



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2741

DATE FILMED 1-31-90 CAMERA NO. 3

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: July 21, 1988ANALYST: Donald L. Averett

I. COMMITTEE: Manor Healthcare Federal Political
Action Committee (FKA Four Seasons
Fed PAC) (C00156851)
Gerald F. Hickey, Treasurer
10750 Columbia Pike
Silver Spring, MD 20901

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

III. BACKGROUND:

Receipt of Funds from Non-Federal Accounts

The Manor Healthcare Federal Political Action Committee's ("Manor Healthcare") 1987 Year End Report disclosed a total of \$5,953.15 in transfers from Four Seasons Texas Political Action Committee, Four Seasons Oklahoma Political Action Committee and Four Seasons New Mexico Political Action Committee ("The Four Seasons State Committees"). The Schedule A indicated that these transfers occurred on December 31, 1987 and that the accounts of the Four Seasons State Committees had been closed (Attachment 2). A Request for Additional Information ("RFAI") was sent to Manor Healthcare on May 18, 1988 (Attachment 3). The RFAI requested clarification of the nature of the Four Seasons State Committees and advised Manor Healthcare that transfers from its non-federal accounts are prohibited by 11 CFR 102.5(a)(1)(i) and should be returned to the non-federal accounts.

On May 25, 1988, Ms. Ann McDermott called the Reports Analysis Division ("RAD") analyst and stated that the Four Seasons State Committees were non-federal accounts of Manor Healthcare, that those accounts had been closed and that those organizations no longer existed. In a series of telephone conversations held the same day, the RAD analyst advised Ms. McDermott that Manor Healthcare must remove the full amount of the transfers from its account and suggested several options, including the establishment of a separate escrow account (Attachments 4, 5 and 6).

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MANOR HEALTHCARE FEDERAL POLITICAL ACTION
COMMITTEE (FKA FOUR SEASONS FED PAC)
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On June 9, 1988, a Second Notice was sent to Manor Healthcare for failing to respond (Attachment 7). On June 23, 1988, Mr. Gerald Hickey, treasurer for Manor Healthcare, called the RAD analyst and was advised of the requirement to remove the full amount of the transfers from Manor Healthcare's account and to advise the Commission of the action taken. The RAD analyst also suggested several options for completing this transaction (Attachment 8).

On June 28, 1988, a response was received from Mr. Hickey (Attachment 9), which stated that Manor Healthcare intended to transfer the full amount of the impermissible funds to a separate escrow account. Mr. Hickey's response indicated that he expected the transfer to be completed by June 28, 1988.

On July 19, 1988, Manor Healthcare filed its July Quarterly Report disclosing the disbursement of the impermissible funds into an escrow account on June 29, 1988 (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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Attachment 1

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (M)

DATE DISCLOSED

PAGE 1

| COMMITTEE | DOCUMENT | RECEIPTS | DISBURSEMENTS | COVERAGE DATES | # OF PAGES | MICROFILM LOCATION |
|--|---|----------|---------------|--------------------|------------|--------------------|
| MINOR HEALTHCARE FEDERAL POLITICAL ACTION COMMITTEE (FHA FOUR SEASONS FED PAC) | | | | | | |
| CONNECTED ORGANIZATION: MINOR HEALTHCARE CORP | | | | | | |
| | 1988 REQUEST FOR ADDITIONAL INFORMATION | | | 1800T88 - 28AN0188 | 1 | 88FED/088/088 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 2501V88 - 2102088 | 1 | 88FED/088/088 |
| 1987 | MID-YEAR REPORT | 2 | | 030987 - 0301087 | 2 | 87FED/088/088 |
| | MID-YEAR REPORT - AMENDMENT | 2 | 4 | 030987 - 0301087 | 2 | 87FED/088/088 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 030987 - 0301087 | 2 | 87FED/088/088 |
| | YEAR-END | 15,850 | 3,200 | 030987 - 0301087 | 1 | 87FED/088/088 |
| | YEAR-END - AMENDMENT | - | - | 030987 - 0301087 | 1 | 87FED/088/088 |
| | YEAR-END - AMENDMENT | 15,850 | 3,200 | 030987 - 0301087 | 1 | 87FED/088/088 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 030987 - 0301087 | 2 | 87FED/088/088 |
| | REQUEST FOR ADDITIONAL INFORMATION & C | | | 030987 - 0301087 | 4 | 87FED/088/088 |
| 1988 | APRIL QUARTERLY | 14,850 | 3,000 | 030988 - 0301088 | 2 | 88FED/088/088 |
| | APRIL QUARTERLY - AMENDMENT | 14,850 | 3,000 | 030988 - 0301088 | 2 | 88FED/088/088 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 030988 - 0301088 | 1 | 88FED/088/088 |
| | JULY QUARTERLY | 3,275 | 4,500 | 040788 - 0301088 | 2 | 88FED/088/088 |
| | TOTAL | 27,125 | 11,700 | | 20 | 88FED/088/088 |

All reports except July Quarterly have been reviewed.

Cash on Hand balance as of 6/30/88 -- \$29,904.81.

Debts owed to the committee as of 6/30/88 --\$0.00.

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SCHEDULE A

ITEM RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Manor Healthcare Federal Political Action Committee

| A. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|--|------------------------------|-------------------------|------------------------------------|
| Four Seasons Texas Political Action Committee 10750 Columbia Pike Silver Spring, MD. 20901 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Closed Account Occupation | 12/31/87 | \$4,162.00 |
| Aggregate Year-to-Date > \$ 4,162.00 | | | |
| B. Full Name, Mailing Address and ZIP Code Four Seasons New Mexico Political Action Committee 10750 Columbia Pike Silver Spring, MD 20901 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Closed Account Occupation | 12/31/87 | \$ 195.86 |
| Aggregate Year-to-Date > \$ 195.86 | | | |
| C. Full Name, Mailing Address and ZIP Code Four Seasons Oklahoma Political Action Committee 10750 Columbia Pike Silver Spring, MD 20901 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Closed Account Occupation | 12/31/87 | \$1,595.29 |
| Aggregate Year-to-Date > \$ 1,595.29 | | | |
| D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | | |
| Aggregate Year-to-Date > \$ | | | |
| E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | | |
| Aggregate Year-to-Date > \$ | | | |
| F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | | |
| Aggregate Year-to-Date > \$ | | | |
| G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | | |
| Aggregate Year-to-Date > \$ | | | |

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| TOTAL of Receipts This Page (optional) | \$ 5,953.15 |
| TOTAL This Period (last page this line number only) | \$ 5,953.15 |



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

BQ-2

MAY 18 1988

Gerald F. Hickey, Treasurer
Manor Healthcare Federal Political
Action Committee (PKA Four Seasons
Fed PAC)
10750 Columbia Pike
Silver Spring, MD 20901

Identification Number: C00156851

Reference: Year End Report (7/1/87-12/31/87)

Dear Mr. Hickey:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." Under 11 CFR 104.7(b), such effort shall consist of a clear request for the information (i.e., name, mailing address, occupation, and name of employer) which request informs the contributor that the reporting of such information is required by law. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR 104.3(a)(4)(i)

-Schedule A of your report (pertinent portions attached) discloses receipts totalling \$5,953.15 from organizations which are not political committees

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registered with the Commission. Please clarify the nature of these entities.

If the receipts are from accounts maintained by your committee for non-federal activity, you are advised that such transfers are prohibited by 11 CFR 102.5(a)(1)(i) and that the full amount of the transfers should be returned to the non-federal accounts.

If the receipts are contributions from unregistered organizations, please clarify whether these funds are permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amounts to the donors in accordance with 11 CFR 103.3(b).

If the receipts were contributed by individuals and transmitted to your committee by collecting agents, the activity should be included on Line 11(a) of the Detailed Summary Page. Any contribution from an individual, that exceeds \$200 in the aggregate during the calendar year, should be itemized on a supporting schedule. Collecting agents need not be identified on your report.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett
Reports Analyst
Reports Analysis Division

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TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Ann McDermott

COMMITTEE: Manor Healthcare Federal Political Action Committee (C00156851)

DATE: 5/25/88

SUBJECT: 1987 Year End Report-- Receipts from unregistered

Ann McDermott called and stated that the Four Seasons Political Action Committees were state accounts of Manor Healthcare which have been terminated in accordance with applicable state laws.

I advised Ms. McDermott that the committee must remove the impermissible funds from its account. I told I would call back with possible options for completing this transaction.

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TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Ann McDermott

COMMITTEE: Manor Healthcare Federal Political Action Committee (C00156851)

DATE: 5/25/88

SUBJECT: 1987 Year End Report--Receipts from non-federal

I called and suggested some options the committee could consider for removing the impermissible funds from their account. I advised that they might refund the amounts to the original contributors, donate the funds to charity, use the funds to contribute to non-federal candidates or committees or possibly transfer the funds to their connected organization.

Ms. McDermott said that transferring the funds to the connected organization seemed to be the best option.

I told her I would research that option to make sure that it was permissible.

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TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Ann McDermott

COMMITTEE: Manor Healthcare Federal Political Action Committee (C00156851)

DATE: 5/25/88

SUBJECT: 1987 Year End Report—Receipts from non-federal

I called and advised Ms. McDermott that transferring the impermissible funds to the connected organization would be permissible under the FECA, however the transfer would be subject to any other applicable laws. I also suggested that, as an additional option, Manor Healthcare could transfer the funds to a separate escrow account, but that in any case the funds had to be removed from Manor Healthcare's account as soon as possible.

