

Appendix A Illustrative Subpoena

Subpena Duces Tecum

**By Authority of the House of Representatives of the
Congress of the United States of America**

To Custodian of Documents International Brotherhood of Teamsters.....

You are hereby commanded to produce the things identified on the attached schedule before the
Subcommittee on Oversight
and Investigations, Committee on Education and the Workforce.....

of the House of Representatives of the United States, of which the Hon. Pete Hoekstra.....

..... is chairman, by producing such things in Room B-346A..... of the

..... Rayburn..... Building in the city of Washington, on


..... March 17, 1998....., at the hour of 5:00 P.M......

To any staff member or agent of the Committee on Education and the Workforce
of the age of 18 years or older or to any United States Marshal
to serve and make return.

Witness my hand and the seal of the House of Representatives

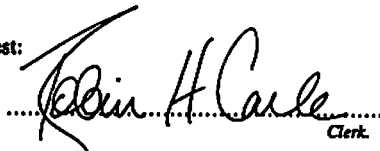
of the United States, at the city of Washington, this

..... 10th..... day of March....., 19.. 98..



.....
The Honorable Pete Hoekstra *Chairman*.

Attest:


.....
Clerk

GENERAL INSTRUCTIONS

1. In complying with this Subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You are also required to produce documents that you have a legal right to obtain, documents that you have a right to copy or have access to, and documents that you have placed in the temporary possession, custody, or control of any third party. No records, documents, data or information called for by this request shall be destroyed, modified, removed or otherwise made inaccessible to the Committee.
2. In the event that any entity, organization or individual denoted in this subpoena has been, or is also known by any other name than that herein denoted, the subpoena shall be read to also include them under that alternative identification.
3. Each document produced shall be produced in a form that renders the document susceptible of copying.
4. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers or identifying markers with which they were associated when this subpoena was served. Also identify to which paragraph from the subpoena that such documents are responsive.
5. It shall not be a basis for refusal to produce documents that any other person or entity also possesses non-identical or identical copies of the same document.
6. If any of the subpoenaed information is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and provide sufficient detail to allow the information to be copied to a readable format. If the information requested is stored in a computer, indicate whether you have an existing program that will print the records in a readable form.
7. If the subpoena cannot be complied with in full, it shall be complied with to the extent possible, which shall include an explanation of why full compliance is not possible.
8. In the event that a document is withheld on the basis of privilege, provide the following information concerning any such document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.
9. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject and recipients) and explain the circumstances by which the document ceased to be in your possession, or control.
10. If a date set forth in this subpoena referring to a communication, meeting, or other event is inaccurate, but the actual date is known to you or is otherwise

apparent from the context of the request, you should produce all documents which would be responsive as if the date were correct.

11. Other than subpoena questions directed at the activities of specified entities or persons, to the extent that information contained in documents sought by this subpoena may require production of donor lists, or information otherwise enabling the re-creation of donor lists, such identifying information may be redacted.
12. The time period covered by this subpoena is included in the attached Schedule A.
13. This request is continuing in nature. Any record, document, compilation of data or information, not produced because it has not been located or discovered by the return date, shall be produced immediately upon location or discovery subsequent thereto.
14. All documents shall be Bates stamped sequentially and produced sequentially.
15. Two sets of documents shall be delivered, one set for the Majority Staff and one set for the Minority Staff. When documents are produced to the Subcommittee, production sets shall be delivered to the Majority Staff in Room B346 Rayburn House Office Building and the Minority Staff in Room 2101 Rayburn House Office Building.

GENERAL DEFINITIONS

1. The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra office communications, electronic mail (E-mail), contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disc, or videotape. A documents bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term "communication" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face to face, in a meeting, by telephone, mail, telexes, discussions, releases, personal delivery, or otherwise.
3. The terms "and" and "or" shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this subpoena any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
4. The term "White House" refers to the Executive Office of the President and all of its units including, without limitation, the Office of Administration, the White House Office, the Office of the Vice President, the Office of Science and Technology Policy, the Office of Management and Budget, the United States Trade Representative, the Office of Public Liaison, the Office of Correspondence, the Office of the Deputy Chief of Staff for Policy and Political Affairs, the Office of the Deputy Chief of Staff for White House Operations, the Domestic Policy Council, the Office of Federal Procurement Policy, the Office of Intergovernmental Affairs, the Office of Legislative Affairs, Media Affairs, the National Economic Council, the Office of Policy Development, the Office of Political Affairs, the Office of Presidential Personnel, the Office of

the Press Secretary, the Office of Scheduling and Advance, the Council of Economic Advisors, the Council on Environmental Quality, the Executive Residence, the President's Foreign Intelligence Advisory Board, the National Security Council, the Office of National Drug Control, and the Office of Policy Development.

