



*Schaffer*, 2000 EAD 8  
(August 1, 2000)

candidates Patrick Flynn, Walter Lytle, Dotty Malinsky, Lester Singer and Philip Young. Outside of the Central Region, petitions for the Hoffa 2001 Unity Slate's regional vice president candidates (as indicated on the left margin of the Hoffagram) were faxed to that region's local unions. Those regional vice president candidates are: Robert Bouvier, Garnet Zimmerman and Joseph McLean (Teamsters Canada); Jack Cipriani, Dan DeSanti, John Murphy and Richard Volpe (Eastern Region); Ken Wood and Tyson Johnson (Southern Region); and Chuck Mack, Jon L. Rabine and Jim Santangelo (Western Region). (These candidates are referred to herein collectively as the "Hoffa 2001 Unity Slate candidates.")

The Hoffagram states:

With your support and effort we are implementing an aggressive Petition Drive program that will ensure that our Hoffa Unity Slate will be able to use all the resources available to deliver our message of accomplishments.

We must secure signatures well above the required amount for our Hoffa Unity Slate Candidates by August 1. By accomplishing this goal our Slate will secure advertising pages in the October Teamster Magazine. We will be able to move forward as a team to deliver our message to all Teamster members.

**To ensure that all of our Hoffa Unity Slate candidates meet the requirements we are asking that you send in completed petitions as soon as possible. All membership petitions totals will be tallied by Local Union.**

(Emphasis in original.) The Hoffagram requests "[p]lease have the attached petitions signed for all the candidates. 10 At Large, 3 Canada, 5 Central, 4 Eastern, 2 Southern, 3 Western." The Hoffagram also states: "**NO UNION RESOURCES MAY BE USED TO COPY AND DISTRIBUTE THESE PETITIONS, THIS FLYER OR ANY OTHER CAMPAIGN MATERIALS.**" (Emphasis in original.) The petitions attached to the Hoffagram contain no such warning.

Another fax transmission to local unions consisted of five petitions forms for candidates Hoffa, Keegel, Cammack, Gegare and Glanton. These petition forms contain no warning concerning use of union resources, nor any directions for handling.

The third fax transmission is a June 10, 2000 letter on Hoffa 2001 campaign letterhead signed by candidate Hoffa, and addressed "Dear Teamster Leader." Attached are two petition forms, one for candidate Hoffa and one in blank. The letter states, "it is time to begin the process of gathering signatures for the accreditation of candidates...", and seeks "your support..." It asks the Teamster leaders who receive the letter to "take the enclosed petitions and activate your network of members to acquire the needed signatures." No warning concerning use of union resources is printed on this letter or the attached petitions.

The fourth fax transmission is also a June 10, 2000 letter on Hoffa 2001 campaign letterhead signed by candidate Hoffa, and addressed "Dear Teamster." Attached is a flyer entitled "Jim Hoffa wants your help," and two petition forms, one for candidate Hoffa and one in

blank. The letter states, “...we must begin the process of gathering signatures for the accreditation of candidates...” and seeks “your support...” It asks those who receive the letter to “take the enclosed petitions and activate your network of members to acquire the needed signatures.” No warning concerning use of union resources is printed on this letter or the attached petitions, but the attached flyer contains the statement that “**Union resources may not be used to copy and distribute these petitions.**” (Emphasis in original.) The flyer also states:

Make copies of the Jim Hoffa petition and the blank petition. Use the blank petition to help the Unity Team members secure the signatures they need. Place the name, home local union, and the position of the union-wide and regional candidates in the proper places on the blank petitions.

### **Analysis and Conclusion**

It is undisputed that the materials that are the subject of this protest are campaign materials and that they were sent by the Hoffa campaign to virtually all Teamsters locals beginning in June 2000. At a minimum, union resources in the form of local union fax machines and supplies, and local union personnel, were used to receive these campaign fax transmissions. Article VII, Section 11(c) of the *Rules* provides that “Union funds, facilities, equipment, stationery, personnel, etc., may not be used to assist in campaigning unless the Union is reimbursed at fair market value for such assistance, and unless all candidates are provided equal access to such assistance and are notified in advance, in writing, of the availability of such assistance.”

