

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 14, 1998

ANALYST: Neil Evans

- I. COMMITTEE: Tenet Healthcare Corporation Political Action Committee (C00119354)  
Susan Limon, Treasurer  
3820 State Street  
Santa Barbara, CA 93105
- II. RELEVANT STATUTE: U.S.C. § 441a(a)(2)(C)
- III. BACKGROUND: Excessive Contribution to a Political Committee Through the Solicitation and Collection of Earmarked Contributions

The Tenet Healthcare Corporation Political Action Committee ("the Committee") disclosed in the 1997 Year End Report on Schedule B for Line 23 of the Detailed Summary Page, a \$5,000 contribution on October 23, 1997 and a \$35,350 contribution on December 22, 1997 to the Federation of American Health Systems Political Action Committee ("FedPAC"). The latter contribution was described as "FedPac--Earmarked Contributions solicited through Tenet-PAC" (Attachment #2).

On February 25, 1998, a Request for Additional Information ("RFAI") regarding the 1997 Year End Report was sent to the Committee which advised it that the Committee made contributions to another political committee in excess of \$5,000 per calendar year. The RFAI recommended that the Committee provide clarifying information if the contributions in question were incorrectly disclosed, and/or notify the recipient and request a refund of the amount in excess of \$5,000 (Attachment #3).

On March 5, 1998, the Commission received a response from Susan Limon, Treasurer, which stated that, "Tenet PAC has been 'earmarking' contributions to FedPac for a number of years. Prior to Tenet PAC beginning this 'earmarking', we spoke with

TENET HEALTHCARE CORPORATION POLITICAL ACTION COMMITTEE  
PAGE 2

someone from the Federal Election Commission to ensure that it was being done properly and legally." Ultimately, the Committee requested an extension to the 15 day deadline in order to review their records (Attachment #4).

On March 16, 1998, the Commission received a response via facsimile from Charles H. Bell, Jr., of Bell, McAndrews & Hiltachk for the Committee which stated that, "the [c]ommittee had responded to a similar inquiry last year and had received no response indicating that the explanation given was inadequate, and had, justifiably, believed that response and explanation had been accepted." Attached to this letter were the 1997 Amended Year End Report and a cover letter from FedPAC. The cover letter stated that the \$35,350 contribution had been previously "miscategorized" as a direct contribution from the Committee, but it actually represented permissible individual earmarked contributions made to FedPAC through the Committee. The letter further stated that "The reattribution rules contained in 11 CFR §110.1(k) permit these contributions to be treated as if they had been made directly to FedPac". The attached amended report disclosed the individual contributors of the earmarked contributions (Attachment #5).<sup>1</sup>

On March 19, 1998, a Second Notice was sent to the Committee which acknowledged that the \$35,350 was an earmarked contribution and asked the Committee to clarify its statement on Schedule B, "Earmarked contribution solicited through Tenet-PAC". The Committee was informed that the \$35,350 in earmarked contributions would count against their contribution limits if the Committee exercised direction or control over the earmarked contributions or if the solicitation was conducted by the connected organization and the funds collected by the Committee. The Committee was asked to clarify the solicitor, if the solicitation mentions making contributions to FedPAC, and to provide a copy of the solicitation (Attachment #6).<sup>2</sup>

On April 15 via facsimile and 17, 1998, the Commission received duplicate responses from Charles H. Bell, Jr., for the Committee which stated that the Committee is communicating with FedPAC regarding reporting and a possible refund. Mr. Bell stated in his response that he will notify the Commission of the status of the response when communications with FedPAC are complete, which he estimated to be in a few days (Attachment #7).

On April 20, 1998, the Reports Analysis Division ("RAD") analyst placed separate calls to Susan Limon and Charles Bell, Jr. The out-going message of the voice mail of Susan Limon stated that she would be out of the office through April 27, 1998. The analyst then called Charles Bell, Jr., and left a message on his voice mail regarding the

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<sup>1</sup> The original response was subsequently received on March 24, 1998.

<sup>2</sup> The Second Notice also refers to the March 16, 1998 facsimile.

TENET HEALTHCARE CORPORATION POLITICAL ACTION COMMITTEE  
PAGE 3

Committee and requested a return call. When Mr. Bell returned the phone call, he was informed by the analyst that the Committee had not provided an adequate response to the Second Notice. The Committee could do so by clarifying the solicitor, informing the Commission if the solicitation mentions making contributions to FedPAC, providing a copy of the solicitation, and using the proper disclosure methods for earmarked contributions. The analyst faxed Mr. Bell a copy of the Second Notice, Appendix D. Earmarked Contributions from the Campaign Guide for Corporations and Labor Organizations, an example of proper disclosure for earmarked contributions. Mr. Bell stated the Committee was eager to resolve this issue and that an amendment would be forthcoming (Attachment #8).

