

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:
	:
Plaintiff,	:
	:
-Against-	:
	:
INTERNATIONAL BROTHERHOOD	:
OF TEAMSTERS, CHAUFFERS,	:
WAREHOUSEMEN AND HELPERS	:
OF AMERICA AFL-CIO, et al.,	:
	:
Defendants.	:
	:
-----X	

88 Civ. 4486 (LAP)

**INDEPENDENT INVESTIGATIONS OFFICER’S APPLICATION FOR THE  
ISSUANCE OF SUBPOENAS DIRECTING THE GRANDFUND, LLC, GRAND  
FUND INVESTMENT GROUP, LLC, GRAND INSURANCE SERVICES, INC.,  
MENTAL HEALTH ADVISORY GROUP, LLC, TEAMSTERS BENEFIT  
TRUST, OPTUMRX, INC., MANAGED HEALTH NETWORK, INC., HEALTH  
MANAGEMENT CONCEPTS, INC. d.b.a. HMC HEALTHWORKS, CHASE  
BANK USA, N.A., AND FREMONT BANK TO PRODUCE SPECIFIED  
RECORDS**

PLEASE TAKE NOTICE, that pursuant to the Final Agreement and Order in United States v. International Brotherhood of Teamsters, 88 Civ. 4486 (S.D.N.Y.) (“Final Order”), the court-approved Rules Governing the Authorities of Independent Disciplinary Officers and the Conduct of Hearings (“Rules”), 18 U.S.C. § 1965(c), the All Writs Act, 29 U.S.C. §1651, and the annexed declaration of Celia A. Zahner, the Independent Investigations Officer requests that this Court issue subpoenas directing The GrandFund, LLC (“GrandFund”), Grand Fund Investment Group, LLC (“GFIG”), Grand Insurance Services, Inc. (“Grand Insurance”), Mental Health Advisory Group, LLC (“Mental

Health Advisory Group”), Teamsters Benefit Trust (“TBT”), OptumRX, Inc. (“OptumRX”), Managed Health Network, Inc. (“Managed Health Network”), Health Management Concepts, Inc. d.b.a. HMC Healthworks (“HMC”), Chase Bank USA, N.A. (“Chase”), and Fremont Bank to produce to the Independent Investigations Officer no later than May 18, 2018, or within ten days after service of the subpoena whichever comes later, the records specified below.

It is requested that **GrandFund** be directed to produce copies of the following records:

1. All contracts and other agreements with or relating to OptumRX in effect during any part of the period from January 1, 2012 to the present relating in any way to any and all labor organizations and all Taft-Hartley benefit funds.
2. For the period from January 1, 2012 to the present, all documents, including emails, regarding all payments, including, but not limited to, any and all fees, commissions and bonus payments, which related in any way to OptumRX and to any and all IBT affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and all benefit funds affiliated with the International, all Locals and all Joint Councils. Include all invoices, billings, and other documents submitted to and received from OptumRX and any entity acting on behalf of OptumRX, in connection with all such payments including, but not limited to, all documents reflecting the calculation of all payments including fees, commissions and bonuses.
3. For the period from January 1, 2012 to the present, all documents, including emails, regarding reimbursed expenses which relate in any way to OptumRX and to any and all Teamster officers and employees and any and all representatives of all Teamster affiliated benefit funds, including all Trustees, administrators, managers and other employees of such funds. Include all expense reports or other documents submitted to OptumRX and any entity acting on behalf of OptumRX, all receipts, other back up documentation and all documents reflecting payments in connection with all such reimbursed expenses and expense reports. Include any and all documents regarding the Alaska train ride for Teamster officials in 2015.
4. For the period from January 1, 2012 to the present, payroll records, including payroll service records, showing all employees and each individual’s salary, fees, commissions, bonuses and all other payments as well as all documents reflecting the calculation of such fees, commissions and bonuses.

