBT Entities, nor will I seek or accept any other IBT offices, paid

or unpaid, provided, however, I may remain a member of the IBT and employed by Local 11 as a Business Agent. I shall not attend meetings of the Local 11 Board except as necessary to report to the board about my activities as a business agent.

4. This agreement is permanent.

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

6. I understand that the Investigations Officer's agreement is limited to the charges described above and that he expressly reserves the right to pursue charges against any other officer or entity of the IBT or Local 11, arising out of the allegations contained in the charges or any other investigations.

7. 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 apply to the district court for that court to enter this agreement as an order.

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

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

Ellen A. Lesch

ELLEN A. LESCH
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES DEC. 12, 1994

William A. Feeney

WILLIAM A. FEENEY

Sworn to before me
this *27th* day of December 1991

Agreed:

Charles M. Carberry
Charles M. Carberry
Investigations Officer

12-31-91

DATED

Approved:

Frederick B. Lacey
Frederick B. Lacey
Independent Administrator

1-8-92

DATED

SO ORDERED:

David N. Edelstein
United States District Judge

DATED

	X
INVESTIGATIONS OFFICER,	:
Claimant,	:
	:
- v -	:
WILLIAM A. FEENEY	:
President,	:
Local 11,	:
Respondent.	:
	X

CHARGE

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

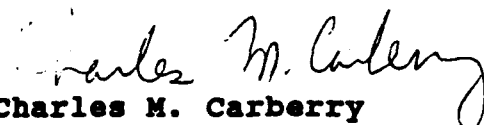
While President of Local 11, you acted in a manner to bring reproach upon the IBT, violated your fiduciary duties, violated your oath, in violation of Article II, Section 2(a) and Article XIX, Section 6(b) and (2) of the IBT Constitution.

TO WIT, while President of Local 11 you wilfully disregarded your fiduciary duty to investigate and to act with respect to allegations and evidence that Robert J. Feeney committed criminal acts by extorting money from catering truck

drivers in the state of New Jersey, used Local 11 automobiles in furtherance of his extortion scheme, wrongfully used funds of Local 11 to pay personal legal fees and expenses, and invoked the fifth amendment privilege against self-incrimination during his sworn statement before the Investigations Officer.

Dated: December 27, 1991
New York, New York

Very truly yours,


Charles M. Carberry
Investigations Officer

cc: Frederick B. Lacey, Esq.
James T. Grady, Esq.
Edward T. Ferguson, Esq.
Zachary Schneider, Esq.