

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICANTS: HONORABLE SODY CLEMENTS, )  
an Individual and Oklahoma Resident on behalf of )  
herself and others similarly situated: LT. GENERAL )  
(Ret.) RICHARD A. BURPEE, an Individual and )  
Oklahoma Resident on behalf of himself and others )  
similarly situated; JAMES PROCTOR, an Individual and )  
Oklahoma Resident on behalf of himself and others )  
similarly situated; RODD A MOESEL, an Individual and )  
Oklahoma Resident on behalf of himself and others )  
similarly situated; RAY H. POTTS, an Individual and )  
Oklahoma Resident on behalf of himself and others )  
similarly situated; BOB A. RICKS, an Individual and )  
Oklahoma Resident on behalf of himself and others )  
similarly situated. )

CAUSE NO. PUD 201500344

RELIEF SOUGHT: VACATE OR MODIFY OKLAHOMA )  
CORPORATION COMMISSION ORDER NO. 341630, )  
CAUSE NO. PUD 260; AND REDETERMINE ISSUES )  
FOLLOWING INTRINSIC FRAUD )



**FILED**  
JAN 13 2016  
COURT CLERK'S OFFICE - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA

Deposition of Glen A. Glass, Esq. taken in Cause No. PUD 890000662

Oklahoma Corporation Commission  
P.O. BOX 52000  
OKLAHOMA CITY, OKLAHOMA 73152-2000

300 Jim Thorpe Building  
Oklahoma City, OK 73105  
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Bob Anthony, Commissioner

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From: \_\_\_\_\_@cox.net  
Sent: Thursday, January 07, 2016 8:34 AM  
To: Bob Anthony  
Subject: [NEWSENDER] - Open Records Request- Bell Bribery Case - Message is from an unknown sender

Commissioner Bob Anthony,

I have read with interest the articles in the Oklahoman newspaper concerning the AT&T/Bell Bribery case.

The issues regarding public corruption, bribery, perjury, etc. have been raised by the Oklahoma Supreme Court and the Oklahoma Corporation Commission.

I would like to know more about this case and as a Open Records Request I ask that you send me, in electronic form, copies of any depositions given in the 1990's commission cases by Bell attorneys Glen Glass and Bill Free.

Thank you for your time and consideration.

---

To: \_\_\_\_\_@cox.net

Re: Open Records Request- Bell Bribery Case

This response is given to your "Open Records Request- Bell Bribery Case" that was received by email on January 7, 2016.

Links provide electronic images of 1993 depositions by Bell attorneys Glen Glass and Bill Free. "Filed under seal" information readily available and certain other information is provided as well (see also David H. Miller deposition).

Respectfully yours,

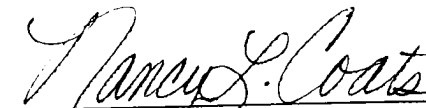
Jackie Hollinhead  
Executive Assistant to Commissioner Bob Anthony  
Oklahoma Corporation Commission

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION )  
OF HOWARD W. MOTLEY, JR., FOR AN )  
INQUIRY INTO THE RATES AND CHARGES )  
OF SOUTHWESTERN BELL TELEPHONE )  
COMPANY. ) CAUSE NO. PUD 890000662

DEPOSITION OF GLEN A. GLASS

[This deposition is filed under seal in the Office of  
General Counsel.]



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Oklahoma City, OK 73102  
Telephone: 405/236-6754

-and-

ANDREW M. COATS OBA# 1741  
RICHARD C. FORD OBA# 3028  
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1800 Mid-America Tower  
20 North Broadway  
Oklahoma City, OK 73102

ATTORNEYS FOR SOUTHWESTERN BELL  
TELEPHONE COMPANY

CERTIFICATE OF MAILING

On this 9th day of June, 1993, a true and correct copy of the foregoing was faxed, hand-delivered and/or mailed, postage prepaid, to:

Maribeth Snapp  
Donna McLain  
Oklahoma Corporation Commission  
Jim Thorpe Office Building  
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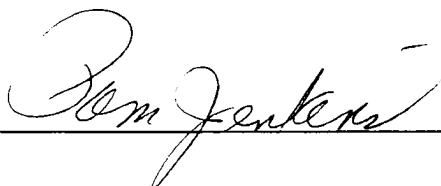
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Major Kenneth C. Kitzmiller  
Staff Judge Advocate  
HQ EID/JA  
Tinker AFB, OK 73145-6343

Jerry Cord Wilson  
301 N.W. 63rd, Suite 400  
Oklahoma City, OK 73105

  
\_\_\_\_\_

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

*MDJ  
bure 11.* IN THE MATTER OF THE APPLICATION OF ) CAUSE NO. PUD 000260  
HOWARD W. MOTLEY, JR., FOR AN INQUIRY )  
INTO THE EFFECT OF THE 1986 TAX REFORM )  
ACT ON OKLAHOMA UTILITIES. ) ORDER NO. **341630**

HEARINGS: November 10, 1986 (Technical Conference)  
January 23, 1989 (Prehearing Conference)  
January 26, 27, 30, and February 3, 1989  
(Hearings on the merits before Shelton L.  
Benedict, Hearing Officer)  
July 20, 1989 (Appeals to the Hearing Officer's Report)  
before the Commission en banc.

APPEARANCES: Maribeth D. Snapp, Deputy General Counsel, and Jane P.  
Olson, Senior Assistant General Counsel, on behalf of the  
Commission Staff  
Glen A. Glass, George Makohin, G. Michael Bauer, and  
William Anderson, Attorneys on behalf of Southwestern Bell  
Telephone Company  
Ronald E. Stakem and C. K. Casteel, Jr. Attorneys on  
behalf of MCI Telecommunications Corporation  
Eric R. King and Connie Mingle, Attorneys on behalf of the  
American Association of Retired Persons  
Ann Domin, Attorney on behalf of INOOG  
Dan Brummitt and Elizabeth Kerr, Attorneys on behalf of  
the City of Oklahoma City  
Robert A. Butkin, Assistant Attorney General, on behalf of  
the Oklahoma Attorney General's Office  
Robert D. Allen and W. Richard Morris, Attorneys on behalf  
of AT&T Communications of the Southwest, Inc.  
Ron Comingdeer, Attorney on behalf of the Oklahoma Rural  
Telephone Coalition  
Jack C. Lorenz, Attorney on behalf of Southwestern Bell  
Yellow Pages

ORDER REGARDING RATES OF SOUTHWESTERN BELL TELEPHONE COMPANY

BY THE COMMISSION:

The Oklahoma Corporation Commission being regularly in session and the undersigned Commissioners being present and participating, this Cause comes on for consideration and action upon the Application of Howard W. Motley, Jr., Director, Public Utility Division, for an inquiry into the effect of the Tax Reform Act of 1986 on Oklahoma utilities, and in this instance, specifically, Southwestern Bell Telephone Company ("SWBT").

INTRODUCTION AND PROCEDURAL HISTORY

On October 23, 1986, Howard W. Motley, Jr., Director of the Public Utility Division, filed an application for an inquiry into the effects of the newly-enacted Tax Reform Act of 1986 ("TRA") on Oklahoma utilities. The TRA revised the corporate federal income tax rate from 46 percent to 34 percent, effective July 1, 1987. However, for calendar year 1987, a "blended" rate of 40 percent was prescribed, with a 34 percent rate to be used in 1988 and thereafter.

Twelve companies were named as respondents, including SWBT. A Technical Conference between the respondents and Commission Staff was conducted on November 10, 1986. The purpose of the Technical Conference was to establish the scope of the information required to determine the effect of the TRA, as well as to establish the time for providing such information for quantification by the Staff.

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION ) CAUSE NO. PUD 000662  
OF HOWARD W. MOTLEY, JR. FOR AN )  
INQUIRY INTO THE RATES AND CHARGES )  
OF SOUTHWESTERN BELL TELEPHONE )  
COMPANY. ) ORDER NO. 367868

ORDER OF THE COMMISSION

HEARINGS: October 7-10, 14-18, 21-25, November 4-8, 18-22, 25, 26,  
December 6, 16, 17, 1991 and January 15-17, 27-31, 1992  
before the Administrative Law Judge.  
June 24, 25, and July 30, 1992 before the Commission  
en banc.

APPEARANCES: Maribeth D. Snapp, Deputy General Counsel, Donna D.  
McLain, Lu Willis, Rick D. Chamberlain and John W. Gray,  
Assistant General Counsels, appeared on behalf of the  
Commission Staff

Robert A. Butkin and Yasodhara M. Mohanty, Assistant  
Attorney Generals, appeared on behalf of Attorney General  
Susan Loving

Eric R. King, Martin Weeks, and Nancy Pennell, Attorneys,  
appeared on behalf of the American Association of Retired  
Persons

Glen A. Glass, George M. Makohin, Nancy L. Coats, Mark P.  
Royer, Thad Hollie, Jr., Garry Wann, Michael C. Cavell,  
Lawrence G. Crahan, and Paula J. Fulks, Attorneys,  
appeared on behalf of Southwestern Bell Telephone Company

Lawrence M. Huffman, William M. Franz and Elizabeth S.  
Wood, Attorneys, appeared on behalf of the Communication  
Workers of America

Ronald E. Stakem and Edward J. Cadieux, Attorneys,  
appeared on behalf of MCI Telecommunications Corporation

Nancy M. Thompson and Rich Kowalewski, Attorneys, appeared  
on behalf of U.S. Sprint Communications Company

Robert D. Allen, R. Stephen Davis, II, and Mark Witcher,  
Attorneys, appeared on behalf of AT&T Communications of  
the Southwest, Inc.

J. Cody Wilbanks, Attorney, appeared on behalf of GTE  
Southwest

Ron Comingdeer and Bill Bullard, Attorneys, appeared on  
behalf of the Oklahoma Rural Telephone Coalition

Cody B. Waddell, Attorney, appeared on behalf of Alltel  
Oklahoma, Inc., Oklahoma Alltel, Inc., Oklahoma  
Communications Systems, Inc., Chickasaw Telephone Company  
and Pine Telephone Company

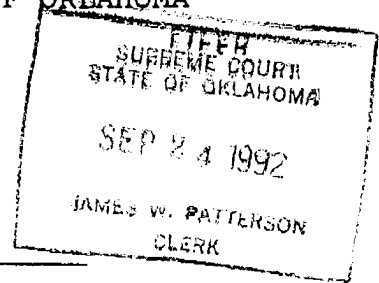
Jerry Cord Wilson, Attorney, appeared on behalf of the  
Cable Television Operators of Oklahoma

Maj. Kenneth C. Kitzmiller, Attorney, appeared on behalf  
of the Department of Defense and all Federal Agencies of  
the Federal Government

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

SOUTHWESTERN BELL TELEPHONE )  
COMPANY )  
 )  
Appellant )  
 )  
v. )  
 )  
OKLAHOMA CORPORATION )  
COMMISSION and STATE OF )  
OKLAHOMA )  
 )  
Appellees )

No. \_\_\_\_\_



#80334

**PETITION IN ERROR  
(AND PRELIMINARY STATEMENT)**

  X   PETITION IN ERROR                      CROSS-PETITION  
           AMENDED PETITION                      COUNTER-PETITION

If the petition is an amended petition state purpose of amendment.

\_\_\_\_\_

\_\_\_\_\_

(Examples: "Amended petition to challenge trial court's final order of (date) granting attorney's fees after judgment." or "Additional points of law urged as error as set forth in Exhibit 'C' attached hereto.")

If the petition is a cross-petition or counter-petition state the date that the original petition in error in the appeal was filed with the Clerk of this Court.

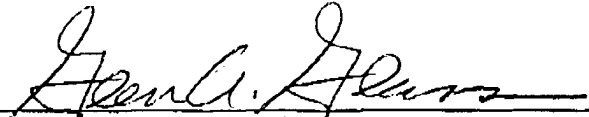
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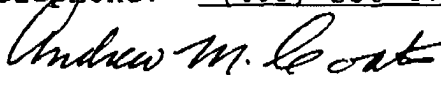
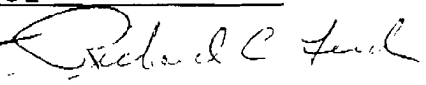
Type of Case in Supreme Court:  
(Check one)

           Judgment or Final Order of District Court (Rule 1.10)  
           Corp. Commission (Oil & Gas) (Rule 1.85)  
  X   Corp. Commission (Utility) (Rule 1.85)  
           Insurance Dept. (Rule 1.55)  
           Tax Commission (Rule 1.125)  
           Court of Tax Review (Rule 1.140)  
           Banking Board or Commissioner (Rule 1.155)  
           Other \_\_\_\_\_

(Explain)

I. DATE September 24, 1992 Verified By:

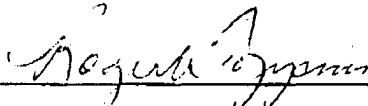
  
(Signature of individual member of firm)  
OBA No. 12183  
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Company  
Address: 800 North Harvey, Room 310  
Oklahoma City, OK 73102  
Telephone: (405) 236-6751

   
ANDREW M. COATS RICHARD C. FORD  
(Signature of individual member of firm)  
OBA No. #1741 #3028  
Firm: Crowe & Dunlevy  
Address: 1800 Mid-America Tower  
20 North Broadway  
Oklahoma City, OK 73102  
Telephone: (405) 235-7700

J. AFFIDAVIT OF MAILING TO APPELLEE AND  
DISTRICT COURT CLERK ON DAY OF FILING  
IN SUPREME COURT

I hereby certify that a true and correct copy of the above and foregoing Petition in Error was mailed this 24th day of September, 1992, to all parties listed on Attachment 1, by depositing it in the U.S. Mails, postage prepaid.

