



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF TAP # 1136

Date Filmed 9/18/80 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Classification Information

pursuant to 437g(a)(4)(B)

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed

Suzanne M. Walker

date

21 Aug 1980

MUR-1136 Callahan

PS Form 3811, Jan 1978
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered.....
 Show to whom, date and address of delivery...
 RESTRICTED DELIVERY
 Show to whom and date delivered.....
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.S
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Robert S. Eberhardt
 5353 W. Dartmouth Ave.
 Suite 501 - Denver Co. 80227

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945972	

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

80 AUG 29 1980
 RECEIVED

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Eberhardt
5353 W. Dartmouth Ave.
Suite 501
Denver, Colorado 80227

Re: MUR 1136

Dear Mr. Eberhardt:

On August 19, 1980, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441b. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Should you have any questions, contact Suzanne Callahan at (202) 523-4057.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

0010011079



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert S. Eberhardt
5353 W. Dartmouth Ave.
Suite 501
Denver, Colorado 80227

Re: MUR 1136

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Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Should you have any questions, contact Suzanne Callahan at (202) 523-4057.

Sincerely,

CSN
8/20/80

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

80040011080

In the Matter of)
)
 Colorado Associated Nursing) MUR 1136
 Homes Education and Political)
 Action Committee)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that Colorado Associated Nursing Homes Education and Political Action Committee ("Respondent") violated 2 U.S.C. § 441b.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is a political committee registered with the Commission.

2. Respondent's treasury prior to May 21, 1979, contained both corporate and non-corporate funds which were held together in the same bank account in accordance

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with Colorado law, and which funds had up until September 5, 1978, been expended solely in state legislative contests.

3. Respondent expended \$1,300 in connection with federal elections during 1978, however there were in excess of \$1,300 in the fund at that time which had been contributed by individuals.

V. Respondent's contributions to federal candidates, using funds commingled with corporate contributions, is a violation of 2 U.S.C. § 441b.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred dollars (\$100.00) pursuant to 2 U.S.C. § 437g(a)(6)(B).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

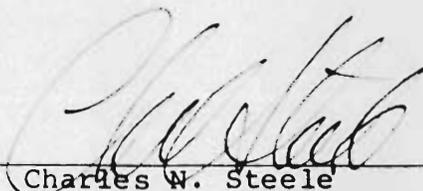
VIII. The Commission, on the request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

0011082

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

20 August 1980
Date



Charles W. Steele
General Counsel
Federal Election Commission

August 1, 1980
Date

Colorado Associated Nursing
Home Education and Political
Action Committee

BY: Rob S. Eubank

ITS: Attorney

60040211083

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Colorado Associated Nursing) MUR 1136
Homes Education and Political)
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 19, 1980, the Commission decided by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Accept the conciliation agreement signed by Robert Eberhardt, counsel to the Colorado Associated Nursing Homes PAC, and attached to the FEC General Counsel's August 13, 1980 report to the Commission.
2. CLOSE THE FILE IN THIS MATTER.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Reiche voted affirmatively for the decision.

Attest:

8/20/80

Date

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

1001100000



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Merritt Schumann
Colorado Associated Nursing Homes
Education and Political Action Committee
Post Office Box 18429
Capital Hill Station
Denver, Colorado 80218

Re: MUR 1136

Dear Mr. Schumann:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities and information supplied by you, the Federal Election Commission, on August 6, 1979, found reason to believe that CANHEPAC may have violated section 441b of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

Mr. Merritt Schumann

Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO : THE COMMISSION
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: March 24, 1980
SUBJECT: MUR 1136

The attached documents are circulated for your information.

ATTACHMENTS:

1) Memo; 2) Brief; 3) Letter

00040211088

March 24, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1136

Please have the attached Memo distributed to the
Commission on an informational basis. Thank you.

60040211089



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

P2: 17

March 24, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1136

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on March 24, 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

60040211090

BEFORE THE FEDERAL ELECTION COMMISSION
February 14, 1980

In the Matter of)
)
Colorado Associated Nursing) MUR 1136
Homes Education and)
Political Action Committee)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 7, 1980, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the Colorado Associated Nursing Homes Education and Political Action Committee ("CANHEPAC") in connection with its violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(2)(ii).

II. LEGAL ANALYSIS

CANHEPAC is a political committee registered with the Commission which supports federal candidates. During the normal course of reports reviewed, the Reports Analysis Division ("RAD") discovered that approximately \$12,710 of CANHEPAC's \$14,211 treasury was comprised of corporate funds.

On April 9, 1979, RAD sent CANHEPAC a surface violation letter in connection with its apparent § 441b violation. On May 2nd, CANHEPAC responded stating that its treasury did contain legally permissible corporate contributions under Colorado law, but that no corporate money had been contributed to federal candidates. The committee stated that it kept its corporate and non-corporate funds

informally separated although they were held in the same account. According to financial reports filed by CANHEPAC, it received \$1,501 in non-corporate contributions and expended \$1,300 in connection with federal elections during 1978.

On May 21, 1979, CANHEPAC sent another letter to RAD stating that they had opened a non-federal account for their corporate funds as they had been requested to do.

2 U.S.C. § 441b(a) makes it unlawful for political committees to expend corporate contributions in connection with federal election activities.

11 C.F.R. § 102.6 prohibits the commingling of state and federal funds. Specifically, 11 C.F.R. § 102.6(b)(2) states that federal accounts may not receive transfers from an account established for state or non-federal elections. The purpose of this provision is to prevent the commingling of contributions which may be lawful for state candidates but unlawful for federal candidates.

On August 6, 1979, the Commission, based upon the recommendation of RAD, found reason to believe that CANHEPAC may have violated 2 U.S.C. § 441b. On August 20th, CANHEPAC again submitted a written statement that no corporate monies had been contributed to federal candidates even though corporate funds were commingled with their federal funds in violation of 11 C.F.R. § 102.6.

60040211092

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that CANHEPAC has violated
2 U.S.C. § 441b.

