

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	X	
	:	
Plaintiff,	:	
	:	DECLARATION
-Against-	:	88 Civ. 4486 (LAP)
	:	
INTERNATIONAL BROTHERHOOD OF TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND HELPERS OF AMERICA AFL-CIO, et al.,	:	
	:	
Defendants.	:	
	:	
	X	

**DECLARATION IN SUPPORT OF THE INDEPENDENT INVESTIGATIONS  
OFFICER’S APPLICATION FOR THE ISSUANCE OF SUBPOENAS  
DIRECTING THE GRANDFUND, LLC, GRAND FUND INVESTMENT GROUP,  
LLC, GRAND INSURANCE SERVICES, INC., MENTAL HEALTH ADVISORY  
GROUP, LLC, TEAMSTERS BENEFIT TRUST, OPTUM RX, INC., MANAGED  
HEALTH NETWORK, INC., HEALTH MANAGEMENT CONCEPTS, INC. d.b.a  
HMC HEALTHWORKS, CHASE BANK USA, N.A, AND FREMONT BANK TO  
PRODUCE SPECIFIED RECORDS**

1. I am Special Counsel to Joseph E. diGenova, the Independent Investigations Officer. I submit this declaration in support of the Independent Investigations Officer’s Application pursuant to the Final Agreement and Order in United States v. International Brotherhood of Teamsters, 88 Civ. 4486 (LAP) (“Final Agreement”), the court-approved Rules Governing the Authorities of Independent Disciplinary Officers and the Conduct of Hearings (“Rules”), 18 U.S.C. § 1965(c) and the All Writs Act, 28 U.S.C. § 1651, for subpoenas directing The GrandFund, LLC (“GrandFund”), Grand Fund Investment Group, LLC (“GFIG”), Grand Insurance Services, Inc. (“Grand Insurance”), Mental

Health Advisory Group, LLC (“Mental Health Advisory Group”), Teamsters Benefit Trust (“TBT”), Optum RX, Inc. (“OptumRX”), Managed Health Network, Inc. (“Managed Health”), Health Management Concepts, Inc. d.b.a. HMC Healthworks (“HMC”), Chase Bank USA, N.A. (“Chase Bank”), and Fremont Bank to produce to the Independent Investigations Officer no later than May 18, 2018, or within ten days after service of the subpoena (whichever comes later), the documents detailed in the attached Application.

2. The Final Agreement and the Rules empower the Independent Investigations Officer to investigate any allegations of corruption in the IBT including, but not limited to, bribery, embezzlement, extortion, loan-sharking, violations of the Landrum Griffin Act, the Taft Hartley Act, acts of racketeering, and allegations of organized crime association. (Ex. 1 at 16; Ex. 2 at 2-3)

3. Pursuant to Paragraph 30 of the Final Order, “consistent with the practice of the IRB, the Independent Investigations Officer shall be authorized to request that the Court issue subpoenas.” (Ex. 1 at 17) Pursuant to Paragraph B, Section 2(c) of the Rules, the Independent Investigations Officer may seek this Court’s permission to obtain through subpoena information from outside the union, its members and officers. For example, the Rules empower the Independent Investigations Officer, upon application to this Court, to take the sworn statements or sworn in-person examinations of persons not covered in the Rules. (Ex. 2 at 4)

4. Pursuant to the Final Order and the Rules, the Independent Investigations Officer has initiated an investigation into, among other things, whether an IBT employer which is a facilitator for a benefit fund service provider to IBT funds gave things of value to

Teamster and fund officials, transactions involving IBT entities and companies whose officers and employees were IBT members, and the circumstances surrounding the awarding to certain service providers of particular contracts for providing services to IBT funds.