Ms. McDermott said that she would call me back when Manor Healthcare had determined a course of action.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

BQ-3

June 9, 1988

Gerald F. Hickey, Treasurer
Manor Healthcare Federal Political
Action Committee (FKA Four Seasons
Fed PAC)
10750 Columbia Pike
Silver Spring, MD 20901

Identification Number: C00156851

Reference: Year End Report (7/1/87-12/31/87)

Dear Mr. Hickey:

This letter is to inform you that as of June 8, 1988, the Commission has not received your response to our request for additional information, dated May 18, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Donald Averett on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Gerald Hickey, Treasurer

COMMITTEE: Manor Healthcare Federal Political Action Committee (C00156851)

DATE: 6/23/88

SUBJECT: 1987 Year End Report—Receipts from non-federal

Mr. Hickey called and asked for suggestions on possible methods of disposing of the funds received from Manor Healthcare's non-federal committees.

I advised him that they could refund the amounts to the original contributors, donate the funds to charity, contribute to non-federal candidates or committees, transfer the amount to the connected organization or transfer the funds to an escrow account. I further advised Mr. Hickey that Manor Healthcare should respond in writing by as soon as possible.

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JUN 26 11:10:13

MANOR HEALTHCARE FEDERAL
POLITICAL ACTION COMMITTEE
10750 Columbia Pike
Silver Spring, MD 20901

June 24, 1988

Mr. Donald L. Averett
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Manor Healthcare Federal
Political Action Committee
I.D. Number C00156851
Year End Report (7/1/87 - 12/31/87)

Dear Mr. Averett:

As a follow-up to our phone conversation this date, concerning the receipt of funds totaling \$5,953.15 from non-federal activity, the disposition will be as follows.

A separate escrow account will be opened and these funds will be disbursed from the Manor Healthcare Federal Political Action Committee. It is anticipated that the funds will be disbursed on or before June 28, 1988.

Thank you for your assistance in outlining the various options available to us in resolving this problem.

Very truly yours,

Gerald F. Hickey
Gerald F. Hickey
Treasurer

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedules) for each category of the Qualified Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Minor Healthcare Federal Political Action Committee

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Distribution of contribution from non-federal activities | Date (month, day, year) | Amount of Each Disbursement This Period |
|--|--|-------------------------|---|
| Four Seasons Nursing Centers, Inc. Escrow Account 10750 Columbia Pike Silver Spring, MD 20901 | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) | 6/29/88 | \$5,953.15 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |

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| SUBTOTAL of Disbursements This Page (optional) | ,953.15 |
| TOTAL This Period (last page this line number only) | \$5,953.15 |

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
88 OCT -5 AM 10:06

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 88L-20
STAFF MEMBER: Ivonne Cotto

EXECUTIVE SESSION
OCT 18 1988

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

RESPONDENTS: Manor Healthcare Federal Political
Action Committee and
Gerald F. Hickey, as treasurer

STATUTES: 11 C.F.R. § 102.5(a)(1)(i)
2 U.S.C. § 441b

INTERNAL REPORTS
CHECKED: Disclosure Reports

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

Manor Healthcare Federal Political Action Committee ("the Committee") and Gerald F. Hickey, as treasurer, were referred to the Office of the General Counsel by the Reports Analysis Division for accepting transfers totalling \$5,953.15 from three (3) of its non-Federal accounts; Four Seasons Texas Political Action Committee; Four Seasons Oklahoma Political Action Committee; and Four Seasons New Mexico Political Action Committee ("the Four Seasons Committees").

II. FACTUAL AND LEGAL ANALYSIS

The Committees' 1987 Year End Report disclosed a total of \$5,953.15 in transfers on December 31, 1987, from the Four Seasons Committees which are three of its non-Federal accounts (Attachment I (5)). The Reports Analysis Division ("RAD") sent a

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Request for Additional Information ("RFAI") on May 18, 1988, which advised the Committee that transfers from its non-Federal accounts are prohibited by 11 C.F.R. § 102.5(a)(1)(i) and should be returned to the non-Federal accounts.

On May 25, 1988, Ms. Ann McDermott, a representative of the Committee, contacted RAD and stated that the non-Federal accounts had been closed and that the organizations no longer existed. The RAD analyst advised Ms. McDermott that the amount of the transfer must be moved from its accounts and suggested several options including the establishment of a separate escrow account.

Mr. Gerald F. Hickey, treasurer of the Committee, contacted RAD on June 23, 1988, and was advised of the requirement to remove the full amount of the transfers from the Committee's account. A response was received from Mr. Hickey on June 28, 1988, which stated that the Committee intended to transfer the full amount of impermissible funds to a separate escrow account.

The 1988 July Quarterly Report disclosed a disbursement of \$5,953.13 into an escrow account on June 29, 1988 (Attachment I (14)).

Pursuant to 11 C.F.R. § 102.5(a)(1), an organization which finances political activity in connection with both Federal and non-Federal elections must keep its Federal and non-Federal accounts strictly segregated in separate accounts. Only funds subject to the prohibitions and limitations of the Act shall be deposited into the Federal account and no transfers may be made

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into the Federal account from any non-Federal accounts of the organization. 11 C.F.R. § 102.5(a)(1)(i). Because it accepted transfers from three (3) of its non-Federal accounts, the Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i).

Pursuant to 2 U.S.C. § 441b, it is unlawful for any national bank or corporation to make a contribution or expenditure in connection to any Federal election or for any candidate, political committee, or any other person knowingly to accept or receive contributions prohibited by this section. The state laws of Texas and Oklahoma prohibit labor union and corporate financing of non-Federal elections; however, New Mexico allows both corporate and labor union contributions to state and local elections. It is thus possible that the Committee's non-Federal account of the Four Seasons New Mexico Political Action Committee contained prohibited funds. Therefore, this Office recommends that the Commission find reason to believe that Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, violated 2 U.S.C. § 441b.

III. RECOMMENDATIONS

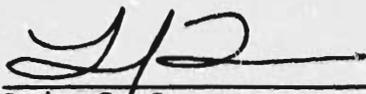
1. Open a MUR.
2. Find reason to believe that the Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1)(i).

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3. Approve the attached letter and Factual and Legal Analysis.

Lawrence M. Noble
General Counsel

10-4-88
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. RAD Referral
2. Letter to respondent and Factual and Legal Analysis

Staff Person: Ivonne Cotto

0004078116



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / JOSHUA MCFADDEN *JM*
COMMISSION SECRETARY

DATE: OCTOBER 7, 1988

SUBJECT: OBJECTIONS TO RAD Ref. 88L-20: FIRST G.C. REPORT
SIGNED OCTOBER 4, 1988

The above-captioned document was circulated to the Commission on Wednesday, October 5, 1988 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

| | |
|-----------------------|---------------|
| Commissioner Aikens | _____ |
| Commissioner Elliott | _____ X _____ |
| Commissioner Josefiak | _____ X _____ |
| Commissioner McDonald | _____ |
| Commissioner McGarry | _____ |
| Commissioner Thomas | _____ |

This matter will be placed on the meeting agenda for October 18, 1988.

Please notify us who will represent your Division before the Commission on this matter.

0004078117

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Manor Healthcare Federal)
Political Action Committee and)
Gerald F. Hickey, as treasurer)

RAD REFERRAL 88L-20

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session on October 25, 1988, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in RAD REFERRAL 87L-20:

1. Open a MUR.
2. Find reason to believe that the Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1)(i).
3. Approve the letter and Factual and Legal Analysis as recommended in the First General Counsel's Report dated October 4, 1988.

Commissioners Aikens, McDonald, McGarry and Thomas voted affirmatively for the decision. Commissioners Elliott and Josefiak dissented.

Attest:

October 31, 1988
Date

Hilda Arnold
Hilda Arnold
Administrative Assistant

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 28, 1988

Gerald F. Hickey, Treasurer
Manor Healthcare Federal
Political Action Committee
10750 Columbia Pike
Silver Spring, MD 20901

RE: MUR 2741

Dear Mr. Hickey:

On October 25, 1988, the Federal Election Commission found that there is reason to believe Manor Healthcare Federal Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 102.5(a)(1)(i), of the Commission's Regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Gerald F. Hickey, Treasurer
Page 2

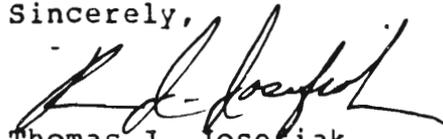
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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MANOR
HEALTHCARE CORP.

HAND DELIVERED

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FEDERAL ELECTION COMMISSION
MAIL ROOM

08C-1006

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November 9, 1988

Federal Express

Federal Election Committee
999 E Street, N.W.
Washington, D.C. 20463

Attn: Ivonne Cotto

Re: MUR 2741

Dear Ms. Cotto:

Enclosed is a Statement of Designation of Counsel, on behalf of Manor Healthcare Federal Political Action Committee ("PAC") and on behalf of Gerald F. Hickey, treasurer of the PAC.

Please be advised that the PAC and Mr. Hickey desire to pursue pre-probable cause conciliation and this should be treated as our formal request.

Finally, please be advised that we will shortly be submitting certain factual material that we believe is relevant to the Commission's consideration of this matter.

I will contact you shortly so we can begin a discussion of this matter.

Sincerely,

MANOR HEALTHCARE CORP.

K. Peter Kemezys
Assistant General Counsel

KPK/kd
Enc.

cc: Gerald F. Hickey

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2741

NAME OF COUNSEL: K. Peter Kemezys

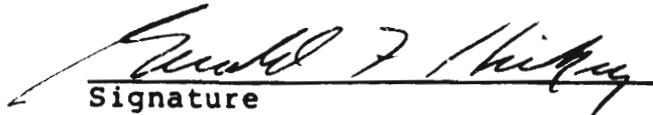
ADDRESS: 10750 Columbia Pike

Silver Spring, MD 20904

TELEPHONE: 301/593-9600

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

11/9/88
Date


Signature

RESPONDENT'S NAME: Manor Healthcare Federal
Political Action Committee
Gerald F. Hickey, Treasurer

ADDRESS: 10750 Columbia Pike

Silver Spring, MD 20904

HOME PHONE: _____

BUSINESS PHONE: 301/593-9600

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Ms. Ivonne Cotto
Page Two
November 18, 1988

This should clarify that there has been no inadvertent violation of 2 U.S.C. § 441 b.

