



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

June 19, 2015

By Hand and ECF

The Honorable Loretta A. Preska
Chief United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Int'l Bhd. of Teamsters, et al.*, No. 88 Civ. 4486 (LAP)

Dear Chief Judge Preska:

Enclosed please find a joint application by the International Brotherhood of Teamsters ("IBT") and the Government (together the "Parties") requesting that the proposed election rules for the 2016 IBT Election (the "Proposed 2016 Election Rules") be approved. The Parties submit these agreed-upon rules to the Court for its consideration and approval in accordance with paragraph four of the Stipulation and Order signed by the Court on February 20, 2015, Docket No. 4416, providing that the Parties will jointly agree on such rules. The Parties make this application upon notice to those IBT members and interested entities that submitted comments to the Proposed 2016 Election Rules during the comment period. Those comments, and an analysis of the comments by the Election Supervisor, are enclosed with the Parties' application. With limited exceptions that are described in the Election Supervisor's analysis, the Proposed 2016 Election Rules are substantially similar to the rules governing the 2011 IBT election.

Also enclosed is a proposed order approving the Proposed 2016 Election Rules. If the Court finds the Proposed 2016 Election Rules acceptable, the Parties respectfully request that the Court enter the proposed order. Alternatively, if the Court does not find the rules acceptable, then the Parties respectfully request that the Court remand the rules to the Parties for revision and re-submission. The Parties are available to answer any questions the Court may have concerning the Proposed 2016 Election Rules.

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We thank the Court for its consideration of this matter.

Respectfully,

PREET BHARARA
United States Attorney
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Encls.

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