I further certify that copy of the above and foregoing Petition in Error was filed with the Corporation Commission on the 24th day of September, 1992.

  
\_\_\_\_\_



BEFORE THE CORPORATION COMMISSION OF THE  
STATE OF OKLAHOMA

ORIGINAL

IN THE MATTER OF THE )  
APPLICATION OF HOWARD W. )  
MOTLEY, JR., FOR AN INQUIRY )  
INTO THE RATES AND CHARGES OF ) No. PUD 890000662  
SOUTHWESTERN BELL TELEPHONE )  
COMPANY. )

DEPOSITION OF GLEN A. GLASS, ESQ.,  
taken on behalf of the applicant, pursuant to  
agreement of the parties on Friday, May 21, 1993, at  
the law offices of Crowe & Dunlevy, 1800 Mid-America  
Tower, Oklahoma City, Oklahoma, before me,  
Maynard E. Peterson, Certified Shorthand Reporter  
within and for the State of Oklahoma.

A p p e a r a n c e s :

For the Applicant:

DAVID W. LEE, Esquire  
Lee & Fields, P.C.  
818 N.W. 63rd Street, Suite 100  
Oklahoma City, OK 73116-7699

For the Respondent and Deponent:

ANDREW M. COATS, Esquire  
RICHARD C. FORD, Esquire  
Crowe & Dunlevy  
1800 Mid-America Tower  
20 N. Broadway  
Oklahoma City, OK 73102  
and  
MELANIE S. FANNIN, Esquire  
ROGER K. TOPPINS, Esquire  
800 North Harvey, Room 310  
Oklahoma City, OK 73102  
and  
LIAM COONAN, Esquire  
Southwestern Bell Corporation  
San Antonio, Texas

1     A p p e a r a n c e s: (Cont'd)

2     For AT&T Communications of the  
3     Southwest, Inc.

4             ROBERT D. ALLEN, Esquire  
5             Equity Tower, Suite 300  
6             1601 Northwest Expressway  
7             Oklahoma City, OK 73118

8     For Public Utilities Division  
9     Oklahoma Corporation Commission:

10            MARIBETH SNAPP, Esquire  
11            2101 N. Lincoln, Suite 400  
12            Oklahoma City, OK 73105

13     For the Oklahoma Attorney General:

14            RICK D. CHAMBERLAIN, Esquire  
15            Office of the Attorney General  
16            State Capitol Building  
17            2300 N. Lincoln Blvd., Suite 112  
18            Oklahoma City, OK 73105-4894

19     For MCI Telecommunications:

20            RONALD E. STAKEM, Esquire  
21            Clark, Stakem, Pherigo & Douglas  
22            101 Park Avenue, Suite 1000  
23            Oklahoma City, OK 73102

24     For OCSI Alltel Chickasaw Pine Telephone Co.:

25            CODY B. WADDELL, Esquire  
26            Huffman, Arrington, Kihle, Gaberino & Dunn  
27            2212 N.W. 50th Street, Suite 163  
28            Oklahoma City, OK 73112-8097

## 1 I N D E X

2

3

## WITNESS

Page

4

5 GLEN A. GLASS, ESQ.

6

Direct Examination by Mr. Mr. Lee

4

7

Cross Examination by Mr. Chamberlain

47

8

Cross Examination by Ms. Snapp

74

9

Cross Examination by Mr. Stakem

80

10

Cross Examination by Mr. Coats

87

11

12

13

## EXHIBITS

NONE

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15

16

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1                   GLEN A. GLASS, ESQ.,  
2   being produced, sworn and examined on behalf of the  
3   Applicant, deposeeth and saith as follows:

4                   DIRECT EXAMINATION

5   BY MR. LEE:

6       Q.    Would you state your name, please.

7       A.    Glen A. Glass.

8       Q.    What is your address, Mr. Glass?

9       A.    7116 Nicki Court, Dallas, Texas 75252.

10      Q.    What is your present occupation?

11      A.    I am an employee, an attorney for  
12   Southwestern Bell Telephone Company.

13      Q.    What is your position as an attorney for  
14   Southwestern Bell Telephone Company?

15      A.    You mean what do I do?

16      Q.    Well, do you have a particular title that  
17   is attached to with the status of being an attorney  
18   for Southwestern Bell?

19      A.    Senior Attorney in Southwestern Bell's  
20   Dallas office.

21      Q.    How long have you been in the Dallas  
22   office?

23      A.    Since October 1st, 1992.

24      Q.    What are your duties as Senior Attorney for  
25   Southwestern Bell in the Dallas office, Mr. Glass?

1           A.     I'm responsible for all the labor and  
2     litigation matters for the North Texas Region, which  
3     is from El Paso to the -- I guess it would be the  
4     eastern part of Texas.

5           Q.     What did you do for Southwestern Bell  
6     before you went to the Dallas office?

7           A.     I began with Southwestern Bell in 1977, as  
8     an attorney in St. Louis, held various positions in  
9     St. Louis from 1977 until 1983. Then I was  
10    transferred to Dallas, Southwestern Bell Telephone  
11    Company's legal department in 1984, let's see, the  
12    fall of 1984, I worked as an attorney for  
13    Southwestern Bell Mobile Systems, Incorporated, in  
14    Dallas, until October of 1986, and I was transferred  
15    to Oklahoma.

16          Q.     So you came to Oklahoma in October of 1986;  
17    was that your testimony?

18          A.     Yes.

19          Q.     What position did you assume in Oklahoma in  
20    October 1986?

21          A.     I was general attorney for Oklahoma.

22          Q.     Does that mean you were the top attorney  
23    for Southwestern Bell in the Oklahoma area?

24          A.     Yes.

25          Q.     Do you know a man named Bill Anderson?

1 A. Yes.

2 Q. How long have you known Mr. Anderson?

3 A. The first time I met him was in 1985.

4 Q. That's when you were in the Dallas office?

5 A. That's when I was with Southwestern Bell  
6 Mobile Systems.

7 Q. In Dallas?

8 A. Yes.

9 Q. What was the occasion for you getting to  
10 know Mr. Anderson when you were in Dallas?

11 A. We had a cellular regulatory matter in  
12 Oklahoma, and I -- it was on that occasion when I  
13 was up here that I met Mr. Anderson.

14 Q. Did you become friends with Mr. Anderson at  
15 any point in time?

16 A. Yes. I mean I don't know how you define  
17 "friend," but, yes, I was acquainted with him and  
18 knew him.

19 Q. Have you ever come to the point where you  
20 consider Mr. Anderson to be a social friend of  
21 yours?

22 A. No.

23 Q. You never visited in his residence?

24 A. I have been to his residence.

25 Q. On social occasions?

1           A.    No, mostly business.  I mean if your  
2   question is did I talk to him about anything other  
3   than business over those seven years, the answer is  
4   "yes."

5           Q.    When was it that you first went to his  
6   residence?

7           A.    I can't recall.

8           Q.    Would it have been after you came to  
9   Oklahoma City in October, 1986?

10          A.    It would have been after '86, yes.

11          Q.    Where was the residence address, where you  
12   saw him?

13          A.    I don't know his address.  It's off of --  
14   it's off of Penn at about, I don't know, 56th  
15   Street.

16          Q.    Approximately how many times did you go to  
17   Mr. Anderson's residence during the time you have  
18   known him?

19          A.    I don't know.

20          Q.    More than ten?

21          A.    Probably not.

22          Q.    Between five and ten times?

23          A.    I don't know.

24          Q.    And on all those occasions that was to  
25   discuss business with him?

1 A. Yes.

2 Q. Did you ever go to his law office --

3 A. Yes.

4 Q. -- in Oklahoma City? When was the first  
5 time you had been to Mr. Anderson's law office?

6 A. 1985.

7 Q. And did you go to Mr. Anderson's law office  
8 after you became the general attorney for Oklahoma  
9 in Oklahoma of 1986?

10 A. Yes.

11 Q. Do you have any way of estimating how many  
12 times after October of 1986 that you physically went  
13 to Mr. Anderson's law office?

14 A. No, I don't.

15 Q. Dozens of times?

16 A. I don't know, more than ten times.

17 Q. Where was your office when you were general  
18 attorney for Southwestern Bell in Oklahoma City?

19 A. 800 North Harvey in Oklahoma City.

20 Q. What would be the occasion for you going to  
21 Mr. Anderson's law office?

22 A. To talk with him or Mr. Waddell concerning  
23 legal matters affecting the telephone company.

24 Q. Why would you go to Mr. Anderson and  
25 Mr. Waddell's office rather than them coming to the



1 Southwestern Bell office on North Harvey?

2 A. Convenience.

3 Q. Where was Mr. Anderson's law office  
4 located?

5 A. When?

6 Q. When you would go to him after you became  
7 general attorney?

8 A. Well, he moved. One time it was out on  
9 Lincoln Boulevard and then several years later he  
10 moved out near Penn Square.

11 Q. Did you visit him when he was in the  
12 Lincoln office?

13 A. I did.

14 Q. And you visited him when he was in the  
15 Pennsylvania office?

16 A. I did. Well, his office was never on  
17 Pennsylvania; it was near Penn Square, though.

18 Q. And there is no way for you to estimate how  
19 many times you went to each of those offices after  
20 you became general attorney here?

21 A. I suppose there's a way; I can't do it,  
22 though. I mean on several occasions, both places.

23 Q. Why would it be more convenient to go to  
24 his law office rather than to meet in the  
25 Southwestern Bell Telephone Company office?

1           A.    Oh, maybe if I was out at the commission or  
2   I was on my way to work or going home from work, and  
3   it's no different than I -- I mean that's the normal  
4   way in which I deal with people.  They don't always  
5   come to my office.  And that's no different with any  
6   other outside counsel that we have utilized.

7           Q.    Where did you live when you were --

8           A.    In Edmond.

9           Q.    The entire time you were here in Oklahoma  
10   City?

11          A.    Yes.

12          Q.    What was Bill Anderson's relationship with  
13   Southwestern Bell?  I presume he was an attorney for  
14   them in some capacity or represented them.

15          A.    He represented the telephone company on  
16   regulatory-related matters.

17          Q.    And what was his situation as far as was he  
18   on a retainer, monthly retainer, or would he be paid  
19   hourly for the --

20          A.    He was paid hourly.  There may have been a  
21   retainer at some time.  He had been an attorney --  
22   he had represented the company for many, many years.

23          Q.    You say he represented the company.  What,  
24   exactly, did his representation of Southwestern Bell  
25   consist of?

1 A. During what time?

2 Q. Let's start in October of 1986.

3 A. He provided -- Well, his firm provided  
4 legal advice and assistance on regulatory matters.

5 Q. Was that relationship established when you  
6 became the general attorney here in Oklahoma City?

7 A. No.

8 Q. Are you the one that established the  
9 relationship with Mr. Anderson?

10 A. No, no.

11 Q. I guess my question is how did it get set  
12 up?

13 A. I don't know. I believe he represented the  
14 company when Mr. Allen had my job here.

15 Q. Okay. But when you came to Oklahoma City,  
16 there was some relationship between Southwestern  
17 Bell and Mr. Anderson that was already established?

18 A. That's correct.

19 Q. He was representing Southwestern Bell when  
20 you came to Oklahoma City; is that correct?

21 A. That's correct.

22 Q. Okay. And was this on an hourly basis --

23 A. Yes.

24 Q. -- or was it --

25 A. Yes, he was paid by the hour.

1 Q. To your knowledge, was Mr. Anderson ever  
2 paid a flat fee per month?

3 A. I don't know what his -- I can't recall  
4 what his fee arrangements were six or seven years  
5 ago. I know that I established an hourly -- paid by  
6 the hour, submitted invoices on -- showing his  
7 hours, consistent with what we did with other  
8 outside counsel.

9 Q. Did he do that with entire time that you  
10 were here in Oklahoma City?

11 A. I can't recall. He did it most of the  
12 time, because I -- I mean that was one of the things  
13 we did with all the outside counsel, but I mean as  
14 to when we -- I mean the details of his billing  
15 changed, did they change during the six years? Yes,  
16 probably, but I can't remember when.

17 Q. Was there a time when Mr. Anderson's  
18 relationship with Southwestern Bell Telephone  
19 Company ended while you were here in Oklahoma City?