Three prior Election Officer decisions have particular bearing on the resolution of this protest. First is *Committee to Elect Ron Carey*, P512 (March 28, 1991), in which the Election Officer considered the propriety of the Durham/Mathis slate’s “bulk distribution of campaign literature to IBT Local Unions with the request that the literature be distributed by the Local Unions to IBT ‘leaders, stewards and members.’” The campaign sent a memorandum with certain of the campaign materials that said, “we hope you will distribute [the literature] to Teamster Union leaders, stewards, and members of your local union.” However, “[n]o instructions were included in the mailings regarding the manner in which the literature was to be distributed” to union leaders, stewards and members, nor was there any “set procedure followed by the Local Unions regarding the distribution of the Durham/Mathis literature.” The protest did “not allege that the literature was distributed by the Local Unions in any particular manner.”

The Election Officer held that “the Election Rules are not violated when a candidate asks a Local Union to distribute campaign literature [because t]he distribution of campaign literature is an appropriate means of apprising Union members about the candidates and the issues on which they will be voting and is encouraged under the Election Rules.” However, quoting Article VIII, Section 6(a)(1) of the Election Rules’ provision that “each candidate shall be permitted a reasonable, equal to that of any other candidate, to have his/her literature distributed by the Union, at the candidate’s expense,” and Article VIII, Section 10(c)’s provision that “all candidates [must be] notified in advance of the availability of [union] goods and services,” the Election Officer held that:

all Local Unions that distributed Durham/Mathis literature must provide similar distribution for any other candidate, group of candidates or slate that makes a similar request. A failure by a Local Union to honor requests for the distribution of campaign literature in the same manner, and to the same extent, that it distributed the Durham/Mathis literature will constitute a violation of the Election Rules. ... each Local Union that received the Durham/Mathis campaign material must inform any candidate who inquires of the manner and extent of the Local Union's distribution of the Durham/Mathis campaign literature. A failure of a Local Union to respond to such a request for information regarding the distribution of campaign literature, or its submission of false, incomplete or misleading information in response to such a request shall constitute a violation of the Election Rules.

In *Buck*, P919 (November 5, 1996), *aff'd*, 96 EAM 274, the Election Officer found, as alleged, that "the facilities of Local Union 745 have been improperly utilized to promote the candidacy of James P. Hoffa for general president through extensive use of the union telephones and by storing and distributing Hoffa campaign materials." The Election Officer found a violation of Article VIII, Section 1 (c), which bars the use of union resources in campaigning, "unless the Union is reimbursed at fair market value for such assistance, and unless all candidates are notified in advance, in writing, of the availability of such assistance."

Discussing *Committee to Elect Ron Carey*, the Election Officer "clarif[ied] candidates' and local unions' responsibilities" concerning the distribution of campaign literature through local union facilities. The Election Officer "reaffirm[ed] *Committee to Elect* to the extent that it permits candidates to send quantities of campaign literature to local unions for proper distribution in accordance with the Rules at Article VIII, Section 7." However, the Election Officer again stressed that under the Rules, "[t]he opportunity to benefit from such distributions, when authorized, must be extended to every candidate for the office on an equal basis." And, in order to assure that such equal opportunity was afforded by local unions, the Election Officer found that it was "both reasonable and necessary for the Election Officer to impose *on candidates* who take advantage of this benefit, the obligation to share in the responsibility of assuring that any literature sent to local unions for distribution is disseminated in accordance with the *Rules*." (Emphasis supplied.)

Accordingly, *Buck* imposed the requirement that "all candidates sending campaign literature to IBT local unions for distribution ... advise them, in writing, that campaign literature may be distributed only in a non-discriminatory manner through the use of a literature distribution table open to all candidates." The Election Officer further directed that literature destined for distribution "outside the confines of the local union ... must be sent to a supporter's home address or to a campaign address," and not to the local union office. The Election Officer noted that "[t]he Hoffa campaign has indicated that it will comply with this procedure."

In *Hall*, PR106 (June 8, 1998), the protest contended that "the Hoffa Slate's [admitted] distribution of campaign material by facsimile to local unions in the United States and Canada constitutes an impermissible use of union resources in violation of Article VIII, Section 11 (c) of the Rules." The material faxed to local unions was a "Hoffa-gram" flyer, with the words "Please

copy and distribute” appearing on its bottom. The Hoffa campaign admitted that it had ‘blast’ faxed this and similar campaigns to local unions, and that it had done so since 1995.

