



OFFICE OF THE ELECTION OFFICER
% INTERNATIONAL BROTHERHOOD OF TEAMSTERS
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Michael H Holland
Election Officer

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Chicago, IL 60604
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February 7, 1991

VIA UPS OVERNIGHT

Gary Haskell
Box 161, West Chenango Rd
Binghamton, NY 13905

Mike Heatherman
RD #6, Box 285B, North Rd.
Binghamton, NY 13905

Thomas Thayne
Secretary-Treasurer
IBT Local Union 693
41 Howard Ave.
Binghamton, NY 13902

Re: Election Office Case No. P-409-LU693-PGH

Gentlemen:

A pre-election protest was filed on behalf of Gary Haskell, a member of Local 693 and a candidate for delegate to the IBT International Convention. The protest alleged that another member of Local 693, Mike Heatherman, was threatened and intimidated by the Secretary-Treasurer of Local 693, Thomas Thayne, with the filing of Union charges against him for selling raffle tickets on behalf of Mr. Haskell.

The Election Officer has conducted an investigation of the protest. As a result of the investigation, the Election Officer has determined that the "rank and file" candidates of Local 693 commenced a fund raising event known as a 50/50 raffle sometime in late December of 1990. Various supporters of the "rank and file" candidates sold tickets for this raffle.

On or about January 12, 1991, Mr. Thayne, Secretary-Treasurer and Business Agent for Teamsters Local 693 and a nominated 1991 IBT International Convention delegate candidate opposing Mr. Haskell, was advised by a friend that the friend had some tickets for members of Local 693 for a 50/50 raffle which he was selling. Mr. Thayne was shown one of the raffle tickets.

On the following day, Mr. Thayne advised the Local Union Executive Board, at a regular meeting, of the selling of these raffle tickets. Before the Executive Board, Mr.

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Thayne characterized the raffles as being sold as if the proceeds were for the benefit of the Union. Mr. Thayne stated that the raffle was not authorized by himself or anyone on the Executive Board. The Executive Board then directed him to make a police report concerning the sale of the raffle tickets and to have the ticket sales ceased.

The raffle ticket in question has on its face the following language:

**TEAMSTER
MEMBERS OF LOCAL 693
Support Your Rank & File Candidate
For
INTERNATIONAL CONVENTION DELEGATE
50/50 Drawing
WINNER TO RECEIVE TOP PRIZE
ESTIMATED TO BE WORTH \$1,000.
JANUARY 26, 1991
NEED NOT BE PRESENT TO WIN
DONATION \$1 00 PER TICKET**

Mr. Thayne claims that the raffle purports to be a raffle conducted by Local 693 which is unauthorized by the Executive Board and also illegal under state law. The Election Officer has been advised that the retired member whose name was reported to the law enforcement authorities by Mr. Thayne, Henry Feiko, has been contacted by the police, however, no charges have been filed to date. The police contacted Mr. Feiko on January 23, 1991. Mr. Feiko and Mr. Haskell state that this is the first time they were made aware of any legal or Union difficulty with the raffle.

Mr. Haskell advised the Election Officer that ticket sales were stopped as of that date. As of that time a total of 1,451 tickets had been sold. Mr. Haskell has further advised the Election Officer that the drawing was not held on January 26, 1991 and the money for all ticket sales remains intact until such time as the legal authorities and counsel for Mr. Haskell and Mr. Feiko determine the appropriate action to be taken in connection with the raffle. Mr. Haskell has further advised the Election Officer that he planned to distribute \$1,000 00 as the raffle drawing prize regardless of the number of raffle tickets sold.

On or about January 23, 1991 Mike Heatherman, a member of Local 693, contacted the Local Union office concerning the sale of the raffle tickets. Mr. Heatherman first spoke with Gene Briggs, who indicated that he should speak with Thomas Thayne. Mr. Heatherman then spoke with Thomas Thayne on the telephone. Specifically, Mr. Heatherman stated that he asked Mr. Thayne what the problem was with the tickets. Mr. Heatherman advised the Election Officer that Mr. Thayne indicated that people who are selling tickets are violating the Union's By-Laws and that he intended to bring them up on charges. Mr. Heatherman further stated that Mr. Thayne said that he and Mr. Briggs are the elected officers of the Local and are running the

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Local and that they could not use Local 693's name without permission. Mr. Thayne agreed that he did speak with Mr. Heatherman on the telephone, that Mr. Heatherman asked what was wrong with the raffle and that Thayne told him that they were selling the tickets illegally, that the Local's name was on them, and that they should not do it or he was going to bring them up on charges.