On May 6, 1998, the analyst for the Committee and the analyst for FedPAC held a meeting with Mr. Tom Scully, President and Executive Officer of the Federation of American Health Systems to discuss the earmarked contributions. Mr. Scully explained that individuals earmarked contributions through the Committee for FedPAC. The Committee then transmitted those earmarked contributions by committee check. He was able to provide copies of earmarked contribution checks from individuals which had been consolidated into the Tenet PAC earmarked contribution check. The analysts advised Mr. Scully how to properly disclose an earmarked contribution. Mr. Scully further stated that, because Tenet Corporation did not grant approval to FedPAC to solicit its members directly, the Committee agreed to reach its \$35,000 contribution goal to FedPAC by earmarking contributions. Mr. Scully was provided a copy of Appendix D, Earmarked Contributions from the Campaign Guide for Corporations and Labor Organizations, was urged to provide a copy of the solicitation used by the Committee, and was asked to clarify the method of solicitation used by the Committee in a cover letter with his amendment. Mr. Scully had a copy of the solicitation from the Committee in his possession at the time of the meeting, but declined to submit it or allow the analysts to read it and instead stated that he would provide a copy to the Commission after consulting with the lawyers of the Committee. Mr. Scully said that he would provide an amendment by Monday, May 11, 1998 (Attachment #9).

On May 20, 1998, the Commission received a response from Charles H. Bell, Jr., for the Committee which included a cover letter, a generic "boilerplate version of the Tenet-PAC solicitation", and the 1997 Amended Year End Report. The cover letter states and the amended report discloses that the \$35,350 in earmarked contributions are individual earmarked contributions transmitted by committee check.<sup>3</sup> The cover letter also states in reference to the boilerplate solicitation, "that the solicitation was from Tenet-PAC, not from the corporation." The solicitation does not mention FedPAC (Attachment #10).

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<sup>3</sup> Of the \$35,350 in earmarked contributions, it appears that \$28,850 was not transmitted to FedPAC within ten days of the Committee's receipt, as required by 11 CFR § 102.8(a).

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
					TYPE OF FILER	
TENET HEALTHCARE CORPORATION POLITICAL ACTION COMMITTEE				ID #C00119354	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: TENET HEALTHCARE CORPORATION						
1997 FILING FREQUENCY CHANGE NOTICE				6JAN97	1	97FEC/165/4335
ACKNOWLEDGEMENT OF FILING FREQUENCY CHANGE				21MAR97	2	97FEC/191/4360
MID-YEAR REPORT		17,860	13,300	1JAN97 -30JUN97	15	97FEC/213/1282
MID-YEAR REPORT - AMENDMENT		17,860	11,500	1JAN97 -30JUN97	16	97FEC/242/2662
MID-YEAR REPORT - AMENDMENT		17,860	11,500	1JAN97 -30JUN97	3	98FEC/262/4355
REQUEST FOR ADDITIONAL INFORMATION				1JAN97 -30JUN97	3	97FEC/240/0357
YEAR-END		57,618	89,550	1JUL97 -31DEC97	34	98FEC/262/4321
YEAR-END - AMENDMENT		-	-	1JUL97 -31DEC97	3	98FEC/286/0459
YEAR-END - AMENDMENT		-	-	1JUL97 -31DEC97	10	98FEC/289/1647
YEAR-END - AMENDMENT		-	-	1JUL97 -31DEC97	4	98FEC/296/1480
YEAR-END - AMENDMENT		-	-	1JUL97 -31DEC97	3	98FEC/302/1355
YEAR-END - AMENDMENT		57,618	89,550	1JUL97 -31DEC97	35	98FEC/311/0624
REQUEST FOR ADDITIONAL INFORMATION				1JUL97 -31DEC97	5	98FEC/284/3807
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JUL97 -31DEC97	3	98FEC/288/0231
1998 ACKNOWLEDGEMENT OF FILING FREQUENCY CHANGE				27FEB98	3	98FEC/285/1794
STATEMENT OF ORGANIZATION - AMENDMENT				7JUL98	2	98FEC/324/4614
FEBRUARY MONTHLY		3,000	5,950	1JAN98 -31JAN98	7	98FEC/283/1517
FEBRUARY MONTHLY - AMENDMENT		3,000	5,950	1JAN98 -31JAN98	6	98FEC/311/0659
MARCH MONTHLY		35,219	11,635	1FEB98 -28FEB98	19	98FEC/287/3061
MARCH MONTHLY - AMENDMENT		35,219	11,635	1FEB98 -28FEB98	18	98FEC/311/0665
APRIL MONTHLY		30,525	10,000	1MAR98 -31MAR98	14	98FEC/295/1606
MAY MONTHLY		7,552	9,500	1APR98 -30APR98	9	98FEC/310/3818
JUNE MONTHLY		4,558	11,500	1MAY98 -31MAY98	10	98FEC/316/1668
JULY MONTHLY		4,323	6,500	1JUN98 -30JUN98	8	98FEC/339/4309
TOTAL		160,655	0 156,135 0		233	TOTAL PAGES