Relying on *Committee to Elect Ron Carey*, the Hoffa campaign argued that absent any evidence of local union “discriminat[ion] against candidates or slates in disseminating materials, once received...”, there was no violation of the Rules. The Election Officer agreed that “faxing campaign material to local unions is not a violation of the Rules, and that all candidates may do so.” However, the Election Officer held that the statement at the bottom of the Hoffa-gram “requesting the recipient to ‘please copy and distribute’ ... does not comply with the Election Officer’s previous ruling [in *Buck*] that required all candidates to notify local unions of the strict limitations that apply to campaign material offered for distribution through a local.” Accordingly, the Election Officer ruled that “all candidates and campaigns that fax or otherwise deliver campaign material to IBT local unions or other IBT subordinate entities for distribution in accordance with that subordinate entity’s policies” are required to include the following on such documents:

Union resources may not be used to copy this document. Campaign literature may be distributed by a local union only in a non-discriminatory manner through the use of a literature table open to all candidates.

The current *Rules* continue the provisions of Article VIII (now Article VII), Section 11 (c) of the prior Rules, as well as other Rules provisions that have bearing on the issue here, such as Article XII (now Article XI), Section 1(b)(1) and (3) (now Section 1(b)(3) and (6)), which prohibit the use of union resources to “promote the candidacy of any individual,” absent fair market value compensation by the candidate, and advance written notice of the availability of union resources to all candidates. Article VII, Section 7 of the *Rules* also carries forward the provisions of Article VIII, Section 7 of the prior election rules with respect to union distribution of campaign literature, with one significant exception, *viz.*, Section 7(g), which now requires that:

The *Union* shall adopt procedures for complying with candidates’ requests for distribution of literature and shall specifically advise all candidates of those procedures.

(Emphasis supplied.)<sup>1</sup> In the prior election rules, this provision was stated only as a “strong recommend[ation],” not as a mandate.

Here, the Hoffa campaign argues that no violation of the *Rules* has been shown because some (but not all) of the materials faxed contained this or a similar statement: “Important information: Union resources may not be used to copy and distribute these petitions.” The Hoffa campaign concedes that this language is not the same as that required by *Hall*, but argues that it is broader than the *Hall* language.

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<sup>1</sup> The *Rules* define “Union” as “the International Union, all Local Unions and all other subordinate bodies of the International Union, unless explicit distinction is made.” No such “explicit distinction” appears in Article VII, Section 7(g) of the *Rules*.

According to the Hoffa campaign, the required *Hall* language contains two constraints. First, asserts the campaign, *Hall* states an absolute constraint against use of union resources to copy campaign materials. Second, the campaign asserts that *Hall* states a limited prohibition against union distribution of campaign materials. According to the Hoffa campaign, campaign “literature may be distributed by a local union, but ‘only in a non-discriminatory manner through the use of a literature distribution table open to all candidates.’”

The campaign’s position statement explains its assertion that its warning on some (but not all) of its faxed campaign materials against union copying *and* distribution “is, in fact, more restrictive than the wording devised by the Election Officer in *Hall*” in the following terms:

Not only is there a prohibition against union resources being used to copy such materials, there is also a complete injunction against such material being distributed by a local union. The Hoffa campaign had every right to fax the disputed campaign literature. Moreover, the admonition at the bottom is more restricting and confining than any language set forth by various Election Officers. Finally, the Hoffa campaign has never requested that the [faxed] literature be distributed by any of the various local unions; nor, it should be emphasized, is there any claim or allegation by Mr. Schaffer that this literature was so distributed, whether in conformity with the *Rules* or not.”

We reject the Hoffa campaign’s arguments. First, if, as it argues, it never intended nor asked the local unions that received its faxed campaign materials to distribute those materials on non-discriminatory campaign literature tables, then it was completely improper under *Buck* to send those materials to local unions.<sup>2</sup> *Buck* holds that literature destined for distribution “outside the confines of the local union ... must be sent to a supporter’s home address or to a campaign address,” and not to the local union office. During the *Buck* investigation, “[t]he Hoffa campaign ... indicated that it w[ould] comply with th[at] procedure.” If the Hoffa campaign did not intend for local unions to distribute its faxed materials on literature tables, as it now contends, then it simply had no business sending those materials to IBT local unions.