21 March 1980
Date



Charles N. Steele
General Counsel

00040211093



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Merritt Schumann
Colorado Associated Nursing Homes
Education and Political Action Committee
Post Office Box 18429
Capital Hill Station
Denver, Colorado 80218

Re: MUR 1136

Dear Mr. Schumann:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities and information supplied by you, the Federal Election Commission, on August 6, 1979, found reason to believe that CANHEPAC may have violated section 441b of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

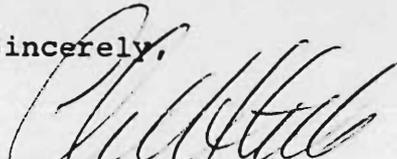
Mr. Merritt Schumann

Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: FEBRUARY 1, 1980
SUBJECT: OBJECTION - MUR 1136 - First General
Counsel's Report dated 1-30-80;
Received in OCS 1-30-80, 12:25

The above-named document was circulated on a
48 hour vote basis at 4:00, January 30, 1980.

Commissioner Aikens submitted an objection at
11:40, February 1, 1980, thereby placing MUR 1136
on the Executive Session Agenda for February 5, 1980.

60041311096

W/drawn

January 30, 1960

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Colgrove
SUBJECT: MUR 1136

Please have the attached First General Counsel's Report on MUR 1136 distributed to the Commission on a 48 hour tally basis.

Thank you.

00040211097

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION JAN 20 1980

MUR # 1136
STAFF MEMBER (S) 24
Callahan (202) 523-5071

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Colorado Associated Nursing Homes Education
and Political Action Committee

RELEVANT STATUTE: 2 U.S.C. 441b
11 C.F.R. § 102.6

INTERNAL REPORTS CHECKED: Respondent PAC

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On January 7, 1980, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the Colorado Associated Nursing Homes Education and Political Action Committee ("CANHEPAC") in connection with its violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(2)(ii).

FACTUAL AND LEGAL ANALYSIS

During the normal course of reports reviewed, RAD discovered that approximately \$11,785 in corporate contributions had been accepted and retained by CANHEPAC, a political committee registered with the Commission which supports federal candidates.

On April 9, 1979, RAD sent CANHEPAC a surface violation letter in connection with its apparent § 441b violation. On May 2nd, CANHEPAC responded stating that it did accept legally permissible corporate contributions under Colorado law, but that no corporate money had been contributed to federal candidates. The committee

stated that it kept its corporate and non-corporate funds informally separated although they were held in the same account. According to financial reports filed by CANHEPAC, it received \$1,501 in non-corporate contributions and expended \$1,300 in connection with federal elections during 1978.

On May 21, 1979, CANHEPAC sent another letter to RAD stating that they had opened a non-federal account for their corporate funds as they had been requested to do.

2 U.S.C. § 441b(a) makes it unlawful for political committees to accept corporate contributions in connection with federal election activities.

2 U.S.C. § 433, 11 C.F.R. § 102.6 prohibit the commingling of state and federal funds. Specifically, 11 C.F.R. § 102.6(b)(2) states that federal accounts may not receive transfers from an account established for state or non-federal elections. The purpose of this provision is to prevent the commingling of contributions which may be lawful for state candidates but unlawful for federal candidates.

On August 6, 1979, the Commission, based upon the recommendation of RAD, found reason to believe that CANHEPAC may have violated 2 U.S.C. § 441b. On August 20th, CANHEPAC again submitted a written statement that no corporate monies had been contributed to federal candidates even though corporate funds were commingled with their federal funds in violation of 11 C.F.R. § 102.6.

In light of the fact that the Committee did have sufficient non-corporate funds to cover its contributions to federal candidates at the time the contributions were made, and since the Committee has taken the action of opening a non-federal account pursuant to 11 C.F.R. § 102.6(a)(2)(ii), it is recommended that the Commission take no further action in this matter.

RECOMMENDATION

It is recommended that the Commission take no further action against CANHEPAC in connection with its violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.6 and close the file in this matter.

Attachments

1. RAD referral
2. Notification letter

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 1-7-80 ANALYST Mark Kleiman HK
TO: Charles N Steale TEAM CHIEF Steve Mrs Lois Zella
William Oldaker
THROUGH: STAFF DIRECTOR OP COMPLIANCE REVIEW _____
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE COMMITTEE: CANHEPAC
TREASURER: Merritt Schumann
ADDRESS: P.O. box 13429, Capitol Hill Station
Denver, CO 80218
AFFILIATE(S): None

ALLEGATION(S): 1. Receipt of corporate contributions. CITE: 2 U.S.C. 441b
2. Failure to establish committee which only receives contributions permissible under the Act. 11 CFR 102.6(a)(2)(ii) ATTACHMENT(S) #2, #9
#4
DATE INITIATED: 4-9-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project: ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-24-78 TO 12-31-78
TOTAL RECEIPTS \$ 111 TOTAL EXPENDITURES \$ 111
CASH ON HAND \$ 455 DEBTS \$ 0

HISTORY:
RESULTS OF REVIEW: Surface Violation letter sent 4-9-79 ATTACHMENT #2
Response 5-1-79 #4
Response 5-25-79 #5
Reason To Believe letter sent 8-6-79 #6
Response 8-20-79 #3

COMMUNICATIONS WITH CANDIDATE COMMITTEE: ATTACHMENT
Telecon 4-17-79 #3
Telecon 8-10-79 #7

REASON(S) FOR REFERRAL: Exceeds threshold ATTACHMENT
Responses require further analysis to determine appropriate course of action. #7

OTHER PENDING ACTIONS INITIATED BY RAD: Not pertinent to the allegations. ATTACHMENT

OTHER RELEVANT INFORMATION: Additional corporate contributions on previous reports. ATTACHMENT #9
Committee has established a separate committee for Non-Federal purposes. ATTACHMENT #10
Committee had Federal activity during time of violations. SEE ATTACHMENT #4

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

0004001100

MEMORANDUM TO THE REFERRAL FOR: CANHEPAC

FROM: MARK KLEINMAN

This referral involves numerous corporate contributions. The committee in responding indicated that they had "informally" separated their receipts and expenditures, with corporate contributions going to support State and Local candidates and purposes, and non-corporate contributions going for Federal purposes. The committee has since set-up, separate accounts, one for non-Federal and one for Federal purposes only. It was decided not to ask the committee to refund the corporate contributions, in their account, but rather to allow the Office of General Counsel to make a final decision as to the appropriate action.

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BREAKDOWN OF CORPORATE CONTRIBUTIONS --- CANHEPAC

Incorporated in good standing ---	\$9090
Incorporation suspended, delinquent or revoked	1550
Incorporation status not available from Colorado Secretary of State	<u>1145</u>
Total	11785

Note: Committee currently has less than \$60 cash-on-hand based upon last report filed 1979.