20 A. Yes.

21 Q. When was that?

22 A. In March of 1991.

23 Q. Why did it end at that time?

24 A. It ended because it came to my attention  
25 that there was an FBI investigation involving or

1 relating to Mr. Anderson. And during a time in  
2 which he was providing representation to the  
3 company, and I made the determination that --  
4 although I was unaware of anything unlawful that  
5 Mr. Anderson had done, that the appearance of that  
6 necessitated that we no longer utilize him.

7 Q. What was your understanding of the nature  
8 of the FBI investigation that led to you to end the  
9 relationship between Southwestern Bell and  
10 Mr. Anderson in March of 1991?

11 A. Two agents of the FBI visited with David  
12 Miller of Southwestern Bell in March of 1991 and  
13 asked him questions concerning Mr. Anderson and I  
14 believe it had to do with -- I believe they -- they  
15 asked him questions concerning the possibility of  
16 bribery of an elected official.

17 Q. What public official was it that they were  
18 referring to?

19 A. I don't know.

20 Q. You ended Mr. Anderson's relationship with  
21 Southwestern Bell back --

22 A. That day.

23 Q. But you don't know what public official was  
24 being referred to?

25 A. No.

1 Q. Did you ask anybody?

2 A. Yes.

3 Q. And did anybody --

4 A. I asked Mr. Anderson.

5 Q. And what did he say?

6 A. He said he doesn't know -- he didn't know  
7 anything about bribery of any public official.

8 Q. Did the FBI come and talk to you in March  
9 of 1991?

10 A. No, I went and talked to them.

11 Q. Who were the agents that you talked to?

12 A. John Hippard was one, but I can't remember  
13 lieu the other one was.

14 Q. Was it Danny Harrell?

15 A. I don't remember who the other one was.

16 Q. Okay. Would this have been in  
17 approximately March of 1991 when you talked to the  
18 FBI?

19 A. March or April; I can't remember.

20 Q. Okay. What did they tell you, and I am  
21 referring to the F.B.I.?

22 A. What did they tell me about what?

23 Q. About what you went to talk to them about.

24 A. Well, they asked me a series of questions,  
25 and I answered them.

1           Q.    Did you go to them to make inquiry of them  
2    or did they contact you and say they wanted to ask  
3    you some questions? How did the meeting come about?

4           A.    I think Mr. Coonan arranged the meeting in  
5    response to his belief that I could be helpful in  
6    clarifying questions that they had at that point in  
7    their investigation.

8           Q.    So you met with Mr. Hippard and at least  
9    one other agent of the FBI?

10          A.    That's correct.

11          Q.    What did they ask you and what did you tell  
12   them during that meeting?

13          A.    They asked me what my name was, what I did,  
14   what my job was, whether or not I knew Mr. Anderson,  
15   how long he had provided representation to the  
16   telephone company, questions about officials at the  
17   commission. I can't recall. I mean it's been over  
18   two years ago; I mean those are the general kinds of  
19   things. They didn't ask me -- it didn't last very  
20   long.

21          Q.    Where was the interview?

22          A.    The FBI offices in Oklahoma City.

23          Q.    Was anybody else present during this  
24   interview besides you and the two FBI agents?

25          A.    Yes.

1 Q. Was Mr. Coonan present?

2 A. Yes.

3 Q. Who else was present, if anyone?

4 A. I don't recall anybody else being present.

5 Q. Did they ask you about any campaign  
6 contribution that you might have made to Mr. Anthony  
7 at any time?

8 A. Yes.

9 Q. What did they ask you about that?

10 A. They asked me if I had made any campaign  
11 contributions.

12 Q. And what did you tell them?

13 A. I told them "yes."

14 Q. What, exactly, did you tell them about  
15 that?

16 A. I told them that I had been solicited by  
17 Mr. Anthony on two different occasions for campaign  
18 contributions that I made.

19 Q. All right. Tell me about when you say you  
20 were solicited by Mr. Anthony for campaign  
21 contributions. When was the first time?

22 A. Shortly before the election.

23 Q. And can you describe how that took place?

24 A. Yes. He sent me a letter at my house,  
25 soliciting campaign contributions.



1 Q. Is this at your residence?

2 A. Yes.

3 Q. Is that what you said?

4 A. Yes.

5 Q. What was your residence address, Mr. Glass?

6 A. 5805 Dundee Court, Edmond, Oklahoma 73034.

7 Q. And did you respond in any way to that  
8 letter?

9 A. Yes, I did.

10 Q. What did you do?

11 A. I believe I contributed \$50.

12 Q. How did you do that? Did you send it by  
13 mail or how was that done?

14 A. I believe I sent a check by mail, I  
15 believe. I'm not sure, but that's my best  
16 recollection.

17 Q. At what point in time was this,  
18 approximately? Was this before the election?

19 A. Yes, at or near the election, October,  
20 November, I don't recall, in 1988.

21 Q. You said there was another contribution  
22 that you made to Mr. Anthony.

23 A. Yes, after the election, he sent a letter  
24 to my house soliciting campaign contributions for  
25 the campaign retirement debt that he stated he had.

1 Q. And what did you do in response to that?

2 A. I made a contribution.

3 Q. How much was that?

4 A. I can't recall, a hundred or a hundred  
5 fifty dollars.

6 Q. And how did you make that contribution?

7 A. That contribution was made -- David Miller  
8 of our company was also making a campaign  
9 contribution to the debt retirement, and I gave that  
10 money to him to give to Mr. Anthony.

11 Q. Was this a check or was it cash?

12 A. It was cash.

13 Q. Why did you give him cash rather than a  
14 check, particularly, since you made a check  
15 contribution the first time?

16 A. Because it happened -- frankly, I had  
17 forgotten about it and he wanted the campaign  
18 contribution and -- David had indicated to me he  
19 wanted it in early January, and I was -- I didn't  
20 have a checkbook, I was at the bank, so I just gave  
21 cash. And I had given cash for political  
22 contributions before.

23 Q. When was it that you gave this cash to  
24 Mr. Miller for the second contribution?

25 A. It was early January, '89.

1 Q. Do you remember the denominations of the  
2 cash that you gave Mr. Miller?

3 A. No.

4 Q. You don't remember if it was a hundred  
5 dollar bill?

6 A. No.

7 Q. What else was there discussed between you  
8 and Mr. Miller about that contribution?

9 A. Nothing.

10 Q. Did he say anything about any of the  
11 conversations he may or may not have had with  
12 Commissioner Anthony concerning that contribution?

13 A. No.

14 Q. Do you know of anybody else that  
15 contributed to this second contribution that was  
16 made to Mr. Miller, given to Mr. Miller to give to  
17 Mr. Anthony?

18 A. I'm sorry, would you repeat that question.

19 Q. Do you know of anybody else besides  
20 yourself and Mr. Miller who participated in the  
21 campaign contribution in January that was to be made  
22 to Mr. Anthony?

23 A. For the campaign -- for his solicited --  
24 based on his solicitation for a retirement debt, you  
25 mean?

1 Q. Yes, the second one is what I am talking  
2 about.

3 A. I believe other individuals in the company  
4 gave; is that your question?

5 Q. Yes, sir.

6 A. Yes, other individuals in the company gave,  
7 but I'm not sure who, and I can't remember who.

8 Q. Did you ever see a list of contributors  
9 that Mr. Miller had with the names of the people who  
10 were --

11 A. No.

12 Q. Do you know somebody named Mildred White?

13 A. Yes.

14 Q. Who is that?

15 A. That's my wife's mother.

16 Q. Where does she live?

17 A. Springfield, Missouri.

18 Q. Did you ever give Mr. Miller the name of  
19 Mildred White for him to use --

20 A. No.

21 Q. -- as being a person who would be --

22 A. No.

23 Q. -- a contributor?

24 A. No.

25 Q. Okay. Do you know how Mr. Miller would

1 have obtained the name of Mildred White?

2 A. No, other than I was in Springfield a lot  
3 at her -- stay there when we are at her -- that's  
4 where my wife's family lives, and I am there a lot  
5 and talked to him from there and to the office from  
6 there.

7 Q. But I mean did you ever specifically  
8 discuss with Mr. Miller that a person named Mildred  
9 White was your mother-in-law?

10 A. Probably. But I don't recall when.

11 Q. Back to this March 1991 meeting that you  
12 had with the Federal Bureau of Investigation in  
13 their office. Can you remember anything else about  
14 the meeting that was discussed?

15 A. Other than what I have told you?

16 Q. Yes, sir.

17 A. I can't remember the specifics; I mean they  
18 asked about the campaign contributions, in general,  
19 who I had made them to.

20 Q. Had you made any to anybody else beside Mr.  
21 Anthony?

22 A. Yes.

23 Q. Any of the other members of the Corporation  
24 Commission?

25 A. Yes.

1 Q. And when would that have been?

2 A. Well, it depends on when they were  
3 running. I made them to Mr. Watts, Mr. Townsend.

4 Q. Did you ever make any campaign  
5 contributions of any type to Mr. Hopkins?

6 A. Yes.

7 Q. When was the first time that you made any  
8 campaign contributions to Mr. Hopkins?

9 A. I don't recall when. I know that there  
10 were -- I participated in campaign contributions for  
11 his labor commission race.

12 Q. And when was that? When did you make the  
13 contribution?

14 A. It would have been sometime in 1989 when he  
15 indicated he was going to run.

16 Q. How was it that you came to make a  
17 contribution to his labor commission race?

18 A. Well, he had publicly expressed an interest  
19 in running the -- I don't recall how the subject  
20 first came up; I do recall that officials of the  
21 Local Communication Workers of America discussed it  
22 with me. They were interested in supporting  
23 Commissioner Hopkins, sought my opinion if I thought  
24 he would be a good labor commissioner.

25 I told them I thought he probably would.

1 And I don't know whether that's the context in which  
2 the idea of a contribution came up. It was about  
3 that time.

4 Q. Did you ever talk to Mr. Anderson about  
5 making campaign contributions to Mr. Hopkins' labor  
6 commission campaign?

7 A. Did I ever talk to him about me making one?

8 Q. Yes, sir.

9 A. I may have. I don't recall. I mean I --  
10 it was -- I mean everybody knew -- I mean it was in  
11 the paper and everybody knew he was running and that  
12 he was raising money. So I -- the subject probably  
13 came up with Mr. Anderson.

14 Q. You say you did make a contribution to him?

15 A. Yes.

16 Q. How much money did you contribute?

17 A. Probably \$50.

18 Q. In cash or check?

19 A. I don't recall. It may -- it was either  
20 cash or check, obviously, but I don't recall.

21 Q. Who did you give the \$50 to?

22 A. David Miller.

23 Q. Do you know approximately when that would  
24 have been?

25 A. Sometime in 1989, summer or fall; I don't

1 recall.

2 Q. Did you ever make any other contributions  
3 for any purpose to Commissioner Hopkins?

4 A. Not -- no, no.

5 Q. Did you and the FBI in your meeting in  
6 March of 1991 have any other discussions about any  
7 campaign contributions you made, besides the ones to  
8 Commissioner Anthony and the one to Commissioner  
9 Hopkins?

10 A. I think they asked me about all the  
11 campaign contributions I had made since I had been  
12 in Oklahoma, and I think I went through them with  
13 them. I gave them -- the guy running for the school  
14 board and for the -- I mean various elected offices.

15 Q. Had Mr. Ellis ever discussed with you his  
16 reservations about Southwestern Bell using  
17 Mr. Anderson to represent them?

18 A. No, he never discussed his reservations.  
19 He and I discussed whether we needed to utilize  
20 Mr. Anderson any more.

21 Q. Did he ever express to you that he had  
22 reservations about Mr. Anderson's reputation or  
23 whether he was a trustworthy or honest individual  
24 and whether you should not be using him for that  
25 reason?



1           A.    No.

2           Q.    Or anything along this line?

3           A.    Well, I mean I don't recall Mr. Ellis ever  
4    using the words "trustworthy" or -- I mean if the  
5    idea -- if you are asking me, Mr. Lee, did he ever  
6    come to me and say "I think Billy Anderson is  
7    dishonest and a crook and untrustworthy, and we got  
8    to get rid of him," the answer to that is "no."

9                   Mr. Anderson was getting older, the needs  
10   of our business were changing and Mr. Ellis and I  
11   shared a common belief that Mr. Anderson's  
12   representation of the company needed to be phased  
13   out, and we were committed to doing that.

14          Q.    Did you talk about that, about doing that  
15   before March of 1991?

16          A.    Yes.

17          Q.    But the precipitating fact that caused the  
18   ending of the relationship was the FBI's  
19   intervention?

20          A.    That's right. That made it happen  
21   suddenly, that's correct.

22          Q.    Did anybody ever make you aware that at  
23   some time prior to 1991, that there had been a  
24   previous investigation by federal authorities of  
25   Mr. Anderson?

1           A.    I was aware of that.

2           Q.    And how did you know or who made you aware  
3 of that?

4           A.    I don't -- I don't recall.

5           Q.    But what was your understanding of what had  
6 been the previous investigation --

7           A.    My understanding is that he had some income  
8 tax problems that resulted in the imposition of some  
9 sort of civil penalty based upon some IRS audit.  
10 That's my understanding of it.