We also reject the Hoffa campaign’s claim that it did not intend that these materials be distributed by local union officers and agents. That the contrary is true appears on the face of the documents, with their repeated request for aggressive circulation of the Hoffa petitions. Such distribution requests, while they would be appropriate in mailings to the homes of local union officers and agents or to campaign offices, are completely inappropriate when faxed, mailed or otherwise delivered to IBT local unions, at least absent compliance with the holdings in *Buck* and *Hall*, with their emphasis on distribution of campaign materials at a local union only on literature tables open to all candidates.

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<sup>2</sup> As discussed above in text, it is obvious from the requests made in the materials accompanying the faxed petitions that the Hoffa campaign intended that *someone* distribute the petitions. The materials accompanying petitions make clear that that was the *only* reason for the fax transmissions.

Moreover, election accreditation petitions are not within the scope of the campaign literature that may be distributed at open, non-discriminatory campaign literature tables at local unions. For such petitions are by their very nature destined for distribution “outside the confines of the local union,” and under *Buck* “must be sent to a supporter’s home address or to a campaign address.” They may not be distributed via local union campaign literature tables, even if such literature table distribution otherwise complies with the decisions in *Committee to Elect, Buck and Hall*.<sup>3</sup>

Finally, none of the campaign materials faxed by the Hoffa campaign here complies with *Hall*, since none contains the warning language required by the Election Officer in *Hall*. We reject the Hoffa campaign’s claim that the language included in some of its material is broader than that required in *Hall*. The campaign’s warning is deficient because it fails to follow *Hall*’s limitation of local union distribution of campaign materials solely to distributions accomplished “in a non-discriminatory manner through the use of a literature distribution table open to all candidates.” Other than candidate-financed mailings (which are not at issue here) that is the only kind of local union distribution allowed by the *Rules*, and the Hoffa campaigns failure to include such language on the face of each page of its materials constitutes a core violation of the *Rules*.

The *Rules* and prior decisions require the conclusion that the Hoffa campaign’s conduct here is improper.<sup>4</sup> First, its petitions and other materials were improperly sent to local unions, given the campaign’s admission that it did not intend that its materials be distributed through literature tables. Second, the faxed materials were improperly sent to the locals because they were obviously intended for distribution outside the locals, a clear violation of *Buck and Hall*. Third, accreditation petitions are by their nature not campaign literature appropriate for distribution on local union literature tables, since such petitions are by their very nature destined for distribution “outside the confines of the local union,” and under *Buck* “must be sent to a supporter’s home address or to a campaign address.” Finally, even a contrary finding on these prior three points would not make the Hoffa campaign fax transmissions valid, since the warning against use of union resources required by *Hall* was not included on the campaign’s materials. In each of these four respects, the Hoffa campaign’s conduct violates the *Rules*.

For the foregoing reasons, the protest is GRANTED.

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<sup>3</sup> Campaign accreditation petitions may, however, be distributed to members by means of a candidate-financed mailing conducted in a manner consistent with Article VII, Section 7 of the *Rules*.

<sup>4</sup> The IBT has submitted a position statement in which it urges that the Election Administrator to refuse to follow *Buck and Hall* as inconsistent “with the text of the *Rules* or with the general principle adopted by Mr. Holland in *The Committee to Elect Ron Carey* that free and open dissemination of information about candidates and issues by Local Unions should be encouraged, provided that Local Unions do not discriminate for or against particular candidates or slates.” (Emphasis in original.) We reject this suggestion as contrary to the provision of Article I of the *Rules* that “the Election Administrator *shall consider and apply*, where applicable, precedents and decisions issued during the 1990-91 and 1995-96 International Elections and the 1997-98 Rerun Election.” (Emphasis supplied).

### Remedy

When the Election Administrator determines that the *Rules* have been violated, he may “take whatever remedial action is appropriate.” Article XIII, Section 4. In fashioning the appropriate remedy, the Election Administrator views the nature and seriousness of the violation, as well as its potential for interfering with the election process.

The protestor argues that the Hoffa campaign knowingly violated the *Rules* here, given its prior involvement in the *Buck* and *Hall* protests, and further argues that these violations have given the Hoffa campaign a significant distributional and psychological advantage over candidate Leedham and his allies with respect to the circulation of accreditation petitions. According to the protestor, this advantage cannot be undone with a limited remedy, since the Hoffa campaign effectively appropriated the entire local union network for its own organizational purposes. The protestor thus seeks the invalidation of all petitions that the Hoffa slate cannot prove to be untainted by its *Rules* violation.