0111102

Commission
 St. N.W.
 Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Line Number: _____

(Use Separate Schedules for
 each numbered line)

7903094189

Name of Candidate or Committee in Full CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Holly Nursing Care Center 320 North 8th Holly, CO 81047	same Occupation	10/7/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ same			
Lakewood Nursing Home 1432 Depew Lakewood, CO 80214	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ 250.00			
Mesa Manor 2901 North 12th St. Grand Junction, CO 81501	same Occupation	10/7/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ 100.00			
North Shore Manor 1365 W. 29th St. Loveland, CO 80537	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ 250.00			
Plaza Care Center 7045 Stuart St. Westminster, CO 80030	same Occupation	10/7/78	150.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ 350.00			
Sharnar Nursing Center 1201 W. Abriendo Pueblo, CO 81004	same Occupation	10/7/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ 100.00			
Villa Manor 7950 W. Mississippi Lakewood, CO 80215	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date \$ 250.00			
SUBTOTAL of receipts this page (optional)			\$ 1,200.00
TOTAL this period (last page this line number only)			\$

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 3 of 4 for

Line Number _____

(Use Separate Schedules for
each numbered line)

Commission
N.W.
D.C. 20463

Name of Candidate or Committee in Full			
CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code Westland Manor 1150 Oak St. Lakewood, CO 80214	Principal Place of Business same	Date (month, day, year) 10/7/78	Amount of each Receipt this Period 250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 250.00		
Full Name, Mailing Address and ZIP Code Willowcrest Retirement Center 2277 East Drive Monte Vista, CO 81144	Principal Place of Business same	Date (month, day, year) 10/7/78	Amount of each Receipt this Period 100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 100.00		
Full Name, Mailing Address and ZIP Code Mesa Vista Sanatorium 2121 Mesa Drive Boulder, CO	Principal Place of Business same	Date (month, day, year) 10/9/78	Amount of each Receipt this Period 500.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 500.00		
Full Name, Mailing Address and ZIP Code Pikes Peak Manor 2719 North Union Blvd. Colorado Springs	Principal Place of Business same	Date (month, day, year) 10/9/78	Amount of each Receipt this Period 200.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 200.00		
Full Name, Mailing Address and ZIP Code Dalrie Berg, DO 9981 North Washington St. Denver, CO 80229	Principal Place of Business same	Date (month, day, year) 10/9/78	Amount of each Receipt this Period 100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 100.00		
Full Name, Mailing Address and ZIP Code Carl Flaxler, MD. 890 Hudson St. Denver, CO 80220	Principal Place of Business MD	Date (month, day, year) 10/9/78	Amount of each Receipt this Period 100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 100.00		
Full Name, Mailing Address and ZIP Code Viola Garlington, NHA 3110 Adams St. Denver, CO 80205	Principal Place of Business NHA	Date (month, day, year) 10/9/78	Amount of each Receipt this Period 25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 25.00		
SUBTOTAL of receipts this page (optional)			\$ 1,275.00
TOTAL this period (last page this line number only)			\$

00040211106

ATTACHMENT #10

January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 1 of 1 for
 Line Number _____

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full **SECOND QUARTER 1979 REPORT**
CANHEPAC (Colorado Associated Nursing Homes Educational Political Action Committee)

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
CANHEPAC - State P. O. Box 18429, Capitol Hill Denver, CO 80218	Transfer of money into a PAC for State purposes Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/31/79	125.00
	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ 125.00
TOTAL this period (last page this line number only)			\$ 125.00

ATTACHMENT #1

1003

0040211109

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22OCT79
PAGE 1 ..

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CANHEPAC COMMITTEE								
CONNECTED ORGANIZATION: HEALTH CARE ASSOCIATION/COLORADO								
ID# C00009118								
1977	APRIL 10 QUARTERLY							1 77FEC/051/5511
	JULY 10 QUARTERLY		0	20		1APR77 -30JUN77		3 77FEC/056/3011
	OCTOBER 10 QUARTERLY	3A - POSICARD				1JUL77 -30SEP77		2 77FEC/059/1687
	YEAR END REPORT		0	250		1APR77 -31DEC77		4 78FEC/064/1010
	REQUEST FOR ADDITIONAL INFORMATION							3 78FEC/066/0180
	REQUEST FOR ADDITIONAL INFO 2ND							2 78FEC/069/1884
	YEAR END REPORT - AMENDMINT		0	250		1APR77 -31DEC77		4 78FEC/069/1368
1978	APRIL 10 QUARTERLY		0	250		1JAN78 -31MAR78		4 78FEC/070/1984
	10 DAY PRE-PRIMARY		240	89		30JUN78 -28AUG78		5 78FEC/084/1043
	30 DAY POST-PRIMARY		0	0		30SEP78 - 2OCT78		2 78FEC/089/4931
	JULY 10 QUARTERLY		0	0		1APR78 -30JUN78		2 78FEC/080/3854
	OCTOBER 10 QUARTERLY		8,145	3,666		1JUL78 -30SEP78		9 78FEC/089/2448
	10 DAY PRE-GENERAL		4,846	8,620		20CT78 -23OCT78		15 78FEC/094/1879
	30 DAY POST-GENERAL		695	955		24OCT78 -27NOV78		5 78FEC/099/2710
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78		2 79FEC/135/3584
	30 DAY POST-GENERAL - AMENDMENT					27NOV78		2 79FEC/127/0255
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78		2 79FEC/135/3416
	YEAR END REPORT		0	188		28NOV78 -31DEC78		5 79FEC/117/3811
	REQUEST FOR ADDITIONAL INFORMATION					10CT78 -31DEC78		1 79FEC/124/1753
	YEAR END REPORT - AMENDMINT					31DEC78		2 79FEC/127/0253
	TOTAL		13,926	0	14,038			75 TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

0004021110

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22OCT79
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CANHEPAC COMMITTEE								ID# C00009118
	CONNECTED ORGANIZATION: HEALTH CARE ASSOCIATION; COLORADO							
	1979 MISCELLANEOUS TRANSACTION TO F.E.C.					3MAY79	2	79FEC/126/5187
	MISCELLANEOUS TRANSACTION TO F.E.C.					25MAY79	2	79FEC/128/1055
	AFRIL 10 QUARTERLY	50		140		1JAN79 -31MAR79	4	79FEC/125/0145
	JULY 10 QUARTERLY	0		125		1APR79 -30JUN79	4	79FEC/132/2868
	OCTOBER 10 QUARTERLY					1JUL79 -30SEP79	2	79FEC/139/3300
	3A - POS CARD							
	TOTAL	50	0	265	0		14	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