All reports except July Monthly reviewed.  
Cash-on-hand balance as of 6/30/98: \$67,837.92  
Debts owed by the committee: \$0  
Debts owed to the committee: \$0

Tenet  
Healthcare  
Corporation

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

JAN 27 11 23 AM '98

Political  
Action  
Committee

January 23, 1998

Public Records Office  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Tenet Healthcare Corporation Federal Political Action Committee (Tenet-PAC)  
ID No.: C00119354

Dear Sir or Madam:

Enclosed please find the January 31 Year End Report due by January 31, 1998, 1997 for Tenet Healthcare Corporation Political Action Committee (Tenet-PAC).

Please note on Schedule A (Contributions from Individuals/Persons) pages 1, 2, 3, 4, 5, 8, 9, 12, 13, 14, 16, 18, 20, 22, 23, 24 and 25, specific contributions are denoted with a double asterisk (\*\*). These particular contributions are *earmarked contributions* solicited through Tenet-PAC for FedPac.

Additionally, enclosed you will find amended reports for the following reporting periods:

- A. The Monthly Report due on September 20, 1996 covering the period from August 1, 1996 through August 31, 1996;
- B. The Monthly Report due on October 20, 1996 covering the period from September 1, 1996 through September 30, 1996;
- C. The 12-Day Pre-Election Report for the General Election on November 5, 1996 covering the period from October 1, 1996 through October 16, 1996;
- D. The 30-Day Post-Election Report following the General Election on November 5, 1996, covering the period from October 17, 1996 through November 25, 1996;
- E. The Monthly Report due on January 31, 1997 covering the period from November 26, 1996 through December 31, 1996;
- F. And, the July 31 Mid-Year Report (Non-Election Year Only) covering the period from January 1, 1997 through June 30, 1997.

3820 State Street  
Santa Barbara,  
California 93105  
(805) 563-7000

TENET

Tenet  
Healthcare  
Corporation

Political  
Action  
Committee

A recent internal review of Tenet-PAC revealed that the on the Summary of Receipts and Disbursements Page on Line 6 (c), the Total Receipts in Column A (This Period) and Column B (Calendar Year-to-Date), and on the Detailed Summary Page, Line 11 a. ii, (This Period and Calendar Year-to-Date) for the report covering *August 1, 1996 through August 31, 1996* was incorrect.

The previously reported total on the Summary of Receipts and Disbursements Page Line 6 (c) was \$2,998.44 (This Period) and \$16,783.38 (Calendar Year-to-Date). The correct Total Receipts for that period should have been \$2990.44 (This Period) and \$16,775.38 (Calendar Year-to-Date).

The error was found on the Detailed Summary Page, Line 11 a. ii. (unitemized contributions). The amount initially reported was \$734.28. The correct total of unitemized contributions for the period is \$726.28. Therefore, the Column B Calendar Year-to-Date total for Line 11 a. ii. now correctly reads \$8,607.08.

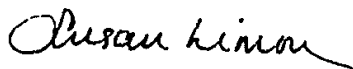
On the Detailed Summary Page, this \$8.00 discrepancy therefore changes the Total Federal Receipts for Line 20 in Column B (Calendar Year-to-Date) to \$16,775.38. The amended report now correctly reads that amount. And, it also changes the Cash on Hand for both Column A and B on the Summary of Receipts and Disbursement Page to correctly read \$67,593.41 for the reporting period.

The subsequent amended reports reflect the amendments made to the August report on both the Summary of Receipts and Disbursement Pages and the Detailed Summary Pages for the amended reports noted above.

Finally, I would like to notify the Federal Election Commission that Tenet-PAC wishes to *change its filing status to monthly* from semi-annually, thus filing monthly reports for the 1998 reporting schedule.

If you need additional information, please call me at 805/563-7046. Thank you.