11          Q.    And do you have any recollection of when  
12 that would have occurred?

13          A.    Well, it was before I got to Oklahoma, so  
14 sometime between -- sometime before 1986.

15          Q.    After this interview you had with the FBI  
16 in -- Was that in March of 1991 or are you just able  
17 to say it was around March of 1991? Is there --

18          A.    It was either March or early April. I  
19 think it was March. I can't recall.

20          Q.    Did you ever have any other interviews with  
21 the FBI after that?

22          A.    No.

23          Q.    Did they ever contact you at any time in  
24 1992?

25          A.    Yes.

1 Q. And when would that have been?

2 A. Did they ever contact me? No. As a matter  
3 of fact, I don't think they did contact me. They  
4 never contacted me.

5 Q. Okay. You said "yes" a minute ago. Did  
6 you --

7 A. Well, I meant "no," because they didn't.  
8 You mean did they ever call me? Is that your  
9 question?

10 Q. Did you ever meet with them or talk to them  
11 on the phone?

12 A. Yes, I did see John Hippard, FBI Agent.

13 Q. When was that?

14 A. November of '92.

15 Q. And can you describe how it was that you  
16 came in contact with Agent Hippard in November,  
17 1992?

18 A. He had a question of me concerning a grand  
19 jury subpoena.

20 Q. What was his question?

21 A. His question was about service of it.

22 Q. To you?

23 A. Yes.

24 Q. Did you ever appear before the Grand Jury?

25 A. Yes.

1 Q. And when was that?

2 A. December of 1992.

3 Q. And that is what his question was about,  
4 your appearance before them? And that was a  
5 federal --

6 A. Yes.

7 Q. -- Grand Jury?

8 A. Yes.

9 Q. Did the FBI ever talk to you about a list  
10 of contributors that --

11 A. No, no.

12 Q. I would like to finish the question.

13 A. Okay, I'm sorry.

14 Q. Did the FBI ever question you at any time  
15 about any list that David Miller gave Commissioner  
16 Anthony with a list of names on it?

17 A. No, they did not.

18 Q. Did anybody ever discuss with you about any  
19 names on a list that David Miller had given  
20 Commissioner Anthony along with the campaign  
21 contribution that he gave to him in 1989?

22 A. Yes.

23 Q. And who was that?

24 A. The Assistant United States Attorney in  
25 Oklahoma.

1 Q. Who was that?

2 A. Arlene Joplin.

3 Q. And when was it you had this conversation  
4 with Ms. Joplin about this?

5 A. In December of 1992.

6 Q. And what was the nature of that  
7 conversation?

8 A. The nature of the conversation was she told  
9 me I couldn't talk about it with anybody else.

10 Q. Have you received any kind of grant of  
11 immunity from the federal government for --

12 MR. COATS: To which we object. I suggest  
13 the witness need not answer the question.

14 MR. LEE: What is the grounds for that?

15 MR. COATS: It is simply not relevant to  
16 this matter, and there is a privilege which prevents  
17 him in a civil matter from having to discuss  
18 anything related to that activity, and I suggest he  
19 need not answer the question.

20 MR. LEE: I am not clear about what kind of  
21 privilege that would be.

22 MR. COATS: Well, I am suggesting to you --

23 MR. LEE: I mean we can discuss later.

24 MR. COATS: You don't have a right to  
25 inquire into whether he has or has not exercised any

1 rights he has under the Constitution. And I'm  
2 instructing the witness he need not answer the  
3 question.

4 Q. (BY MR. LEE) I take it Mr. Coats is your  
5 attorney during this deposition.

6 A. Yes.

7 MR. COATS: I am acting for Southwestern  
8 Bell. Mr. Glass is an employee of Southwestern Bell  
9 and, therefore, I'm also acting for Mr. Glass.

10 MR. LEE: Here in this deposition today,  
11 too?

12 MR. COATS: That's right.

13 Q. (BY MR. LEE) Have you ever discussed with  
14 anybody else other than your attorney, if that's  
15 appropriate, the list of purported contributors that  
16 compose people giving money to Commissioner Anthony  
17 in 1989?

18 A. Only with attorneys.

19 Q. Mr. Glass, were you involved in the  
20 litigation involving the Southwestern Bell PUD 260  
21 matter?

22 A. Yes.

23 Q. Were you counsel of record for Southwestern  
24 Bell in that case?

25 A. Yes.

1           Q.    Was Mr. Anderson also involved in that  
2 case?

3           A.    His name may have appeared on one pleading,  
4 but he had no substantive involvement in the  
5 hearings in the case, examination of witnesses,  
6 motions, or anything like that.

7                    So, as a practical matter, no, he was not  
8 involved in the hearing process in that case at  
9 all. He did assist with legal research, review of  
10 testimony and that sort of thing. But he was not an  
11 active participant in the hearing process.

12          Q.    Do you know about any kind of contact that  
13 Mr. Anderson might have had with Commissioner  
14 Anthony concerning the decision or any decision in  
15 the PUD 260 case?

16          A.    For which one of Mr. Anderson's clients?

17          Q.    For Southwestern Bell.

18          A.    Okay. And your question was what with  
19 respect?

20          Q.    Any kind of contact that Mr. Anderson might  
21 have had with Commissioner Hopkins concerning his --

22                   MR. COATS: Excuse me. Are you asking  
23 about does he know about it now or did he know about  
24 it then or it makes some difference; he may have  
25 learned some things in recent times.

1           Q.     (BY MR. LEE) All right. During the time,  
2 during 1991, and through the summer of 1992, were  
3 you aware of Mr. Anderson having any contact with  
4 Commissioner Hopkins, other than in a normal court  
5 proceeding concerning his vote in the PUD 260  
6 matter?

7           A.     Well, if he did, it wasn't on behalf of  
8 Southwestern Bell, because he didn't work for  
9 Southwestern -- he provided no representation for  
10 Southwestern Bell after March of 1991. I mean if  
11 that's when he -- if your question is --

12                   MR. COATS: The question was do you  
13 know, --

14                   THE WITNESS: Oh.

15                   MR. COATS: -- did you know about any such  
16 meetings.

17                   THE WITNESS: Oh, I'm sorry, Mr. Lee. In  
18 fact, will you repeat the question so I don't get  
19 confused.

20           Q.     (BY MR. LEE) Do you know of any kind of  
21 contact that Mr. Anderson might have had with  
22 Commissioner Hopkins other than in a court  
23 proceeding in open court regarding Commissioner  
24 Hopkins decision in the PUD 260 case? And when I  
25 say "did you know," I mean I am talking about in



1 1991 and in 1992.

2 A. Did I know about contacts he had made  
3 earlier?

4 Q. Any kind of contacts that he made with  
5 Commissioner Hopkins concerning his vote in any PUD  
6 260 matter.

7 A. Well, I was generally aware of the fact  
8 that Mr. Anderson in the representation of all of  
9 his clients had contact with the staff, other  
10 parties, commissioners related to issues pending  
11 before the commission, so I was aware that  
12 Mr. Anderson had discussions about the issues  
13 related to the 260 case with Commissioner Hopkins  
14 and many other people during the pendency of that  
15 case.

16 Q. Did you ever discuss with Mr. Anderson any  
17 campaign contributions being given to Commissioner  
18 Hopkins with regard to his labor commission case?

19 A. Yes. I was aware that Mr. Anderson was  
20 aware of Mr. Hopkins' labor commission race and was  
21 a contributor to that.

22 Q. You were?

23 A. I was aware that Mr. Anderson was involved  
24 in making a contribution.

25 Q. Did he talk to you about that?

1           A.     Yes.

2           Q.     What did he tell you?

3           A.     I can't recall specifically, other than I  
4     mean everybody talked about it, that Hopkins was  
5     running for the labor commission and was raising  
6     money, it was in the papers; I mean it was no -- I  
7     mean there wasn't anything clandestine about it or  
8     secret about it.

9           Q.     Did you ever talk to Mr. Anderson about any  
10    campaign contribution being made for Commissioner  
11    Hopkins' labor commission race and that being made  
12    in conjunction with Commissioner Hopkins' vote in  
13    the PUD 260 case?

14          A.     No.

15          Q.     Did Mr. Anderson ever discuss with you any  
16    thought he might have had to assisting Commissioner  
17    Anthony's aide purchase a motor vehicle?

18          A.     No.

19          Q.     Did you ever have a meeting in 1991 with  
20    Commissioner Anthony's aide, Skip Nicholson, in  
21    Mr. Anderson's office with Mr. Free present?

22          A.     No.

23          Q.     Did you ever have any kind of a meeting  
24    with Mr. Nicholson?

25          A.     Yes.

1 Q. And when would that have been?

2 A. Sometimes in 1990.

3 Q. Where would this have been?

4 A. Mr. Anderson's office.

5 Q. What was the nature of that meeting?

6 A. Well, my best recollection of that meeting  
7 was that Mr. Anderson was complaining about the  
8 effectiveness of David Miller in working with the  
9 commission staff and, to be honest with you, I'm not  
10 sure why Mr. Nicholson was there.

11 Q. Do you remember anything else that took  
12 place during that conversation?

13 A. That was the -- I mean that is the subject  
14 matter I remember being discussed at that meeting.

15 Q. Did Mr. Anderson ever show you a fax that  
16 he had received from Commissioner Anthony advising  
17 him not to contact him any more, because there was  
18 an FBI investigation?

19 A. No, no.

20 Q. Your testimony --

21 A. When was this fax sent, supposedly?

22 Q. January of 1992.

23 A. No, I didn't -- of course, he wasn't doing  
24 any work for us then, and I wouldn't have any  
25 occasion to talk to Mr. Anderson other than see him

1 out at the commission or see him on the street.

2 So --

3 Q. And your testimony is that Mr. Anderson did  
4 no more work for Southwestern Bell for which he was  
5 compensated after March of 1991? Would that be a  
6 fair statement?

7 A. That's right.

8 Q. Do you remember a press conference that Jim  
9 Proctor and Randy Swanson gave in Tulsa, and I  
10 understand another one in Oklahoma City, in July of  
11 1991?

12 A. Yes, I do.

13 Q. What is your recollection of that press  
14 conference?

15 A. My recollection of that press conference  
16 was that Mr. Proctor in his role as director of  
17 Public Utilities asserted that the position we were  
18 taking out -- that Southwestern Bell was taking at  
19 the Commission in the current rate proceedings was a  
20 fraud on the people of Oklahoma and that it was a  
21 media attempt to berate the company and the  
22 positions we were taking before the commission.

23 Mr. Nicholson, it is my understanding, was  
24 there, too, and spoke.

25 Q. Did you ever have a conversation with

1 Mr. Anthony about that press conference?

2 A. No. I had no conversation with  
3 Mr. Anthony, other than in the commission hearing  
4 room, and I would see him occasionally at civic  
5 things, but -- (negative head shake).

6 Q. I understand you handled the litigation in  
7 the 662 case before the commission.

8 A. Yes.

9 Q. Okay. Did you participate in that until  
10 you went to Dallas in October of 1992?

11 A. I did.

12 Q. During any of the course of those  
13 proceedings, did you have any reason to believe that  
14 Commissioner Anthony was biased against Southwestern  
15 Bell?

16 A. Absolutely no basis to believe he was  
17 biased at all.

18 Q. And you never raised that as an issue as  
19 the -- I guess you were the primary litigator.

20 A. If I didn't believe it, I wouldn't raise  
21 it.

22 Q. And you didn't raise it?

23 A. And I didn't raise it, because I didn't  
24 believe it, until October the 2nd.

25 Q. Did you receive a notice from the Federal

1 Bureau of Investigation that any of the telephone  
2 conversations that you participated in were being  
3 monitored by electronic surveillance?

4 A. I did receive a notice from them.

5 Q. When was that that you received that  
6 notice?

7 A. I don't recall. I think it was in March of  
8 '91.

9 Q. Did they advise you who the party was whose  
10 conversation was being monitored?

11 A. It was the -- Mr. Anderson's firm, I  
12 believe, and it may have been Mr. Anderson's home  
13 phone; I can't recall.

14 Q. Did you ever receive any other notices that  
15 any of the telephone conversations you had  
16 participated in had been electronically monitored?

17 A. No.

18 Q. Just this one time that you mentioned?

19 A. That's correct.

20 Q. With regard to that \$100 contribution that  
21 you say you gave to Mr. Miller in January of 1989,  
22 did Mr. Miller give you the details of any of the  
23 transaction where that was conveyed to Commissioner  
24 Anthony?

25 MR. COATS: Can you fix that in time for

1 us?

2 THE WITNESS: Yes, can you fix that in  
3 time?

4 Q. (BY MR. LEE) I believe you previously  
5 testified that in approximately January of 1989 that  
6 you gave David Miller \$100 in cash.