5. For the period from January 1, 2012 to the present, all Forms W-2 and Forms 1099 issued and all documents explaining all services provided by each recipient.
6. For the period from January 1, 2012 to the present, all documents, including emails, regarding any thing of value given by The GrandFund or any entity or person acting on GrandFund's behalf to any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds, including, but not limited to, all gifts, meals, drinks, tickets to sports events, tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and all expense reports or other documents reflecting such things of value, any and all documents reflecting the cost of such things of value and the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This includes any expenses that GrandFund paid and any official or employee of any IBT affiliated entity reimbursed.
7. For the period from January 1, 2012 to the present, to the extent not provided in response to item 6 above, all documents, including emails, regarding all expenses incurred, including expenses subsequently reimbursed, for any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of any Teamster affiliated benefit fund including, but not limited to, all receipts, credit card bills, expense reports and checks.
8. For the period from January 1, 2012 to the present, all documents, including emails, regarding all golf trips, golf outings, golf games and all planned golf trips, golf outings and golf games which any and all Teamster officers and employees and any and all Trustees, administrators, managers and employees of any Teamster affiliated benefit fund attended or planned to attend, including, but not limited to, all expenses and payments in connection with such events, all invoices, all receipts, all reimbursements, all expense reports regarding all such events and all documents reflecting the cost for each individual.
9. All documents regarding the provision of any services, including employment, by any and all Teamster officers' and employees' relatives. Include any and all contracts, agreements, emails, expense reports, credit card expenses, Forms W-2 and Forms 1099, correspondence and any and all payments including, but not limited to, checks and wire transfers and documents reflecting how all such payments were calculated.
10. For the period from January 1, 2012 to the present, all documents, including emails, relating to transactions, presentations or solicitations of business with all IBT affiliated benefits funds including, but not limited to, the IBT's Voluntary Employee Benefits Trust, the Teamsters Benefit Trust, the North Coast Trust

Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund.

11. For the period from January 1, 2012 to the present, all documents, including emails, regarding Pharmacy Benefits Manager services provided to or proposed to the IBT's Voluntary Employee Benefits Trust including, but not limited to, all documents and emails reflecting and regarding contact with all IBT officials and employees, with all representatives of OptumRX and with all representatives of Cheiron, Inc. and all documents and emails regarding any and all bids for Pharmacy Benefits Manager services.
12. For the period from January 1, 2012 to the present, all documents, including, but not limited to, all emails, contracts, invoices, billings, and checks, regarding all payments, fees, commissions and bonuses received from insurance companies or other third parties for business placed and transactions with all IBT affiliated benefit funds including, but not limited to, the IBT's Voluntary Employee Benefits Trust, the Teamsters Benefit Trust, the North Coast Trust Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund. Include all documents reflecting the calculation of any such payments, fees, commissions and bonuses.
13. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all checks and wire transfers, involving all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including, but not limited to, the following individuals, any of their relatives and any non-union entity associated with the following individuals:
  - a. James Hoffa
  - b. Ken Hall
  - c. William C. Smith, III
  - d. Rome Aloise
  - e. David Laughton
  - f. Kevin Moore
  - g. Stephen Mack
  - h. John Slatery
  - i. John Murphy
  - j. Carl Pecoraro
  - k. William Hamilton
  - l. Nora Johnson
  - m. John T. Coli, Sr.

Include documents reflecting the calculation of all such payments and financial transactions.



14. For the period from January 1, 2012 to the present, all records of all communications, including, but not limited to, emails, to or from all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including, but not limited to, the following:
  - a. James Hoffa
  - b. Ken Hall
  - c. William C. Smith, III
  - d. Rome Aloise
  - e. David Laughton
  - f. Kevin Moore
  - g. Stephen Mack
  - h. John Slatery
  - i. John Murphy
  - j. Carl Pecoraro
  - k. William Hamilton
  - l. Nora Johnson
  - m. John T. Coli, Sr.
  
15. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all checks and wire transfers, involving the following:
  - a. Richard Leebove
  - b. Edward Sullivan
  - c. Greg Tarpinian
  - d. Giacomo "Jack" Cipriani
  - e. RL Communications
  - f. Labor Benefits, LLC
  - g. Entrust Capital
  - h. Cipriani Solutions
  - i. Geoffrey Hoffa
  - j. Geoffrey W. Hoffa, PLLC

Include documents reflecting the calculation of all such payments and financial transactions.

16. For the period from July 1, 2008 to the present, all contracts and other agreements with or relating to Mental Health Advisory Group, LLC.
  