Alternatively, the protestor urges that the Hoffa campaign be required to pay for a mailing of an amount of Leedham slate literature, to be furnished by the Leedham slate, equivalent in quantity to the amount of materials that the Hoffa campaign is known to have faxed in violation of the Rule, to all local unions, and to be held strictly liable for ensuring that local unions place the Leedham slate petitions on literature distribution tables in the union halls and refrain from destroying or discarding them.

Finally, the protestor seeks an order that the Hoffa campaign slate be required to send a notice to all local unions, for posting on local union bulletin boards, informing members that the Hoffa slate petitions were distributed in violation of the Rules, that members cannot sign or file petitions that were copied from the tainted faxes, and informing all local unions and members of the requirements of the *Rules* as set forth in the *Hall* disclaimer.

In *Wirtz v. Hotel Employees Local 6*, 391 U.S. 492, 505-09 (1968), the Court held that proof of the commission of a violation of section 401 of the LMRDA makes out a prima facie case of probable impact on the outcome of an unsupervised election, which, unless rebutted, presumptively establishes an impact on the election sufficient to have affected the outcome. This is the general rule applicable to any kind of campaign violation not susceptible to quantification when committed in the course of an unsupervised election. The rule applied by the courts following *Wirtz* is that the violator must produce “tangible evidence” to rebut the presumption, a burden of proof that the courts have admitted to be “so great as to be insurmountable in some cases.” *McLaughlin v. American Federation of Musicians of U.S. and Canada, AFL-CIO*, 700 F. Supp. 726, 732 (S.D.N.Y. 1988) (collecting cases).

The presumption that a violation has affected an unsupervised election, requiring a rerun, has been enforced specifically in the context of campaign literature distributed or produced with unlawful union support or providing substantive campaign support. *Hodgson v. Liquor Salesman’s Union, Local No. 2*, 334 F. Supp. 1369, 78 L.R.R.M. 2020 (S.D.N.Y.), *aff’d*, 444 F.2d 1344 (2d Cir. 1971); *Donovan v. UAW Local 719*, 561 F. Supp. 54 (N.D. Ill. 1982); *Usery*



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*v. Masters, Mates and Pilots*, 422 F. Supp. 1221 (S.D.N.Y.), *mod. on other grounds*, 538 F.2d 946 (2d Cir. 1976).

Here, the election is supervised, providing an opportunity for remedies ordered by the Election Administrator that “ensure fair, honest, open and informed elections.” *Rules*, Article I. In this case, the Election Administrator finds that it is necessary and appropriate to declare that all election accreditation petitions on behalf of each of the Hoffa 2001 Unity Slate candidates be declared presumptively void, there being no other remedy which will assure that such candidates will not benefit, to the detriment of other candidates, from the improper conduct found herein. It is so ordered with respect to each of the Hoffa 2001 Unity Slate candidates.

Petitions for each of these candidates will be valid for accreditation purposes only if it is shown by evidence acceptable to the Election Administrator that the submitted petition forms do not find their source in petition forms or copies of petition forms that were faxed to local unions or other IBT bodies by the Hoffa campaign. Acceptable evidence must prove a chain of custody that completely excludes the fax transmission of accreditation petitions by the Hoffa campaign.

The Election Administrator recognizes that August 31, 2000 has been set as a deadline for the submission of signed petitions for accreditation for the purpose of publication of campaign materials in the October 2000 issue of *The Teamster*. In order to afford the Hoffa 2001 Unity Slate candidates a means of submission of accreditation petitions untainted by the *Rules* violation found herein, the Election Administrator will provide such candidates and any other persons with accreditation forms dated August 1, 2000. The Election Administrator will consider petition signatures on such redated forms to be presumptively free of the taint of the *Rules* violation found herein. This will not, however, insulate any person or campaign from any future *Rules* violations with respect to the distribution of accreditation petitions.

In addition to the foregoing, the Election Administrator also orders the Hoffa campaign to cease and desist from any future violation of the *Rules* with respect to the use of union resources in the distribution of campaign materials. Further, the Election Administrator orders the Hoffa campaign to fax a copy of the attached Notice to each IBT local union no later than five (5) days after receipt of this decision. Within one (1) day after so faxing the Notice, the Hoffa campaign shall file an affidavit with the Election Administrator demonstrating compliance with this decision.<sup>5</sup>

An order of the Election Administrator, unless otherwise stayed, takes immediate effect against a party found to be in violation of the *Rules*. *Lopez*, 96 EAM 73.