7 A. It was a hundred or a hundred fifty, but  
8 that's about right.

9 Q. To convey to Commissioner Anthony for his  
10 campaign --

11 A. Right.

12 Q. -- retirement?

13 A. Right.

14 Q. Did you have any -- and I believe you  
15 stated you gave it to him after you cashed a check,  
16 and that did you ever have any subsequent  
17 conversation with Miller about how that was conveyed  
18 to Commissioner Anthony?

19 A. Yes, indirectly I did, yes.

20 Q. And when was that call?

21 A. It was about a year later, in 19 -- well,  
22 actually, about two years later in 1991 --

23 Q. When in 1991 would that have been,  
24 Mr. Glass?

25 A. I don't recall. I think it was in April of

1 1991, Mr. Miller had visited with Commissioner  
2 Anthony and Mr. Miller advised me that the subject  
3 of his campaign contribution for the debt  
4 retirement -- of the campaign contribution for debt  
5 retirement had come up in a meeting he had with  
6 Mr. Anthony.

7 Q. Now, this was a conversation that  
8 Mr. Miller and you had in April of 1991?

9 A. Yes, that's correct.

10 Q. All right. And what did Mr. Miller tell  
11 you?

12 A. He told me that he had gone over to  
13 Commissioner Anthony's -- my best recollection of  
14 this is that he had gone to visit --

15 MR. COATS: Excuse me just a minute. I  
16 believe this conversation would be attorney-client  
17 conversation. You were acting as an attorney for  
18 the phone company at the time, were you not?

19 THE WITNESS: That's correct.

20 MR. COATS: David was an employee of the  
21 phone company?

22 THE WITNESS: Correct.

23 MR. COATS: Our concern here is with this  
24 meeting and then with the subsequent one that you  
25 are going to get into that is responsive to your



1 question is that they are both -- one of them is  
2 clearly attorney-client, the other one is clearly  
3 attorney-client and is also work product, because  
4 there is another one that comes up that's a part of  
5 the internal investigation Mr. Coonan did.

6 We are willing to allow him to testify as  
7 to the meetings with Miller, and to the subsequent  
8 meeting as part of the internal investigation, with  
9 the understanding that we are making only a limited  
10 waiver of the privilege.

11 We are limiting it to those meetings and  
12 that there will be other areas or may be other areas  
13 that we would be able to assert the privilege. And  
14 as long as we can have an understanding between the  
15 parties that these conversations with Mr. Miller and  
16 with Mr. -- both the meeting with Mr. Glass that  
17 he's now discussing and a subsequent meeting at  
18 Mr. Miller's -- a part of the internal  
19 investigation, as long as we can agree that none of  
20 the parties would assert that we have waived our  
21 privilege as to other matters by letting him talk to  
22 these, to this one, then we will agree that he can  
23 testify as to it; but we want that understanding  
24 that we are doing it on a limited waiver, only, and  
25 that we are not waiving the attorney-client

1 privilege for other matters, for other purposes, for  
2 other conversations, nor are we waiving work-product  
3 privilege for other aspects of the internal  
4 investigation.

5 And if the parties can agree to that, then  
6 he will go forward and produce the testimony of what  
7 went on at those two meetings.

8 MR. LEE: Let me ask it this way.

9 Q. (BY MR. LEE) You said this took place in  
10 April of 1991, --

11 A. Yes.

12 Q. -- Mr. Glass? Was there ever any  
13 discussion between you and Mr. Miller prior to that  
14 time about what had happened to your \$100 or your  
15 \$150?

16 A. Not that I recall.

17 Q. And you and he didn't discuss the details  
18 of him transferring --

19 A. Not that I recall.

20 Q. Did Mr. Miller, and let's talk about in  
21 1989, so the time period is clear, did he ever  
22 discuss with you collecting money from other people  
23 and then transferring it to Commissioner Anthony in  
24 1989?

25 A. I was aware that other people -- he had

1 passed the hat to other people, yes, and who they --  
2 you know, so, yes, I mean I was aware of that.

3 Q. Did he ever give you any of the details of  
4 how it was actually physically transferred to  
5 Commissioner Anthony?

6 A. No.

7 Q. And I am talking about in 1989. I am not  
8 getting into the 19 --

9 A. Not that I recall; I don't recall any, no.

10 Q. Mr. Glass, why were you transferred to  
11 Dallas in October of 1992?

12 A. I was advised early in -- well, earlier in  
13 1992 that at the conclusion of the 662 case, I could  
14 probably be expected to be transferred, and that's  
15 what happened.

16 Q. Did it have anything to do with the FBI  
17 investigation in this case?

18 A. What do you mean?

19 MR. COATS: Would you repeat the question,  
20 I was woolgathering.

21 Q. (BY MR. LEE) Did it have anything to do  
22 with the fact that the FBI was investigating  
23 Southwestern Bell in this case?

24 A. I think it would -- yes, I think there was  
25 a relationship between the existence of that and the

1 timing of my transfer.

2 Q. In what way?

3 A. Well, I was the -- I was the lawyer for  
4 Oklahoma and we have -- our company has an extremely  
5 high standard with respect to sensitivity of public  
6 proceedings. If your question is was my transfer  
7 related to any finding or belief by the company that  
8 I had done anything improper or illegal or that  
9 there had been any illegal activity to the company's  
10 knowledge conducted -- by any employee of the  
11 company, I was specifically advised that was not the  
12 case, if that's your question.

13 So it was unrelated to any finding of that,  
14 but we have the conclusion of the case and the  
15 rather high standard that we have with respect to  
16 our -- the perception of our public image, did  
17 affect the timing of my transfer and the fact of my  
18 transfer.

19 Q. When was the last time you either talked to  
20 on the telephone or met with Bill Anderson?

21 A. I think I saw Mr. Anderson out at the  
22 commission last summer is probably the last time I  
23 saw him. I can't recall.

24 Q. What was the nature of your conversation  
25 with Mr. Anderson at that time?

1           A.    He was out in the hall at the commission  
2   and essentially small talk.

3           Q.    Have you ever at any time ever discussed  
4   the FBI investigation with Mr. Anderson?

5           A.    Yes.

6           Q.    And when would the first time that have  
7   been?

8           A.    March of 1991.

9           Q.    What was the nature of your conversation  
10   between Mr. Anderson and yourself in March of 1991,  
11   concerning the FBI investigation?

12          A.    Well, that was the date in which the FBI  
13   agents visited Mr. Miller and I went to --  
14   Mr. Anderson was at home that afternoon and I  
15   immediately went to his house, informed him of the  
16   fact that Mr. Miller was questioned by the FBI,  
17   questions concerned matters relating to him and the  
18   term "bribery of an elected official" was  
19   mentioned. I asked Mr. Anderson about that. He  
20   advised me he knew nothing about a bribery of an  
21   elected official.

22                I told him that because of the inquiries  
23   that were made and the absolute necessity that the  
24   reputation of our company be at the highest possible  
25   standard, that we -- it was necessary for us to

1     terminate the use of him until this matter was  
2     resolved.

3             Q.     You said you and Mr. Anderson talked about  
4     the possible bribery of a high public official, was  
5     that your testimony?

6             A.     No, I talked about the allegation. I  
7     talked about the fact that there were questions to  
8     Mr. Miller concerning that.

9             Q.     All right. Did you know what public  
10    official was being referred to?

11            A.     No.

12            Q.     You had no idea?

13            A.     Well, I know the name Commissioner Hopkins  
14    was mentioned, but I didn't directly relate it to  
15    that. For the purposes I went to visit  
16    Mr. Anderson, it didn't matter.

17            Q.     Was anybody else present during that  
18    conversation you had with Mr. Anderson?

19            A.     No.

20            Q.     No, just you and he?

21            A.     That's right.

22            Q.     At his residence?

23            A.     Yes.

24                    MR. LEE: I have no further questions.

25                    (An off-the-record discussion was here had.)

## 1 CROSS EXAMINATION

2 BY MR. CHAMBERLAIN:

3 Q. Mr. Glass, I am Rick Chamberlain of the  
4 Attorney General's Office. I have got a series of  
5 questions I want to ask you, and I would ask you if  
6 you don't understand the particular question, you  
7 ask me, and I will try to rephrase it. Okay?

8 A. Yes, sir.

9 Q. Okay. I want to make sure that I  
10 understand the corporate structure that existed  
11 during this time period that we have been talking  
12 about, 1988 to, I guess, 1992. Now, were you  
13 actually an employee of Southwestern Bell Telephone  
14 Company?

15 A. Yes.

16 Q. Okay. And I think you testified that you  
17 were the -- I don't know if the word was the top  
18 attorney, the highest ranking attorney in Oklahoma  
19 for Southwestern Bell Telephone Company, correct?

20 A. Yes.

21 Q. Okay. And as part of your duties in that  
22 position, did you decide whom to use as outside  
23 counsel?

24 A. I was involved in the decision of that, but  
25 I did not have final authority.

1 Q. Who had final authority?

2 A. Mr. Taylor -- Well, whoever my boss was,  
3 and that changed.

4 Q. Okay. Who did you report to?

5 A. When?

6 Q. During that time period from '88 through  
7 '92.

8 A. I reported to two different people,  
9 Mr. Ellis for a year or two and then Mr. Taylor.

10 Q. Okay. Now, when you reported to Mr. Ellis,  
11 was that when he was the president of Southwestern  
12 Bell Telephone Company's Oklahoma operation?

13 A. No. That's James D. Ellis, that's when he  
14 was Vice President and General Counsel of the  
15 telephone company. It's a different Ellis.

16 Q. Okay. And then you began reporting to --  
17 who was the other gentleman?

18 A. Mr. Taylor, when Mr. Taylor assumed  
19 Mr. James D. Ellis's job.

20 Q. And these were both employees of  
21 Southwestern Bell Telephone Company in St. Louis?

22 A. Yes.

23 Q. Okay. And you testified when you came to  
24 work for Southwestern Bell Telephone in Oklahoma,  
25 that there was already a relationship established



1     between the company and Mr. Anderson, correct?

2           A.     That's correct.

3           Q.     Okay. How did you and Mr. Anderson  
4     communicate during that time period? Did you write  
5     him letters; did you call him on the telephone; how  
6     did you communicate with him?

7           A.     I talked to him in person, talked on the  
8     telephone and communicated in writing.

9           Q.     Okay. And was it your job to instruct him  
10    as far as what he was to do?

11          A.     Well, in a general way, yes; with respect  
12    to specifics, I don't know if that's a fair  
13    characterization at all.

14          Q.     Okay. Whose job was it to instruct  
15    Mr. Anderson what to do in specific terms?

16          A.     Well, like all outside counsel, the firm of  
17    Anderson & Waddell that we utilized and the other  
18    outside counsel utilized by the telephone company in  
19    Oklahoma were retained to provide legal advice and  
20    assistance.

21                 Now, they, obviously, within the scope of  
22    the work that they do, the attorneys, as all outside  
23    counsel do, have latitude with respect to the  
24    performance of those duties.

25          Q.     Okay. Was Mr. Anderson free to do anything

1 he wanted to on behalf of Southwestern Bell  
2 Telephone Company?

3 A. No.

4 Q. Okay. So there were certain restrictions  
5 on what he was allowed to do during that time?

6 A. Yes.

7 Q. Okay.

8 A. Which was true for all outside counsel.

9 Q. All right. And I am trying to understand  
10 where those limitations or restrictions came from.

11 A. Well, Mr. Anderson wasn't engaged to do any  
12 workers' compensation defense work for us, so he  
13 didn't do any, for example. And there's a thousand  
14 of those things he didn't do. He provided legal  
15 advice and assistance with respect to regulatory  
16 matters at the commission.

17 With respect to Anderson & Waddell, the  
18 firm, it included utilization of both Mr. Anderson  
19 and Mr. Waddell. That did not generally include any  
20 actual hearing work or entries of appearance  
21 formally in commission cases, however.

22 Q. Did it involve discussions with  
23 commissioners or staff members?

24 A. It could.

25 Q. Okay. And did you instruct Mr. Anderson

1     whom to talk with?

2           A.     Sometimes.

3           Q.     Okay.  Those times when you did instruct  
4     him to talk with a commissioner or staff members,  
5     did you instruct him what to talk about?

6           A.     General subject matter, yes.

7           Q.     Okay.  And then do you recall any  
8     instances, specific instances, in which you  
9     instructed Mr. Anderson to talk with a commissioner  
10    or a staff member?

11          A.     Yes.

12          Q.     Okay.  Could you tell me what those  
13    instances you recall?

14          A.     Oh, for example, when we were preparing  
15    accounting testimony, I might have Mr. Anderson sit  
16    down with some of the staff accountants and go over  
17    exhibits that the -- or documents being produced by  
18    the company to help clarify rate base or accounting  
19    issues, things of that nature.

20          Q.     Is Mr. Anderson an accountant?

21          A.     You mean is he a Certified Public  
22    Accountant?

23          Q.     Does he have an accounting degree, that you  
24    know of?

25          A.     Not that I am aware of.  But he knows a lot

1 more about regulatory accounting than most people  
2 with accounting degrees, I am absolutely satisfied  
3 of that.

