

CHARGE

INVESTIGATIONS OFFICER,

Claimant,

-v-

WARREN SELVAGGI,

Respondent.

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. A copy of the order is enclosed.

The time and place for the hearing of this matter will be determined by the Independent Administrator, Frederick B. Lacey, and he will notify you accordingly.

You are charged with:

Violating Article II, § 2(a) and Article XIX, § 6(b) of the International Brotherhood of Teamsters Constitution, by conducting yourself in a manner to bring reproach upon the International Brotherhood of Teamsters and by violating your oath, to wit: from January 1, 1984 to the present, while an officer of Local 240 by knowingly associating with members of

La Cosa Nostra, including Anthony Salerno, Vincent Cafaro and
Louis Di Napoli.

Very truly yours,

Charles M. Carberry
Charles M. Carberry
Investigations Officer
599 Lexington Avenue
New York, New York 10022
(212) 326-3920

Dated: New York, New York
December 5, 1989

cc: Frederick B. Lacey, Esq.
James T. Grady, Esq.
Richard Mark, Esq.

1480q

JONES, DAY, REAVIS & POGUE

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6664-efh-4676q
927896-008-010

May 9, 1990

BY TELEFAX AND EXPRESS MAIL

Frederick B. Lacey, Esq.
LeBoeuf, Lamb, Leiby & MacRae
One Gateway Center
Newark, New Jersey 07102-5311

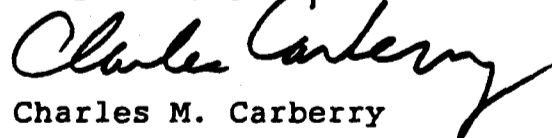
Re: Warren Selvaggi

Dear Mr. Lacey:

I have been informed by Assistant U.S. Attorney David Richman that the attached order was entered by Judge Sand in the Southern District of New York with respect to Warren Selvaggi. Paragraph two of the order provides for Mr. Selvaggi's resignation from the presidency of Local 240 as of June 12, 1990. It bars him for the rest of his life from dealing with any labor organization or employee benefit plan "about any matter that relates directly or indirectly to the affairs of the International Brotherhood of Teamsters or any of its affiliated entities, or any other labor organization, where such dealings relate to the union or benefit plan affairs." Mr. Selvaggi consented to the entry of the order. He may only obtain relief from its restrictions by an application to the court on notice to the United States Attorney's Office.

In light of this judicial bar of Selvaggi from Teamster-related activities, I do not believe a hearing on the charges filed is necessary.

Very truly yours,


Charles M. Carberry

Enclosure

cc: Ronald Straci, Esq. - w/enclosure (by telefax)

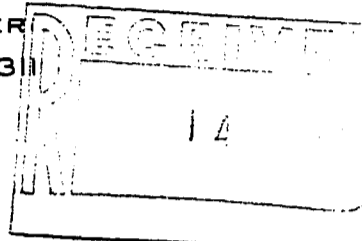
LEBOEUF, LAMB, LEIBY & MACRAE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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May 10, 1990

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VIA FACSIMILE AND REGULAR MAIL

Charles M. Carberry, Esq.
Jones, Day, Reavis & Pogue
599 Lexington Avenue
New York, NY 10022

Re: Investigations Officer v Warren Selvaggi

Dear Mr. Carberry:

I have reviewed your letter of May 9, 1990, regarding Mr. Selvaggi's agreement with the Government. Given the terms of that agreement I concur that the hearing in the above referenced matter need not proceed.

Very truly yours,

15/7 BL SA
Frederick B. Lacey

FBL:msl

cc: Ronald Straci, Esq. (via Facsimile and Regular Mail)

Exhibit 16