Please contact me after your review of the enclosed documents to discuss this matter further.

Sincerely,

MANOR HEALTHCARE CORP.



K. Peter Kemezys
Assistant General Counsel

KPK/kd
Enc.

cc: Jerry Hickey

90040781124

Four Seasons New Mexico Political Action Committee
10750 Columbia Pike
Silver Spring, Maryland 20901

Summary of Contributions

Contributions:

| | <u>1983</u> | <u>1984</u> | <u>Total</u> |
|----------------------|------------------|------------------|-------------------|
| Gregory L. Brewer | \$ 10.00 | \$ - | \$ 10.00 |
| Mark Hemingway | 210.00 | 130.00 | 340.00 |
| Florence L. McCarthy | 105.00 | 65.00 | 170.00 |
| Dianne Moody | 105.00 | 65.00 | 170.00 |
| Janice Reynolds | 105.00 | 65.00 | 170.00 |
| Jerry Sell | 42.00 | 10.00 | 52.00 |
| Joyce Stalgren | 75.00 | 65.00 | 140.00 |
| Total | <u>\$ 652.00</u> | <u>\$ 400.00</u> | <u>\$1,052.00</u> |

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FOUR SEASONS NEW MEXICO POLITICAL ACTION COMMITTEE

00040781126

| Check No. | Description of Transaction | Date | Deposit | Payment | Balance |
|-----------|------------------------------------|----------|---------|---------|---------|
| | Deposit - Contribution - Brewer | 3-3-83 | 1000 ✓ | | 1000 |
| | Deposit - PRD (3-18) FSNC | 3-21-83 | 2700 ✓ | | 3700 |
| 4/16/83 | Deposit - PRD (4-1) FSNC | 4-1-83 | 2700 ✓ | | 6400 |
| | Deposit - PRD (4-15) FSNC | 4-15-83 | 2700 ✓ | | 9100 |
| 5/13/83 | Deposit - PRD (4-29) FSNC | 5-2-83 | 2700 ✓ | | 11800 |
| | Deposit - PRD (5-13) FSNC | 5-13-83 | 2700 ✓ | | 14500 |
| 6/13/83 | Deposit - PRD (5-27) FSNC | 5-27-83 | 2700 ✓ | | 17200 |
| | Deposit - PRD (6-10) FSNC | 6-10-83 | 3200 ✓ | | 20400 |
| 7/14/83 | Deposit - PRD (6-24) FSNC | 6-24-83 | 3200 ✓ | | 23600 |
| | Deposit - PRD (7-8) FSNC | 7-8-83 | 3200 ✓ | | 26800 |
| | Deposit - PRD (7-22) FSNC | 7-22-83 | 3200 ✓ | | 30000 |
| 10/1 | New Mexico Value Education Project | 7-26-83 | | 100 00 | 20000 |
| | Deposit - PRD (8-5) FSNC | 8-5-83 | 3200 ✓ | | 23200 |
| | Deposit - PRD (8-19) FSNC | 8-19-83 | 3200 ✓ | | 26400 |
| 9/4/83 | Deposit - PRD (9-2) FSNC | 9-2-83 | 3200 ✓ | | 29600 |
| | Deposit - PRD (9-16) FSNC | 9-20-83 | 3200 ✓ | | 32800 |
| 10/5/83 | Deposit - PRD (9-30) FSNC | 9-30-83 | 3200 ✓ | | 36000 |
| | Deposit - PRD (10-14) FSNC | 10-14-83 | 3200 ✓ | | 39200 |
| 11/7/83 | Deposit - PRD (10-28) FSNC | 10-28-83 | 3200 ✓ | | 42400 |
| | Deposit - PRD (11-1) FSNC | 11-1-83 | 3200 ✓ | | 45600 |
| | Deposit - PRD (11-25) FSNC | 12-2-83 | 3200 ✓ | | 48800 |
| 12/15/83 | Deposit - PRD (12-9) FSNC | 12-9-83 | 3200 ✓ | | 52000 |
| 12/23/83 | Deposit - PRD (12-23) FSNC | 12-23-83 | 3200 ✓ | | 55200 |
| | Deposit - PRD (1-6) FSNC | 1-6-84 | 3200 ✓ | | 58400 |
| 2/7/84 | Deposit - PRD (1-20) FSNC | 1-23-84 | 3200 ✓ | | 61600 |
| | Deposit - PRD (2-3) FSNC | 2-7-84 | 3200 ✓ | | 64800 |
| | Deposit - PRD (2-17) FSNC | 2-21-84 | 3200 ✓ | | 68000 |
| 3/1/84 | Deposit - PRD (3-2) FSNC | 3-2-84 | 3200 ✓ | | 71200 |
| | Deposit - PRD (3-16) FSNC | 3-21-84 | 3000 ✓ | | 74200 |
| 4/4/84 | Deposit - PRD (3-30) FSNC | 4-2-84 | 3000 ✓ | | 77200 |
| | Deposit - PRD (4-13) FSNC | 4-17-84 | 3000 ✓ | | 80200 |
| 4/5/84 | Deposit - PRD (4-27) FSNC | 4-27-84 | 3000 ✓ | | 83200 |
| | Deposit - PRD (5-11) FSNC | 5-14-84 | 3000 | | 86200 |
| 6/1/84 | Deposit - PRD (5-25) FSNC | 5-25-84 | 3000 | | 89200 |
| | PRD 6-8 FSNC | 6-8-84 | 2000 | | 91200 |
| | ✓ ✓ ✓ ✓ | ✓ | 1000 | | 92200 |
| | Report ✓ 6-22 ✓ | 6-22-84 | 2000 | | 94200 |
| | ✓ ✓ ✓ ✓ | 6-22-84 | 1000 | | 95200 |
| 4/10 | Duplicate Posting | 6-28-84 | 3000 | | 98200 |
| 10/2 | Cash PAC | 11-5-84 | | 75000 | 20200 |

FOUR SEASONS NEW MEXICO POLITICAL ACTION COMMITTEE

✓ 1983

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| | 1 | 2 | 3 | 4 |
|-------------|----------------------|------------------------|-------|----|
| Contributor | Date of Contribution | Amount of Contribution | Total | |
| | 3-18-83 | 500 | 500 | 1 |
| | 4-1-83 | 500 | 1000 | 2 |
| | 4-15-83 | 500 | 1500 | 3 |
| | 4-29-83 | 500 | 2000 | 4 |
| | 5-13-83 | 500 | 2500 | 5 |
| | 5-27-83 | 500 | 3000 | 6 |
| | 6-10-83 | 500 | 3500 | 7 |
| | 6-24-83 | 500 | 4000 | 8 |
| | 7-8-83 | 500 | 4500 | 9 |
| | 7-22-83 | 500 | 5000 | 10 |
| | 8-5-83 | 500 | 5500 | 11 |
| | 8-19-83 | 500 | 6000 | 12 |
| | 9-2-83 | 500 | 6500 | 13 |
| | 9-16-83 | 500 | 7000 | 14 |
| | 9-30-83 | 500 | 7500 | 15 |
| | 10-14-83 | 500 | 8000 | 16 |
| | 10-28-83 | 500 | 8500 | 17 |
| | 11-11-83 | 500 | 9000 | 18 |
| | 11-25-83 | 500 | 9500 | 19 |
| | 12-9-83 | 500 | 10000 | 20 |
| | 12-23-83 | 500 | 10500 | 21 |
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| | Contributor | Date of Contribution | Amount of Contribution | Total | |
|----|--|-------------------------|------------------------|-----------------|------|
| 1 | Florence L. McCarthy 11100 Kielick, NE Albuquerque, NM 87111 | 1-6-84 | 500 | 500 | |
| 2 | | 1-20-84 | 500 | 1000 | |
| 3 | | 2-3-84 | 500 | 1500 | |
| 4 | | 2-17-84 | 500 | 2000 | |
| 5 | | 3-2-84 | 500 | 2500 | |
| 6 | | Sandia Administrator | 3-16-84 | 500 | 3000 |
| 7 | | | 3-30-84 | 500 | 3500 |
| 8 | | | 4-13-84 | 500 | 4000 |
| 9 | | | 4-27-84 | 500 | 4500 |
| 10 | | | 5-11-84 | 500 | 5000 |
| 11 | | 5-25-84 | 500 | 5500 | |
| 12 | | 6-2-84 | 500 | 6000 | |
| 13 | | 6-22-84 | 500 | 6500 | |
| 14 | | 6-22-84 | 500 | 7000 | |
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FOUR SEASONS NEW MEXICO POLITICAL ACTION COMMITTEE

1983

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|--|----------------------|------------------------|-------|
| Dianne Moody 6508 Esther Ave., NE Albuquerque, NM Administrator FSNC-Albuquerque | 3-18-83 | 500 | 500 |
| | 4-1-83 | 500 | 1000 |
| | 4-15-83 | 500 | 1500 |
| | 4-29-83 | 500 | 2000 |
| | 5-13-83 | 500 | 2500 |
| | 5-27-83 | 500 | 3000 |
| | 6-10-83 | 500 | 3500 |
| | 6-24-83 | 500 | 4000 |
| | 7-8-83 | 500 | 4500 |
| | 7-22-83 | 500 | 5000 |
| | 8-5-83 | 500 | 5500 |
| | 8-19-83 | 500 | 6000 |
| 9-2-83 | 500 | 6500 | |
| 9-16-83 | 500 | 7000 | |
| 9-30-83 | 500 | 7500 | |
| 10-14-83 | 500 | 8000 | |
| 10-28-83 | 500 | 8500 | |
| 11-11-83 | 500 | 9000 | |
| 11-25-83 | 500 | 9500 | |
| 12-9-83 | 500 | 10000 | |
| 12-23-83 | 500 | 10500 | |

