



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

September 16, 1998

Howard M. Glicken  
8400 Old Cutler Road  
Miami, FL 33143-6216

RE: MUR 4806

Dear Mr. Glicken:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena to produce documents and order to submit written answers which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, at this time, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information within 30 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

If you have any questions, please contact me at (800) 424-9530 or (202) 694-1650.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tamara K. Kapper", followed by a small flourish.

Tamara K. Kapper  
Paralegal Specialist

Enclosure  
Subpoena and Order

26432 363 40 02

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
)  
)

MUR 4806

**SUBPOENA TO PRODUCE DOCUMENTS**  
**ORDER TO SUBMIT WRITTEN ANSWERS**

TO: Howard M. Glicken  
8400 Old Cutler Road  
Miami, FL 33143-6216

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpocna. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order.

2014-03-23 10:02

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her  
hand in Washington, D.C. on this 16<sup>th</sup>, day of September, 1998.

For the Commission,

Joan D. Aikens  
Joan D. Aikens  
Chairman

ATTEST:

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

Attachments

1. Instructions
2. Definitions
3. Questions

INSTRUCTIONS

In answering these interrogatories, furnish all information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including information appearing in your records.

Each answer is to be given separately and independently, and, unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any communications or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1996 to the present.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

### DEFINITIONS

For the purpose of this discovery request, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named person in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

**BEFORE THE FEDERAL ELECTION COMMISSION**

**INTERROGATORIES**

MUR: 4806  
Howard M. Glicken

1. Describe your substantive participation in the solicitation and receipt of the \$50,000 contribution by Hamilton Bank, N.A. of Miami, Florida ("the Bank"), to the Democratic National Committee on April 26, 1996.
2. Describe all communications by you with agents, officers or employees of Hamilton Bank, N.A. relating to or referencing:
- a) the solicitation of any contribution on behalf of the DNC;
  - b) the making of any contribution by Hamilton Bank, N.A. or any of its officers to the DNC;
  - c) the receipt on behalf of the DNC of any contribution made by Hamilton Bank, N.A. or any of its officers;
  - d) the transmission of any contribution made by Hamilton Bank, N.A. or any of its officers to the DNC;
  - e) please provide all documents related to the communications cited in responses to questions 2.a-d above.
3. Please identify all person(s) who participated in the solicitation and/or the making of any contribution by *Hamilton Bank, N.A. to the Democratic National Committee* and describe their role in the solicitation.
4. Please explain, in detail, the benefits and responsibilities of an annual trustee membership holder in the DNC.
5. Please explain, in detail, the benefits and responsibilities of someone who makes a donation to the DNC's building fund.

6. Please state the method by which the \$50,000 Bank check cited in Interrogatory 1, was transmitted to the DNC, e.g., regular mail, hand-delivered. If the contribution was hand-delivered to the DNC or to a representative of the DNC, please identify the person who delivered the check for the Bank and the person who received the check for the DNC.

7. Please explain the role played by Charles Dusseau in the receipt of the contribution by the Bank to the DNC cited in Interrogatory 1.

2014-06-10 03:43:43