Shortly thereafter, Mr. Thayne wrote a letter to Mr. Haskell, basically stating that the raffle was illegal and that Local 693's name was improperly used. Mr. Thayne stated in his letter that he had therefore taken necessary legal action and intended to seek compensation from Mr. Haskell for all costs to the Local.

The Election Officer's investigation determined that utilization of 50/50 raffles for fund raising purposes has been previously undertaken by members or retirees associated with Local Union 693. Mr. Thayne, Mr. Haskell and Mr. Heatherman all confirmed that 50/50 raffles are common in the community served by Local 693. The retirees of Local 693 commonly sell 50/50 raffles. These raffles are sold with the knowledge, and apparent approval, of Local Union 693, tickets are sold at Local Union 693 Union meetings. A recent 50/50 raffle sold by the Local 693 retirees, sold in December, 1990, states on the face of the ticket "Teamster Retirees Local 693, Binghamton, New York." The International Union insignia is printed on the raffle ticket. As indicated above, the officers and Executive Board of Local Union 693 not only refrained from raising the sale of such raffle tickets with law enforcement authorities, but condoned and encouraged the tickets' sale.

Article VIII, § 10 (a) of the *Rules* provide that all Union members retain the right to participate in campaign activities including the right to support or oppose any candidate and to aid or campaign for any candidate including the making of personal campaign contributions. Article X, § 1 (b)(3) of the *Rules* provides that the use of the Union's official stationery with the Union's name, insignia or other mark identifying the Union is prohibited. The Election Officer determines that the raffle ticket at issue does not violate this rule. The raffle ticket clearly states that it is a ticket to benefit the rank and file candidates of Local 693. The use of Local 693 in and of itself is not a violation of the *Rules*. Regardless of whether the raffle is or is not illegal under State law, neither the raffle nor the ticket violates the *Rules*.

It must next be determined whether or not the actions of Mr. Thayne in making a legal complaint, advising members that they would be brought up on Union charges and advising Mr. Haskell that he would have to reimburse the Local is a violation of the *Rules*.

As indicated above, 50/50 raffles are common in the community served by Local 693 and have been utilized in the past by Local Union 693 retirees. The recent December, 1990 retiree 50/50 raffle tickets by the writing on the face of the ticket was more, not less, likely to be understood as an "official" fund raising device than was the ticket utilized by the delegate and alternate delegate candidates here.

Yet, in the past, and regardless of the legality of these raffles, neither the officers nor the Executive Board of Local Union 693 has sought to lodge any complaints, whether civil or criminal, against the raffle ticket sellers. Yet, in the past, and regardless of the likelihood of the raffle tickets being mistaken as tickets being sold on behalf of the Local Union, neither the officers nor the Executive Board of Local Union 693 sought to impose internal Union discipline or recover moneys from ticket sellers. The Election Officer finds no distinguishing factors between the 50/50 raffle held by the retirees and the raffle conducted by the Rank and File candidates at issue here.

Therefore, in accordance with the foregoing, the Election Officer determines that Mr. Thayne and the Executive Board of Local 693 have violated the Election *Rules*, and in particular Article VIII, § 10 (a) of the *Rules*, by threatening to take civil and internal Union action against Mr. Haskell, Mr. Heatherman, and others supporting them with respect to the sale of the Rank and File candidates 50/50 raffle tickets. Further, the Election Officer finds that the criminal report by Mr. Thayne was an unjustified attempt to infringe on these members' political rights as set forth in the *Rules*.

In accordance with the authority of the Election Officer under the *Rules*, Article XIII, § 2, the Election Officer orders the following remedy for said violation:

1. That the Local Union and Mr. Thayne cease and desist from taking any civil legal action and/or dismiss with prejudice any civil suit heretofore brought, against Mr. Haskell, Mr. Heatherman, Mr. Feiko, or any other member of Local 693 for reason of the 50/50 raffle at issue here.
2. That the Executive Board of Local 693 and Mr. Thayne cease and desist from bringing any intra-Union charges, and/or dismiss any charges heretofore brought, against any member of Local 693 in connection with the raffle.
3. That Mr. Haskell be compensated in the sum of \$451.00 by the Local Union for his losses in connection with the raffle.¹
4. Within five days of its receipt of this decision, Mr. Thayne and Local Union 693 shall file appropriate affidavits with the Election Officer demonstrating its compliance with this decision.