FOUR SEASONS NEW MEXICO POLITICAL ACTION COMMITTEE

1983

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| | 1 | 2 | 3 | 4 |
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| Contributor | Date of Contribution | Amount of Contribution | Total | |
| 1 Janice Reynolds | 3-18-83 | 500 | 500 | 1 |
| 2 Route 3, Box 93RR | 4-1-83 | 500 | 1000 | 2 |
| 3 Santa Fe, NM 87501 | 4-15-83 | 500 | 1500 | 3 |
| 4 Administrator | 4-29-83 | 500 | 2000 | 4 |
| 5 FSNC-Santa Fe | 5-13-83 | 500 | 2500 | 5 |
| 6 | 5-27-83 | 500 | 3000 | 6 |
| 7 | 6-10-83 | 500 | 3500 | 7 |
| 8 | 6-24-83 | 500 | 4000 | 8 |
| 9 | 7-8-83 | 500 | 4500 | 9 |
| 10 | 7-22-83 | 500 | 5000 | 10 |
| 11 | 8-5-83 | 500 | 5500 | 11 |
| 12 | 8-19-83 | 500 | 6000 | 12 |
| 13 | 9-2-83 | 500 | 6500 | 13 |
| 14 | 9-16-83 | 500 | 7000 | 14 |
| 15 | 9-30-83 | 500 | 7500 | 15 |
| 16 | 10-14-83 | 500 | 8000 | 16 |
| 17 | 10-28-83 | 500 | 8500 | 17 |
| 18 | 11-11-83 | 500 | 9000 | 18 |
| 19 | 11-25-83 | 500 | 9500 | 19 |
| 20 | 12-9-83 | 500 | 10000 | 20 |
| 21 | 12-23-83 | 500 | 10500 | 21 |
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| Contributor | Date of Contribution | Amount of Contribution | Total |
|--|----------------------|------------------------|-------------|
| <i>Janice Reynolds</i> <i>Route 3, Box 93RR</i> <i>Santa Fe, NM 87501</i> <i>Santa Fe</i> <i>Administrator</i> | <i>1-6-84</i> | <i>500</i> | <i>500</i> |
| | <i>1-20-84</i> | <i>500</i> | <i>1000</i> |
| | <i>2-3-84</i> | <i>500</i> | <i>1500</i> |
| | <i>2-17-84</i> | <i>500</i> | <i>2000</i> |
| | <i>3-2-84</i> | <i>500</i> | <i>2500</i> |
| | <i>3-16-84</i> | <i>500</i> | <i>3000</i> |
| | <i>3-30-84</i> | <i>500</i> | <i>3500</i> |
| | <i>4-13-84</i> | <i>500</i> | <i>4000</i> |
| | <i>4-27-84</i> | <i>500</i> | <i>4500</i> |
| | <i>5-11-84</i> | <i>500</i> | <i>5000</i> |
| | <i>5-25-84</i> | <i>500</i> | <i>5500</i> |
| <i>6-8-84</i> | <i>500</i> | <i>6000</i> | |
| <i>6-22-84</i> | <i>500</i> | <i>6500</i> | |
| | <i>6-22-84</i> | <i>500</i> | <i>7000</i> |

FOUR SEASONS NEW MEXICO POLITICAL ACTION COMMITTEE

1983

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|---------------------------------|----------------------|------------------------|-------|
| Jerry Sell | 3-18-83 | 200 | 200 |
| 2241 Ashley Drive | 4-1-83 | 200 | 400 |
| Oklahoma City, OK 73120 | 4-15-83 | 200 | 600 |
| Manager-Reimbursement and Taxes | 4-29-83 | 200 | 800 |
| FSNC, Inc. | 5-13-83 | 200 | 1000 |
| | 5-27-83 | 200 | 1200 |
| | 6-10-83 | 200 | 1400 |
| | 6-24-83 | 200 | 1600 |
| | 7-8-83 | 200 | 1800 |
| | 7-22-83 | 200 | 2000 |
| | 8-5-83 | 200 | 2200 |
| | 8-19-83 | 200 | 2400 |
| | 9-2-83 | 200 | 2600 |
| | 9-16-83 | 200 | 2800 |
| | 9-30-83 | 200 | 3000 |
| | 10-14-83 | 200 | 3200 |
| | 10-28-83 | 200 | 3400 |
| | 11-11-83 | 200 | 3600 |
| | 11-25-83 | 200 | 3800 |
| | 12-9-83 | 200 | 4000 |
| | 12-23-83 | 200 | 4200 |

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|--|----------------------|------------------------|-------|
| Joyce Stalgren 3216 Judy Pl., NE Albuquerque, NM 87111 Ridgcrest Administrator | 1-6-84 | 500 | 500 |
| | 1-20-84 | 500 | 1000 |
| | 2-3-84 | 500 | 1500 |
| | 2-17-84 | 500 | 2000 |
| | 3-2-84 | 500 | 2500 |
| | 3-16-84 | 500 | 3000 |
| | 3-30-84 | 500 | 3500 |
| | 4-13-84 | 500 | 4000 |
| | 4-27-84 | 500 | 4500 |
| | 5-11-84 | 500 | 5000 |
| 5-25-84 | 500 | 5500 | |
| 6-8-84 | 500 | 6000 | |
| 6-22-84 | 500 | 6500 | |
| 6-29-84 | 500 | 7000 | |

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Four Seasons Oklahoma Political Action Committee
10750 Columbia Pike
Silver Spring, Maryland 20901

Summary of Contributions

Contributions:

| | <u>1983</u> | <u>1984</u> | <u>Total</u> |
|--------------------|-------------------|------------------|-------------------|
| Jackie Bosler | \$ 105.00 | \$ 65.00 | \$ 170.00 |
| Gregory L. Brewer | 30.00 | - | 30.00 |
| Carol A. Bullett | 105.00 | 65.00 | 170.00 |
| Lola Burnett | 105.00 | 65.00 | 170.00 |
| Arlena Dunbar | 210.00 | 70.00 | 280.00 |
| June Garver | 105.00 | 165.00 | 270.00 |
| Phillip Howard | 105.00 | 45.00 | 150.00 |
| Marla J. McMeans | 55.00 | 15.00 | 70.00 |
| Kaye Ronk | 210.00 | 70.00 | 280.00 |
| Jerry Sell | 42.00 | 10.00 | 52.00 |
| Linda Swain Siegal | 105.00 | 65.00 | 170.00 |
| Ken Stephens | 147.00 | 14.00 | 161.00 |
| Lee Stephens | 57.00 | - | 57.00 |
| Russ Wilsie | <u>210.00</u> | <u>70.00</u> | <u>280.00</u> |
| Total | <u>\$1,591.00</u> | <u>\$ 719.00</u> | <u>\$2,310.00</u> |

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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

| Check No. | Description of Transaction | Date | Deposit | Payment | Balance |
|-----------|---------------------------------|----------|---------|----------|---------|
| 1 | Deposit Contribution - Brewer | 3-3-83 | 30.00 ✓ | | 30.00 |
| 2 | Deposit - PRD (3-18) FSNC | 3-21-83 | 64.00 ✓ | | 94.00 |
| 3 | Deposit - PRD (3-25) Challenge | 3-28-83 | 5.00 ✓ | | 99.00 |
| 4 | Deposit - PRD (4-1) FSNC | 4-1-83 | 64.00 ✓ | | 163.00 |
| 5 | Check Printing Charges | | | 25.59 ✓ | 137.42 |
| 6 | Deposit - PRD (4-8) Challenge | 4-8-83 | 8.00 ✓ | | 145.42 |
| 7 | Deposit - PRD (4-15) FSNC | 4-15-83 | 64.00 ✓ | | 209.42 |
| 8 | Deposit - PRD (4-22) Challenge | 4-25-83 | 8.00 ✓ | | 217.42 |
| 9 | Deposit - PRD (4-29) FSNC | 5-2-83 | 64.00 ✓ | | 281.42 |
| 10 | Deposit - PRD (5-6) Challenge | 5-6-83 | 8.00 ✓ | | 289.42 |
| 11 | Deposit - PRD (5-13) FSNC | 5-13-83 | 64.00 ✓ | | 353.42 |
| 12 | Deposit - PRD (5-20) Challenge | 5-23-83 | 8.00 ✓ | | 361.42 |
| 13 | Deposit - PRD (5-27) FSNC | 5-27-83 | 64.00 ✓ | | 425.42 |
| 14 | Deposit - PRD (6-3) Challenge | 6-3-83 | 8.00 ✓ | | 433.42 |
| 15 | Deposit - PRD (6-10) FSNC | 6-10-83 | 64.00 ✓ | | 497.42 |
| 16 | Deposit - PRD (6-17) Challenge | 6-20-83 | 8.00 ✓ | | 505.42 |
| 17 | Deposit - PRD (6-24) FSNC | 6-24-83 | 64.00 ✓ | | 569.42 |
| 18 | Deposit - PRD (7-1) Challenge | 7-1-83 | 8.00 ✓ | | 577.42 |
| 19 | Deposit - PRD (7-8) FSNC | 7-8-83 | 64.00 ✓ | | 641.42 |
| 20 | Deposit - PRD (7-15) Challenge | 7-15-83 | 8.00 ✓ | | 649.42 |
| 21 | Deposit - PRD (7-22) FSNC | 7-22-83 | 64.00 ✓ | | 713.42 |
| 22 | Deposit - PRD (7-29) Challenge | 7-29-83 | 8.00 ✓ | | 721.42 |
| 23 | Deposit - PRD (8-5) FSNC | 8-5-83 | 69.00 ✓ | | 790.42 |
| 24 | Deposit - PRD (8-12) Challenge | 8-12-83 | 8.00 ✓ | | 798.42 |
| 25 | McBee + Taft | 8-16-83 | | 523.04 ✓ | 275.38 |
| 26 | Deposit - PRD (8-19) FSNC | 8-19-83 | 69.00 ✓ | | 344.38 |
| 27 | Deposit - PRD (8-26) Challenge | 8-26-83 | 8.00 ✓ | | 352.38 |
| 28 | Deposit - PRD (9-2) FSNC | 9-2-83 | 69.00 ✓ | | 421.38 |
| 29 | Deposit - PRD (9-9) Challenge | 9-9-83 | 8.00 ✓ | | 429.38 |
| 30 | Deposit - PRD (9-16) FSNC | 9-20-83 | 69.00 ✓ | | 498.38 |
| 31 | Deposit - PRD (9-23) Challenge | 9-23-83 | 8.00 ✓ | | 506.38 |
| 32 | Deposit - PRD (9-30) FSNC | 9-30-83 | 69.00 ✓ | | 575.38 |
| 33 | Deposit - PRD (10-7) Challenge | 10-7-83 | 8.00 ✓ | | 583.38 |
| 34 | Deposit - PRD (10-14) FSNC | 10-14-83 | 69.00 ✓ | | 652.38 |
| 35 | Deposit - PRD (10-21) Challenge | 10-21-83 | 8.00 ✓ | | 660.38 |
| 36 | Deposit - PRD (10-28) FSNC | 10-28-83 | 69.00 ✓ | | 729.38 |
| 37 | Deposit - PRD (11-4) Challenge | 11-4-83 | 8.00 ✓ | | 737.38 |
| 38 | Deposit - PRD (11-11) FSNC | 11-11-83 | 69.00 ✓ | | 806.38 |
| 39 | Deposit - PRD (11-18) Challenge | 11-18-83 | 8.00 ✓ | | 814.38 |
| 40 | Deposit - PRD (11-25) FSNC | 12-2-83 | 69.00 ✓ | | 883.38 |
| 41 | Deposit - PRD (12-2) Challenge | 12-2-83 | 8.00 ✓ | | 891.38 |
| 42 | Deposit - PRD (12-9) FSNC | 12-9-83 | 69.00 ✓ | | 960.38 |
| 43 | Deposit - PRD (12-16) Challenge | 12-16-83 | 8.00 ✓ | | 968.38 |