17. For the period from January 1, 2012 to the present, all documents, including emails, regarding any and all payments to and received from Mental Health Advisory Group, LLC including, but not limited to, all checks, wire transfer records, invoices, billings, expense reports and documents reflecting the calculation of each such payment. Include any and all documents regarding any and all payments, including, but not limited to, all fees, commissions, bonus

payments and expenses, including reimbursements made and received and the calculation of all such payments.

18. For the period from July 1, 2008 to the present, all contracts and other agreements with or relating to Managed Health Network relating in any way to any and all IBT affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and all benefit funds affiliated with the International, all Locals and all Joint Councils.
19. For the period from January 1, 2012 to the present, all documents, including emails, regarding any and all payments, including, but not limited to, any and all fees, commissions and bonus payments, which relate in any way to Managed Health Network and any and all IBT affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and all benefit funds affiliated with the International, all Locals and all Joint Councils. Include all invoices, billings, expense reports, checks, wire transfers and other documents submitted to and received from Managed Health Network in connection with all such payments including, but not limited to, all documents reflecting the calculation of all payments including fees, commissions and bonuses.
20. For the period from January 1, 2013 to the present, all contracts and other agreements with or relating to Cipriani Solutions, Giacomo "Jack" Cipriani and any other entity associated with Giacomo "Jack" Cipriani.

It is requested that **Grand Fund Investment Group** be directed to produce

copies of the following records:

1. For the period from January 1, 2012 to the present, payroll records, including payroll service records, showing all employees and each individual's salary, fees, commissions, bonuses and all other payments as well as all documents reflecting the calculation of such fees, commissions and bonuses.
2. For the period from January 1, 2012 to the present, all Forms W-2 and Forms 1099 issued and all documents explaining all services provided by each recipient.
3. For the period from January 1, 2012 to the present, all documents, including emails, regarding any thing of value given by Grand Fund Investment Group or any entity or person acting on Grand Fund Investment Group's behalf to any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds, including, but not limited to, all gifts, meals, drinks, tickets to sports events, tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and

all expense reports or other documents reflecting such things of value, any and all documents reflecting the cost of such things of value and the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This includes any expenses that Grand Fund Investment Group paid and any official or employee of any IBT affiliated entity reimbursed.

4. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all checks and wire transfers, involving all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including but not limited to, the following individuals, any of their relatives and any non-union entity associated with the following individuals:

- a. James Hoffa
- b. Ken Hall
- c. William C. Smith, III
- d. Rome Aloise
- e. David Laughton
- f. Kevin Moore
- g. Stephen Mack
- h. John Slatery
- i. John Murphy
- j. Carl Pecoraro
- k. William Hamilton
- l. Nora Johnson
- m. John T. Coli, Sr.

Include documents reflecting the calculation of all such payments and financial transactions.

It is requested that **Grand Insurance Services** be directed to produce copies of the following records:

1. All contracts and other agreements with or relating to OptumRX and Vision Service Plan in effect during any part of the period from January 1, 2012 to the present relating in any way to any and all IBT affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, Teamster Locals, Teamster Joint Councils and all benefit funds affiliated with the International, all Locals and all Joint Councils.
2. For the period from January 1, 2012 to the present, payroll records, including payroll service records, showing all employees and each individual's salary, fees, commissions, bonuses and all other payments as well as all documents reflecting the calculation of such fees, commissions and bonuses.

3. For the period from January 1, 2012 to the present, all Forms W-2 and Forms 1099 issued and all documents explaining all services provided by each recipient.
4. For the period from January 1, 2012 to the present, all documents, including emails, relating to all transactions, presentations or solicitations of business with all IBT affiliated benefit funds, including, but not limited to, the IBT's Voluntary Employee Benefits Trust, the Teamsters Benefit Trust, the North Coast Trust Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund.
5. For the period from January 1, 2012 to the present, all documents, including, but not limited to, all emails, contracts, invoices and checks, regarding all payments including fees, commissions and bonuses received from insurance companies and other third parties for business placed and transactions with IBT affiliated benefit funds including, but not limited to, the IBT's Voluntary Employee Benefits Trust, Teamsters Benefit Trust, the North Coast Trust Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund.
6. For the period from January 1, 2012 to the present, all documents, including emails, regarding any thing of value given by Grand Insurance Services or any entity or person acting on Grand Insurance Services' behalf to any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds, including, but not limited to, all gifts, meals, drinks, tickets to sports events, tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and all expense reports or other documents reflecting such things of value, any and all documents reflecting the cost of such things of value and the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This includes any expenses that Grand Insurance Services paid and any official or employee of any IBT affiliated entity reimbursed.
7. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all checks and wire transfers, involving all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including but not limited to, the following individuals, any of their relatives and any non-union entity associated with the following individuals:
  - a. James Hoffa
  - b. Ken Hall
  - c. William C. Smith, III
  - d. Rome Aloise