If any interested party is not satisfied with this determination, they may request a hearing before the Independent Administrator within twenty-four (24) hours of their receipt of this letter. The parties are reminded that, absent extraordinary circumstances, no party may rely upon evidence that was not presented to the Office of the Election Officer in any such appeal. Requests for a hearing shall be made in writing, and shall be served on Independent Administrator Frederick B. Lacey at LeBoeuf, Lamb, Leiby

¹If Mr. Haskell is permitted to retain the proceeds of the raffle, Mr. Haskell shall refund the \$451.00 to Local 693

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& MacRae, One Gateway Center, Newark, New Jersey 07102-5311, Facsimile (201) 622-6693 Copies of the request for hearing must be served on the parties listed above, as well as upon the Election Officer, IBT, 25 Louisiana Avenue, N.W., Washington, D. C 20001, Facsimile (202) 624-8792. A copy of the protest must accompany the request for a hearing

Very truly yours,



Michael H. Holland

MHH/mca

cc Frederick B Lacey, Independent Administrator
William B Kane, Regional Coordinator

IN RE:

GARY HASKELL and
MIKE HEATHERMAN,

Complainants,

and

THOMAS THAYNE and
IBT LOCAL UNION NO. 693

Respondents.

91 - Elec. App. 72 (SA)

DECISION OF THE
INDEPENDENT ADMINISTRATOR

This matter arises out of an appeal from a February 7, 1991, decision of the Election Officer in Case No. ~~91-109-111693-PGH~~. A hearing was held before me on February 13, 1991, at which the following persons attended: Patrick Szymanski, Esq., on behalf of IBT Local Union 693 (the "Local" or "Local 693"); and Thomas Thayne, Local 693's Secretary-Treasurer. The following persons were also heard by way of teleconference: John Sullivan, on behalf of the Election Officer; Gail Mrozowski, the Adjunct Regional Coordinator; Richard Gilberg, Esq. on behalf of Gary Haskell; Mr. Haskell himself; Michael Heatherman; and Henry Feeko.

Central to this appeal is a "50/50" raffle, started by Mr. Haskell, a candidate for delegate to the IBT International Convention on behalf of Local 693. The raffle was organized as a fund raising device for Mr. Haskell's campaign. Mr. Haskell's

opponent in the delegate race is Gene Briggs, the President of Local 693. Secretary-Treasurer Thayne, is the Local's sole nominee for the position of alternate delegate.

Attached hereto as Exhibit A is a copy of one of the "50/50" raffle tickets in question. The ticket bears the notation on the first two lines, "Teamsters Members of Local 693." On the third line are the words "Support Your Rank & File Candidate For International Convention Delegate." In Mr. Haskell's campaign literature he has identified himself as "a rank and file candidate."

On January 12, 1991, Mr. Thayne was meeting with a Joe Ritz. Mr. Ritz is not an IBT member or officer. Mr. Ritz asked Mr. Thayne about "Local 693's" raffle. Mr. Ritz indicated that Local 693 was not involved in any raffle. Mr. Thayne then obtained a copy of one of the raffle tickets from Mr. Ritz. Mr. Ritz informed Mr. Thayne that he had purchased the ticket from Henry Feeke, a retired member of Local 693. At the hearing Mr. Thayne admitted that while he could not be positive he had a suspicion at the time he met with Mr. Ritz, that Mr. Haskell was responsible for the raffle.

The next day, at the regularly scheduled January 13 Local 693 Executive Board meeting, Mr. Thayne asked Mr. Briggs if he was selling the raffles. Mr. Briggs stated he was not. This solidified Mr. Thayne's suspicion that Mr. Haskell was behind the raffle. In fact at the hearing Mr. Thayne admitted that upon

hearing that Mr. Briggs had not organized the raffle, he "strongly believed" it was Mr. Haskell. As reflected in the minutes of the January 13 meeting Mr. Thayne announced to the Election Board that "someone is conducting a 50/50 raffle in the name of Local 693 to support your rank and file candidate." Messrs Briggs and Thayne stated at the meeting that they had no knowledge who was conducting the raffle. This, of course, is inconsistent with Mr. Thayne's admission at the hearing that, although he could not be certain, he had a "strong suspicion" that Mr. Haskell was conducting the raffle. Mr. Thayne then made a motion "to investigate and follow through with what ever legal recourse may be necessary." This motion was unanimously passed. Apparently, such raffles are illegal in New York.¹

The following day, January 14, Mr. Thayne indicated that he received a call from two shop stewards inquiring into "Local 693's raffle." Again, Mr. Thayne explained that the Local was not running any raffle. That same day Mr. Thayne filed a criminal complaint against Mr. Fesko in Binghamton, N.Y. This was apparently done on the advice of the Local's attorney, Gregory Gates. Mr. Thayne did not mention Mr. Haskell in the complaint.