Sincerely,



Susan Limon  
Treasurer  
Tenet-PAC

enclosures

3820 State Street  
Santa Barbara,  
California 93105  
(805) 563-7000

 TENET

SCHEDULE B  
ITEMIZED DISBURSEMENTS  
Contributions to Candidates/CommitteesPAGE 2 OF 3  
FOR LINE NUMBER 23NAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Friends of Bob Livingston P.O. Box 6329 New Orleans, LA 70174-6329	Bob Livingston, LA, U.S. House, CD-01	09/11/97	\$2,000.00
	Disbursement for [X] Primary		
Ashcroft 2000 911 Main Street Suite 1710 Kansas City, MO 64105-	John Ashcroft, MO, U.S. Senate	09/11/97	\$500.00
	Disbursement for [X] Primary		
Democratic Senatorial Campaign 430 South Capitol Street, SE Washington, DC 20003-	DSCC	10/16/97	\$5,000.00
	Disbursement for [X] Primary		
Democratic Senatorial Campaign 430 South Capitol Street, SE Washington, DC 20003-	DSCC	10/17/97	\$5,000.00
	Disbursement for [X] Primary		
NE FedPac 1111 19th Street, N.W. Washington, DC 20036-	Federation of American Health Systems PAC	10/23/97	\$5,000.00
	Disbursement for [X] Primary		
Coverdell Good Govt. Comm. 3091 Maple Drive Suite 200 Atlanta, GA 30305-	Paul Coverdell, GA, U.S. Senate	11/26/97	\$1,000.00
	Disbursement for [X] Primary		
AHAPAC 325 7th Street, NW Washington, DC 20004-	American Hospital Association Political Action Committee	11/26/97	\$5,000.00
	Disbursement for [X] Primary		
SUBTOTAL of Disbursements This Page .....			\$23,500.00
TOTAL This Period .....			

SCHEDULE B                    ITEMIZED DISBURSEMENTS                    PAGE 3 OF 3  
Contributions to Candidates/Committees                    FOR LINE NUMBER 23

NAME OF COMMITTEE(in Full)  
Tenet Healthcare Corporation PAC C00119354

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Wyden for Senate P.O. Box 3498 Portland, OR 97208-	Ron Wyden, OR, U.S. Senate	12/10/97	\$1,000.00
Disbursement for DQ Primary			
Mary Landrieu for Senate Comm. PO Box 7037 Metairie, LA 70821-	Mary Landrieu, LA, U.S. Senate	12/17/97	\$1,000.00
Disbursement for DQ Primary			
NE FedPac 1111 19th Street, N.W. Washington, DC 20036-	FedPac--Earmarked Contributions solicited through Tenet-PAC Disbursement for DQ Primary	12/22/97	\$35,350.00
Van Hilleary for Congress 104 Short Springs Road Tulahoma, TN 37388-	Van Hilleary, TN, U.S. House, CD-04 Uncashed Contribution from 11/3/95. Stop payment placed on check.	12/31/97	\$4250.00
SUBTOTAL of Disbursements This Page			\$37,100.00
TOTAL This Period			\$76,650.00





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

FEB 25 1998

Susan Limon, Treasurer  
Tenet Healthcare Corporation  
Political Action Committee  
3820 State Street  
Santa Barbara, CA 93105

Identification Number: C00119354

Reference: Year End Report (7/1/97-12/31/97)

Dear Ms. Limon:

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 total listed on Lines 19, 20, and 29, Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

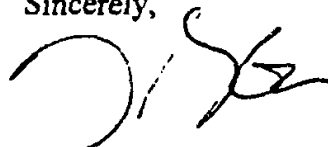
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) 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) 694-1130. My local number is (202) 694-1130.

Sincerely,



Neil Evans  
Reports Analyst  
Reports Analysis Division

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Tenet  
Healthcare  
Corporation

March 4, 1998

MAR 5 10 10 AM '98

Political  
Action  
Committee

Mr. Neil Evans  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: 1997 Year End Report (7/1/97-12/31/97) for Tenet Healthcare Corporation  
Political Action Committee (Tenet-PAC)  
ID No.: C00119354

Dear Mr. Evans:

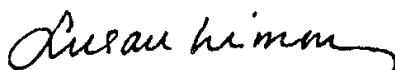
Enclosed please find the amended 1997 Year End report. As noted in your correspondence, the totals listed on Lines 19, 20 and 29, Column B of the Detailed Summary Page were incorrect. Those were typographical errors, and have been corrected on the attached amended Detailed Summary Page.

Additionally, your correspondence referenced excess contributions on Schedule B. Tenet-PAC has been "earmarking" contributions to FedPac for a number of years. Prior to Tenet-PAC beginning this "earmarking," we spoke with someone from the Federal Election Commission to ensure that it was being done properly and legally. We believe our records and copies of FEC reports include notes from those discussions with the FEC. However, those records are archived in our Dallas Operations Center in Dallas, TX. A request has been submitted to locate those records from 1989-1993 and have them shipped to my office in Santa Barbara, CA.