5. The Teamsters Benefit Trust is an IBT affiliated health benefit fund. Rome Aloise (“Aloise”), a suspended International Vice President and the former principal officer of Local 853 and Joint Council 7, was the Chairman of the TBT. The Independent Review Board recommended charges against Aloise for, among other things, taking things of value from employers and for entering into a sham collective bargaining agreement with The GrandFund, LLC. After a hearing, on October 24, 2017, the Independent Review Officer (“IRO”) found, among other things, that Aloise had solicited and taken things of value from employers on multiple occasions and had entered into a sham collective bargaining agreement with GrandFund. On December 22, 2017, the IRO issued a decision suspending Aloise for two years from all IBT-affiliated positions.

6. The GrandFund, LLC has had a collective bargaining agreement with Local 853 and has been an IBT employer. Charles Bertucio (“Bertucio”) is the CEO of GrandFund. GrandFund acts as a facilitator for service providers seeking to obtain contracts from IBT funds.

7. OptumRX is part of UnitedHealth Group which also includes UnitedHealthcare. OptumRX is a service provider to various Teamster affiliated benefit funds, including: the IBT’s Voluntary Employee Benefits Trust (“VEBA”), the TBT, the North Coast Trust Fund, the Teamsters’ Miscellaneous Security Fund, the Local 727 Health and Welfare

Fund and the Cleveland Bakers and Teamsters Health and Welfare Fund. OptumRX provides pharmacy benefits management services to the funds.

8. OptumRX uses GrandFund to facilitate obtaining and maintaining its contracts with IBT funds. Bertucio is a licensed accident and health insurance producer in California. He was authorized to transact business on behalf of United Healthcare.

9. According to Bertucio, OptumRX paid a monthly fee to GrandFund, which Bertucio solely owns. GrandFund also received an annual bonus based upon the union business it and Bertucio generated for OptumRX.

10. To resolve IRB-recommended charges against him for entering into a sham collective bargaining agreement and sham membership with Local 853, on April 10, 2017, Bertucio entered into an agreement pursuant to which he resigned from IBT membership for 20 years and agreed to a ban from associating with IBT members for one year, among other terms. He neither admitted nor denied liability. The Independent Review Officer approved this agreement on April 14, 2017.

11. Vickie Lanini (“Lanini”) has been a Local 853 member employed at GrandFund. Lanini began working at GrandFund in May 2004. According to a former union official, Aloise caused Bertucio to hire Lanini. Lanini maintained membership in Local 853 pursuant to a contract that the Independent Review Officer found to be a sham.

12. Mental Health Advisory Group, LLC was formed in Delaware in July 2008. As a Delaware limited liability company, its ownership is not disclosed. The Certificate of Formation for Mental Health Advisory Group filed with the Delaware Secretary of State on July 15, 2008 was signed by Lake Grey as an “authorized person”. The California law firm that represented both Lanini and Bertucio at their IRB sworn examinations

employed a paralegal named Lake Grey. According to filings Mental Health Advisory Group made with the California Secretary of State, Lanini is the “sole member”, “owner” and “president” of Mental Health Advisory Group. Lanini is the registered agent for Mental Health Advisory Group in the State of California. When asked how she became the agent for service of process on Mental Health Advisory Group, Lanini testified during her 2015 IRB sworn examination that, “It occurred underneath GrandFund.” Bertucio is the sole owner of GrandFund.

13. Health Management Concepts, Inc. (“HMC”) was incorporated in Florida in 2005. HMC does business as HMC Healthworks. Janis DiMonaco is the owner of HMC. Mark Mauro (“Mauro”) and Joshua Jaklevick were Executive Vice Presidents of HMC Healthworks.

14. Lanini and Bertucio testified that Lanini received a 40% commission on business she brought into GrandFund. A former union official testified that Aloise made clear to vendors that to secure a contract from the TBT, the vendor seeking the business needed to be represented by Lanini in dealings with the TBT. An example of this was Lanini being involved with assisting HMC to secure a contract with the TBT. Tera Clizbe (“Clizbe”) worked at HMC. Aloise, then the TBT Chairman, testified that he had known Clizbe since she was two. In an internal IBT email in September 2013, Aloise identified Clizbe as his person at HMC whom he wanted to receive credit for Teamster contracts entered into with her employer. There would have been no business reason for Clizbe to go through Lanini as she did to sell services to TBT. After HMC received the business from TBT, Aloise emailed Lanini and Clizbe informing them of the decision and stated, “. . . You both owe me.”