The District Attorneys office then investigated the matter and Mr. Haskell was eventually told that as long as no drawing took place the matter would not be pursued. Mr. Haskell indicated that

¹ The Election Officer takes no position on the legality of the raffle, but it seems clear that such raffles are indeed violative of New York Penal Law.

he stopped selling the tickets and canceled the drawing. Mr. Haskell also indicated that he intends to return all the money collected and will begin doing so upon resolution of this protest.

On January 28, 1991, Mr. Thayne wrote to Local 693's attorney, Mr. Gates, and informed him that the raffle tickets were still being sold.² In his letter Mr. Thayne stated: "It now becomes necessary for me to seek a full accounting of all funds and compensation for fees incumbent to this matter." Mr. Thayne added: "If need be, seek a Temporary Restraining Order and/or Civil Suit to recover cost, and follow through with the District Attorney to remedy this problem as soon as possible."

In the interim Mr. Haskell had filed a protest with the Election Office against Mr. Thayne and the Local 693 Executive Board regarding their interference with his raffle. That protest, which was signed January 27, 1991, was received by the Local on January 29. Upon receipt of the protest Mr. Thayne claims he was then certain that Mr. Haskell was responsible for the raffle.

On January 29, 1991, Mr. Thayne wrote to Mr. Haskell asking him to "voluntarily rescind" his protest. In his letter Mr. Thayne stated:

My actions were completely within my duties as Secretary-Treasurer and I assure you that had the same circumstances applied to your opponent, my action would have been no different. To do otherwise, I would be

² There is factual dispute as to whether any additional raffle tickets were actually sold. I need not resolve that dispute, however, to decide this matter.

neglecting my fiduciary responsibilities as Secretary-Treasurer.

In his letter, Mr. Thayne defended his actions, in part, by stating that "raffles are illegal in New York State." Mr. Thayne also claimed that Mr. Haskell's "misleading, deceptive and possibly fraudulent use of: TEAMSTER MEMBERS OF LOCAL 693 made [his] action necessary and mandatory." Mr. Thayne closed by stating: "Until you filed your protest, I had no direct knowledge of your involvement." Mr. Thayne also reminded Mr. Haskell that he "must now ask for a full accounting of the tickets and proceeds and . . . seek compensation through [Mr. Haskell] for all costs to the Local." Mr. Thayne sent a copy of his letter to the Election Officer.

On January 30, 1991, Mr. Gates, the Local's attorney, wrote to the District Attorney informing him that the sale of the tickets had continued. Mr. Haskell's name was not used in that letter. The letter speaks of "an illegal raffle being conducted by an apparent candidate for Union office."

In investigating this matter, the Election Officer found that Mr. Thayne and Local 693 had violated Article VIII, Section 10 of the Rules For The IBT International Union Delegate And Office Election ("Election Rules"). Article VIII, Section 10 provides, in part, that all IBT members retain the right to "participate in campaign activities, including the right to run for office, to openly support or oppose any candidate, to aid or campaign for any candidate, and to make personal campaign contributions." The

Election Officer properly concluded that, "[i]mplicit in the right to make personal campaign contributions is the right to solicit such contributions consistent with the limitations of Article X, Section 1 of the [Election] Rules." Election Officer Summary at p. 5.³

Mr. Thayne defends his actions by contending that his motives in pressing this matter through the District Attorney's Office were based solely on his concern that the raffle tickets gave the impression that the Local was either sanctioning or running the raffle. Mr. Thayne points to the comments of Mr. Ritz and the two shop stewards regarding "Local 693's raffle" in support of his position. Mr. Thayne, allegedly fearing the perception that the Local was involved in an illegal activity, filed his complaint with the District Attorney's office and pursued the matter when he thought the tickets were still being sold after the District Attorney's intervention. He notes that the Local has not organized a raffle for some twelve-fifteen years. In addition, Mr. Thayne notes that the Mr. Haskell's raffle tickets are confusing as they do not mention Mr. Haskell's name. In addition, he points to the use of the words "Teamsters Members of Local 693" as suggesting a

³ The Election Officer also considered Article VIII, Section 10(d) of the Election Rules which provides that no restriction shall be placed upon candidates' or members' pre-existing rights to, inter alia, "solicit support" or "or engage in similar activities on employer or Union premises." Given that the Local's objection to the raffle was not based on a concern that the raffles were being sold on "Union premises," I need not consider this provision.