Therefore, I am requesting an extension on the 15-day deadline to respond to your correspondence regarding the issue of excess contributions on Schedule B. Is it possible to be given such an extension so that we may review our records and respond properly to your correspondence? Could you let me know in writing if this is agreeable to you?

If you need additional information, please call me at 805/563-7046. Thank you.

Sincerely,



Susan Limon  
Treasurer  
Tenet-PAC

3820 State Street  
Santa Barbara,  
California 93105  
(805) 563-7000

 TENET

**BELL, McANDREWS & HILTACHK**

Attorneys and Counselors at Law

455 CAPITOL MALL, SUITE 401  
SACRAMENTO CA 95834

(916) 442-7767

FAX (916) 442-7799

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DIVISION

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CHARLES H. BELL, JR.  
COLLEEN C. McANDREWS  
THOMAS W. HILTACHK  
JEFFREY E. LANGANJAMES F. SWEENEY  
Of Counsel1441 FOURTH STREET  
SANTA MONICA CA 90401  
(310) 458-1405**FAX TRANSMITTAL****DATE:** March 16, 1998**TIME:** 10:00 am PST**FROM:** Charles H. Bell, Jr.**TO:** Mr. Neil Evans  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission**FAX #:** 202-219-3496

Number of pages (including this cover sheet):

10

Please deliver IMMEDIATELY to the above-named individual. If there are any problems with receipt of this transmission or quality of the copy received, please call me at (916) 442-7757.

ORIGINAL WILL FOLLOW BY:

Regular Mail ☐ Yes ☒ NoOvernight Mail ☒ Yes ☐ No**COMMENTS:** ATTACHED RESPONSE ON BEHALF OF TENET HEALTHCARE CORPORATION PAC. Please call if questions. Thank you.

Please disregard previous fax.

THIS COMMUNICATION IS INTENDED FOR THE USE OF THE PERSON TO WHOM IT IS ADDRESSED. AND MAY BE ATTORNEY-CLIENT PRIVILEGED. ANY UNAUTHORIZED DISCLOSURE, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED.

IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TO THE SENDER AT THE ABOVE ADDRESS VIA U.S. POSTAL SERVICE. WE WILL REIMBURSE YOU FOR THAT COST. THANK YOU.

Attachment 5  
Page 2 of 10  
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REPORTS ANALYSIS  
DIVISION

**BELL, MCANDREWS & HILTACHK**

ATTORNEYS AND COUNSELORS AT LAW

455 CAPITOL MALL, SUITE 601  
SACRAMENTO, CALIFORNIA 95814

(916) 442-7757

FAX (916) 442-7759

www.BMHlaw.com

CHARLES H. BELL, JR.  
COLLEEN C. MCANDREWS  
THOMAS W. HILTACHK  
JEFFREY E. LANGAN

1441 FOURTH STREET  
SANTA MONICA, CA 90401  
(310) 458-1406  
FAX (310) 324-4028

MAR 16 3 24 PM '98

March 16, 1998

BY FACSIMILE AND U.S. MAIL

Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
999 E Street, N.W.  
Washington DC 20463

Re: Your Letter of February 25, 1998  
to Susan Limon, Treasurer  
Tenet Healthcare Corporation PAC  
No. C00119354 (Year End Report 12/31/97)

Dear Mr. Evans:

This letter is sent on behalf of Susan Limon, Treasurer, and the Tenet Healthcare Corporation Political Action Committee in response to your above-referenced letter.

The committee is filing an amendment with respect to the first item on the preliminary review letter.

This is to respond further to the item concerning possible violation of 2 U.S.C. § 441a(a). This is to confirm that the committee had responded to a similar inquiry last year and had received no response indicating that the explanation given was inadequate, and had, justifiably, believed that response and explanation had been accepted.

We now understand that another Reports Analyst for the recipient, Federation of American Health Systems PAC, may have received approval for the transaction, as explained by that PAC (Copy of Letter attached.)

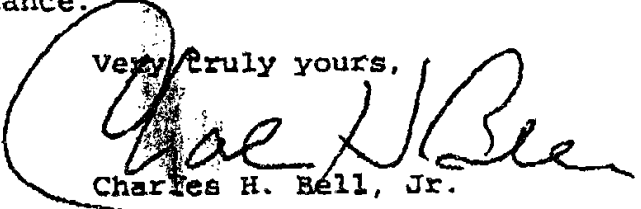
CONFIDENTIAL ATTORNEY-CLIENT PRIVILEGE

Letter to Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
March 16, 1998  
Page 2

If your office has concluded that Federation of American Health Systems PAC's response is satisfactory, please advise us. If not, we will respond further to your inquiry.