15. According to the IRS Forms 5500 the TBT filed with the IRS covering the period from October 1, 2009 through September 30, 2016, Mental Health Advisory Group received commissions from Managed Health Network for insurance the TBT obtained from Managed Health Network. On the 2009 through 2013 IRS Forms 5500 the TBT filed with the IRS, the address given for Mental Health Advisory Group was 26 Sanford Lane, Lafayette, CA. That address was a residence Bertucio owned. On the 2014 and 2015 Forms 5500 the TBT filed, the address for Mental Health Advisory Group was P.O. Box 399 in Alameda, CA. This P.O. Box was associated with GrandFund. Despite this, during his 2015 IRB sworn examination, Bertucio testified that Mental Health Advisory Group was Lanini's company and not his. Lanini asserted it was a company associated with GrandFund.

16. The relationship between GrandFund and Mental Health Advisory Group is evidenced in a March 2012 email regarding GrandFund. Bertucio's sister, Local 853 member Lisa Ramsey ("Ramsey"), an employee of GrandFund, wrote to Lanini, ". . . Charlie said you might want a check from Mental Health for a golf thing just let me know."

17. Mental Health Advisory Group maintained an account at Fremont Bank in San Leandro, CA. The last four digits of this checking account are -3380. Lanini's name was printed on the checks for this account under "Mental Health Advisory Grp LLC". Lanini was a signatory on the account.

18. With respect to the commissions Managed Health Network paid to Mental Health Advisory Group as reflected on the TBT's 2009 IRS Form 5500, Lanini testified that she helped Managed Health Network to obtain the contract with the TBT for which

GrandFund received a commission. Lanini testified that she did not get paid directly by Managed Health Network. She received a portion of the commission paid to GrandFund. No commissions to GrandFund were shown on the IRS Forms 5500 the TBT filed for the years 2009 through 2015. As noted above, the TBT's Forms 5500 for the years 2009 through 2015 showed commissions paid to Mental Health Advisory Group.

19. Managed Health Network also paid Mental Health Advisory Group a commission in connection with insurance contracts for the North Coast Trust Fund, a Teamster affiliated benefit fund in which some California Locals in Joint Council 7 participated.

20. Grand Fund Investment Group filed Articles of Organization as an LLC in California on November 14, 2005. Bertucio is a managing member of Grand Fund Investment Group.

21. The GrandFund collective bargaining agreement provided only for GrandFund employees to receive benefits from the TBT. It appears that there was a scheme to provide health insurance coverage for an individual by falsely claiming such individual was an employee of GrandFund when such individual had a relationship with Grand Fund Investment Group and was not covered under the GrandFund collective bargaining agreement. In March 2013, Neal Wilkinson ("Wilkinson") became a member of Local 853. He reported to Aloise that he had "... joined Charles Bertucio as a partner with GrandFund."

22. According to the complaint in a lawsuit Wilkinson filed in January 2018 against Bertucio and Grand Fund Investment Group, he was owed commissions from Grand Fund Investment Group for work he performed in 2013 and 2014. In contrast, Wilkinson

represented on his February 1, 2013 Local 853 membership application that he was a salesman employed at GrandFund, LLC. Wilkinson contacted Aloise directly about securing health insurance. He requested Aloise to waive the three month waiting period for coverage through the TBT for GrandFund employees. Aloise directed Nora Johnson, the Fund manager, that Wilkinson be covered immediately upon receipt of the first contribution on his behalf on the ground that Wilkinson had “previous coverage.”