4 Q. So you had him discuss accounting matters  
5 with commission staff. What about conversations  
6 with commissioners? Do you recall any of those  
7 specific ones that you directed him to have?

8 A. No.

9 Q. After he would have these conversations at  
10 your instruction, would he report back to you?

11 A. Generally, he would, yes, yes.

12 Q. Okay. And would he call you on the phone,  
13 write you a letter? How did he do that, typically?

14 A. Typically, he would call me or I'd see him  
15 and he will tell me.

16 Q. Do you know whether or not there was an  
17 engagement letter or written contractual arrangement  
18 between Mr. Anderson and Southwestern Bell Telephone  
19 Company?

20 A. Yes, there was.

21 Q. Okay. And do you know the terms of that --  
22 First of all, was it an engagement letter; was it a  
23 written contract? What was it?

24 A. Well, I think historically over the years  
25 there have been engagement letters. I mean that's

1 the way we routinely do it. I mean when -- the  
2 dates of those and, specifically, what those letters  
3 said, I don't recall. I mean I'm sure we -- I know  
4 there was -- the relationship was memorialized in  
5 writing, if that's your question.

6 Q. Okay. Do you know whether or not that  
7 arrangement changed during your tenure with the  
8 Oklahoma operations?

9 A. What, that we didn't memorialize it any  
10 longer?

11 Q. No. The arrangement or agreement which  
12 Southwestern Bell had with Mr. Anderson.

13 A. I believe it did, yes.

14 Q. Okay. Were you involved in that process?

15 A. Yes.

16 Q. Okay. And did you discuss with  
17 Mr. Anderson fee arrangements and that sort of  
18 thing?

19 A. Yes.

20 Q. Okay. Would you tell me just generally  
21 what the fee structure was?

22 A. I don't recall, specifically. My best  
23 recollection was that the fee for the firm was a  
24 hundred dollars an hour, plus expenses, that were  
25 generally approved ahead of time.

1           Q.     Okay. Do you know whether or not as a part  
2     of that arrangement in its various forms that  
3     Mr. Anderson or the firm would provide you with time  
4     sheets?

5           A.     They would provide me with billing  
6     statements that set forth the day and the hours  
7     worked and the matters worked on.

8           Q.     In other words, for the itemized bills that  
9     were sent to the phone company?

10          A.     Well, I don't know what you mean by  
11     "itemized," it set forth the day, the number of  
12     hours and the matter that was worked on on each  
13     day. If that's itemized, then, yes.

14          Q.     It did not set forth specifically what he  
15     did?

16          A.     I don't -- I can't say it did or didn't. I  
17     don't recall.

18          Q.     Now, in your role as the -- I believe it  
19     was the general attorney for Southwestern Bell  
20     Telephone Company - Oklahoma, who was your client?

21          A.     The telephone company.

22          Q.     Okay. Was it just the Oklahoma operations?

23          A.     As a practical matter, yes, I mean I don't  
24     know the finite definition of "client." I mean as a  
25     practical matter, I handled matters pertaining and

1 related to the Oklahoma operation.

2 Q. I guess I am trying to understand, again,  
3 the structure of how the company is structured, and  
4 to the best of your knowledge as an official matter,  
5 your client was supposed to be Southwestern Bell  
6 Telephone Company - Oklahoma operations; is that  
7 correct?

8 MR. COATS: Let me just interpose an  
9 objection to the form of the question. I think he's  
10 calling for a legal conclusion. It is true that  
11 Mr. Glass is a lawyer, but he's not here testifying  
12 as an expert. The law provides that under the  
13 circumstances he may have several clients, employees  
14 of the firm, other firms in the chain and the firm  
15 itself.

16 So you may answer the question with that  
17 caveat, but, indeed, the law would determine who  
18 your clients were.

19 MR. CHAMBERLAIN: Well, if I may, counsel,  
20 I am not asking him for any legal conclusion; I am  
21 asking him for his understanding as to who his  
22 client or clients were.

23 A. My client was Southwestern Bell Telephone  
24 Company, and its Oklahoma employees.

25 Q. (BY MR. CHAMBERLAIN) Okay.

1           A.     As a practical matter. Now, legally, was  
2     it broader or different than that, I don't know; I  
3     guess I would have to think about it or --

4           Q.     As far as the invoices that Mr. Waddell's  
5     firm would submit to the company, were those  
6     submitted directly to you?

7           A.     Yes.

8           Q.     And did you review those?

9           A.     Yes.

10          Q.     And was it your responsibility to approve  
11     those?

12          A.     Yes.

13          Q.     Okay. Let's talk about the events that  
14     occurred in March of '91, and that I believe you  
15     testified is when you first became aware of the  
16     pending FBI investigation; is that correct?

17          A.     That's correct.

18          Q.     Okay. And I believe -- I am trying to put  
19     this in context, but I believe you indicated that  
20     you first became aware of that investigation when  
21     Mr. Miller came to you after having been visited by  
22     some FBI agents; is that correct?

23          A.     That's correct.

24          Q.     All right. Now, why did Mr. Miller come to  
25     you at that point in time?



1           A.     Because I was a lawyer for the company, I  
2     represented him as an employee of the company.

3           Q.     Did you give him legal advice?

4           A.     Yes.

5           Q.     Now, you have also testified, I believe,  
6     that sometime after that, that you personally met  
7     with the FBI; is that correct?

8           A.     That's correct.

9           Q.     Okay. Do you have a recollection of what  
10    amount of time elapsed between the your conversation  
11    with Mr. Miller and the point in time in which you  
12    met with the FBI agents?

13          A.     Less than a month, probably a week or so.

14          Q.     And you also testified that Mr. Coonan  
15    arranged that meeting, correct?

16          A.     That is the best of my recollection, yes.

17          Q.     And that Mr. Coonan was also present with  
18    you at that meeting; is that correct?

19          A.     That's correct.

20          Q.     Was Mr. Coonan acting as your attorney at  
21    that meeting?

22          A.     Well, let me answer it this way,  
23    Mr. Chamberlain. The matter --

24                   MR. COONAN: Hold it. Let's talk.

25                   (A brief recess was here had.)

1                   THE WITNESS:   Would you repeat the  
2   question, Mr. Chamberlain.

3                   (The last question was read by the reporter.)

4           A.     If I needed an attorney, he would have  
5   acted as one.   As it turned out, I mean they asked  
6   questions and I answered every one of them and it  
7   wasn't -- it wasn't a situation where he is entering  
8   an appearance and lodging objections and all that.  
9   So he was with me and, yes, in that sense, I guess  
10   he was, but as a practical matter, there wasn't much  
11   representation surrounding my meeting.

12          Q.     (BY MR. CHAMBERLAIN) Did he give you any  
13   legal advice during that meeting?

14          A.     Not that I recall.

15          Q.     Back up to your meeting with Mr. Miller.  
16   Okay?

17          A.     Which meeting?

18          Q.     I'm sorry. The meeting that you had with  
19   Mr. Miller after he learned about the FBI  
20   investigation and relayed that to you.

21          A.     Yes.

22          Q.     I take it from your answers and with  
23   counsel's statements that you believe that that was  
24   an attorney-client meeting that you had with  
25   Mr. Miller?

- 1           A.     I believe it was.
- 2           Q.     Okay.  So you felt that Mr. Miller was your  
3     client at that point?
- 4           A.     Yes.
- 5           Q.     All right.  And then, did you discuss that  
6     matter with anyone else?
- 7           A.     Yes.
- 8           Q.     All right.  Can you tell me who?
- 9           A.     Mr. Coonan.
- 10          Q.     Okay.  And what was the context of that  
11     meeting?
- 12          A.     I advised him what had occurred with  
13     respect to the contact by Mr. Miller from the FBI  
14     and the events that transpired.
- 15          Q.     Why did you communicate that information to  
16     Mr. Coonan?
- 17          A.     Because I was told to.
- 18          Q.     By whom?
- 19          A.     By Mr. Coonan's boss, Mr. Ellis.
- 20          Q.     Okay.  This is James --
- 21          A.     D. Ellis.
- 22          Q.     I'm sorry, James D. --
- 23          A.     (Affirmative head nod).
- 24          Q.     -- Ellis?
- 25          A.     (Affirmative head nod).

1 Q. Okay. And was that your boss at the time?

2 A. He was the Vice President and General  
3 Counsel of Southwestern Bell Corporation, so in the  
4 ultimate sense, he was, but not actually.  
5 Mr. Taylor was my boss at the time.

6 Q. I am trying to get the contractual context  
7 accurately here. You had a conversation with  
8 Mr. Miller in which you first learned about the FBI  
9 investigation?

10 A. Correct.

11 Q. Okay. And then who was the first person  
12 you talked to about that?

13 A. I can't remember who the first person I  
14 talked to. It may have been J. B. Ellis, but I --  
15 if he was there, I would have talked to him, advised  
16 him about it, and then I immediately advised my  
17 superiors in the legal department.

18 Q. Okay. Your superiors were Mr. Taylor and  
19 Mr. James D. Ellis, correct?

20 A. Correct.

21 Q. Okay.

22 A. And I don't recall who I called first, and  
23 I may have talked to Mr. Taylor, I don't recall, but  
24 I remember I was in contact with Mr. Coonan very  
25 shortly thereafter.

1 Q. And at that point in time, which we are  
2 discussing, which is somewhere in March or April of  
3 '91, --

4 A. Uh-huh.

5 Q. -- Mr. James B. Ellis was president of  
6 Southwestern Bell Oklahoma's operations?

7 A. Yes.

8 Q. Okay. Now, back to the meeting that you  
9 and Mr. Coonan had with the FBI agents. What  
10 occurred after that meeting?

11 A. Can you be more specific as to when?

12 Q. Immediately after the meeting. You and  
13 Mr. Coonan, I assume, left.

14 A. We left.

15 Q. And went back to Southwestern Bell  
16 Telephone headquarters in Oklahoma City?

17 A. I don't remember. I mean this was March  
18 19 -- I don't know whether I took him to the  
19 airport, whether I -- I mean I don't recall where we  
20 went. We left. I mean we didn't stay there, if  
21 that's your question.

22 Q. Did you make notes at the meeting?

23 A. No.

24 Q. Did you make notes after the meeting?

25 A. No.

1           Q.    Do you know whether or not Mr. Coonan made  
2 notes at the meeting or after the meeting?

3           A.    My best recollection is he did, but I don't  
4 know; you would have to ask him.

5           Q.    Okay. Is it your recollection that he made  
6 notes at the meeting or after?

7           A.    I don't recall. I don't recall. He may  
8 have; I don't -- I cannot say for sure whether he  
9 did or didn't. I just don't recall,  
10 Mr. Chamberlain, I'm sorry.

11          Q.    Did you continue to have discussions or  
12 meetings with Mr. Coonan after your meetings with  
13 the FBI?

14          A.    Yes.

15          Q.    Okay. Did you also discuss meeting with  
16 your superiors?

17          A.    Well, Mr. Coonan was essentially the legal  
18 department representative at that point involved in  
19 the investigation, and I communicated with  
20 Mr. Coonan. You mean did I talk with others about  
21 it in the legal department or issues related to it?  
22 I'm sure that I did, but I can't recall when or  
23 where. Mr. Coonan was essentially at that point  
24 directing the investigation for the legal  
25 department.

1           Q.     The discussions that you had with  
2     Mr. Coonan following your meeting with the FBI, do  
3     you have any recollection of how many discussions  
4     you had? Was it two, two dozen?

5           A.     Involving what, Mr. Chamberlain?

6           Q.     Involving the FBI investigation.

7           A.     Anything related to it?

8           Q.     Yes.

9           A.     Well, I have had numerous discussions with  
10    Mr. Coonan since that time involving this matter.

11          Q.     Okay. Is Mr. Coonan acting as your  
12    attorney now?

13          A.     No, Mr. Coats is.

14          Q.     All right. Let's talk about the cash  
15    contributions. You had testified that you gave a  
16    hundred to a hundred fifty dollars in cash to  
17    Mr. Miller. This was after Commissioner Anthony's  
18    election. Do you recall that testimony?

19          A.     Yes.

20          Q.     Okay. Now, as I listened to you testify,  
21    it seemed to me that Mr. Miller collected  
22    contributions on more than one occasion; is that  
23    correct?

24          A.     Yes.

25          Q.     Was that something he did often?

1           A.     No.

2           Q.     Okay.  Why was he the one that was making  
3     the collections?

4           A.     Well, he was the one that primarily had an  
5     opportunity to interface with people in the  
6     political process.

7           Q.     Okay.  Now, you indicated, also, that  
8     Mr. Miller was making a contribution at that point  
9     in time, correct?

10          A.     I believe he was.  I don't know.  I believe  
11     he was.

12          Q.     Do you have any recollection how much of a  
13     contribution he was going to make?

14          A.     No.

15          Q.     You may have answered this, do you recall  
16     who the other employees --

17          A.     No, I don't recall who they were.  I'm sure  
18     there were others, but I don't recall.

19          Q.     Were you aware of the so-called 60-day  
20     window for post-campaign contributions at that point  
21     in time?

