

EXHIBIT "A"

**AFFIDAVIT**

**Concerning NMB Rerun Election, Case No. R-6044 for ALPA  
Representation at Federal Express**

I am a flight deck crew employee of Federal Express Corporation. I voted for USPA in the above mentioned election. I feel that the election structure was fundamentally flawed. My vote for USPA should in no way help ALPA become the bargaining representative for Federal Express pilots because: (place your initials after the statement that applies to you).

- I am opposed to union representation for the pilots at Federal Express. I voted for USPA as the lesser of two evils in an effort to stop ALPA. If the election were conducted with ALPA being the only choice, I would not have returned a ballot (would not have voted for representation).

Initials: \_\_\_\_\_

- I desire representation by USPA, but oppose representation by ALPA. If the election were conducted with ALPA being the only choice, I would not have returned a ballot (would not have voted for representation).

Initials: \_\_\_\_\_

I hereby attest under penalty of perjury that this affidavit is given freely and without coercion, and that the foregoing statements are correct. I understand that my name and this affidavit will be held confidential by the NO Committee, their attorney and the NMB.

Name: \_\_\_\_\_ Empl. Ident. No. \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Mail your Affidavit to:

Myles J. Tralins, Esq.  
Tralins and Associates  
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2 South Biscayne Boulevard  
Miami, Florida 33131

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1. I am a Flight Deck Crew Employee of Federal Express Corporation.
2. My employee identification number is \_\_\_\_\_.
3. My home address is \_\_\_\_\_.
4. I received an "Official Ballot of National Mediation Board for a rerun election in NMB Case No. R-6044 for ALPA representation.
5. The NMB's official ballot instructed me that:
  - a. I was not required to vote.
  - b. If less than a majority of Flight Deck Crew Members vote, no union will be certified as our bargaining representative.
  - c. If more than a majority of the Flight Deck Crew Members vote, then the bargaining representative which receives a majority of the votes cast will be certified as my representative.
6. The NMB's Official Ballot placed me in an impossible dilemma and took away my freedom of choice.
7. I DO NOT want union representation for the Federal Express Flight Deck Crew Members.
8. My freedom of choice was taken away from me because if I did not vote and a majority of the Flight Deck Crew Members did vote, my right to select a union representative would have been taken away from me. Had I been given the choice, I would have voted AGAINST union representation. As it was, I felt compelled to vote for one union over the other because if I did not do so I would give up my right to have my vote counted as to my choice of representation.
9. To me, the way this election was conducted was fundamentally unfair. I believe it is my Constitutionally guaranteed right to have a voice by my vote in:
  - A. Whether or not I want union representation; and
  - B. If a union is to represent me and affect my livelihood, working conditions and my relationship with my employer, who that union will be.
 I have personal knowledge that many other coworkers of mine felt compelled to vote as I did due to the unfair way this election was conducted.
10. If a union is certified as a result of the way the election was conducted by the NMB, it is my opinion that the vote to certify is tainted and does not fairly represent the desire of a majority of the Flight Deck Crew Members that they not be represented by a union at all.

I HEREBY ATTEST UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS ARE CORRECT.

SIGNATURE \_\_\_\_\_

P.S. I UNDERSTAND THAT MY NAME AND THIS AND THIS AFFIDAVIT WILL BE CONFIDENTIAL AND ONLY PRESENTED TO THE NMB.