23. Bertucio’s sister, Ramsey, has been a Local 853 member. According to filings with the California Secretary of State, Ramsey was the Chief Financial Officer of Grand Insurance Services, Inc.. According to the 2014 IRS Form 5500 the IBT’s Voluntary Employee Benefits Trust filed, Grand Insurance Services received a commission from Vision Service Plan for a contract with that Fund.

24. Federal labor law, 29 U.S.C. §432(a), and Department of Labor (“DOL”) regulations require individual union employees to report to the DOL in public filings, DOL Forms LM-30, anything of value received from employers, vendors, and others doing business with the union that was cumulatively \$250 or higher for the year. A reciprocal disclosure obligation on employers and their agents for giving gifts to union officials has been met by their filing DOL Form LM-10, 29 U.S.C. §433.

25. An individual familiar with both Bertucio and certain IBT officials testified he saw Bertucio on multiple occasions pay for those IBT officials’ golf related expenses, including meals, equipment, and clothing. In the years paid, these expenses appeared to have exceeded the \$250 reporting threshold per official. Neither the vendor nor the union employees reported these payments.

26. Carl Pecoraro (“Pecoraro”) is the Secretary-Treasurer and principal officer of Local 507 in Cleveland, Ohio. Pecoraro is also a Trustee of the Cleveland Bakers and Teamsters Health and Welfare Fund.

27. Bertucio testified that he introduced OptumRX’s insurance products to multiple IBT Funds. Effective January 1, 2015, OptumRX replaced the Cleveland Fund’s pharmacy benefits manager. OptumRX then began to administer prescription drug claims for the Cleveland Fund.

28. GrandFund, which Bertucio solely owned, provided Pecoraro with a ticket to an NBA Finals game between the Golden State Warriors and the Cleveland Cavaliers on June 7, 2015. That ticket was worth \$3,066. Pecoraro and GrandFund each were required to file forms with the Department of Labor disclosing the giving and receiving of this thing of value. According to a witness familiar with Pecoraro, Pecoraro had contemporaneously posted a photo of himself online in attendance at the game. On February 25, 2016, Pecoraro filed a Form LM-30 for 2015, asserting under oath for that year the only disclosable amount he had received was \$398.83 paid by a fiduciary advisor. According to the fiduciary advisor’s 2015 Form LM-10, this amount was for five dinners at which Pecoraro was an attendee. Pecoraro omitted the ticket to the NBA Championship series game from this filing.

29. On August 29, 2016, over six months after Pecoraro had omitted the Championship ticket from his filed 2015 form, the IIO filed a public subpoena application with this Court to obtain, among other things, Bertucio’s credit card statements. The IIO Declaration in support of the application noted, “In June 2015, a Teamster Local officer from the Midwest who was a Trustee of a fund attended an NBA

Finals game in Oakland, CA with Bertucio.” After this public filing, on September 20, 2016, Pecoraro filed an amended Form LM-30 for 2015, in which he disclosed that GrandFund had provided him a “ticket to sporting event” worth \$3,066 which he had failed to disclose in his initial February 2016 filing. In October 2016, approximately 16 months after he had received the ticket and two months after the IIO’s subpoena application filing, Pecoraro paid GrandFund \$3,066 for the NBA Finals ticket. Despite the amount involved and his previously disclosing items worth less from another source, Pecoraro only disclosed the NBA Finals ticket and paid GrandFund for it after the IIO’s public filing reporting its receipt.

30. Also after the IIO’s public subpoena application, on September 15, 2016, GrandFund, which previously failed to disclose the ticket as required on the Form LM-10 for 2015 for vendors who gave things of value to union and fund officials, belatedly filed a Form LM-10 disclosing that it had given Pecoraro a “single ticket for June 7, 2015 NBA Finals game at Oracle Arena in Oakland, California” valued at \$3,066. Bertucio signed this form as GrandFund’s President. Bertucio, who had signed such forms in an earlier year for GrandFund, was aware of the requirement to file Forms LM-10. GrandFund filed this form six months late after its gift of the NBA Finals ticket to Pecoraro was described in a public filing.