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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

| Check No. | Description of Transaction | Date | Deposit | Payment | Balance |
|-----------|------------------------------------|----------|----------|----------|---------|
| | | | | | 962.38 |
| | Deposit - PRD (12-23) FSNC | 12-23-83 | 69.00 ✓ | | 1037.38 |
| 101 | Deposit - PRD (12-30) Challenge | 12-30-83 | 500 ✓ | | 1042.38 |
| | Deposit - PRD (1-6) FSNC | 1-6-84 | 69.00 ✓ | | 1111.38 |
| | Deposit - PRD (1-13) Challenge | 1-13-84 | 500 ✓ | | 1116.38 |
| | Deposit - PRD (1-20) FSNC | 1-23-84 | 69.00 ✓ | | 1185.38 |
| 102 | Deposit - PRD (1-27) Challenge | 1-27-84 | 500 ✓ | | 1190.38 |
| | Four Seasons Turning Chg. | 2-6-84 | | 6594 ✓ | 112444 |
| | Deposit - PRD (2-3) FSNC | 2-7-84 | 62.00 ✓ | | 118644 |
| | Deposit - PRD (2-10) Challenge | 2-10-84 | 500 ✓ | | 119144 |
| 103 | City Jones Jones Re-Elect Comm. | 2-10-84 | | 100.00 ✓ | 109144 |
| | Deposit - PRD (2-17) FSNC | 2-21-84 | 57.00 ✓ | | 114844 |
| | Deposit - PRD (2-24) Challenge | 2-27-84 | 500 ✓ | | 115344 |
| 105 | Deposit - PRD (3-2) FSNC | 3-2-84 | 57.00 ✓ | | 121044 |
| | Deposit - PRD (3-9) Challenge | 3-9-84 | 500 ✓ | | 121544 |
| | Deposit - PRD (3-16) FSNC | 3-21-84 | 55.00 ✓ | | 127044 |
| | Deposit - PRD (3-23) Challenge | 3-26-84 | 500 ✓ | | 127544 |
| 104 | Deposit - PRD (3-30) FSNC | 4-2-84 | 2500 ✓ | | 133044 |
| | Deposit - PRD (4-6) Challenge | 4-6-84 | 500 ✓ | | 133544 |
| | Deposit - PRD (4-13) FSNC | 4-18-84 | 2500 ✓ | | 136044 |
| | Deposit - PRD (4-20) Challenge | 4-23-84 | 500 ✓ | | 136544 |
| 105 | Deposit - PRD (4-27) FSNC | 4-27-84 | 2500 ✓ | | 139044 |
| | Deposit - PRD (5-4) Challenge | 5-7-84 | 500 ✓ | | 139544 |
| | Deposit - PRD (5-11) FSNC | 5-14-84 | 2000 ✓ | | 141544 |
| | Deposit - PRD (5-18) Challenge | 5-22-84 | 500 ✓ | | 142044 |
| | Deposit - PRD (5-25) FSNC | 5-25-84 | 2000 ✓ | | 144044 |
| 106 | Deposit - PRD (6-1) Challenge | 6-1-84 | 500 ✓ | | 144544 |
| | PRD - 6-8 FSNC | 6-8-84 | 200 ✓ | | 146544 |
| | Deposit - PRD - 6-15 Pulling up | 6-15-84 | 500 ✓ | | 147044 |
| | PRD - 6-22 FSNC | 6-22-84 | 200 ✓ | | 149044 |
| | PRD - 6-28 FSNC | 6-28-84 | 2500 ✓ | | 151544 |
| 104 | Deposit - PRD - 10-21 FSNC - Jones | 6-21-84 | 100.00 ✓ | | 159544 |
| | James R. Jones election Committee | 8-17-86 | VOID | 200.00 | 139544 |

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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| | 1 | 2 | 3 | 4 |
|----|-------------------------|----------------------|------------------------|-------|
| | Contributor | Date of Contribution | Amount of Contribution | Total |
| 1 | Jackie Bosler | 3-18-83 | 500 | 500 |
| 2 | 5 S.W. 98th | 4-1-83 | 500 | 1000 |
| 3 | Oklahoma City, OK 73139 | 4-15-83 | 500 | 1500 |
| 4 | Administrator | 4-22-83 | 500 | 2000 |
| 5 | FSNC-SW Oklahoma City | 5-13-83 | 500 | 2500 |
| 6 | | 5-27-83 | 500 | 3000 |
| 7 | | 6-10-83 | 500 | 3500 |
| 8 | | 6-24-83 | 500 | 4000 |
| 9 | | 7-8-83 | 500 | 4500 |
| 10 | | 7-22-83 | 500 | 5000 |
| 11 | | 8-5-83 | 500 | 5500 |
| 12 | | 8-19-83 | 500 | 6000 |
| 13 | | 9-2-83 | 500 | 6500 |
| 14 | | 9-16-83 | 500 | 7000 |
| 15 | | 9-30-83 | 500 | 7500 |
| 16 | | 10-14-83 | 500 | 8000 |
| 17 | | 10-28-83 | 500 | 8500 |
| 18 | | 11-11-83 | 500 | 9000 |
| 19 | | 11-25-83 | 500 | 9500 |
| 20 | | 12-9-83 | 500 | 10000 |
| 21 | | 12-23-83 | 500 | 10500 |
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| Contributor | Date of Contribution | Amount of Contribution | Total |
|---|----------------------|------------------------|-------|
| Jackie Booher 5 S.W. 98th Okla. City, OK 73139 SW Oklahoma City Administrator | 1-6-84 | 500 | 500 |
| | 1-20-84 | 500 | 1000 |
| | 2-3-84 | 500 | 1500 |
| | 2-17-84 | 500 | 2000 |
| | 3-2-84 | 500 | 2500 |
| | 3-16-84 | 500 | 3000 |
| | 3-30-84 | 500 | 3500 |
| | 4-13-84 | 500 | 4000 |
| | 4-27-84 | 500 | 4500 |
| | 5-11-84 | 500 | 5000 |
| Duplicate | 5-25-84 | 500 | 5500 |
| | 6-8-84 | 500 | 6000 |
| | 6-22-84 | 500 | 6500 |
| | 6-22-84 | 500 | 7000 |

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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|--|----------------------|------------------------|-------|
| Gregory L. Brewer 5812 N.W. 71 Oklahoma City, OK 73132 Vice President FSNC, Inc. | 3-1-83 | 3000 | 3000 |

FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|------------------------|----------------------|------------------------|-------|
| Carol A. Bullett | 3-25-83 | 500 | 500 |
| 520 1/2 W. Harrison | 4-8-83 | 500 | 1000 |
| McAlester, OK 74501 | 4-22-83 | 500 | 1500 |
| Administrator | 5-6-83 | 500 | 2000 |
| Colonial Park Care Ctr | 5-20-83 | 500 | 2500 |
| | 6-3-83 | 500 | 3000 |
| | 6-17-83 | 500 | 3500 |
| | 7-1-83 | 500 | 4000 |
| | 7-15-83 | 500 | 4500 |
| | 7-29-83 | 500 | 5000 |
| | 8-12-83 | 500 | 5500 |
| | 8-26-83 | 500 | 6000 |
| | 9-9-83 | 500 | 6500 |
| | 9-23-83 | 500 | 7000 |
| | 10-7-83 | 500 | 7500 |
| | 10-21-83 | 500 | 8000 |
| | 11-4-83 | 500 | 8500 |
| | 11-18-83 | 500 | 9000 |
| | 12-2-83 | 500 | 9500 |
| | 12-16-83 | 500 | 10000 |
| | 12-30-83 | 500 | 10500 |

FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| | 1 | 2 | 3 | 4 | |
|-------------|----------------------|------------------------|-------|-------|----|
| Contributor | Date of Contribution | Amount of Contribution | Total | | |
| 1 | Lola Burnett | 3-12-83 | 500 | 500 | 1 |
| 2 | 102 Crystal Circle | 4-1-83 | 500 | 1000 | 2 |
| 3 | Norman, OK | 4-15-83 | 500 | 1500 | 3 |
| 4 | Administrator | 4-29-83 | 500 | 2000 | 4 |
| 5 | FSNC-Norman | 5-13-83 | 500 | 2500 | 5 |
| 6 | | 5-27-83 | 500 | 3000 | 6 |
| 7 | | 6-10-83 | 500 | 3500 | 7 |
| 8 | | 6-24-83 | 500 | 4000 | 8 |
| 9 | | 7-8-83 | 500 | 4500 | 9 |
| 10 | | 7-22-83 | 500 | 5000 | 10 |
| 11 | | 8-5-83 | 500 | 5500 | 11 |
| 12 | | 8-19-83 | 500 | 6000 | 12 |
| 13 | | 9-2-83 | 500 | 6500 | 13 |
| 14 | | 9-16-83 | 500 | 7000 | 14 |
| 15 | | 9-30-83 | 500 | 7500 | 15 |
| 16 | | 10-14-83 | 500 | 8000 | 16 |
| 17 | | 10-28-83 | 500 | 8500 | 17 |
| 18 | | 11-11-83 | 500 | 9000 | 18 |
| 19 | | 11-25-83 | 500 | 9500 | 19 |
| 20 | | 12-9-83 | 500 | 10000 | 20 |
| 21 | | 12-23-83 | 500 | 10500 | 21 |
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FOUR SEASONS OF OKLAHOMA POLITICAL ACTION COMMITTEE

1983

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| | 1 | 2 | 3 | 4 |
|-------------|----------------------|------------------------|-------|----|
| Contributor | Date of Contribution | Amount of Contribution | Total | |
| | 3-18-83 | 1000 | 1000 | 1 |
| | 4-1-83 | 1000 | 2000 | 2 |
| | 4-15-83 | 1000 | 3000 | 3 |
| | 4-29-83 | 1000 | 4000 | 4 |
| | 5-13-83 | 1000 | 5000 | 5 |
| | 5-27-83 | 1000 | 6000 | 6 |
| | 6-10-83 | 1000 | 7000 | 7 |
| | 6-24-83 | 1000 | 8000 | 8 |
| | 7-8-83 | 1000 | 9000 | 9 |
| | 7-22-83 | 1000 | 10000 | 10 |
| | 8-5-83 | 1000 | 11000 | 11 |
| | 8-19-83 | 1000 | 12000 | 12 |
| | 9-2-83 | 1000 | 13000 | 13 |
| | 9-16-83 | 1000 | 14000 | 14 |
| | 9-30-83 | 1000 | 15000 | 15 |
| | 10-14-83 | 1000 | 16000 | 16 |
| | 10-28-83 | 1000 | 17000 | 17 |
| | 11-11-83 | 1000 | 18000 | 18 |
| | 11-25-83 | 1000 | 19000 | 19 |
| | 12-9-83 | 1000 | 20000 | 20 |
| | 12-23-83 | 1000 | 21000 | 21 |
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FOUR SEASONS OF OKLAHOMA POLITICAL ACTION COMMITTEE

1983

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| | 1 | 2 | 3 | 4 |
|-------------|-----------------------|------------------------|-------|-------|
| Contributor | Date of Contribution | Amount of Contribution | Total | |
| 1 | June Garver | 3-18-83 | 500 | 500 |
| 2 | 10501 Bayberry Drive | 4-1-83 | 500 | 1000 |
| 3 | Oklahoma City, OK | 4-18-83 | 500 | 1500 |
| 4 | Administrator | 4-29-83 | 500 | 2000 |
| 5 | FSNC-NW OKLAHOMA CITY | 5-13-83 | 500 | 2500 |
| 6 | | 5-27-83 | 500 | 3000 |
| 7 | | 6-10-83 | 800 | 3500 |
| 8 | | 6-24-83 | 500 | 4000 |
| 9 | | 7-8-83 | 500 | 4500 |
| 10 | | 7-22-83 | 500 | 5000 |
| 11 | | 8-5-83 | 500 | 5500 |
| 12 | | 8-19-83 | 500 | 6000 |
| 13 | | 9-2-83 | 500 | 6500 |
| 14 | | 9-16-83 | 500 | 7000 |
| 15 | | 9-30-83 | 500 | 7500 |
| 16 | | 10-14-83 | 500 | 8000 |
| 17 | | 10-28-83 | 500 | 8500 |
| 18 | | 11-11-83 | 500 | 9000 |
| 19 | | 11-25-83 | 500 | 9500 |
| 20 | | 12-9-83 | 500 | 10000 |
| 21 | | 12-23-83 | 500 | 10500 |
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| Contributor | Date of Contribution | Amount of Contribution | Total |
|--|----------------------|------------------------|-------|
| June Garner 10501 Bayberry Dr. Okla. City, Ok NW Oklahoma City Administrator | 1-6-84 | 500 | 500 |
| | 1-20-84 | 500 | 1000 |
| | 2-3-84 | 500 | 1500 |
| | 2-17-84 | 500 | 2000 |
| | 3-2-84 | 500 | 2500 |
| | 3-16-84 | 500 | 3000 |
| | 3-30-84 | 500 | 3500 |
| | 4-13-84 | 500 | 4000 |
| | 4-27-84 | 500 | 4500 |
| | 5-11-84 | 500 | 5000 |
| | 5-25-84 | 500 | 5500 |
| | 6-8-84 | 500 | 6000 |
| | 6-22-84 | 500 | 6500 |
| | 7-6-84 | 500 | 7000 |
| | 12-21-84 | 10000 | 17000 |

FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|---|----------------------|------------------------|-------|
| Phillip Howard 1606 S. 108th E. Ave. Tulsa, OK 74128 Administrator FSNC-Tulsa El Paso | 3-18-83 | 500 | 500 |
| | 4-1-83 | 500 | 1000 |
| | 4-15-83 | 500 | 1500 |
| | 4-29-83 | 500 | 2000 |
| | 5-13-83 | 500 | 2500 |
| | 5-27-83 | 500 | 3000 |
| | 6-10-83 | 500 | 3500 |
| | 6-24-83 | 500 | 4000 |
| | 7-8-83 | 500 | 4500 |
| | 7-22-83 | 500 | 5000 |
| | 8-5-83 | 500 | 5500 |
| | 8-19-83 | 500 | 6000 |
| | 9-2-83 | 500 | 6500 |
| | 9-16-83 | 500 | 7000 |
| | 9-30-83 | 500 | 7500 |
| 10-14-83 | 500 | 8000 | |
| 10-28-83 | 500 | 8500 | |
| 11-11-83 | 500 | 9000 | |
| 11-25-83 | 500 | 9500 | |
| 12-9-83 | 500 | 10000 | |
| 12-23-83 | 500 | 10500 | |

FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

1984



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| | Contributor | Date of Contribution | Amount of Contribution | Total |
|----|------------------------------|----------------------|------------------------|-------------|
| 1 | <i>Phillip Howard</i> | <i>1-6-84</i> | <i>500</i> | <i>500</i> |
| 2 | | <i>1-20-84</i> | <i>500</i> | <i>1000</i> |
| 3 | | <i>2-3-84</i> | <i>500</i> | <i>1500</i> |
| 4 | | <i>2-17-84</i> | <i>500</i> | <i>2000</i> |
| 5 | <i>El Paso Administrator</i> | <i>3-2-84</i> | <i>500</i> | <i>2500</i> |
| 6 | | <i>3-16-84</i> | <i>500</i> | <i>3000</i> |
| 7 | | <i>3-30-84</i> | <i>500</i> | <i>3500</i> |
| 8 | | <i>4-13-84</i> | <i>500</i> | <i>4000</i> |
| 9 | | <i>4-27-84</i> | <i>500</i> | <i>4500</i> |
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| 12 | | <i>Terminated</i> | | |
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| Contributor | Date of Contribution | Amount of Contribution | Total | |
| 1 Marla J. McMeans | 8-5-83 | 500 | 500 | 1 |
| 2 1277 E. 140th Place | 8-19-83 | 500 | 1000 | 2 |
| 3 Glenpool, OK 74033 | 9-2-83 | 500 | 1500 | 3 |
| 4 Administrator | 9-16-83 | 500 | 2000 | 4 |
| 5 FSNC-Tulsa | 9-30-83 | 500 | 2500 | 5 |
| 6 | 10-14-83 | 500 | 3000 | 6 |
| 7 | 10-28-83 | 500 | 3500 | 7 |
| 8 | 11-11-83 | 500 | 4000 | 8 |
| 9 | 11-25-83 | 500 | 4500 | 9 |
| 10 | 12-9-83 | 500 | 5000 | 10 |
| 11 | 12-23-83 | 500 | 5500 | 11 |
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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| Contributor | Date of Contribution | Amount of Contribution | Total |
|---------------------------------------|----------------------|------------------------|-------|
| Kaye Ronk | 3-18-83 | 1000 | 1000 |
| 4211 Hidden Hill Norman, OK | 4-1-83 | 1000 | 2000 |
| | 4-15-83 | 1000 | 3000 |
| Regional Director | 4-29-83 | 1000 | 4000 |
| Four Seasons Nursing Centers, Inc. | 5-13-83 | 1000 | 5000 |
| | 5-27-83 | 1000 | 6000 |
| | 6-10-83 | 1000 | 7000 |
| | 6-24-83 | 1000 | 8000 |
| | 7-8-83 | 1000 | 9000 |
| | 7-22-83 | 1000 | 10000 |
| | 8-5-83 | 1000 | 11000 |
| | 8-19-83 | 1000 | 12000 |
| | 9-2-83 | 1000 | 13000 |
| | 9-16-83 | 1000 | 14000 |
| | 9-30-83 | 1000 | 15000 |
| | 10-14-83 | 1000 | 16000 |
| | 10-28-83 | 1000 | 17000 |
| | 11-11-83 | 1000 | 18000 |
| | 11-25-83 | 1000 | 19000 |
| | 12-9-83 | 1000 | 20000 |
| | 12-23-83 | 1000 | 21000 |

FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

1983

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| | 1 | 2 | 3 | 4 |
|-------------------------|----------------------|------------------------|-------|----|
| Contributor | Date of Contribution | Amount of Contribution | Total | |
| Jerry Sell | 3-18-83 | 200 | 200 | 1 |
| 2241 Ashley Drive | 4-1-83 | 200 | 400 | 2 |
| Oklahoma City, OK 73120 | 4-15-83 | 200 | 600 | 3 |
| Manager-Reimbursement | 4-29-83 | 200 | 800 | 4 |
| and Taxes | 5-13-83 | 200 | 1000 | 5 |
| FSNC, Inc. | 5-27-83 | 200 | 1200 | 6 |
| | 6-10-83 | 200 | 1400 | 7 |
| | 6-24-83 | 200 | 1600 | 8 |
| | 7-8-83 | 200 | 1800 | 9 |
| | 7-22-83 | 200 | 2000 | 10 |
| | 8-5-83 | 200 | 2200 | 11 |
| | 8-19-83 | 200 | 2400 | 12 |
| | 9-2-83 | 200 | 2600 | 13 |
| | 9-16-83 | 200 | 2800 | 14 |
| | 9-30-83 | 200 | 3000 | 15 |
| | 10-14-83 | 200 | 3200 | 16 |
| | 10-28-83 | 200 | 3400 | 17 |
| | 11-11-83 | 200 | 3600 | 18 |
| | 11-25-83 | 200 | 3800 | 19 |
| | 12-9-83 | 200 | 4000 | 20 |
| | 12-23-83 | 200 | 4200 | 21 |
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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

1983

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| | 1 | 2 | 3 | 4 |
|---------------------|----------------------|------------------------|-------|----|
| Contributor | Date of Contribution | Amount of Contribution | Total | |
| Linda Swain Siegal | 3-18-83 | 500 | 500 | 1 |
| 721 Flamingo Avenue | 4-1-83 | 500 | 1000 | 2 |
| Oklahoma City, OK | 4-15-83 | 500 | 1500 | 3 |
| Administrator | 4-29-83 | 500 | 2000 | 4 |
| FSNC-Warr Acres | 5-13-83 | 500 | 2500 | 5 |
| | 5-27-83 | 500 | 3000 | 6 |
| | 6-10-83 | 500 | 3500 | 7 |
| | 6-24-83 | 500 | 4000 | 8 |
| | 7-8-83 | 500 | 4500 | 9 |
| | 7-22-83 | 500 | 5000 | 10 |
| | 8-5-83 | 500 | 5500 | 11 |
| | 8-19-83 | 500 | 6000 | 12 |
| | 9-2-83 | 500 | 6500 | 13 |
| | 9-16-83 | 500 | 7000 | 14 |
| | 9-30-83 | 500 | 7500 | 15 |
| | 10-14-83 | 500 | 8000 | 16 |
| | 10-28-83 | 500 | 8500 | 17 |
| | 11-11-83 | 500 | 9000 | 18 |
| | 11-25-83 | 500 | 9500 | 19 |
| | 12-9-83 | 500 | 10000 | 20 |
| | 12-23-83 | 500 | 10500 | 21 |
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| Contributor | Date of Contribution | Amount of Contribution | Total |
|---|----------------------|------------------------|-------|
| Linda Swain Siegal 721 Flamingo Ave. Okla. City, OK Wen Acres Administrator | 1-6-84 | 500 | 500 |
| | 1-20-84 | 500 | 1000 |
| | 2-3-84 | 500 | 1500 |
| | 2-17-84 | 500 | 2000 |
| | 3-2-84 | 500 | 2500 |
| | 3-16-84 | 500 | 3000 |
| | 3-30-84 | 500 | 3500 |
| | 4-13-84 | 500 | 4000 |
| | 4-27-84 | 500 | 4500 |
| | 5-11-84 | 500 | 5000 |
| Duplicate | 5-25-84 | 500 | 5500 |
| | 6-8-84 | 500 | 6000 |
| | 6-22-84 | 500 | 6500 |
| | 6-27-84 | 500 | 7000 |

FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

1983

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| Contributor | Date of Contribution | Amount of Contribution | Total | |
| | 3-18-83 | 700 | 700 | 1 |
| Ken Stephens | 4-1-83 | 700 | 1400 | 2 |
| 3613 Ridgewood Drive | 4-15-83 | 700 | 2100 | 3 |
| Midwest City, OK | 4-29-83 | 700 | 2800 | 4 |
| Director-Accounting Serv. | 5-13-83 | 700 | 3500 | 5 |
| FSNC, Inc. | 5-27-83 | 700 | 4200 | 6 |
| | 6-10-83 | 700 | 4900 | 7 |
| | 6-24-83 | 700 | 5600 | 8 |
| | 7-8-83 | 700 | 6300 | 9 |
| | 7-22-83 | 700 | 7000 | 10 |
| | 8-5-83 | 700 | 7700 | 11 |
| | 8-19-83 | 700 | 8400 | 12 |
| | 9-2-83 | 700 | 9100 | 13 |
| | 9-16-83 | 700 | 9800 | 14 |
| | 9-30-83 | 700 | 10500 | 15 |
| | 10-14-83 | 700 | 11200 | 16 |
| | 10-28-83 | 700 | 11900 | 17 |
| | 11-11-83 | 700 | 12600 | 18 |
| | 11-25-83 | 700 | 13300 | 19 |
| | 12-9-83 | 700 | 14000 | 20 |
| | 12-23-83 | 700 | 14700 | 21 |
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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

1984 ✓

| | Contributor | Date of Contribution | Amount of Contribution | Total |
|----|---|---------------------------------|------------------------|-------------|
| 1 | <i>Ken Stephens</i> <i>3613 Ridgewood Dr.</i> <i>Midwest City, Ok</i> | <i>1-6-84</i> | <i>700</i> | <i>700</i> |
| 2 | | <i>1-20-84</i> | <i>700</i> | <i>1400</i> |
| 3 | <i>Director - Accounting</i> <i>Services</i> <i>FSNC, Inc.</i> | <i>Discontinued by request.</i> | | |
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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

1983

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| Lee Stephens | 4-8-83 | 300 | 300 |
| 1120 N. Strong, #3 | 4-22-83 | 300 | 600 |
| McAlester, OK | 5-6-83 | 300 | 900 |
| Administrator | 5-20-83 | 300 | 1200 |
| Colonial Lodge Care Ctr. | 6-3-83 | 300 | 1500 |
| | 6-17-83 | 300 | 1800 |
| | 7-1-83 | 300 | 2100 |
| | 7-15-83 | 300 | 2400 |
| | 7-29-83 | 300 | 2700 |
| | 8-12-83 | 300 | 3000 |
| | 8-26-83 | 300 | 3300 |
| | 9-9-83 | 300 | 3600 |
| | 9-23-83 | 300 | 3900 |
| | 10-7-83 | 300 | 4200 |
| | 10-21-83 | 300 | 4500 |
| | 11-4-83 | 300 | 4800 |
| | 11-18-83 | 300 | 5100 |
| | 12-2-83 | 300 | 5400 |
| | 12-16-83 | 300 | 5700 |

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FOUR SEASONS OKLAHOMA POLITICAL ACTION COMMITTEE

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| Contributor | Date of Contribution | Amount of Contribution | Total |
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| Russ Wilsie | 3-18-83 | 1000 | 1000 |
| 2108 Everglade Court | 4-1-83 | 1000 | 2000 |
| Yukon, OK | 4-15-83 | 1000 | 3000 |
| Regional Director | 4-29-83 | 1000 | 4000 |
| Four Seasons Nursing | 5-13-83 | 1000 | 5000 |
| Centers, Inc. | 5-27-83 | 1000 | 6000 |
| | 6-10-83 | 1000 | 7000 |
| | 6-24-83 | 1000 | 8000 |
| | 7-8-83 | 1000 | 9000 |
| | 7-22-83 | 1000 | 10000 |
| | 8-5-83 | 1000 | 11000 |
| | 8-19-83 | 1000 | 12000 |
| | 9-2-83 | 1000 | 13000 |
| | 9-16-83 | 1000 | 14000 |
| | 9-30-83 | 1000 | 15000 |
| | 10-14-83 | 1000 | 16000 |
| | 10-28-83 | 1000 | 17000 |
| | 11-11-83 | 1000 | 18000 |
| | 11-25-83 | 1000 | 19000 |
| | 12-9-83 | 1000 | 20000 |
| | 12-23-83 | 1000 | 21000 |

| | Contributor | Date of Contribution | Amount of Contribution | Total | |
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| 1 | <i>Luss Wilcox</i> 1515 G Division Arlington, TX <i>Regional Director</i> <i>FSNC, Inc.</i> | <i>1-6-84</i> | <i>1000</i> | <i>1000</i> | 1 |
| 2 | | <i>1-20-84</i> | <i>1000</i> | <i>2000</i> | 2 |
| 3 | | <i>2-3-84</i> | <i>1000</i> | <i>3000</i> | 3 |
| 4 | | <i>2-17-84</i> | <i>1000</i> | <i>4000</i> | 4 |
| 5 | | <i>3-2-84</i> | <i>1000</i> | <i>5000</i> | 5 |
| 6 | | <i>3-16-84</i> | <i>1000</i> | <i>6000</i> | 6 |
| 7 | | <i>3-30-84</i> | <i>1000</i> | <i>7000</i> | 7 |
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 8, 1989

K. Peter Kemezys, Esquire
10750 Columbia Pike
Silver Spring, Maryland 20904

RE: MUR 2741
Manor Healthcare Federal
Political Action Committee and
Gerald F. Hickey, as treasurer

Dear Mr. Kemezys:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission found reason to believe that your clients, Manor Healthcare Political Action Committee and Gerald F. Hickey, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1)(i), and instituted an investigation in 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 no probable cause to believe that a violation of 2 U.S.C. § 441b has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) 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 the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

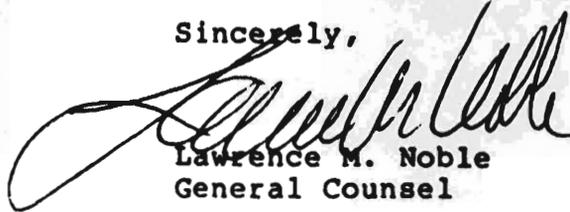
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K. Peter Kemezys
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Manor Healthcare Federal Political) MUR 2741
Action Committee and Gerald)
F. Hickey, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On October 25, 1988, the Commission found reason to believe that Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer ("Respondents"), violated 11 C.F.R. § 102.5(a)(1)(i) by transferring funds totalling \$5,953.15 from three (3) of its non-Federal accounts into the Federal account. In addition, the Commission found reason to believe that Respondents violated 2 U.S.C. § 441b by accepting apparent corporate and labor union funds from the Four Seasons New Mexico Political Action Committee and Four Seasons Oklahoma Political Action Committee ("non-Federal accounts").