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clear affiliation with the Local, especially to members of the public who may not be familiar with the election process occurring in Local 693. In short, Mr. Thayne contends that his motives were not political.

I do not find Mr. Thayne's claims credible. I find that he was quite certain that Mr. Haskell was behind the raffle, especially after Mr. Briggs denied any participation, and pursued the matter as vigorously as he did precisely because the raffle was for Mr. Haskell's benefit.

I further find that notwithstanding his "strong suspicion" Mr. Thayne took painstaking caution not to mention Mr. Haskell's name when he brought the matter to the Executive Board's attention and when he filed his criminal complaint. The only conclusion to reach from this is that Mr. Thayne was deliberately trying to avoid the obvious inference -- that he was driven by political motives.

Mr. Thayne's contentions ring especially hollow when one considers another 50/50 raffle that was being run concurrently with Mr. Haskell's to benefit an organization known as "693 Teamsters Retiree Chapter" (the "Retired Teamsters"). Attached hereto as Exhibit B is a copy of a 50/50 raffle ticket sold on behalf of the Retired Teamsters. The Teamsters logo is prominently displayed on the ticket. Surrounding the Teamster logo are the words "Teamsters Retirees" on the first line, and "Local 693 Binghamton, N.Y." on the second line. Mr. Thayne admits that the Local permits these raffle tickets to be sold in the Local Union hall during membership

meetings. As a matter of fact, the Local permits retirees to stand just outside the entrance to the meeting room in the Union hall to sell the raffles. The raffles are also sold to members of the public by retirees.

Mr. Thayne attempts to distinguish the Retired Teamsters' raffle by noting that the Retired Teamsters' is an entity separate and apart from the Local. Mr. Thayne ignores the fact, however, that Mr. Haskell's campaign, is also an entity separate and apart from the Local.

Mr. Thayne's concern that members of the public would be confused by the Haskell raffle is just as applicable to the retiree's raffle, given the prominence of the Teamster logo and the words in bold "Local 693 Binghamton, N.Y." emblazoned on the retiree's ticket.⁴

Accordingly, I find that Mr. Thayne and Local 693 did, in fact, violate the Election Rules by interfering with Mr. Haskell's right to "participate in campaign activities" which, in this case, included no attempt to solicit campaign contributions by way of a 50/50 raffle.

Turning to the remedy to be imposed. The Election Officer ordered the Local Union and Mr. Thayne to "cease and desist from taking any civil legal action and/or dismiss with prejudice any

⁴ This is not to say that Haskell's raffle may not lead to confusion, especially given the absence of Mr. Haskell's name on the ticket. The conclusion reached here, however, is that if Mr. Thayne was truly concerned with the public's confusion, he would have also taken steps to prevent the Retired Teamsters' raffle.

civil suit heretofore brought, against Mr. Haskell, Mr. Heatherman, Mr. Feeke, or any other member of Local 693 for reason of the 80/80 raffle at issue here." The Local Union and Mr. Thayne were also ordered to "cease and desist from bringing any intra-union charges, and/or dismiss any charges heretofore brought, against any member of Local 693 in connection with the raffle." The Local Union was also directed to compensate Mr. Haskell \$451.00 "for his losses in connection with the raffle." This sum was calculated as follows: At the time Mr. Haskell had stopped selling his tickets he had sold \$1,451.00 worth. Mr. Haskell had planned to award a minimum of \$1,000 in prize money if the raffle drawing took place. Thus, the Election Officer calculated that had the drawing gone forward Mr. Haskell would have netted \$451.

The Local objects to the remedy on several grounds. First, as for the direction not to commence any civil legal action⁵ the Local cites to Bill Johnson's Restaurants, Inc. v. NLRB, 461 U.S. 731 (1983) which held that:

The filing and prosecution of a well-founded lawsuit may not be enjoined as an unfair labor practice, even if it would not have been commenced but for plaintiff's desire to retaliate against the defendant for exercising rights protected by the [National Labor Relations] Act. [431 U.S. at 743]

* * *

To summarize, we hold that the Board may not halt the prosecution of a state-court lawsuit, regardless of the plaintiffs motive, unless the suit lacks a reasonable

⁵ Mr. Thayne confirmed that the Local has yet to file any civil action.

basis in fact or law. Retaliatory motive and lack of reasonable basis are both essential prerequisites to the issuance of a cease-and-desist order against a state suit.
[461 U.S. at 748].