31. In 2014, Bertucio and other vendors to IBT funds and entities went on a golf trip to Ireland with IBT General President James Hoffa; William C. Smith, III (“Smith”), then Executive Assistant to the General President; David Laughton, Director of the IBT’s Brewery and Soft Drink Workers Conference and Kevin Moore, an International Trustee. The other vendors included Richard Leebove (“Leebove”), from RL Communications,

Edward Sullivan (“Sullivan”), from Labor Benefits, LLC, and Greg Tarpinian (“Tarpinian”), from Entrust Capital. Bertucio charged on his Chase Bank credit card ending in -0161, \$3,552.81 and \$10,513.05 to Southwest Ireland Golf on February 24, 2014 and June 13, 2014, respectively. Checks from IBT employer GrandFund paid these charges on Bertucio’s card. Subsequently, the IBT individuals who went on the golf trip to Ireland made checks payable to Bertucio’s credit card company directly designated for payment to his credit card account, reimbursing the expense previously incurred. Neither Bertucio nor the employees disclosed these payments.

32. An individual with direct knowledge of Bertucio and certain IBT International officials stated he knew that in the past Bertucio had reimbursed surreptitiously at least one Teamster employee for expenses the IBT employee paid while with Bertucio. He heard from other sources that this occurred on other occasions.

33. Stephen Mack (“Mack”), a brother-in-law of suspended IBT Vice President Rome Aloise, is the Director of the IBT’s Industrial Trades Division. Bertucio and Mack have known each other for more than thirty years. In the past, Mack filed a Form LM-30 for transportation, food, beverages and golf he received from Bertucio.

34. In August 2013, Bertucio, Hoffa, Smith, Mack, and IBT vendors Sullivan, Leebove, Tarpinian and others went on a golf trip to Scotland. Reservations for this trip were made in August 2012.

35. Sullivan, who went on the 2013 Scotland golf trip and the 2014 Ireland golf trip, is the owner of Labor Benefits, LLC. Labor Benefits is a vendor to the IBT and other IBT entities, including the IBT’s VEBA Trust. In 2013, Sullivan’s company Labor Benefits received approximately \$400,000 from its business with the IBT.

36. Cell phone records, text messages, and calendar entries obtained by the IIO indicate that certain senior IBT officials planned to have dinner at Piero's Restaurant in Las Vegas on May 12, 2015. Bertucio's credit card issued by Chase Bank ending in -8598 had a charge posted May 13, 2015 at Piero's Restaurant in Las Vegas for \$1,467.80. This charge was paid by a check from GrandFund to the credit card company.

37. An individual familiar for at least a decade with Bertucio and his interactions with Teamster officials testified that on several occasions Bertucio paid for expensive meals in connection with golf for senior IBT officials in Las Vegas. These meals would follow Bertucio's paying for merchandise at golf courses for those officials.

38. On May 21, 2015, Bertucio charged \$8,000 on his Chase Bank credit card for "AK Railroad Pass Svc". This charge on Bertucio's credit card number ending in -8598 was paid by a check from The GrandFund. OptumRX sponsored a railroad trip for IBT officials during an IBT Joint Council 28 meeting in Anchorage, AK on June 13, 2015.

39. An email obtained by the IIO indicated that vendor Leebove attempted to coordinate a golf outing including himself, vendors Bertucio and Tarpinian, and certain senior IBT officials at the IBT's Brewery Conference in Fort Lauderdale, Florida between January 26 and 28, 2015. IBT records reflected that the senior IBT officials and the vendors were all scheduled to stay at the same hotel during the Conference.

40. To comply with their responsibilities to disclose items given to union officials with an annual value totaling over \$250, both GrandFund and OptumRX would need to track payments to particular union officials throughout the year.

41. The IIO has obtained an email referencing a golf trip to Charleston, SC in September 2015 involving senior IBT officials and vendors. According to Smith's testimony, the trip was cancelled. Yet he paid Bertucio \$2,350 for this trip, which Smith testified was cancelled.