- e. David Laughton
- f. Kevin Moore
- g. Stephen Mack
- h. John Slatery
- i. John Murphy
- j. Carl Pecoraro
- k. William Hamilton
- l. Nora Johnson
- m. John T. Coli, Sr.

Include documents reflecting the calculation of all such payments and financial transactions.

It is requested that **Mental Health Advisory Group** be directed to produce copies of the following records:

1. Documents reflecting the ownership, partners and officers of Mental Health Advisory Group from its formation to the present including, but not limited to, all documents reflecting any change in ownership, partners and officers.
2. For the period from January 1, 2012 to the present, all contracts and other agreements with or relating to the following entities:
  - a. The GrandFund, LLC
  - b. Grand Fund Investment Group, LLC
  - c. Grand Insurance Services, Inc.
  - d. Managed Health Network, Inc.
  - e. UnitedHealth Group, Inc.
  - f. OptumRX, Inc.
  - g. United Healthcare, Inc.
  - h. Cipriani Solutions
  - i. Vision Service Plan
3. For the period from January 1, 2012 to the present, all contracts and other agreements with any IBT affiliated entities, including, but not limited to, all IBT affiliated benefit funds including, but not limited to, the IBT's Voluntary Employee Benefits Trust, the Teamsters Benefit Trust, the North Coast Trust Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund.
4. For the period from January 1, 2012 to the present, all documents, including emails, relating to all transactions, presentations or solicitations of business with all IBT affiliated benefit funds, including, but not limited to, the IBT's Voluntary Employee Benefits Trust, the Teamsters Benefit Trust, the North Coast Trust

Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund.

5. For the period from January 1, 2012 to the present, all documents, including, but not limited to, all emails, contracts, invoices, billings, checks and wire transfers, regarding all payments, fees, commissions and bonuses received from insurance companies or other third parties for business placed and transactions with all IBT affiliated benefit funds including, but not limited to, the IBT's Voluntary Employee Benefits Trust, the Teamsters Benefit Trust, the North Coast Trust Fund, the Teamsters' Miscellaneous Security Fund, the Local 727 Health and Welfare Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund. Include all documents reflecting the calculation of any such payments, fees, commissions and bonuses.
6. For the period from January 1, 2012 to the present, payroll records, including payroll service records, showing all employees and each individual's salary, fees, commissions, bonuses and all other payments and all documents reflecting the calculation of such fees, commissions and bonuses.
7. For the period from January 1, 2012 to the present, all Forms W-2 and Forms 1099 issued and all documents explaining all services provided by each recipient.
8. For the period from January 1, 2012 to the present, all check registers.
9. For the period from January 1, 2012 to the present, all bank statements, including check images.
10. For the period from January 1, 2009 to the present, all documents, including, but not limited to, all emails, contracts, invoices, billings, checks and wire transfers, regarding all payments, including fees, commissions and bonuses, Managed Health Network paid to Mental Health Advisory Group which related in any way to any and all Teamster affiliated benefit funds, including, but not limited to, the Teamsters Benefit Trust and the North Coast Trust Fund.
11. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all emails, checks and wire transfers, involving all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including but not limited to, the following individuals, any of their relatives and any non-union entity associated with the following individuals:
  - a. James Hoffa
  - b. Ken Hall
  - c. William C. Smith, III
  - d. Rome Aloise
  - e. David Laughton

- f. Kevin Moore
- g. Stephen Mack
- h. John Slatery
- i. John Murphy
- j. Carl Pecoraro
- k. William Hamilton
- l. Nora Johnson
- m. John T. Coli, Sr.