22          A.     Yes, I was aware of what the law was with  
23     respect to campaign contributions.

24          Q.     All right.  Did you go look up a statute,  
25     anything like that?



1           A.     Absolutely.  We did research on it,  
2     prepared a memo on it.

3           Q.     And who is that memo to, do you recall?

4           A.     It was to Mr. Caldwell at that time.

5           Q.     Okay.  You have identified Mildred White as  
6     your mother-in-law.  Do you know whether or not she  
7     was ever interviewed by the FBI?

8           A.     Yes.

9           Q.     Do you know when that was?

10          A.     No.

11          Q.     You have no recollection whatsoever?

12          A.     It was 1992, the summer of 1992.

13          Q.     I'm sorry?

14          A.     The summer of 1992.

15          Q.     Did she call you and discuss that  
16     afterwards?

17          A.     No.

18          Q.     Did she discuss it before?

19          A.     No.

20          Q.     Did she discuss it with you at all?

21          A.     No.

22          Q.     So she was interviewed by the FBI and she  
23     thought nothing of it and didn't discuss it with  
24     anyone; is that your testimony?

25          A.     No, that's not my testimony.

1 Q. Who did she discuss it with; do you know?

2 A. My wife.

3 Q. Did your wife discuss it with you?

4 A. Yes.

5 Q. Okay. Can you tell me what that discussion  
6 involved?

7 A. Yes. That her mother had been interviewed  
8 by the FBI concerning campaign contributions.

9 Q. Do you know what your mother-in-law told  
10 the FBI?

11 A. No, I don't.

12 Q. Did she tell them that she had made the  
13 contributions?

14 A. No, she didn't tell them that.

15 Q. So we can assume that she told them she  
16 didn't make the contributions?

17 A. If they asked her that, she told them that.

18 Q. Okay. Let's talk about the contributions  
19 to Commissioner Hopkins for his 1989 labor  
20 commissioner race. Was that another instance where  
21 Mr. Miller was collecting money?

22 A. Yes.

23 Q. Okay. And do you recall who besides  
24 yourself and Mr. Miller were making contributions?

25 A. I do not recall.

1           Q.    Okay.  You made the statement that you and  
2   Mr. Ellis shared the belief that Mr. Anderson's  
3   representation of Southwestern Bell needed to be  
4   phased out.  Do you recall that?

5           A.    Yes.

6           Q.    Why do you believe that?

7           A.    Oh, there were several things.  Primarily,  
8   the nature and needs of the business were changing.  
9   Mr. Anderson was getting older and we felt that the  
10  traditional representation that he had been able to  
11  provide the company for many, many years was no  
12  longer going to be necessary for us to handle our --  
13  the legal issues surrounding our regulatory work.

14          Q.    What do you mean by the phrase "the  
15  traditional" -- what was your phrase, "traditional  
16  representation"?  What do you mean by that?

17          A.    Well, the fact that he had traditionally  
18  represented us since -- I don't know when, early  
19  Seventies or when.

20          Q.    So that was not a reference to any  
21  particular type of representation?

22          A.    No.

23          Q.    All right.  You testified that you met  
24  again with an FBI agent in approximately November of  
25  '92; is that correct?

1           A.    Well, I -- -- in terms of -- yes, yes. I  
2 met with, I guess was a good one.

3           Q.    Maybe a euphemism, but you discussed the  
4 service of a federal subpoena with an FBI agent,  
5 correct?

6           A.    That's correct.

7           Q.    Okay. Now, what did you do when you  
8 received that subpoena? Did you seek legal advice?

9           A.    Yes.

10          Q.    Okay. And whom did you seek out legal  
11 advice from?

12          A.    Mr. Coats.

13          Q.    Okay. Was Mr. Coonan involved in that  
14 instance at all?

15          A.    Involved in what?

16          Q.    Did you discuss the matter with Mr. Coonan?

17          A.    I need to be careful here. What matter?  
18 The fact that I had received a subpoena?

19          Q.    Yes.

20          A.    I don't recall whether I discussed it with  
21 him or not.

22          Q.    Okay. Did you discuss any other matter  
23 with Mr. Coonan on or about November of 1992?

24          A.    Oh, I'm sure I did.

25          Q.    Why do you say that? Why are you sure that

1     you did?

2           A.     Well, there hasn't been a week go by that I  
3     haven't discussed something with him, since March of  
4     1991.

5           Q.     Okay. And were all these conversations  
6     related to the FBI investigation?

7           A.     I don't recall, probably not. I don't  
8     recall. I mean that was the main -- that was the  
9     main thing that we shared a common interest in.

10          Q.     So the FBI investigation was the main focus  
11     of your relationship with Mr. Coonan?

12          A.     Well, that is.

13                 Issues related to that were what caused the  
14     need for Mr. Coonan and I to have frequent  
15     discussions.

16          Q.     Okay. Did Mr. Coonan appear with you  
17     before the Federal Grand Jury? Let me rephrase  
18     that. Did he accompany you --

19          A.     I don't know whether you know this or not,  
20     Mr. Chamberlain, but you don't get a lawyer in front  
21     of a Federal Grand Jury. If he was there, I didn't  
22     see him.

23          Q.     Okay. Do you know whether or not other  
24     Southwestern Bell employees or agents were  
25     subpoenaed to testify before the Federal Grand Jury?

1           A.     Yes.

2           Q.     Okay. Can you tell me who that is? Could  
3 you identify those people for me?

4           A.     J. B. Ellis, Jim Taylor, Royce Caldwell,  
5 Bob Stafford, Thoms, T-h-o-m-s, White, and there  
6 maybe have been others. I mean I don't know whether  
7 that's all of them.

8           Q.     Is that all you recall?

9           A.     That's all I can name right now, but don't  
10 hold me to that, because I may have forgotten some.

11          Q.     Okay. Some of these names I am not  
12 familiar with, so I am just going to ask you briefly  
13 about them. Who is Jim Taylor?

14          A.     Well, we have talked about him. He was my  
15 boss at the time.

16          Q.     Okay.

17          A.     He's Vice President and General Counsel of  
18 the Southwestern Bell Telephone Company.

19          Q.     And who is Thoms White, is that --

20          A.     He used to believe the Chief Accountant for  
21 the Oklahoma Division.

22          Q.     Okay. You testified that you had only  
23 discussed the contribution list with attorneys, and  
24 by "contribution list," I am referring to the list  
25 of the 14 or 15 contributors that accompanied a cash

1 contribution to Commissioner Anthony.

2 A. Well, I don't know anything about a list --  
3 I mean you say that. I didn't discuss that -- I  
4 mean I have never seen the list, so I mean that --

5 Q. Okay. I am going to by my notes here, I  
6 may be incorrect, but I have written down here that  
7 you stated that you had only discussed that  
8 contribution list with attorneys. Do you recall  
9 having discussed that contribution list at all with  
10 anyone?

11 A. Well, I don't recall discussing the list at  
12 all, because I'm not sure what you mean by "the  
13 list." And I am not trying to be cute,  
14 Mr. Chamberlain, but I mean there was never any -- I  
15 was never aware of any list. I mean you mentioned  
16 names or something, yes, but -- so I discussed that  
17 with Mr. Coats. Mr. Coonan was aware of it, I  
18 believe.

19 Q. Okay. Were you aware of any conversations  
20 that Mr. Anderson had with any of the three  
21 commissioners during the Southwestern Bell PUD 260  
22 case?

23 A. I was aware that he had conversations with  
24 commissioners during that time, yes.

25 Q. Okay. And we talked about earlier the way

1 in which you and Mr. Anderson worked together.  
2 Would you call Mr. Anderson up and say, "I would  
3 like for you to go by and visit with the  
4 Commissioner about this particular matter"? Is that  
5 the way that those conversations arose?

6 A. I would not ask him to go by and talk to  
7 any commissioner. I don't recall doing that. I  
8 mean it's possible I did that, but the contact with  
9 the commissioners were handled by Mr. Miller and his  
10 staff for the company.

11 Q. I guess I am having a little trouble  
12 understanding exactly what kind of services it was  
13 that Mr. Anderson provided, since you have indicated  
14 that he didn't represent the company as an attorney  
15 of record in court or in the hearings.

16 Did you use him to do legal research?

17 A. Yes.

18 Q. Did you seek out advice from him?

19 A. Yes.

20 Q. Okay. What other services did he provide  
21 you?

22 A. He would review pleadings; he would review  
23 draft testimony from all the parties; he would help  
24 prepare responsive pleadings; he would help prepare  
25 cross-examination questions, things related to that.



1 Q. Okay.

2 A. By the way, not only him, but Mr. Waddell,  
3 also.

4 Q. Do you know whether or not Mr. Miller's  
5 mother-in-law was ever interviewed by the FBI?

6 A. I don't know. I don't know his  
7 mother-in-law. I mean -- maybe I know her, I don't  
8 remember -- I've never talked to his mother-in-law.

9 Q. That wasn't my question. Maybe I wasn't  
10 clear.

11 A. Okay.

12 Q. Do you know whether or not his  
13 mother-in-law was ever interviewed or contacted by  
14 the FBI?

15 A. I was told that by Mr. Miller, yes.

16 Q. Okay. Do you know whether or not  
17 Mr. Miller's brother-in-law was ever interviewed or  
18 contacted by the FBI?

19 A. I don't know about his brother-in-law.

20 Q. Did you review Mr. Ellis's transcript and  
21 Mr. Miller's transcript in preparation for this  
22 deposition?

23 A. No.

24 MR. CHAMBERLAIN: Thank you, Mr. Glass,  
25 that's all the questions I have.

1 CROSS EXAMINATION

2 BY MS. SNAPP:

3 Q. Mr. Glass, as you know, I am Maribeth  
4 Snapp, and I am representing the Public Utility  
5 Division staff in this case. I am not to be  
6 confused with the commission or some other entity in  
7 this case.

8 Mr. Glass, how did you prepare for this  
9 deposition?

10 A. Well, I talked to Mr. Coats about the  
11 deposition, and I kind of showed up. I mean I  
12 didn't -- I mean I spent no time in the library or  
13 anything like that. I mean I didn't -- in terms of  
14 preparation, I --

15 Q. Did you have any documents or notes in your  
16 possession which you reviewed?

17 A. Let's see, specifically for this  
18 deposition, I probably looked at some notes, not a  
19 great deal.

20 Q. Who prepared those notes?

21 A. The ones I looked at, I did.

22 Q. And when were those notes prepared?

23 A. When?

24 Q. Yes, sir.

25 A. The ones I specifically recalled looking at

1     were ones prepared by me in April of 1991.

2             Q.     And what did those regard?

3             A.     Those regarded a meeting I had with  
4     Mr. Miller.

5             Q.     Who has possession of those notes at this  
6     time?

7             A.     Oh, my, I don't know whose got them.

8                     MR. COATS:   I have them.

9             A.     Mr. Coats has them.

10            Q.     (BY MS. SNAPP) Did you provide Mr. Coonan  
11     any documents in conjunction with his investigation  
12     during the time frame of March '91 - April '91  
13     investigation?

14            A.     Yes.

15            Q.     What documents did you provide Mr. Coonan?

16            A.     I don't recall what they were, but I know I  
17     provided some. I recall specifically providing  
18     documents related to legal research done with  
19     respect to campaign contributions.

20            Q.     You indicated previously that you had done  
21     some research --

22            A.     Correct.

23            Q.     -- regarding campaign contributions.

24            A.     Correct.

25            Q.     When was that research done?

1           A.     December of 1988.

2           Q.     When you met with Mr. Miller in March of  
3     '91, he advised you that he was contacted by the  
4     FBI, was anyone else present besides yourself and  
5     Mr. Miller?

6           A.     No.

7           Q.     Do you know how many employees Southwestern  
8     Bell received wiretap notices --

9           A.     No.

10          Q.     -- involving the --

11          A.     No, I don't.

12          Q.     If I can get my question in the record,  
13     please?

14          A.     Oh, I'm sorry, Maribeth.

15          Q.     Involving the wiretapping of Mr. Anderson's  
16     telephone?

17          A.     I do not know how many.

18          Q.     Could you give me names you recall  
19     receiving those?

20          A.     Myself, J.B. Ellis, David Miller are the  
21     only three I recall, but I don't know if that's --  
22     if those are the only people who received notices.

23          Q.     When were those received?

24          A.     I don't know when they were received. Mine  
25     was received in March of 1991, but I don't know

1 about the others, Ms. Snapp.

2 Q. Do you recall the time frame covered by the  
3 wiretap notice?

4 A. My recollection was it was February to  
5 March of 1991, some days in there, those two months,  
6 to the best of my recollection, but I don't know for  
7 sure. That's just my recollection.

8 Q. So, essentially, it covered a time frame  
9 very close in proximity to when you received the  
10 notice; is that correct?