42. Cheiron, Inc. is an advisor to the IBT and the VEBA Trust. In 2013, the VEBA Trust issued a request for proposals for a Pharmacy Benefits Manager ("PBM") for two programs under the VEBA Trust: Medicare Part D and TeamsterRx Coalition. OptumRX was the incumbent PBM for the VEBA Trust.

43. The Director of the IBT's Benefits Department, John Slatery ("Slatery"), was involved in coordinating the bidding process for the PBM for the VEBA Trust and the IBT.

44. The Trustees of the VEBA included Ken Hall, Aloise, Smith, William Hamilton, and John Murphy.

45. Cheiron prepared reports analyzing the bids submitted to provide PBM services for the VEBA Trust. A Cheiron report dated May 29, 2013, reflected that the best and final offers submitted by OptumRX were dated after the best and final offers the other bidders submitted. OptumRX used a third party intermediary, The GrandFund, to assist it in securing business from IBT funds.

46. Aloise, then a VEBA Trustee, and Slatery discussed in emails on the eve of the VEBA Trust meeting during which final bids were to be considered, how OptumRX, then the highest bidder, could restructure its bid in light of its competitors' bids to be as high as possible but be competitive with the lower bids its competitors had submitted. Through Lanini, Aloise passed information on to Bertucio, OptumRX's agent, about where

OptumRX stood in relation to its competitors' bids. Both Slatery and Aloise were fiduciaries of the VEBA Trust.

47. The Fund Trustees, including Aloise and Smith, selected OptumRX to provide PBM services for the VEBA Trust under the new contract. OptumRX also had the previous contract for PBM services.

48. OptumRX representatives, including Peter Beerman and Vincent Condino, appear to have given Slatery things of value including tickets to sports events and meals. It appears that in at least one year, the unreported gifts OptumRX gave Slatery were worth more than \$250. Neither Slatery nor OptumRX disclosed these items.

49. Giacomo "Jack" Cipriani ("Cipriani") was an IBT Vice President and the principal officer of Local 391 in Greensboro, NC. Cipriani retired from the Local and the IBT in 2010. Cipriani owns Cipriani Solutions. In 2014 and 2015, the IBT paid Cipriani Solutions \$61,445 and \$20,270 respectively for "professional services" as a "consultant." Between January 2012 and October 2015, there were more than 900 cell phone calls and texts between Cipriani and Bertucio. The IIO has received information from a source in the IBT who has previously been proven to be reliable that Cipriani was in a business relationship with Bertucio concerning services provided to the IBT and, during the period of Bertucio's suspension, Cipriani would interact with IBT officials on Bertucio's behalf.

50. John T. Coli, Sr. ("Coli") was the principal officer of Joint Council 25 and Local 727 in Chicago until July 12, 2017. He had been an International Vice President until March 2017. He had lost his re-election bid.

51. On July 12, 2017, a federal indictment was filed against Coli in the Northern District of Illinois for taking money on several occasions from an IBT employer in violation of 29 U.S.C. §186(b). On September 21, 2017, a superseding indictment was filed which charged Coli with taking money from an IBT employer during the years 2014, 2015, 2016 and 2017. Coli was also charged with violating federal labor law by failing to file accurate Forms LM-30 with the DOL by omitting the payments he had received from the employer in the years 2014, 2015 and 2016 from the Forms LM-30 he had filed for those years.

52. On August 10, 2017, the IIO recommended to the IBT that Coli be charged with failing to cooperate with the IIO by failing to appear for his duly noticed sworn examination under the Final Agreement and Order. After a hearing, on January 10, 2018, the IBT found that Coli had failed to cooperate with the IIO and permanently barred him from the IBT. On January 12, 2018, the IRO approved the IBT's decision.