Include documents reflecting the calculation of all such payments and financial transactions.

12. For the period from January 1, 2012 to the present, all payments and other financial transactions, including, but not limited to, all checks and wire transfers, involving the following:

- a. Vickie Lanini
- b. Charles Bertucio
- c. Richard Leebove
- d. Edward Sullivan
- e. Greg Tarpinian
- f. Giacomo "Jack" Cipriani
- g. RL Communications
- h. Labor Benefits, LLC
- i. Entrust Capital
- j. Cipriani Solutions
- k. Geoffrey Hoffa
- l. Geoffrey W. Hoffa, PLLC

Include documents reflecting the calculation of all such payments and financial transactions.

13. For the period from January 1, 2012 to the present, all documents, including emails, regarding any thing of value given by Mental Health Advisory Group or any entity or person acting on Mental Health Advisory Group's behalf to any and all Teamster officers and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds including, but not limited to, all gifts, meals, drinks, tickets to sports events, tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and all expense reports or other documents reflecting such things of value and any and all documents reflecting the cost of such things of value and the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This

includes any expenses that Mental Health Advisory Group paid and any official or employee of any IBT affiliated entity reimbursed.

14. For the period from January 1, 2012 to the present, to the extent not provided in response to item 13 above, all documents, including emails, regarding all expenses, including expenses subsequently reimbursed, incurred for any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of any Teamster affiliated benefit fund including, but not limited to, all receipts, credit card bills, expense reports and checks.
15. For the period from January 1, 2012 to the present, all documents, including emails, regarding all golf trips, golf outings, golf games and all planned golf trips, golf outings and golf games which any and all Teamster officers and employees and any and all Trustees, administrators, managers and employees of any Teamster affiliated benefit fund attended or planned to attend, including, but not limited to, all expenses and payments in connection with such events, all invoices, all receipts, all reimbursements, all expense reports regarding all such events and all documents reflecting the cost for each individual.

It is requested that the **Teamsters Benefit Trust** be directed to produce copies of the following records:

1. All Trustee meeting minutes for the period from January 1, 2012 to the present, including all attachments (with the exception of any attachments relating to an individual's medical claim).
2. For the period from January 1, 2009 to the present, all documents regarding fees, commissions and other payments to Mental Health Advisory Group, LLC, including, but not limited to, all documents received from Managed Health Network regarding such fees, commissions and other payments. Include all documents regarding the calculation of all such fees, commissions and other payments.
3. For the period from January 1, 2009 to the present, all documents supporting the Schedules A for Managed Health Network submitted with the TBT's Forms 5500, including, but not limited to, all accountant's work papers.
4. All audits TBT performed at The GrandFund, LLC including the results of all such audits and all documents relating to such audits, including, but not limited to, emails and follow-up correspondence.
5. For the period from January 1, 2013 through December 31, 2014, all plan documents, trust agreements and any other documents governing eligibility for participation in any and all TBT plans and programs available to employees of



The GrandFund, LLC. Please provide all such documents in effect during any part of the period.

6. All contracts and other agreements with or relating to Mental Health Advisory Group, LLC and Vickie Lanini in effect during any part of the period from January 1, 2012 to the present.
7. For the period from January 1, 2012 to the present, all emails between the TBT Fund administrator and manager and the following:
  - a. Charles Bertucio
  - b. Vickie Lanini
  - c. Lisa Ramsey
  - d. The GrandFund
  - e. Mental Health Advisory Group
  - f. Grand Fund Insurance Services
8. For the period from January 1, 2014 through December 31, 2015, all emails between the TBT fund administrator and Rome Aloise and between the fund manager and Rome Aloise (with the exception of any emails relating to an individual's medical claim).