Given the clear holding of the Supreme Court in Bill Johnson's Restaurants, Inc., it would appear that an order preventing the Local from commencing a civil suit is premature and improper. While the motives of Mr. Thayne and the Local are indeed retaliatory, it is impossible at this time to determine whether the Local's suit "lack[s] a reasonable basis," since the threat of suit has only been made in the most general of terms.

As for the second prong of the Election Officer's remedy -- preventing any intra-union charges -- I find such order to be proper and I adopt it here. Bill Johnson's Restaurants, Inc. addresses civil suits only, and is thus not applicable to intra-union proceedings.

I do note, however, that in a letter received by my office via facsimile on February 14, 1991, at 3:23 p.m., Mr. Szymanski indicated:

[N]either Mr. Thayne nor Local 693 will take any further action with respect to the raffle if Mr. Haskell and his supporters fulfill their promise to return the money to the individuals who purchased raffle tickets.⁶

Lastly, I find the \$451 payment ordered by the Election Officer to be inappropriate in that the remedy does not take into

⁶ Mr. Szymanski suggests that this offer renders the matter moot. I disagree. Local 693's violation of the Election Rules is still an issue regardless of its willingness to forego further action.

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consideration the fact that the raffle conducted by Mr. Haskell is indeed illegal. The Election Officer should not condone, either implicitly or explicitly, fundraising efforts that run afoul of local or state laws. By ordering the Local to compensate Mr. Haskell for compensatory damages incurred as a result of the aborted raffle, this is exactly what is being done. Thus, I vacate this portion of the Election Officer's ruling.

A more appropriate remedy is one that addresses Mr. Haskell's aborted opportunity to campaign and reach out to his fellow members. Thus, it is ordered that the Local, at the Local's expense, make copies of campaign literature to be supplied by Mr. Haskell. The literature shall be no more than one two-sided 8 1/2 x 11 inch sheet of paper. The Local shall make as many copies as there are members of Local 693 and give those copies to Mr. Haskell. The Local shall also make as many additional copies as needed so that one copy will be posted on each Local Union bulletin board at all Local 693 worksite locations.⁷ The Local shall be responsible for posting the literature. The literature shall


⁷ The postings of the literature on the Local Union bulletin boards shall be accompanied by a notice from the Local to be printed on the Local's stationery as follows:

This is an official Local Union notice posted by order of the Independent Administrator and the Election Officer. The Local Union does not endorse the contents of the literature.

The purpose of this notice is to insure that employers do not remove the literature based on a belief that it is not an "official" Union notice.

remain posted until the Election Officer directs that it be removed. The Local shall comply with this order within five calendar days after receiving the literature from Mr. Haskell, and Mr. Thayne shall supply an affidavit to the Election Officer within that time period stating that the Local has complied with this order.

To the extent modified herein, the Election Officer's ruling is affirmed.



Frederick B. Lacey
Independent Administrator
By: Stuart Alderoty, Designee

Dated: February 15, 1991.

EXHIBIT A

No 0179

NAME

ADDRESS

CITY

PHONE

Teamster Members of Local 693

TEAMSTER

MEMBERS OF LOCAL 693

SUPPORT YOUR RANK & FILE CANDIDATE

FOR

INTERNATIONAL CONVENTION DELEGATE

50-50 DRAWING

WINNER TO RECEIVE TOP PRIZE

ESTIMATED TO BE \$1000

JANUARY 28 1991

Need Not Be Present To Win

DONATION \$100 PER TICKET

No 0179

Copy Enlarged 127%

TRUE EXHIBIT
filed with
Broom County
DISTRICT ATT

FEB 18- 91 MON 12 38 AM '91

EXHIBIT B

FEB-18-'91 MON 12:41 PM

**RETIRED TEAMSTERS
50/25 DRAWING
LOCAL 693**

NAME _____

ADDRESS _____

PHONE _____

**TEAMSTERS
LOCAL 693**



**RETIRES
BINGHAMTON, N**

**RETIRED TEAMSTERS
50/25 DRAWING**

Donation - \$1.00

MAR 13 1991

WINNER NEED NOT BE PRESENT TO WIN