53. On May 8, 2010, Coli and other Teamster officers and employees from Chicago, including Local 731 President Terrence Hancock ("Hancock"), attended a meal at Mastro's Ocean Club in Las Vegas. A representative from Health Management Concepts, Mark Mauro, also attended this meal. The cost per attendee was approximately \$600. Hancock caused Local 731 to pay \$4,172 for this meal. According to Hancock, HMC representative Mauro split the bill for this meal with Local 731.

54. By 2013, the Local 727 Health and Welfare Fund, the Local 731 Garage Attendants, Linen and Laundry Health and Welfare Fund and the Local 731 Private Scavengers Health and Welfare Fund each identified Health Management Concepts as a service provider. Coli and Hancock were Trustees on the respective Local 727 and Local

731 health funds. In February 2016, the Local 727 Health and Welfare Fund terminated its agreement with Health Management Concepts effective in May 2016.

55. In approximately March 2013, Coli asked the IBT to endorse HMC Healthworks as an IBT preferred provider in a letter the IBT General Secretary-Treasurer would send to IBT Locals and benefit funds. Aloise was concerned that Coli was attempting to get credit for his contact at HMC. Aloise wanted his person at HMC, Clizbe, to get the credit.

56. Bertucio testified that GrandFund introduced insurance products to the Local 727 Health and Welfare Fund. Coli was a Trustee on the Local 727 Health and Welfare Fund. In 2014, the Local 727 Health and Welfare Fund decided to use OptumRX for Pharmacy Benefit Services.

57. The foregoing demonstrates that just cause exists for the issuance of subpoenas directing GrandFund, Grand Fund Investment Group, Grand Insurance, Mental Health Advisory Group, Teamsters Benefit Trust, OptumRX, Managed Health Network, Health Management Concepts, Inc. d.b.a. HMC Healthworks, Chase Bank, and Fremont Bank to produce the specified records which would assist the Independent Investigations Officer in the ongoing investigation into whether an IBT employer, which is a facilitator for a benefit fund service provider to IBT funds, gave things of value to Teamster and fund officials, transactions involving IBT entities and companies whose officers and employees were IBT members, and the circumstances surrounding the awarding to certain service providers of particular contracts for providing services to IBT funds. Accordingly, just cause exists for the issuance of the subpoenas directing the production of the specified records.

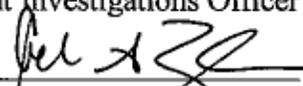
I declare under penalty of perjury the foregoing is, to the best of my knowledge,  
true and correct.

Dated: New York, New York  
April 30, 2018

Respectfully submitted,

Joseph E. diGenova  
Independent Investigations Officer

By:

  
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TO: AUSA Rebecca Tinio  
Bradley T. Raymond, Esq.  
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Grand Insurance Services, Inc.  
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Teamsters Benefit Trust  
Optum RX, Inc.  
Managed Health Network, Inc.  
Health Management Concepts, Inc. d.b.a. HMC Healthworks  
Chase Bank USA, N.A.  
Fremont Bank

**CERTIFICATE OF SERVICE**

I, Celia A. Zahner, hereby certify that on April 30, 2018, I caused a copy of the foregoing INDEPENDENT INVESTIGATIONS OFFICER'S APPLICATION FOR THE ISSUANCE OF SUBPOENAS DIRECTING THE GRANDFUND, LLC, GRAND FUND INVESTMENT GROUP, LLC, GRAND INSURANCE SERVICES, INC., MENTAL HEALTH ADVISORY GROUP, LLC, TEAMSTERS BENEFIT TRUST, OPTUMRX, INC., MANAGED HEALTH NETWORK, INC. HEALTH MANAGEMENT CONCEPTS, INC. d.b.a HMC HEALTHWORKS, CHASE BANK USA, N.A. AND FREMONT BANK TO PRODUCE SPECIFIED RECORDS and the DECLARATION IN SUPPORT OF THE INDEPENDENT INVESTIGATIONS OFFICER'S APPLICATION to be filed electronically and served upon the below by mail to anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by cooperation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

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