Thank you for your assistance.

Very truly yours,



Charles H. Bell, Jr.

CHB:ljs  
1015.01

Attachment

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
REPORTS ANALYSIS  
DIVISION

## FOLEY &amp; LARDNER

ATTORNEYS AT LAW

Mar 16 3 24 PM '98

CHICAGO  
JACKSONVILLE  
LOS ANGELES  
MADISON  
MILWAUKEE  
ORLANDO  
SACRAMENTO  
SAN DIEGO2029 CENTURY PARK EAST, 38TH FLOOR  
LOS ANGELES, CALIFORNIA 90067-3081  
TELEPHONE (310) 577-2233  
FACSIMILE (310) 597-8679

WINTER'S DIRECT LINE

(310) 975-7733

SAN FRANCISCO  
TALLAHASSEE  
TAMPA  
WASHINGTON D.C.  
WEST PALM BEACHLEON FOLEY (1996-1978)  
LYNARD LARDNER, JR. (1915-1972)FILE NUMBER  
127671-903

February 24, 1998

Ms. Melissa Hurd  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463Re: Federation of American Health Systems Political  
Action Committee - January, 1998 Report (12/1/97-  
12/31/97)

Dear Ms. Hurd:

This is in response to your letter dated February 18, 1998, addressed to  
Sylvia Ulrich, Treasurer of the above-referenced organization ("FedPac").

Your first inquiry addresses whether the receipt of a \$35,350 check from  
Tenet Healthcare Corporation PAC (the "Tenet PAC") in December 1997 exceeded the  
\$5,000 per person annual contribution limit. I believe it did not since the FedPac  
January report inadvertently miscategorized this contribution as having been received  
directly from the Tenet PAC. In fact, these amounts were actually individual  
contributions sent to the Tenet PAC but which were earmarked for FedPac. I have  
enclosed a list of these donors and the amount of their earmarked contributions for  
your review. The reattribution rules contained in 11 CFR § 110.1(k) permit these  
contributions to be treated as if they had been made directly to FedPac.

ESTABLISHED 1942

A member of the American Bar Association is located in NEW YORK, NEW YORK, CHICAGO, ILLINOIS, PHILADELPHIA, PENNSYLVANIA, SAN FRANCISCO, CALIFORNIA, SEATTLE, WASHINGTON, AND ST. LOUIS, MISSOURI.

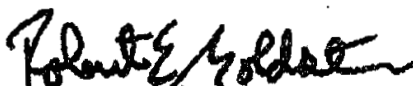
FOLEY &amp; LARDNER

Ms. Melissa Hurd  
February 24, 1998  
Page 2

I have also enclosed a revised Detailed Summary Page reflecting the correct amount shown on Line 21 for FedPac's January, 1998 month report reflecting December 1997 activity.

Please call me if you have any further questions regarding these matters.

Sincerely,

  
Robert E. Goldstein

REG:pab  
Enclosures

REG\LETTER\254741.1

99 "04" 302 "1163



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than an Authorized Commit.  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
REPORTS ANALYSIS  
DIVISION

MAR 16 3 24 PM '98

1. NAME OF COMMITTEE (in full) FEDERATION OF AMERICAN HEALTH SYSTEMS POLITICAL ACTION COMMITTEE		2. FEC IDENTIFICATION NUMBER C00002261
ADDRESS Number and street <input type="checkbox"/> Check if different than previously reported 1111 18th Street N.W., Suite 402		
CITY, STATE and ZIP CODE Washington, D.C. 20036		
3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

## 4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

(b) Is this Report an Amendment? ☒ Yes ☐ No

## Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☒ January 31

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
 election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report preceding following the General Election  
 on \_\_\_\_\_ in the State of \_\_\_\_\_

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 12/01/97 through 12/31/97		
6. (a) Cash on Hand January 1, 1997		102,124.04
(b) Cash on Hand at Beginning of Reporting Period	86,094.40	
(c) Total Receipts (from Line 19)	38,817.50	82,021.24
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(d) for Column B	124,911.90	184,145.28
7. Total Disbursements (from Line 20)	6,000.00	89,825.04
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	118,911.90	94,320.24
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.		
Type or Print Name of Treasurer SYLVIA UNLICH		
Signature of Treasurer		Date

For further information contact:  
Federal Election Commission  
900 E. Street, NW  
Washington, DC 20463  
Toll Free 800-424-9530  
Local 202-319-3430

NOTE: Submission of false, erroneous, or incomplete information may subject the person filing this Report to the penalties of 2 U.S.C. 1432g.