ATTACHMENT #2



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

April 9, 1979

Merrit C. Schumann, Treasurer
CANHEPAC
P.O. Box 18429, Capitol Hill Station
Denver, Colorado 80218

Dear Mr. Schumann:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 30 Day Post-General and Year End '78 Reports of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns of the contribution should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If the identification of the source of these contributions is incomplete or incorrect on the original report, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Kurt Burkhardt (800) 424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

7 9 0 3 1 1 2 4 1 1 7 5 3

DEBTS AND OBLIGATIONS

Page 1 of 1 for

Line Number 17a

(Use Separate Schedules for each numbered line)

Commission
St. N.W.
D.C. 20463

**Supporting Line Numbers 12 and 13
of FEC FORM 3**

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Harry Asmus P. O. Box 1448 Greeley, CO 80631	8/19/78	5,000. \$	-0- \$	5,000. \$
<input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Interim personal loan until voluntary contributions arrive.				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
SUBTOTALS this period this page (optional)		\$	\$	\$
TOTAL this period (last page this line number only)		\$	\$	\$5,000.00
Carry outstanding balance only to appropriate line of summary.				

780309021155

ATTACHMENT #3

011116

TELECON TO THE FILE: CANHEPAC

FROM: MARK KLEINMAN

DATE: 4-17-79

RE: SV

I spoke with Merritt Schumann, Treasurer (303) 861-8228, regarding response to SV. He stated that the committee had informally separated their state and local activity from federal activity and assured me that no corporate contributions went to federal candidates. In addition, I advised him that he should set-up separate accounts one for Federal and one for non-Federal activity. I told him to respond to that effect.

Merritt Schumann, Treasurer
(303) 861-8228

600402117

ATTACHMENT #4

0004021118

CANHEPAC

RECEIVED
FEDERAL ELECTION
COMMISSION

COLORADO ASSOCIATED NURSING HOMES EDUCATION AND POLITICAL ACTION COMMITTEE

79 MAY 9 AM 11:50
POST OFFICE BOX 18429 • CAPITOL HILL STATION
DENVER, COLORADO 80218 • PHONE 303 / 861 - 8228

May 2, 1979

Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Mr. Potter:

Please know that we appreciate the extension that Mr. Mark Klineman gave us of ten days to answer your letter of April 9, 1979. This extension was requested due to several people being out of State.

We have examined our ledgers and are pleased to state that we are within the limits of our contributions from individuals in making contributions to Congressional candidates. Below is a compilation of collections from individuals and an accounting of contributions to Congressional candidates from the reports we have mailed as required.

Contributions to PAC

Contributions to Congressional candidates

Dalrie Berg, DO	\$100. 10/9
Carl Flaxler, MD	100. 10/9
Viola Garlington	25. 10/9
Robert Gottschalk, MD	25. 10/9
Lloyd Hickey	500. 10/9
Gilbert Hirsch, CPA	100. 10/9
Donald Hoffman	98. 10/9
Paul Mullison	98. 10/9
Wilma Wagonblast	100. 10/9
Dorothy Boggio	25. 9/11
Bernard Heese	50. 9/11
George Curtis	90. 9/12
Sharon Curtis	90. 9/12
June Schwantes	100. 11/15
	<u>1,501.</u>

Wm. Armstrong	\$500. 10/9
J. Johnson	250. 10/9
Ed Scott	250. 10/9
Ken Kramer	100. 10/9
H. McCormick	200. 9/5
	<u>1,300.</u>

The receipts were \$1,501 from individuals and the contributions to Congressional candidates was \$1,300. As you review our original reports, you will see that this is evident.

As you know the State of Colorado allows corporations to donate to political action committees for contributions to State legislative candidates.

Yours sincerely,

Merritt C. Schumann

Treasurer

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

790501313132

ATTACHMENT #5

0004021120

CANHEPAC

FEDERAL ELECTION COMMISSION

COLORADO ASSOCIATED NURSING HOMES EDUCATION AND POLITICAL ACTION COMMITTEE

POST OFFICE BOX 518429 72 CAPITOL HILL STATION
DENVER, COLORADO 80218 PHONE 303 / 861 - 8228

May 21, 1979

Mr. Mark Klineman
Federal Election Commission
1325 "K" Street
Washington, D.C. 20463

Dear Mr. Klineman:

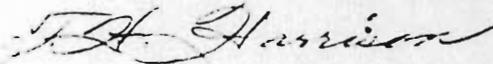
I appreciate very much your call and timely suggestions regarding the handling of our political action committee banking account. Your recommendations are being followed explicitly as follows:

We are setting up separate bank accounts and automatically using separate bank books.

The account which will be used for the State political affairs will be titled "CANHEPAC - State".

We are most anxious to cooperate with the Federal Election Commission to the fullest extent and will follow your suggestions accordingly.

Yours sincerely,



F. H. 'Bud' Harrison
Executive Director



Merritt C. Schumann
Treasurer

dt

720004 102311015251

ATTACHMENT #6

10 11 22

In reply please refer to: 2SV2/79-19-24



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1979

Merrit C. Schumann, Treasurer
CANHEPAC
P.O. Box 18429 Capitol Hill Station
Denver, Colorado

Dear Mr. Schumann:

On May 5, 1979, you were notified that certain entries in the 30 Day Post-General and Year End '78 Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on May 25, 1979, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take not action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days or receipt of this letter.

If you have responded to the above or you require additional information, please contact Mark Kleinman, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Robert D. Tiemo
Commissioner

Certified Mail:
Return Receipt Requested

ALLEGED VIOLATION REPORT
Refer To: 7903/353416

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

ATTACHMENT #7

1 2 4

TELECON TO THE FILE: CANHEPAC

FROM: MARK KLEINMAN

DATE: 8-20-79

RE: RTB-Corporate contributions

I spoke with Bud Harrison (303) 861-8228, Executive Director of CANHEPAC, to clarify what was still needed. I stated that he should reiterate that the committee had informally separated state and local activity from federal (corporate contributions going to State and Local and non-corporate going to Federal). I told him that response of 5-2-79 was an indication that they had separated contributions but we needed this to be reiterated.

