



September 28, 2018

To: Dan Wasser, PPMWS Executive Officer

Subject: Pension Suit

Dear Dan:

I have obtained a copy of a complaint filed in the matter of Daniel Wasser and the Printing, Publishing, and Media Workers Sector of the Communications Workers of America (PPMWS) v. Arthur Deianni, James Brill, Daniel Faberman, Robert Maida and Theodore Rilea, in their capacities as Trustees of the CWA/ITU Negotiated Pension Plan and the CWA/ITU Negotiated Pension Plan (NPP), itself. While I have attempted to determine what the merits of this case are, I have not been able to discern much other than that the lawsuit was filed to declare void an amendment made to the Trust Agreement that "terminates the exclusive power of the ITU Sector to appoint, remove, and replace Union Trustees." The complaint itself is problematic in other ways.

This suit has been filed on behalf of the PPMWS of CWA. PPMWS is an administrative arm of CWA. This suit may incur expenses, liabilities, and other obligations on CWA's behalf. Such a suit needs authorization and review. You did not consult with me or with our General Counsel prior to filing the suit.

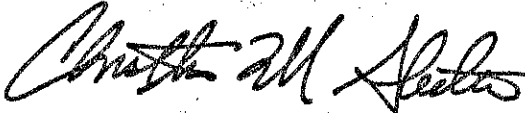
Such consultation is important for many reasons. For instance, I would want to know the merits of the case, whether a lawsuit is worthwhile, and whether there had been any attempt at resolving the matter short of litigation. This suit forces legal expenses upon the PPMWS and the NPP, neither of which have deep pockets and both of which need those funds to benefit our members and our retirees. If this suit was filed without any attempt at resolving the matter first, that is deeply troubling, especially if this dispute arises from actions taken at a trustee meeting that you failed to attend.

I am directing you to **proceed no further** with this lawsuit on behalf of PPMWS unless and until there is a full accounting to me of the following:

1. Who approved the filing of this lawsuit and the expenditure of Union funds on this lawsuit? What is the anticipated cost of this lawsuit?
2. What efforts did you make to resolve the dispute identified in the complaint prior to filing the lawsuit?
3. What is the amount of funds utilized to date on this case, and what account have they been paid from?
4. What are the merits of the case? I need to more fully understand the lawsuit filed in our name before I can decide whether it should proceed.

Please provide the requested information to General Counsel Pat Shea by October 5, 2018.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher M. Shelton". The signature is written in a cursive, flowing style.

Christopher M. Shelton
President