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<sup>5</sup> The Election Administrator recommends that the International Union immediately adopt recommended procedures for the distribution of campaign materials by local unions, which local unions may then adopt. Article VII, Section 7(g) of the Rules mandates the adoption of such procedures at each level of the Union. Such procedures as are adopted by the IBT and by local unions and other subordinate bodies must comply with the *Rules*, and each such body must “specifically advise all candidates of th[e] procedures” it adopts. Article VII, Section 7(g). To guard against *Rules* violations such as evidenced here, such procedures should provide for notice in advance, in writing, to all candidates of the availability of assistance from a local union or other subordinate body with respect to the distribution of campaign literature. See, Article VII, Section 11(c).

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Any interested party not satisfied with this determination may request a hearing before the Election Appeals Master within two (2) working days of receipt of this decision. The parties are reminded that, absent extraordinary circumstances, no party may rely upon evidence that was not presented to the Office of the Election Administrator in any such appeal. Requests for a hearing shall be made in writing, shall specify the basis for the appeal, and shall be served upon:

Kenneth Conboy  
Election Appeals Master  
Latham & Watkins  
Suite 1000  
885 Third Avenue  
New York, New York 10022  
Fax: 212-751-4864

Copies of the request for hearing must be served upon the parties listed above, as well as upon the Election Administrator for the International Brotherhood of Teamsters, c/o International Brotherhood of Teamsters, 25 Louisiana Ave., NW, Washington, DC 20001, all within the time period prescribed above. A copy of the protest must accompany the request for hearing.

*William A. Wertheimer, Jr.*

William A. Wertheimer, Jr.  
Election Administrator

cc: Kenneth Conboy  
Michael Nicholson  
2000EAD8

# NOTICE TO ALL LOCAL UNIONS

The Election Administrator has determined that the Hoffa campaign violated the *Election Rules* by its fax transmission of campaign materials to virtually all IBT local unions throughout the United States and Canada. In issuing this decision, the Election Administrator has presumptively invalidated all accreditation petitions circulated on behalf of the Hoffa 2001 Unity Slate candidates, and has ordered the Hoffa campaign to cease and desist from any future violation of the *Rules* with respect to the use of union resources in the distribution of campaign materials.

Further, each local union must assure that campaign literature on behalf of any candidate is distributed by each local union only on campaign literature tables open on a non-discriminatory basis to all candidates. Election accreditation petitions may not be sent by any campaign to a local union for distribution at campaign literature tables, or for distribution other than by a candidate mailing consistent with Article VII, Section 7 of the *Rules*.

Further, all campaign literature sent by a candidate or campaign to a local union for non-discriminatory distribution must contain the following language on each page of the document to be distributed:

Union resources may not be used to copy this document. Campaign literature may be distributed by a local union only in a non-discriminatory manner through the use of a literature table open to all candidates.

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James P. Hoffa  
Candidate for General President and  
head of the Hoffa 2001 Unity Slate

***This is an official notice and must remain posted for thirty (30) consecutive days from the day of initial posting, and must not be altered, defaced or covered by any other material.***

***Prepared and approved by William A. Wertheimer, Jr.,  
Election Administrator for the International Brotherhood of  
Teamsters.***

*Schaffer*, 2000 EAD 8  
(August 1, 2000)

**DISTRIBUTION LIST VIA UPS NEXT DAY AIR:**

James P. Hoffa  
General President  
25 Louisiana Avenue, N.W.  
Washington, D.C. 20001

Ron McClain  
Trustee  
2425 Delaware Avenue  
Des Moines, IA 50317

C. Thomas Keegel  
General Secretary-Treasurer  
25 Louisiana Avenue, N.W.  
Washington, D.C. 20001

John Steger  
Trustee  
3100 Ames Place, N.E.  
Washington, D.C. 20018

Randy Cammack  
Vice President  
845 Oak Park Road  
Covina, CA 91724-3624

Patrick W. Flynn  
Vice President Central Region  
4217 South Halsted Street  
Chicago, IL 60609

Fred Gegare  
Vice President  
1546 Main Street  
Green Bay, WI 54302

Walter A. Lytle  
Vice President Central Region  
2644 Cass Street  
Fort Wayne, IN 46808

Chester Glanton  
Vice President  
300 South Ashland Avenue  
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Dotty Malinsky  
Vice President Central Region  
9409 Yukon Avenue South  
Bloomington, MN 55438

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