March 10, 1998

Custodian of Documents
International Brotherhood of Teamsters
25 Louisiana Avenue, N.W.
Washington, D.C. 20001

SCHEDULE A

1. All organizational charts and personnel rosters for the International Brotherhood of Teamsters ("Teamsters" or "IBT"), including the DRIVE PAC, in effect during calendar years 1991 through 1997.
2. All IBT operating, finance, and administrative *manuals* in effect during calendar years 1991 through 1997, including, but not limited to those that set forth (1) operating policies, practices, and procedures; (2) internal financial practices and reporting requirements; and (3) authorization, approval, and review responsibilities.
3. All annual audit reports of the IBT for the years 1991 through 1996 performed by the auditing firm of Grant Thornton.
4. All IBT annual reports to its membership and the public for years 1991 through 1997, including copies of IBT annual audited financial statements certified to by independent public accountants.
5. All books and records showing receipts and expenditures, assets and liabilities, profits and losses, and all other records used for recording the financial affairs of the IBT including, journals (or other books of original entry) and ledgers including cash receipts journals, cash disbursements journals, revenue journals, general journals, subledgers, and workpapers reflecting accounting entries.
6. All Federal Income Tax returns filed by the IBT for years 1991 through 1997.
7. All minutes of the General Board, Executive Board, Executive Council, and all Standing Committees, including any internal ethics committees formed to investigate misconduct and corruption, and all handouts and reports prepared and produced at each Committee meeting.
8. All documents referring or relating to, or containing information about, any contribution, donation, expenditure, outlay, in-kind assistance, transfer, loan, or grant (from DRIVE, DRIVE E&L fund, or IBT general treasury) to any of the following entities/organizations:
 - a. Citizen Action
 - b. Campaign for a Responsible Congress
 - c. Project Vote
 - d. National Council of Senior Citizens
 - e. Vote Now '96
 - f. AFL-CIO

- g. AFSCME
 - h. Democratic National Committee
 - i. Democratic Senatorial Campaign Committee ("DSCC")
 - j. Democratic Congressional Campaign Committee ("DCCC")
 - k. State Democratic Parties
 - l. Clinton-Gore '96
 - m. SEIU
9. All documents referring or relating to, or containing information about any of the following individuals/entities:
- a. Teamsters for a Corruption Free Union
 - b. Teamsters for a Democratic Union
 - c. Concerned Teamsters 2000
 - d. Martin Davis
 - e. Michael Ansara
 - f. Jere Nash
 - g. Share Group
 - h. November Group
 - i. Terrence McAuliffe
 - j. Charles Blitz
 - k. New Party
 - l. James P. Hoffa Campaign
 - m. Delancy Printing
 - n. Axis Enterprises
 - o. Barbara Arnold
 - p. Peter McGourty
 - q. Charles McDonald
 - r. Theodore Kheel
10. All documents referring or relating to, or containing information on about, communications between the Teamsters and the White House regarding any of the following issues:
- a. United Parcel Service Strike
 - b. Diamond Walnut Company Strike
 - c. Pony Express Company organizing efforts
 - d. Davis Bacon Act
 - e. NAFTA Border Crossings
 - f. Ron Carey reelection campaign
 - g. IBT support to 1996 federal election campaigns.
 - i. All documents referring or relating to, or containing information about, communications between the Teamsters and the Federal Election Commission.
12. All documents referring or relating to, or containing information about, communications between the Teamsters and the Democratic National Committee, DSCC, or DCCC.

13. All documents referring or relating to, or containing information about, communications between the Teamsters and the Clinton-Gore '96 Campaign Committee.
14. All documents referring or relating to, or containing information about, policies and procedures in effect during 1996 regarding the approval of expenditures from the IBT general treasury, DRIVE E&L fund, and DRIVE PAC.
15. All documents referring or relating to, or containing information about the retention by the IBT of the law firm Covington & Burling and/or Charles Ruff.
16. All documents referring or relating to, or containing information about work for the IBT performed by the firm Palladino & Sutherland and/or Jack Palladino.
17. All documents referring or relating to, or containing information about work for the IBT performed by Ace Investigations and/or Guerrieri, Edmund, and James.
18. All documents referring or relating to, or containing information about IBT involvement in the 1995-1996 Oregon Senate race (Ron Wyden vs. Gordon Smith).
19. All documents referring or relating to, or containing information about, Ron Carey's campaign for reelection as general president of the Teamsters.
20. All documents referring or relating to, or containing information about organization, planning, and operation of the 1996 IBT Convention.
21. All documents referring or relating to, or containing information about the following:
 - a. Trish Hoppey
 - b. John Latz
 - c. any individual with the last name of "Golovner".
 - d. Convention Management Group.
22. All documents referring or relating to, or containing information about the Household Finance Corporation.
23. All documents referring or relating to, or containing information about, any "affinity credit card" program or other credit card program sponsored by or participated in by the IBT.
24. A list of all bank accounts held by the International Brotherhood of Teamsters including the name of the bank, account number, and bank address.
25. All documents referring or relating to, or containing information about, payments made by the IBT to any official or employee of the Independent Review Board.

26. Unless otherwise indicated, the time period covered by this subpoena is between January 1991 and December 1997.