Bud Harrison,
(303) 861-8228, Executive Director

00040211125

ATTACHMENT #8

00040211126

CAREPAC

COLORADO ASSOCIATE MEMBERS

400 BROADWAY SUITE 1200 • CAPITAL BUILDING STATION
DENVER, COLORADO 80202 • PHONE 333-7226 2278

August 20, 1979

Mark Kleinman, Reports Analyst
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

REF: 25V2/79-19-24

Dear Mr. Kleinman:

Thank you for your cooperation and guidance in our telephone conversation this morning.

Consequent to our previous conversations, we have responded as stated in our letters of May 21, 1979, and May 2, 1979; forthrightly disclosing the receipts and the expenditures of all CAREPAC monies.

This disclosure shows that no corporation monies were used as contributions to Congressional candidates. We did in "good faith" keep them separated; however, not with as much distinction and clarity as is indicated by your counsel to us.

We accordingly have, as stated in our letter of May 21, and our regular quarterly report, established two distinct bank accounts for State and Federal political expenditures.

We will strive to comply explicitly with whatever regulations are applicable.

Thank you for your consideration and counsel.

Yours sincerely,

F. H. Harrison

F. H. 'Bud' Harrison
Executive Director

dt

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

19031353416

ATTACHMENT #9

00040211128

ITEMIZED RECEIPTS

Section Commission
Street, N.W.
Washington, D.C. 20463

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
LaVilla Grande, Inc. 2501 Little Bookcliff Drive Grand Junction 81501	address listed Occupation nursing home	8/15	240.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 240.00			
Garden Manor 115 Ingals Lakewood, CO 80215	address listed Occupation nursing home	8/29	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00			
Garden Village 2425 Teller Avenue Grand Junction, 81501	address listed Occupation nursing home	8/29	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00			
Elegant Care 7481 Knox Ct. Westminster, 80030	address listed Occupation nursing home	8/29	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00			
Colonial Manor 7490 Lowell Blvd. Westminster, CO 80030	address listed Occupation nursing home	8/29	500.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Dorothy Boggio 8678 East Doane Place Denver, CO 80231	1432 Depew St. Occupation nursing home administrator	9/11	25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 25.00			
Bernard Heese 335 East 112 Drive Northglenn, CO	401 Malley Drive Occupation nursing home administrator	9/11	50.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 50.00			
SUBTOTAL of receipts this page (optional)			\$ 1,565.00
TOTAL this period (last page this line number only)			\$

709073000001450

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

(Use Separate Schedules for
each numbered line)

.78
Section Commission
Street, N.W.
ington, D.C. 20463

Name of Candidate or Committee in Full			
CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Christopher House 6270 West 38th Avenue Wheatridge 80033	address listed	9/11	300.00
Receipt for	Occupation		
<input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	nursing home		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 300.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Columbine Properties 1675 Tennyson Denver, CO 80204	3835 Harlan, Wheatridge 80035	9/11	250.00
Receipt for	Occupation		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	nursing home		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Holly Heights 6000 East Iliff Denver, CO 80222	same as listed	9/11	250.00
Receipt for	Occupation		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	nursing home		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
KLS Properties 1655 Eaton Lakewood, CO 80215	1655 Eaton	9/11	250.00
Receipt for	Occupation		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	nursing home		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Pine Haven Nursing Home P. O. Box 117 Morrison, CO	Morrison, CO	9/11	250.00
Receipt for	Occupation		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	Nursing home		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Pueblo Manor 2611 Jones Avenue Pueblo, CO 81004	address listed	9/11	100.00
Receipt for	Occupation		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	nursing home		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 100.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
George W. Curtis 1795 Monterey Road Colorado Springs, CO 80930	1795 Monterey Rd, Colo. Sprgs	9/12	90.00
Receipt for	Occupation		
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	nursing home administrator		
	<input type="checkbox"/> Check if Contributor is self-employed		
Aggregate Year-To-Date	\$ 90.00		
SUBTOTAL of receipts this page (optional)			\$ 1,490.00
TOTAL this period (last page this line number only)			\$

BU
80
5
2
3
3
7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Merritt Schumann
CANHEPAC
Post Office Box 18429
Capital Hill Station
Denver, Colorado 80218

Re: MUR 1136

Dear Mr. Schumann:

You were notified on August 6, 1979, that the Federal Election Commission had found reason to believe that CANHEPAC may have violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.

The Commission, on _____, 1980, determined that substantial compliance has been achieved with respect to the § 441b violation based on your letter of May 21, 1979, which indicates that CANHEPAC now has separate federal and non-federal accounts. Accordingly, the Commission voted to take no further action with regard to your violations of 2 U.S.C. § 441b and 11 C.F.R. 102.6. This matter will become part of the public record within 30 days.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523 5071.

Sincerely,

Charles N. Steele
General Counsel

D 587
RAD 802-5

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 1-7-80 ANALYST Mark Kleinman MK
TO: Charles N Sparks
William Oldaker TEAM CHIEF Steve Mims Lois Zella
THROUGH: STAFF DIRECTOR OPB. COMPLIANCE REVIEW _____
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: CANHEPAC
TREASURER: Merritt Schumann
ADDRESS: P.O. Box 13429, Capitol Hill Station
Denver, CO 80218
AFFILIATE(S): None

ALLEGATION(S): 1. Receipt of corporate contributions. CITE: 2 U.S.C. 441b
11 CFR 102.6(a)(2)(ii) ATTACHMENT(S) #2, #9
2. Failure to establish committee which only receives contributions permissible under the Act. #4
DATE INITIATED: 4-9-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-24-78 TO 12-31-78
TOTAL RECEIPTS \$ 695 TOTAL EXPENDITURES \$ 1110
CASH ON HAND \$ 455 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: Surface Violation letter sent 4-9-79 ATTACHMENT #2
Response 5-2-79 #4
Response 5-25-79 #5
Reason To Believe letter sent 8-6-79 #6
Response 8-20-79 #8

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon 4-17-79 #3
Telecon 8-20-79 #7

REASON(S) FOR REFERRAL: Exceeds threshold ATTACHMENT
Responses require further analysis
to determine appropriate course
of action.

OTHER PENDING ACTIONS INITIATED BY RAD: Not pertinent to ATTACHMENT
the allegations.