FEC FORM 1X  
Revised 3-93

**DETAILED SUMMARY PAGE****OF RECEIPTS AND DISBURSEMENTS****PAGE 2, FEC FORM 3X**

Page 7 of 10

(revised 1/1/91)

NAME OF COMMITTEE: Federation of American Health Systems Political Action Committee CO0002281		REPORT COVERING PERIOD FROM: 12/01/87 TO: 12/31/87	
		COLUMN A Total This Period	COLUMN B Calendar Year
<b>I. Receipts</b>			
11. Contributions (other than loans) from:			
a. Individual Persons Other Than Political Committees			
1. Named (see Schedule A)	100.00	23,680.00	
2. Unnamed		305.00	
3. Total (add 1 and 2)	100.00	23,985.00	
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contributions (add a, b and c)	35,380.00	48,782.00	
12. Transfers from Affiliated/Other Party Committees			
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets to Operating Expenditures (Refunds, Rebates, etc.)			
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Gifts, Interest, etc.)	67.80	3,408.24	
18. Transfers from Nonfederal Account for Joint Activity			
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18)	35,447.80	52,190.24	
20. Total Federal Receipts (subtract line 18 from line 19)	35,380.00	48,782.00	
<b>B. Disbursements</b>			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
1. Federal Share			
2. Non-Federal Share			
b. Other Federal Operating Expenditures		1,781.00	
c. Total Operating Expenditures (add a 1, a 2, and b)		1,781.00	
22. Transfers to Affiliated/Other Party Committees			
23. Contributions to Federal Candidates/Committees and Other Political Committees	6,000.00	88,771.00	
24. Independent Expenditures (see Schedule E)			
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d) (see Schedule F)			
26. Loan Repayments Made			
27. Loans Made			
28. Refunds of Contributions To:			
a. Individual Persons Other Than Political Committees			
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds (add a, b and c)			
29. Other Disbursements		3.00	
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28e, and 29)	6,000.00	90,555.00	
31. Total Federal Disbursements (subtract line 21a 5 from line 30)	6,000.00	88,771.00	
<b>III. Net Contributions/Operating Expenditures</b>			
32. Total Contributions (other than loans) (from line 11d)	35,440.00	79,627.00	
33. Total Contribution Refunds (from line 28d)	-0-	-0-	
34. Net Contributions (other than loans) (from line 32 from 33)	35,440.00	79,627.00	
35. Total Federal Operating Expenditures (add line 21a 1 and 21b)	-0-	1,781.00	
36. Offsets to Operating Expenditures (from line 15)	-0-	-0-	
37. Net Operating Expenditures (subtract line 35 from 36)	-0-	1,781.00	

JAN 21 1998 3:38AM

TELETYPE UNIT ANNEX 1

Remarked Trust-PAC Contributors

Jeffrey Barbakow, Chairman & CEO \$3,000.00  
1187 Coast Village Road  
Suite 1-166  
Santa Barbara, CA 93108

Jim Bilcz, Senior Vice President \$1,500.00  
2204 Crown Knoll Lane  
Plano, TX 75093

Steve Biaka, Vice President \$ 300.00  
825 Buckingham Place  
Danville, CA 94506

Norman S. Bobes, M.D. \$1,500.00  
3535 Gillespie, Apt. 2D  
Dallas, TX 75219

Stephen Brown, Senior Vice President \$1,500.00  
636 Oakdale Drive  
Plano, TX 75025

Scott Brown, Senior Vice President \$1,500.00  
885 Park Lane  
Santa Barbara, CA 93108

Thomas E. Casaday, Vice President \$ 750.00  
4421 Knollview  
Plano, TX 75024

David S. Dearman, Vice President \$ 500.00  
4836 Holly Tree Drive  
Dallas, TX 75287

Alan Ewatt, Senior Vice President \$1,500.00  
396 Hot Springs Road  
Montecino, CA 93108

Michael Fecht, Sr., President & COO \$3,000.00  
P.O. Box 703  
Santa Ynez, CA 93460-0703

JAN 21 1998 3:38AM

TELETYPE UNIT ANNEX 1

Page 9 of 10

Douglas Fritsche, Vice President  
2142 S. Catalina Circle  
Mesa, AZ 85202

\$ 500.00

Reynold J. Jennings, Senior Vice President  
236 Evangeline Drive  
Mandeville, LA 70471

\$1,500.00

Dennis Jorgensen, Senior Vice President  
3125 Fawn Canyon Road  
Santa Ynez, CA 93460

