

## INDEPENDENT DISCIPLINARY OFFICERS

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Independent Review Officer  
Hon. Barbara S. Jones

Independent Investigations Officer  
Hon. Joseph E. diGenova  
Administrator  
John J. Cronin, Jr., CPA

February 17, 2017

**VIA First Class Mail and  
Email (BRaymond@teamster.org)**

Bradley T. Raymond, Esq.  
General Counsel  
International Brotherhood of Teamsters  
25 Louisiana Ave., NW  
Washington, DC 20001

### **RE: Ken Hall Recommended Charges**

Dear Mr. Raymond:

I am in receipt of your February 7, 2017 letter and accompanying sworn declarations concerning the charges I recommended against General Secretary-Treasurer Ken Hall on October 31, 2016.

Based on the representations in your letter, and the affidavits of counsel executed under penalty of perjury, I am persuaded that Mr. Hall did not play a personal role in the International Brotherhood of Teamsters' ("IBT") noncompliance with my March 4 and 11, 2016 document requests. In particular, I accept your representation that Mr. Hall "did not participate in the IBT's legal strategy, did not review any documents, and did not decide whether to withhold any documents or categories of documents." Ltr. at 2. Accordingly, I am withdrawing my October 31, 2016 recommendation of charges against Mr. Hall.

In addition, as a condition of my withdrawal of the charges against Mr. Hall, the Union agrees to designate an individual officer at the IBT personally responsible for ensuring document requests of the Independent Disciplinary Officers ("IDOs") for International Union records under the Final Agreement and Order are fully complied with. As you know, the General President and General Secretary-Treasurer are responsible under federal law for maintaining and ensuring there are records to support the IBT's Forms LM-2 filed with the Department of Labor, 29 U.S.C. §§ 431(b), 436, 439. Therefore, it is consistent with their existing legal obligations that one of them (*i.e.*, the General President or the General Secretary-Treasurer) should be responsible for

Pursuant to the Consent Order of the United States District Court of the S.D.N.Y.  
United States-v-International Brotherhood of Teamsters 88 CIV.4486 (LAP)

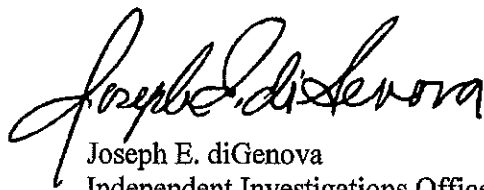


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fulfilling the IDOs' requests. The Union must identify to the IDOs which one of the two aforementioned officers will be responsible on an ongoing basis. If the Union fails to do so promptly, whomever of the two officers the IDOs designate on a document request will be held responsible for complying with the Union's and his obligations under the Final Agreement to make the required records available.

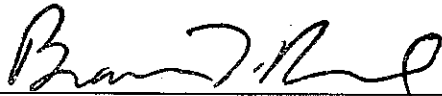
I share your aspiration of advancing the goals of the Final Order in a cooperative manner, and I trust this arrangement will further that aim.

Sincerely,



Joseph E. diGenova  
Independent Investigations Officer

AGREED:



International Brotherhood of Teamsters

cc: Hon. Barbara S. Jones  
Viet Dinh, Esq.  
Ken Hall