II. ANALYSIS

Pursuant to 11 C.F.R. § 102.5(a)(1), an organization which finances political activity in connection with both Federal and non-Federal elections must keep its Federal and non-Federal accounts strictly segregated in separate accounts. Only funds subject to the prohibitions and limitations of the Act shall be deposited into the Federal account and no transfers may be made into the Federal account from any non-Federal accounts of the organization. 11 C.F.R. § 102.5(a)(1)(i). Because it accepted transfers from three (3) of its non-Federal accounts, Respondents violated 11 C.F.R. § 102.5(a)(1)(i).

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Pursuant to 2 U.S.C. § 441b, it is unlawful for any national bank or corporation to make a contribution or expenditure in connection to any federal election or for any candidate, political committee, or any other person knowingly to accept or receive funds prohibited by this section.

Oklahoma law prohibits corporate funds, but allows labor union political action committee funds for state and local elections. New Mexico law allows both corporate and labor union funds for state and local elections. It thus appeared that the Committee's non-Federal accounts for New Mexico and Oklahoma contained prohibited funds. However, Respondents' reply to the Commission's reason to believe finding of a 2 U.S.C. § 441b violation states that "no corporate or union contributions" were deposited into the Committee's non-Federal accounts. According to Respondents' letter, "All contributions were from individuals." In support of their position, Respondents submitted a summary of all contributions, transaction ledgers and individual contribution records received since these accounts were opened.^{1/} From a review of the information submitted, it appears that there were only contributions from individuals, not union or corporate funds, in the non-Federal accounts.

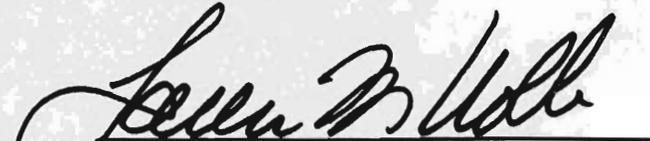
^{1/} According to a conversation with the Committee's Counsel on November 29, 1988, Manor Healthcare acquired these non-federal accounts when they bought the Four Seasons in 1984. These accounts have not been used since then.

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III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, violated 2 U.S.C. § 441b.

2/3/89
Date



Lawrence M. Noble
General Counsel

Staff Person: Ivonne Cotto

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In the Matter of)
)
Manor Healthcare Federal Political)
Action Committee and Gerald)
F. Hickey, as treasurer)

MUR 2741

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EXECUTIVE SESSION

SENSITIVE

FEB 28 1989

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 25, 1988, the Commission found reason to believe that Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer ("Respondents"), violated 11 C.F.R. § 102.5(a)(1)(i) by transferring funds totalling \$5,953.15 from three (3) of its non-Federal accounts into the Federal account. In addition, the Commission found reason to believe that Respondents violated 2 U.S.C. § 441b by accepting apparent corporate and labor union funds from the Four Seasons New Mexico PAC and Four Seasons Oklahoma PAC ("non-Federal accounts").

A letter notifying the Respondents of reason to believe was mailed on October 27, 1988. On November 10, 1988, Respondents requested conciliation prior to a finding of probable cause. (Attachment 1).

II. ANALYSIS

It is unlawful for any political committee knowingly to accept or receive any funds from a corporation or labor organization. 2 U.S.C. § 441b(a). To ensure that prohibited monies are not used in connection with federal elections, the Commission's Regulations, at 11 C.F.R. § 102.5, prescribe certain requirements for organizations that intend to finance both federal and non-federal political activity. An organization

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which is a political committee under the Act has two available alternatives pursuant to 11 C.F.R. § 102.5(a): (1) it may maintain a single account for both federal and non-federal activity, with such an account containing only funds subject to the prohibitions and limitations of the Act, or (2) it may maintain a separate account for federal activity. In the latter case, only funds subject to the prohibitions and limitations of the Act may be deposited in the Federal account. 11 C.F.R. § 102.5(a)(1)(i). No transfers may be made to the federal account from any other account(s) maintained by such organization for the purpose of financing activity in connection with non-federal elections. Respondents accepted transfers from three (3) of its non-Federal accounts into the Federal account in violation of 11 C.F.R. § 102.5(a)(1)(i).

New Mexico law allows both labor union and corporate financing of non-Federal elections. Oklahoma law only allows labor union political action committees to contribute to non-Federal elections. Therefore, it appeared possible that the Committee's non-Federal accounts for these states contained corporate and labor union money. However, Respondents' reply to the Commission's reason to believe finding of a 2 U.S.C. § 441b violation states that there were "no corporate or union contributions" deposited into the Committee's non-Federal accounts. In support of their position, Respondents submitted a summary of all contributions, transaction ledgers and individual contribution records received since these accounts were opened

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(Attachment 2). A brief is being circulated simultaneously with this report which recommends a finding of no probable cause to believe that a violation of 2 U.S.C. § 441b has occurred.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into conciliation with Manor Healthcare Federal Political Action Committee and Gerald T. Hickey, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Lawrence M. Noble
General Counsel

Date 2/2/89

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Request for pre-probable cause conciliation dated November 9, 1988
2. Letter from Respondents dated November 18, 1988.
3. Proposed Conciliation Agreement and Letter

Staff Person: Ivonne Cotto

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Manor Healthcare Federal Political) MUR 2741
Action Committee and Gerald F.)
Hickey, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of Feruary 28, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2741:

1. Enter into conciliation with Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated February 2, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

3-1-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 8, 1989

K. Peter Kemezys, Esquire
10750 Columbia Pike
Silver Spring, Maryland 20904

RE: MUR 2741
Manor Healthcare Federal
Political Action Committee and
Gerald F. Hickey, as treasurer

Dear Mr. Kemezys:

On October 25, 1988, the Federal Election Commission found reason to believe that Manor Healthcare Political Action Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1)(i). At your request, on February 28, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of the violation of 11 C.F.R. § 102.5(a)(1)(i) prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
 Manor Healthcare Federal Political) MUR 2741
 Action Committee and Gerald F.)
 Hickey, as treasurer)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by K. Peter Kemezys, the attorney for the Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on September 19, 1989. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
 General Counsel

1-2-90
 Date

BY: 
 Lois G. Lerner
 Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: A. Buckley

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Manor Healthcare Federal Political) MUR 2741
Action Committee and Gerald F.)
Hickey, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 8, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2741:

1. Accept the conciliation agreement with the Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer, as recommended in the General Counsel's Report dated January 2, 1990.
2. Close the file.
3. Approve the letter as recommended in the General Counsel's Report dated January 2, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

1/9/90
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wednesday, January 3, 1990 11:34
Circulated to the Commission: Wednesday, January 3, 1990 4:00
Deadline for vote: Monday, January 8, 1990 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 16, 1990

K. Peter Kemezys, Assistant General
Counsel, Manor Healthcare Corp.
10750 Columbia Pike
Silver Spring, MD 20904

RE: MJR 2741
Manor Healthcare Federal
Political Action Committee
and Gerald F. Hickey, as
treasurer

Dear Mr. Kemezys:

On January 8, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 11 C.F.R. § 102.5(a)(1)(i). Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Manor Healthcare Federal Political) MUR 2741
Action Committee and Gerald F.)
Hickey, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Manor Healthcare Federal Political Action Committee and Gerald F. Hickey, as treasurer ("Respondents") violated 11 C.F.R. § 102.5(a)(1)(i).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Manor Healthcare Federal Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Gerald F. Hickey is the treasurer of Manor Healthcare Federal Political Action Committee.

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3. Pursuant to 11 C.F.R. § 102.5(a)(1), an organization which finances political activity in connection with both Federal and non-Federal elections must keep its Federal and non-Federal accounts strictly segregated in separate accounts. Only funds subject to the prohibitions and limitations of the Act shall be deposited into the Federal account and no transfers may be made into the Federal account from any accounts of the organization. 11 C.F.R. § 102.5(a)(1)(i).

4. Respondents transferred funds totaling \$5,953.15 from three (3) of its non-Federal accounts into the Federal account.

V. By transferring funds totaling \$5,953.15 from three (3) of its non-Federal accounts into its Federal account, Respondents violated 11 C.F.R. § 102.5(a)(1)(i).

VI. Respondents contend that this violation of 11 C.F.R. § 102.5(a)(1)(i) was not knowing and willful and was based upon incomplete information from officials of the three state election commissions.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Eight Hundred Dollars (\$800.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on 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

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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. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: *Lois G. Lerner*
Lois G. Lerner
Associate General Counsel

Date 1-12-90

FOR THE RESPONDENTS:

Gerald F. Heckay
(Name)
(Position) *TREASURER*

Date December 14, 1989

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2741

DATE FILMED 1-31-90 CAMERA NO. 3

CAMERAMAN AS

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