It is requested that **OptumRX** be directed to produce copies of the following records:

1. For the period from January 1, 2012 to the present, all contracts and other agreements with the below entities and individuals related in any way to any and all Teamster affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and any and all benefit funds affiliated with the International, all Locals and all Joint Councils:
  - a. The GrandFund, LLC
  - b. Grand Fund Investment Group, LLC
  - c. Grand Insurance Services, Inc.
  - d. Mental Health Advisory Group, LLC
  - e. Charles Bertucio
  - f. Vickie Lanini
  - g. Giacomo "Jack" Cipriani
  - h. Cipriani Solutions
  - i. Edward Sullivan
  - j. Labor Benefits, LLC
  - k. Geoffrey Hoffa
  - l. Geoffrey W. Hoffa, PLLC

2. For the period from January 1, 2012 to the present, all documents, including emails, regarding payments to The GrandFund, LLC and any of its employees and representatives, including, but not limited to, all fees, commissions and bonuses, related in any way to any and all Teamster affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and any and all benefit funds affiliated with the International, all Local and all Joint Councils. Include all invoices, billings or other documents The GrandFund, LLC and any of its employees or representatives submitted in connection with all such payments and documents reflecting the calculation of all payments, fees, commissions and bonuses.
3. For the period from January 1, 2012 to the present, all documents, including emails, The GrandFund and any of its employees and representatives, including, but not limited to, Charles Bertucio and Vickie Lanini, submitted which involved any and all expenses and reimbursed expenses related to any and all Teamster officers and employees and any and all representatives of Teamster affiliated benefit funds, including all Trustees, administrators, managers and other employees of such funds. Include all expense reports, receipts, other back up documentation and all documents reflecting payments in connection with all such expenses and reimbursed expenses.
4. For the period from January 1, 2012 to the present, all documents, including emails, reflecting payments to Mental Health Advisory Group, LLC and any of its employees and representatives, including, but not limited to, all fees, commissions and bonuses, related in any way to any and all Teamster affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and any and all benefit funds affiliated with the International, all Locals and all Joint Councils. Include all invoices, billings and other documents Mental Health Advisory Group, LLC and any of its employees or representatives submitted in connection with all such payments and documents reflecting the calculation of all payments, fees, commissions and bonuses.
5. For the period from January 1, 2012 to the present, all documents, including emails, Mental Health Advisory Group, LLC and any of its employees and representatives, including, but not limited to, Charles Bertucio and Vickie Lanini, submitted which involved any and all expenses and reimbursed expenses related to any and all Teamster officers and employees and any and all representatives of Teamster affiliated benefit funds, including all Trustees, administrators, managers and other employees of such funds. Include all expense reports, receipts, other back up documentation and all documents reflecting payments in connection with all such expenses and reimbursed expenses.
6. For the period from January 1, 2012 to the present, all documents, including emails, regarding payments to Grand Insurance Services, LLC and any of its employees and representatives, including, but not limited to, all fees, commissions

and bonuses, related in any way to any and all Teamster affiliated entities, including, but not limited to, the International Brotherhood of Teamsters, all Teamster Locals, Teamster Joint Councils and any and all benefit funds affiliated with the International, all Locals and all Joint Councils. Include all invoices, billings and other documents Grand Insurance Services, LLC and any of its employees or representatives submitted in connection with all such payments and documents reflecting the calculation of all payments, fees, commissions and bonuses.

7. For the period from January 1, 2012 to the present, all documents, including emails, Grand Insurance Services, LLC and any of its employees and representatives submitted which involved any and all expenses and reimbursed expenses related to any and all Teamster officers, representatives and employees and any and all representatives of Teamster affiliated benefit funds, including all Trustees, administrators, managers and other employees of such funds. Include all expense reports, receipts, other back up documentation and all documents reflecting payments in connection with all such expenses and reimbursed expenses.
8. For the period from January 1, 2012 to the present, all records regarding any and all credit cards issued to Charles Bertucio or Vickie Lanini which were used to pay for any expenses related to any and all Teamster officers and employees and any and all representatives of Teamster affiliated benefit funds, including all Trustees, administrators, managers and other employees of such funds. Include all billing records, receipts and documents reflecting payments in connection with such credit cards.
9. For the period from January 1, 2012 to the present, all records regarding any thing of value given by OptumRX or any entity or person acting on OptumRX's behalf to any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds including, but not limited to, all gifts, meals, drinks, tickets to sports events, tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and all expense reports or other documents reflecting such things of value, any and all documents reflecting the cost of such things of value and the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This includes, but is not limited to, the following individuals:
  - a. James Hoffa
  - b. Ken Hall
  - c. William C. Smith, III
  - d. Rome Aloise
  - e. David Laughton

- f. Kevin Moore
- g. Stephen Mack
- h. John Slatery
- i. John Murphy
- j. Carl Pecoraro
- k. William Hamilton
- l. Nora Johnson
- m. John T. Coli, Sr.