OTHER RELEVANT INFORMATION: Additional corporate contributions . ATTACHMENT #9
on previous reports.
Committee has established a separate ATTACHMENT #10
committee for Non-Federal purposes.
Committee had Federal activity SEE ATTACHMENT #4
during time of violations.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

D 587
RAD 302-5

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 1-7-80 ANALYST Mark Kleirman MK
TO: Charles N Steele TEAM CHIEF Steve Nims Lois Zella
~~William Oldaker~~
THROUGH: STAFF DIRECTOR OH COMPLIANCE REVIEW _____
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: CANHEPAC
TREASURER: Merritt Schumann
ADDRESS: P.O. Box 13429, Capitol Hill Station
Denver, CO 80218
AFFILIATE(S): None

M.R. 36

ALLEGATION(S): 1. Receipt of corporate contributions. CITE: 2 U.S.C. 441b ATTACHMENT(S) #2, #9
2. Failure to establish committee which only receives contributions permissible under the Act. 11 CFR 102.6(a)(2)(ii) #4
DATE INITIATED: 4-9-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-24-78 TO 12-31-78

TOTAL RECEIPTS \$ 695 TOTAL EXPENDITURES \$ 1143

CASH ON HAND \$ 455 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: Surface Violation letter sent 4-9-79 ATTACHMENT #2
Response 5-2-79 #4
Response 5-25-79 #5
Reason To Believe letter sent 8-6-79 #6
Response 8-20-79 #8

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon 4-17-79 #3
Telecon 8-20-79 #7

REASON(S) FOR REFERRAL: Exceeds threshold ATTACHMENT
Responses require further analysis
to determine appropriate course
of action.

OTHER PENDING ACTIONS INITIATED BY RAD: Not pertinent to ATTACHMENT
the allegations.

OTHER RELEVANT INFORMATION: Additional corporate contributions ATTACHMENT #9
on previous reports.
Committee has established a separate ATTACHMENT #10
committee for Non-Federal purposes.
Committee had Federal activity SEE ATTACHMENT #4
during time of violations.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

MEMORANDUM TO THE REFERRAL FOR: CANHEPAC

FROM: MARK KLEINMAN

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This referral involves numerous corporate contributions. The committee in responding indicated that they had "informally" separated their receipts and expenditures, with corporate contributions going to support State and Local candidates and purposes, and non-corporate contributions going for Federal purposes. The committee has since set-up, separate accounts, one for non-Federal and one for Federal purposes only. It was decided not to ask the committee to refund the corporate contributions, in their account, but rather to allow the Office of General Counsel to make a final decision as to the appropriate action.

BREAKDOWN OF CORPORATE CONTRIBUTIONS --- CANHEPAC

Incorporated in good standing ---	\$9090
Incorporation suspended, delinquent or revoked	1550
Incorporation status not available from Colorado Secretary of State	<u>1145</u>
Total	11785

Note: Committee currently has less than \$60 cash-on-hand based upon last report filed 1979.

1137

ATTACHMENT #1

0004021150

80040211139

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22OCT79

PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CANHEPAC COMMITTEE								
CONNECTED ORGANIZATION: HEALTH CARE ASSOCIATION/COLORADO								
1977	APRIL 10 QUARTERLY		3A - POSTCARD					ID# C00009118
	JULY 10 QUARTERLY	0		20		1APR77 -30JUN77	1	77FEC/051/5511
	OCTOBER 10 QUARTERLY		3A - POSTCARD			1JUL77 -30SEP77	3	77FEC/056/3011
	YEAR END REPORT	0		250		1APR77 -31DEC77	2	77FEC/059/1687
	REQUEST FOR ADDITIONAL INFORMATION						4	78FEC/064/1010
	REQUEST FOR ADDITIONAL INFO 2ND						3	78FEC/066/0180
	YEAR END REPORT - AMENDMENT	0		250		1APR77 -31DEC77	2	78FEC/069/1884
1978	APRIL 10 QUARTERLY	0		250		1JAN78 -31MAR78	4	78FEC/070/1984
	10 DAY PRE-PRIMARY	240		89		30JUN78 -28AUG78	5	78FEC/084/1043
	30 DAY POST-PRIMARY	0		0		30SEP78 - 20CT78	2	78FEC/089/4931
	JULY 10 QUARTERLY	0		0		1APR78 -30JUN78	2	78FEC/080/3854
	OCTOBER 10 QUARTERLY	8,145		3,666		1JUL78 -30SEP78	9	78FEC/089/2448
	10 DAY PRE-GENERAL	4,846		8,620		20CT78 -23OCT78	15	78FEC/094/1879
	30 DAY POST-GENERAL	695		955		24OCT78 -27NOV78	5	78FEC/099/2710
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	2	79FEC/135/3584
	30 DAY POST-GENERAL - AMENDMENT					27NOV78	2	79FEC/127/0255
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	2	79FEC/135/3416
	YEAR END REPORT	0		188		28NOV78 -31DEC78	5	79FEC/117/3811
	REQUEST FOR ADDITIONAL INFORMATION					10CT78 -31DEC78	1	79FEC/124/1753
	YEAR END REPORT - AMENDMENT					31DEC78	2	79FEC/127/0253
	TOTAL	13,926	0	14,038	0		75	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

8004021140

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 22OCT79
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CANHEFAC COMMITTEE								ID# C00009118
	CONNECTED ORGANIZATION: HEALTH CARE ASSOCIATION; COLORADO							
	1979 MISCELLANEOUS TRANSACTION TO F.E.C.					3MAY79	2	79FEC/126/5187
	MISCELLANEOUS TRANSACTION TO F.E.C.					25MAY79	2	79FEC/128/1055
	APRIL 10 QUARTERLY	50		140		1JAN79 -31MAR79	4	79FEC/125/0145
	JULY 10 QUARTERLY	0		125		1APR79 -30JUN79	4	79FEC/132/2868
	OCTOBER 10 QUARTERLY					1JUL79 -30SEP79	2	79FEC/139/3300
	3A - POSTCARD							
	TOTAL	50	0	265	0		14	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW.