11 A. Yes.

12 Q. The same is true --

13 A. Well, no, no, I don't know when I -- Ms.  
14 Snapp, I need to tell you I don't know when I  
15 received it. I don't know whether I received it  
16 then or later that summer. I don't -- I need to  
17 correct that. I don't recall when exactly I  
18 received it. I do recall that the notice said  
19 February and March time period, but it may have been  
20 several months later that I actually received the  
21 notice. I don't recall when exactly I received it.  
22 I do know I received it in 1991.

23 Q. What was the first thing which called  
24 Southwestern Bell Telephone Company's attention to  
25 the fact that there was an FBI investigation

1 involving Bill Anderson?

2 A. Well, certainly, the visit by the FBI  
3 agents to Mr. Miller in March of 1991 mentioned Bill  
4 Anderson, and so I was aware then that there was  
5 some relationship, I didn't know whether it was  
6 substantive or a passing relationship between the  
7 FBI investigation and Mr. Anderson.

8 Q. Did you ever have any contact was the FBI,  
9 the U.S. Attorney's Office in which you asked  
10 whether or not Southwestern Bell was a target in the  
11 investigation?

12 A. No.

13 Q. There was not anybody else with  
14 Southwestern Bell who was asked whether or not  
15 Southwestern Bell was a target of the investigation?

16 A. I don't know whether anybody asked that  
17 question of them or not. I did not.

18 Q. As of this date, do you know whether or not  
19 Mr. Miller delivered any contribution, campaign  
20 contributions, to Mr. Anthony?

21 MR. COATS: Let me interpose an objection  
22 to the question. You are entitled to answer that if  
23 you had sources other than from David Miller about  
24 that. But you don't need to reveal any information  
25 you received from David Miller or from anybody

1 involved in the internal investigation we talked  
2 about.

3 A. Subject to those restrictions, Ms. Snapp,  
4 the answer to the question is "no."

5 Q. (BY MS. SNAPP) What steps did Southwestern  
6 Bell take to determine when the contributions might  
7 have been given to Commissioner Anthony by  
8 Mr. Miller?

9 A. I don't know all of the steps that were  
10 taken. There was an investigation conducted that I  
11 provided input to, but I -- that was part of the  
12 investigative process for which I was not  
13 responsible, and so I don't know beyond that.

14 Q. Do you know whether any steps were taken to  
15 ascertain the date of any checks that might have  
16 been received?

17 MR. COATS: I didn't get the question. I'm  
18 sorry. Say again.

19 Q. (BY MS. SNAPP) Were any steps taken to  
20 determine the date of any checks for campaign  
21 contributions which might have been given to  
22 Mr. Anthony?

23 A. I don't know. I don't know.

24 MS. SNAPP: No further questions. Thank  
25 you.

## 1 CROSS EXAMINATION

2 BY MR. STAKEM:

3 Q. Good afternoon, Mr. Glass. My name is Ron  
4 Stakem, I represent the MCI Telecommunications  
5 Corporation, and I do have a few questions that will  
6 concern two areas. The first is a bar complaint;  
7 the second will have to do with a campaign  
8 contribution you made in January of 1990 to  
9 Commissioner Anthony.

10 Let's turn to the first area. On or about  
11 October the 2nd of 1992, Commissioner Anthony made a  
12 public announcement that he had filed a bar  
13 complaint against one or more attorneys. Were you  
14 one of those persons against whom he filed a bar  
15 complaint?

16 A. I have been informally advised that I am.

17 Q. You seem to draw a distinction between  
18 informal advice and formal advice. Let me put it to  
19 you directly.

20 Is there a bar complaint investigation  
21 pending against you in Oklahoma? If you know.

22 A. I don't know that -- I don't know that  
23 there is.

24 Q. Have you been asked to respond to the Bar  
25 Association to any concerns about your conduct?



1           A.     I have not.

2           Q.     Have you had any contact from, for example,  
3     the General Counsel of the Bar, Dan Murdock, or  
4     any --

5           A.     I have.

6           Q.     And whatever those conversations were, they  
7     did not involve asking you to respond to some  
8     complaint; is that right?

9           A.     That's correct.

10           MR. STAKEM: Thank you. That's all the  
11     questions I have on that area.

12           Q.     (BY MR. STAKEM) You mentioned at one time  
13     that you had done some legal research on Oklahoma  
14     political campaign contribution laws, and put it  
15     into memo form for Mr. Royce Caldwell. Was he at  
16     that time the president of Southwestern Bell  
17     Company - Oklahoma?

18           A.     Yes.

19           Q.     And that was, I take it, in December of  
20     1988; is that right?

21           A.     That's correct.

22           Q.     When you got the research memo.

23           A.     November, December, yes, sir.

24           Q.     Did you have occasion or lawyers working  
25     for you have occasion to update that research or

1     that memoranda between December 1988 and January of  
2     1990?

3           A.     Yes.

4           Q.     And did you also give that information to  
5     Mr. Caldwell?

6           A.     Yes.

7           Q.     And am I correct that Mr. J.B. Ellis became  
8     president of Southwestern Bell Telephone Company -  
9     approximately January 1, 1990?

10          A.     Yes.

11          Q.     And, to your knowledge, was that  
12     information about Oklahoma campaign contribution  
13     research given to Mr. J.B. Ellis, "B" as in  
14     business, Ellis, if you recall?

15          A.     Oh, I recall. I don't know whether the  
16     actual memorandum was given to him. He was aware of  
17     it, though.

18          Q.     All right. Now, without getting into the  
19     details, and I understand it may be somewhat  
20     complicated, there is discussion about a so-called  
21     60-day window on either side of election date for a  
22     Corporation Commissioner, being a window in which  
23     contributions were appropriate; is that generally  
24     accurate?

25          A.     Well, there was -- yes, at one time that

1 was it.

2 Q. At one time. And would that have been  
3 generally the situation in November of 1989 and  
4 January 1990?

5 A. To the best of my recollection, that's  
6 correct.

7 Q. Now, I take it from your testimony that you  
8 personally were solicited by Commissioner Anthony's  
9 campaign to contribute to retire his campaign debt,  
10 accumulated for his election run in November of  
11 1989; is that right?

12 A. That's correct.

13 Q. And early in January you made a hundred  
14 dollar or a hundred fifty dollar cash contribution.

15 A. Correct.

16 Q. Now, I take it that you, if I understand  
17 your testimony correctly, you gave the money,  
18 physically gave the money to David Miller expecting  
19 that he would put it together with some other funds  
20 and see that it was contributed to Mr. Anthony's  
21 campaign, correct?

22 A. I gave it to Mr. Miller, yes.

23 Q. And that's what you expected him to do with  
24 the money?

25 A. Yes.

1           Q.    Do you remember the date you gave him the  
2 money?

3           A.    Well, it was probably no later than January  
4 the 5th.

5           Q.    And why are you able to fix the date as no  
6 later than January the 5th, probably?

7           A.    Well, we were aware of the obligation to  
8 make any contributions prior to him becoming a  
9 Corporation Commissioner. I also recall that the  
10 5th was a date -- I had forgot even to get a check  
11 and the 5th was the day I do my banking, anyway, and  
12 I went to the bank and just gave cash.

13          Q.    Did David Miller accompany you to the bank?

14          A.    No -- I don't think so.

15          Q.    All right.

16          A.    I mean he could have been in the car -- no,  
17 I don't think so.

18          Q.    Was it in your mind and consciously part of  
19 your consideration in making this cash contribution  
20 that one must do it before the swearing in?

21          A.    Yes, I was aware of that. I mean every  
22 waking moment I didn't think that, but he, yes.

23          Q.    No, I mean were you familiar enough with  
24 the law and comfortable enough with your  
25 understanding of the law that you contributed the

1 cash without reviewing the written memoranda on the  
2 subject, or did you go back and look at the  
3 research?

4 A. I was very aware -- I was very well aware  
5 of the existence of the memoranda and what our  
6 research had done when I made the contribution.

7 Q. And did you believe at the time you gave  
8 the cash money to David Miller that if it were  
9 promptly delivered to the campaign, it would have  
10 been a legal contribution?

11 A. Yes.

12 Q. Do you know when the money was delivered to  
13 the campaign?

14 A. No.

15 Q. Have you --

16 A. I mean what exact date, no.

17 Q. Have you ever undertaken to determine when  
18 the money was delivered to Commissioner Anthony's  
19 campaign?

20 A. Yes.

21 Q. And what have you done to try to find out  
22 that date?

23 A. I asked Mr. Miller; Mr. Miller and I  
24 discussed it.

25 Q. And what did Mr. Miller tell you?

1           MR. COATS: To which we object because of  
2 the problems with the work-product privilege and the  
3 attorney-client privilege. I advise the witness he  
4 need not answer.

5           MR. STAKEM: I appreciate that, Mr. Coats,  
6 and I don't mean to tread on that. For my client's  
7 purpose, I am willing to commit to the limited  
8 waiver proposal that you announced earlier. I don't  
9 know that that's the case with everyone or that they  
10 are going to be able to decide that today. I would  
11 defer now asking more questions in recognition of  
12 that advice, but I would like to have the  
13 opportunity to have those questions answered in some  
14 convenient way if everyone else at some point could  
15 agree with your stipulation. Could we have that  
16 understanding?

17           MR. COATS: Yes, I think we can. We have  
18 had -- Mr. Glass has been up here once and then  
19 released from deposition, had to come back.

20           THE WITNESS: Been up here twice.

21           MR. COATS: And so I hate to hesitate to  
22 have to call him back, however, I understand that  
23 you may not be willing to agree today to accept a  
24 limited waiver we suggested; it's the only way that  
25 we believe that the notes and his recollection of

1     those meetings can be released.

2                 So I think we can agree that assuming  
3     everyone got together and you all decided you could  
4     agree to it and would accept the limited waiver, we  
5     could probably make arrangements to do Mr. Glass  
6     either on the telephone or something, or have him  
7     here.

8                 MR. STAKEM: That's fine from my  
9     perspective, Mr. Coats, thank you. And Mr. Glass, I  
10    have no further questions, thank you, too.

11                MR. LEE: I have no further questions.

12                MR. COATS: No further questions?

13                I have got just a couple questions.

14                         CROSS EXAMINATION

15    BY MR. COATS:

16                Q.    Did you have any previous knowledge prior  
17    to October 2nd, 1992, that Commissioner Anthony was  
18    going to file a bar complaint against you?

19                A.    Absolutely not.

20                Q.    Did you have any knowledge prior to that  
21    date that Mr. Anthony thought you had done anything  
22    unethical or improper before he filed the bar  
23    complaint?

24                A.    Absolutely not.

25                Q.    Did you have any knowledge at any time that

1 Commissioner Anthony was operating as a covert,  
2 cooperating participant in an investigation of  
3 Southwestern Bell prior to October 2nd, 1992?

4 A. No, I did not.

5 MR. COATS: Okay. I believe that's all I  
6 have except we have one other thing. We want to  
7 have a conference for a moment about the notes.

8 (An off-the-record discussion was here had.)

9 MR. COATS: I think we have completed  
10 Mr. Glass, and I believe he will read and sign.

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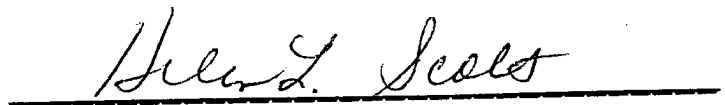
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GLEN A. GLASS, ESQ.

STATE OF OKLAHOMA )  
 ) ss.  
COUNTY OF OKLAHOMA )

Subscribed and sworn to before me this  
5<sup>th</sup> day of June, 1993.



Notary Public, State of Oklahoma

My commission expires 8-28-96.

C E R T I F I C A T E

STATE OF OKLAHOMA )  
 ) ss.  
COUNTY OF OKLAHOMA )

I, Maynard E. Peterson, a Certified Shorthand Reporter within and for the State of Oklahoma, do certify that the witness in the foregoing deposition, GLEN A. GLASS, ESQ., was duly sworn to testify the truth, the whole truth and nothing but the truth, in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported by me and thereafter transcribed into typewriting by computer.

I do further certify that I am not counsel, attorney or relative of either party, or clerk or stenographer of either party, or otherwise interested in the event of this suit.

I do further certify that I am a duly qualified and acting Certified Shorthand Reporter within and for the State of Oklahoma, Certificate No. 00325.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my CSR stamp at my office in Oklahoma City, Oklahoma, this 28th day of May, 1993.

*Maynard E. Peterson*  
*by Dorothy Peterson*  
Oklahoma Certified Shorthand Reporter

COSTS: \$ \_\_\_\_\_

Paid by Applicant

Maynard E. Peterson  
Oklahoma Certified Shorthand Reporter  
Certificate Number 00325  
Exp. Date: December 31, 1994

1 WITNESS ERRATA SHEET

2 GLEN A. GLASS, ESQ.

3 Application of Howard W. Motley, Jr.-SWB

4 PUD No. 890000662

5

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June 8, 1993

Date

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Glen A. Glass

Signature of witness