This includes any expenses that OptumRX paid and any official or employee of any IBT affiliated entity reimbursed.

- 10. For the period from January 1, 2012 to the present, to the extent not provided in response to item 9 above, all documents, including emails, regarding all expenses incurred, including expenses subsequently reimbursed, for any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of any Teamster affiliated benefit fund including, but not limited to, all receipts, credit card bills, expense reports, checks and wire transfers. Include any and all documents regarding the Alaska train ride for Teamster officials in 2015 and all expense reports for Vincent Condino and Peter Beerman relating to any IBT affiliated individual or entity.
- 11. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all emails, checks and wire transfers, involving all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including, but not limited to, the following individuals, any of their relatives and any non-union entity associated with the following individuals:

- a. James Hoffa
- b. Ken Hall
- c. William C. Smith, III
- d. Rome Aloise
- e. David Laughton
- f. Kevin Moore
- g. Stephen Mack
- h. John Slatery
- i. John Murphy
- j. Carl Pecoraro
- k. William Hamilton
- l. Nora Johnson
- m. John T. Coli, Sr.

Include documents reflecting the calculation of all such payments and financial transactions.



12. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, checks and wire transfers, involving the following:

- a. Vickie Lanini
- b. Charles Bertucio
- c. Lisa Ramsey
- d. Giacomo "Jack" Cipriani
- e. Cipriani Solutions

Include documents reflecting the calculation of all such payments and financial transactions.

13. For the period from January 1, 2012 to the present, all emails to or from the following individuals regarding any and all IBT affiliated entities, including benefit funds:

- a. Vickie Lanini
- b. Charles Bertucio
- c. Lisa Ramsey
- d. Giacomo "Jack" Cipriani
- e. Cipriani Solutions

It is requested that **Managed Health Network** be directed to produce copies of the following records:

1. For the period from January 1, 2009 to the present, all documents, including emails, invoices, billings, checks and wire transfers, regarding all payments including, but not limited to, any and all fees, commissions and bonus payments, Managed Health Network paid to Mental Health Advisory Group related to any IBT affiliated entity, including all IBT affiliated benefit funds. Include all documents Managed Health Network provided to each IBT affiliated entity regarding such payments.
2. For the period from January 1, 2009 to the present, all documents, including emails, invoices, billings, checks and wire transfers, regarding all payments Managed Health Network made to Vickie Lanini, Charles Bertucio and any other representative of The GrandFund related to any Teamster affiliated benefit fund.
3. For the period from January 1, 2012 to the present, all documents, including emails, regarding any thing of value given by Managed Health Network or any entity or person acting on Managed Health Network's behalf to any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds including, but not limited to, all gifts, meals, drinks, tickets to sports events,

tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and all expense reports or other documents reflecting such things of value, any and all documents reflecting the cost of such things of value, the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This includes any expenses that Managed Health Network paid and any officer or employee of any IBT affiliated entity reimbursed.

It is requested that **Health Management Concepts, Inc. d.b.a HMC**

**Healthworks (“HMC”)** be directed to produce copies of the following records:

1. For the period from January 1, 2012 to the present, all documents, including emails, regarding any thing of value given by HMC or any entity or person acting on HMC’s behalf to any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of all Teamster affiliated benefit funds including, but not limited to, all gifts, meals, drinks, tickets to sports events, tickets to other events, passes to events, golf, golf equipment and accessories, golf equipment rental fees, golf cart fees, greens fees, caddy fees, entertainment, clothes, shoes, hotel stays, gambling chips and transportation. Include any and all expense reports or other documents reflecting such things of value, any and all documents reflecting the cost of such things of value and the individuals involved and all documents tracking the cumulative annual value of things of value given to IBT officers and employees and IBT affiliated benefit fund employees. This includes, but is not limited to, the following individuals:

- a. James Hoffa
- b. Ken Hall
- c. William C. Smith, III
- d. Rome Aloise
- e. David Laughton
- f. Kevin Moore
- g. Stephen Mack
- h. John Slatery
- i. John Murphy
- j. Carl Pecoraro
- k. William Hamilton
- l. John T. Coli, Sr.
- m. Terrence Hancock

This includes any expenses that HMC paid and any official or employee of any IBT affiliated entity reimbursed.