ATTACHMENT #2



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

April 9, 1979

Merrit C. Schumann, Treasurer
CANHEPAC
P.O. Box 18429, Capitol Hill Station
Denver, Colorado 80218

Dear Mr. Schumann:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 30 Day Post-General and Year End '78 Reports of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns of the contribution should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If the identification of the source of these contributions is incomplete or incorrect on the original report, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Kurt Burkhardt (800) 424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

7
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7
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3

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
CANHEPAC (Colo. Associated NH Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Harry Asmus loan of 8/19/78 repaid by Geriatrics, Inc., P.O. Box 1448, Greeley, CO 80631 on 12/14/78	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$

DEBTS AND OBLIGATIONS

(Use Separate Schedules for each numbered line)

Commission
St. N.W.
D.C. 20463

**Supporting Line Numbers 12 and 13
of FEC FORM 3**

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full
CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Harry Asmus P. O. Box 1448 Greeley, CO 80631	8/19/78	5,000.	-0-	5,000.
<input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

Interim personal loan until voluntary contributions arrive.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$5,000.00

Carry over outstanding balance only (do not appropriate date of summary)

70800 30919214535

ATTACHMENT #3

0004021146

TELECON TO THE FILE: CANHEPAC

FROM: MARK KLEINMAN

DATE: 4-17-79

RE: SV

I spoke with Merritt Schumann, Treasurer (303) 861-8228, regarding response to SV. He stated that the committee had informally separated their state and local activity from federal activity and assured me that no corporate contributions went to federal candidates. In addition, I advised him that he should set-up separate accounts one for Federal and one for non-Federal activity. I told him to respond to that effect.

Merritt Schumann, Treasurer
(303) 861-8228

6004091147

ATTACHMENT #4

00040211148

CANHEPAC

RECEIVED
FEDERAL ELECTION
COMMISSION

COLORADO ASSOCIATED NURSING HOMES EDUCATION AND POLITICAL ACTION COMMITTEE

79 MAY 9 AM 11:50
POST OFFICE BOX 18429 • CAPITOL HILL STATION
DENVER, COLORADO 80218 • PHONE 303 / 861 - 8228

May 2, 1979

Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Mr. Potter:

Please know that we appreciate the extension that Mr. Mark Klineman gave us of ten days to answer your letter of April 9, 1979. This extension was requested due to several people being out of State.

We have examined our ledgers and are pleased to state that we are within the limits of our contributions from individuals in making contributions to Congressional candidates. Below is a compilation of collections from individuals and an accounting of contributions to Congressional candidates from the reports we have mailed as required.

Contributions to PAC

Contributions to Congressional candidates

Dalrie Berg, DO	\$100.
Carl Flaxler, MD	100.
Viola Garlington	25.
Robert Gottschalk, MD	25.
Lloyd Hickey	500.
Gilbert Hirsch, CPA	100.
Donald Hoffman	98.
Paul Mullison	98.
Wilma Wagonblast	100.
Dorothy Boggio	25.
Bernard Heese	50.
George Curtis	90.
Sharon Curtis	90.
June Schwantes	100.
	<u>1,501.</u>

Wm. Armstrong	\$500.
J. Johnson	250.
Ed Scott	250.
Ken Kramer	100.
H. McCormick	200.
	<u>1,300.</u>

The receipts were \$1,501 from individuals and the contributions to Congressional candidates was \$1,300. As you review our original reports, you will see that this is evident.

As you know the State of Colorado allows corporations to donate to political action committees for contributions to State legislative candidates.

Yours sincerely,

Merritt C. Schumann

Treasurer

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

79051185187

ATTACHMENT #5

0004021150

CANHEPAC

FEDERAL ELECTION COMMISSION

COLORADO ASSOCIATED NURSING HOMES EDUCATION AND POLITICAL ACTION COMMITTEE

POST OFFICE BOX 58429 CAPITOL HILL STATION
DENVER, COLORADO 80218 PHONE 303 / 861 - 8228

May 21, 1979

Mr. Mark Klineman
Federal Election Commission
1325 "K" Street
Washington, D.C. 20463

Dear Mr. Klineman:

I appreciate very much your call and timely suggestions regarding the handling of our political action committee banking account. Your recommendations are being followed explicitly as follows:

We are setting up separate bank accounts and automatically using separate bank books.

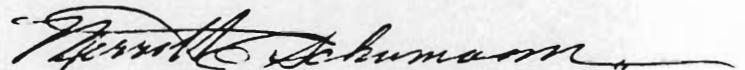
The account which will be used for the State political affairs will be titled "CANHEPAC - State".

We are most anxious to cooperate with the Federal Election Commission to the fullest extent and will follow your suggestions accordingly.

Yours sincerely,



F. H. 'Bud' Harrison
Executive Director



Merritt C. Schumann
Treasurer

dt

7000010151

ATTACHMENT #6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1979

Merrit C. Schumann, Treasurer
CANHEPAC
P.O. Box 18429 Capitol Hill Station
Denver, Colorado

Dear Mr. Schumann:

On May 5, 1979, you were notified that certain entries in the 30 Day Post-General and Year End '78 Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on May 25, 1979, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take not action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days or receipt of this letter.

If you have responded to the above or you require additional information, please contact Mark Kleinman, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Robert D. Tiano
Commissioner

Certified Mail:
Return Receipt Requested

ALLEGED RESPONSE FILED
Refer To: 7903/35 3416

19031353584

ATTACHMENT #7

000400211154

TELECON TO THE FILE: CANHEPAC

FROM: MARK KLEINMAN

DATE: 8-20-79

RE: RTB-Corporate contributions

I spoke with Bud Harrison (303) 861-8228, Executive Director of CANHEPAC, to clarify what was still needed. I stated that he should reiterate that the committee had informally separated state and local activity from federal (corporate contributions going to State and Local and non-corporate going to Federal). I told him that response of 5-2-79 was an indication that they had separated contributions but we needed this to be reiterated.

Bud Harrison,
(303) 861-8228, Executive Director

00040211155

ATTACHMENT #8

00040211156

CARIEPAC

COLORADO ASSOCIATED BUSINESS AND PROFESSIONAL WOMEN

4000 EAST WASHINGTON • CAPITAL BUILDING STATION
DENVER, COLORADO 80218 • PHONE 269-1600 • 2778

August 20, 1979

Mark Kleinman, Reports Analyst
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

REF: 25V2/79-19-24

Dear Mr. Kleinman:

Thank you for your cooperation and guidance in our telephone conversation this morning.

Consequent to our previous conversations, we have responded as stated in our letters of May 21, 1979, and May 2, 1979; forthrightly disclosing the receipts and the expenditures of all CARIEPAC monies.

This disclosure shows that no corporation monies were used as contributions to Congressional candidates. We did in "good faith" keep them separated; however, not with as much distinction and clarity as is indicated by your counsel to us.

We accordingly have, as stated in our letter of May 21, and our regular quarterly report, established two distinct bank accounts for State and Federal political expenditures.

We will strive to comply explicitly with whatever regulations are applicable.

Thank you for your consideration and counsel.

Yours sincerely,
F. H. Harrison

F. H. 'Bud' Harrison
Executive Director

dt

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

19031353416

ATTACHMENT #9

00040211150

78
 Section Commission
 Street, N.W.
 Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 3 for

Line Number 14a

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
LaVilla Grande, Inc. 2501 Little Bookcliff Drive Grand Junction 81501	address listed Occupation nursing home	8/15	240.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 240.00			
Garden Manor 115 Ingals Lakewood, CO 80215	address listed Occupation nursing home	8/29	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 250.00			
Garden Village 2425 Teller Avenue Grand Junction, 81501	address listed Occupation nursing home	8/29	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 250.00			
Elegant Care 7481 Knox Ct. Westminster, 80030	address listed Occupation nursing home	8/29	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 250.00			
Colonial Manor 7490 Lowell Blvd. Westminster, CO 80030	address listed Occupation nursing home	8/29	500.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 500.00			
Dorothy Boggio 8678 East Doane Place Denver, CO 80231	1432 Depew St. Occupation nursing home administrator	9/11	25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 25.00			
Bernard Heese 335 East 112 Drive Northglenn, CO	401 Malley Drive Occupation nursing home administrator	9/11	50.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 50.00			
SUBTOTAL of receipts this page (optional)			\$ 1,565.00
TOTAL this period (last page this line number only)			\$

88-07090-30-0145510

5-15-71

3-9-61

NIA

NIA

10-23-71

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

(Use Separate Schedules for each numbered line)

78
 Section Commission
 Street, N.W.
 Washington, D.C. 20463

Name of Candidate or Committee in Full

CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
8U Christopher House 6270 West 38th Avenue Wheatridge 80033 8-10-61	address listed Occupation nursing home	9/11	300.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Columbine Properties 1675 Tennyson Denver, CO 80204 Filed 4-3-61	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 300.00 Principal Place of Business 3835 Harlan, Wheatridge 80033 Occupation nursing home	9/11	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Holly Heights 6000 East Iliff Denver, CO 80222 11-24	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00 Principal Place of Business same as listed Occupation nursing home	9/11	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code KLS Properties 1655 Eaton Lakewood, CO 80215 NIA	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00 Principal Place of Business 1655 Eaton Occupation nursing home	9/11	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Pine Haven Nursing Home P. O. Box 117 Morrison, CO 11-20-56	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00 Principal Place of Business Morrison, CO Occupation Nursing home	9/11	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Pueblo Manor 2611 Jones Avenue Pueblo, CO 81004 Filed 1-20-61	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00 Principal Place of Business address listed Occupation nursing home	9/11	100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other Full Name, Mailing Address and ZIP Code George W. Curtis 1795 Monterey Road Colorado Springs, CO 80930	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 90.00 Principal Place of Business 1795 Monterey Rd, Colo. Sprgs Occupation nursing home administrator	9/12	90.00

SUBTOTAL of receipts (this page optional) \$ 1,490.00

TOTAL this period (last page this line number only) \$

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 4 for

Line Number _____

(Use Separate Schedules for
each numbered line)

Commission
N.W.
D.C. 20463

Name of Candidate or Committee in Full CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Belmont Lodge <i>3-31-78</i> 1601 Constitution Rd. Pueblo, CO 81001	Same Occupation	10/7/78	150.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 50.00		
Beth Israel Hospital & Geriatric Center <i>2-2-78</i> 1601 Lowell Blvd. Denver, CO 80204	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Cinderella Nursing Home <i>10-18-78</i> 205 So. 10th Lamar, CO 81052	same Occupation	10/7/78	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 50.00		
Columbine Manor <i>Filed 10-20-78</i> 3835 Harlan Wheat Ridge, CO	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Four Seasons Nursing Center <i>10-30-78</i> 2515 Pitman Place Pueblo, CO 81004	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Garden Manor <i>3-2-78</i> 115 Ingalls Lakewood, CO 80226	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Highland Park <i>5-13-78</i> 1610 Scranton Pueblo, CO 81004	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
SUBTOTAL of receipts this page (optional)			\$ 1,450.00
TOTAL this period (last page this line number only)			\$

Commission
 St. N.W.
 Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Line Number: _____

(Use Separate Schedules for
 each numbered line)

7
 9
 0
 3
 0
 9
 9
 4
 1
 0
 9
 0

Name of Candidate or Committee in Full CANHEPAC (Colorado Associated Nursing Homes Education and Political Action Committee)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Holly Nursing Care Center 320 North 8th Holly, CO 81047	same Occupation	10/7/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ same			
Lakewood Nursing Home 1432 Depew Lakewood, CO 80214	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 250.00			
Mesa Manor 2901 North 12th St. Grand Junction, CO 81501	same Occupation	10/7/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 100.00			
North Shore Manor 1365 W. 29th St. Loveland, CO 80537	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 250.00			
Plaza Care Center 7045 Stuart St. Westminster, CO 80030	same Occupation	10/7/78	150.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 350.00			
Sharmar Nursing Center 1201 W. Abriendo Pueblo, CO 81004	same Occupation	10/7/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 100.00			
Villa Manor 7950 W. Mississippi Lakewood, CO 80215	same Occupation	10/7/78	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 250.00			
SUBTOTAL of receipts this page (optional)			\$ 1,200.00
TOTAL this period (last page this line number only)			\$

0004021164

ATTACHMENT #10

January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 1 of 1 for
 Line Number _____

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full **SECOND QUARTER 1979 REPORT**
CANHEPAC (Colorado Associated Nursing Homes Educational Political Action Committee)

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
CANHEPAC - State P. O. Box 18429, Capitol Hill Denver, CO 80218	Transfer of money into a PAC for State purposes Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/31/79	125.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ 125.00
TOTAL this period (last page this line number only)			\$ 125.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1136

Date Filmed 9/18/80 Camera No. --- 2

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