2. For the period from January 1, 2012 to the present, to the extent not provided in response to item 1 above, all documents, including emails, regarding all expenses incurred, including expenses subsequently reimbursed, for any and all Teamster officers, representatives and employees and any and all Trustees, administrators, managers and employees of any Teamster affiliated benefit fund including, but not limited to, all receipts, credit card bills, expense reports, checks and wire transfers. Include any and all expense reports for Janis DiMonaco, Mark Mauro and Joshua Jaklevick relating to any IBT affiliated individual or entity.
3. For the period from January 1, 2012 to the present, all records of payments and other financial transactions, including, but not limited to, all emails, checks and wire transfers, involving all IBT officers and employees and all Trustees, administrators, managers and employees of all IBT affiliated benefit funds, including but not limited to, the following individuals, any of their relatives and any non-union entity associated with the following individuals:
  - a. James Hoffa
  - b. Ken Hall
  - c. William C. Smith, III
  - d. Rome Aloise
  - e. David Laughton
  - f. Kevin Moore
  - g. Stephen Mack
  - h. John Slatery
  - i. John Murphy
  - j. Carl Pecoraro
  - k. William Hamilton
  - l. Nora Johnson
  - m. John T. Coli, Sr.
  - n. Terrence Hancock

Include documents reflecting the calculation of all such payments and financial transactions.

4. For the period from January 1, 2012 to the present, all documents, including, but not limited to, all emails and other correspondence, regarding any IBT affiliated entity naming HMC or any HMC related entity as a preferred provider.

It is requested that **Chase Bank USA, N.A.** be directed to produce copies of the following records:

1. For the statement closing dates in November and December 2013 and in January 2015, February 2015 and March 2015 and the period from February 2016 to the present, all account statements for accounts ending in 0161 and 8598 in the name of Charles Bertucio including, but not limited to, copies of all receipts from

vendors, all payments identifying the sources of payments, and records of all interest charges, foreign transaction fees and late payment fees.<sup>1</sup>

It is requested that **Fremont Bank** be directed to produce copies of the following records:

1. For the account ending in 3380 in the name of Mental Health Advisory Group, LLC, all account opening documents including, but not limited to, all documents regarding all authorized signatories on the account, including all changes in authorized signatories.<sup>2</sup>
2. For the period from January 1, 2012 to the present, for the account ending in 3380 in the name of Mental Health Advisory Group, LLC, any and all documents including, but not limited to, the following:
  - a. Monthly account statements;
  - b. Copies of the front and back of all checks drawn on the account;
  - c. Deposit tickets;
  - d. Copies of front and back of deposited items;
  - e. Incoming and outgoing wire transfers, electronic fund transfers and electronic payments and deposits including the identity of all persons or entities sending or receiving funds;
  - f. Credit and debit memoranda;
  - g. Records of all debit card transactions, including, but not limited to, the identities of all vendors and any cash withdrawals;

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<sup>1</sup> The full credit card account numbers are in the attachment to the relevant subpoena.

<sup>2</sup> The full bank account number is in the attachment to the relevant subpoena.

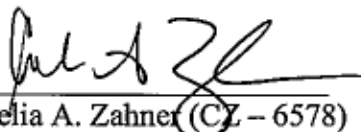


- h. Records of any purchase of cashier's checks, money orders and teller's checks.

Dated: New York, New York  
April 30, 2018

Respectfully submitted,

Joseph E. diGenova  
Independent Investigations  
Officer

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TO: AUSA Rebecca Tinio  
Bradley T. Raymond, Esq.  
The GrandFund, LLC  
Grand Insurance Services, Inc.  
Grand Fund Investment Group, LLC  
Mental Health Advisory Group, LLC  
Teamsters Benefit Trust  
OptumRX, Inc.  
Managed Health Network, Inc.  
Health Management Concepts, Inc. d.b.a HMC Healthworks  
Chase Bank USA, N.A.  
Fremont Bank