\$1,500.00

Ben F. King, Senior Vice President  
5724 Mixed Branch Drive  
Plano, TX 75093

\$ 750.00

Kenneth B. Love, Jr., Vice President  
16 Ashton  
Mission Viejo, CA 92692

\$ 500.00

Thomas Mackey, Executive Vice President  
P.O. Box 834  
Rancho Santa Fe, CA 92067

\$2,500.00

William Murray, Senior Vice President  
10371 E. Desert Cove Avenue  
Scottsdale, AZ 85260

\$1,600.00

Karen Poole, Vice President  
11555 N. 127th Way  
Scottsdale, AZ 85259

\$ 750.00

J. Scott Richardson, Vice President  
2400 Piedra Drive  
Plano, TX 75023

\$ 500.00

Berry Schocher, Executive Vice President  
5200 Keller Springs Road, #1212  
Dallas, TX 75248

\$1,500.00

W. Randolph Smith, Executive Vice President  
2908 Masters Circle  
Plano, TX 75093

\$2,500.00

JAN 21 1998 3:39AM

T8 WALTHAM ANNEX 1

4427759 P.28/28  
Page 10 of 10

Neil Sorrentino, Senior Vice President  
4440 Deer Ridge Road  
Danville, CA 94506

\$1,500.00

Don S. Steigman, Senior Vice President  
837 N.W. 110th Avenue  
Coral Springs, FL 33071

\$1,500.00

Ed Tudanger, Senior Vice President  
415 Laurel Chase Court  
Atlanta, GA 30327

\$1,000.00

Michael E. Tyson, Vice President  
13917 St. Michael Drive  
Little Rock, AR 72211

\$ 500.00

Kenneth K. Westbrook, Vice President  
33801 Blinnington Lane  
San Juan Capistrano, CA 92675

\$ 750.00

Barry A. Wolfman, Vice President  
20 Callender Court  
Laguna Niguel, CA 92677

\$ 750.00

---

\$35,350.00

FEB 28 '98 11:27

PAGE.08

\*\* TOTAL PAGE.08 \*\*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

March 19, 1998

Susan Limon, Treasurer  
Tenet Healthcare Corporation  
Political Action Committee  
3820 State Street  
Santa Barbara, CA 93105

Identification Number: C00119354

Reference: Year End Report (7/1/97-12/31/97)

Dear Ms. Limon:

On February 25, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 5, 1998 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your response provided a letter from the recipient committee of your earmarked contributions, Federation of American Health Systems PAC (FedPac). FedPac explained in their letter that the contribution from your committee was actually individual contributions sent to the Tenet PAC but earmarked for FedPac. These contributions, therefore, would not count against Tenet PAC's contribution limits, but annual individual limits.

An SSF, Tenet PAC, may act as a conduit for earmarked contributions. An earmarked contribution counts against the original contributor's contribution limits. It does not count against the limits on the SSF's own contributions unless the SSF exercises direction or control over the contributor's choice of the recipient committee or unless the earmarked contribution was solicited by the connected organization. 11 CFR §110.6(d). If the earmarked contribution was solicited from the restricted class by a communication from the SSF's connected organization and was

collected by the SSF, it is considered a contribution to both the SSF and the recipient committee, and from both the individual contributor and the SSF.

Your Schedule B disclosing the disbursement of the earmarked contributions to FedPac states - "Earmarked Contributions solicited through Tenet-PAC". Please clarify your solicitation efforts (i.e., who makes the solicitation and is there any mention of contributing to FedPac in the solicitation). Additionally, please provide a copy of your solicitation.

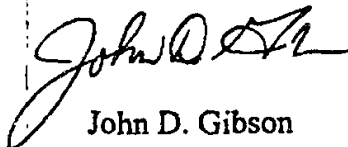
If the contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee.

If this information is not received by the Commission 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 Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
REPORTS ANALYSIS  
DIVISION

APR 15 12 43 PM '98

BELL, McANDREWS & HILTACHK

ATTORNEYS AND COUNSELORS AT LAW

455 CAPITOL MALL, SUITE 801

SACRAMENTO, CALIFORNIA 95814

(916) 442-7757

FAX (916) 442-7759

CHARLES H. BELL, JR.  
COLLEEN C. McANDREWS  
THOMAS W. HILTACHK  
JEFFREY E. LANGAN  
JAMES F. SWEENEY  
OF COUNSEL

1441 FOURTH STREET  
SANTA MONICA, CA 90401  
(310) 456-1408  
FAX (310) 384-4028  
www.BMHlaw.com

## FAX TRANSMITTAL

DATE: April 15, 1998

TIME: 8:30am

FROM: Charles H. Bell, Jr.

cbell@bmhlaw.com

TO: Mr. Neal Evans

FAX #: 202-219-3496

Number of pages (including this cover sheet): 3

Please deliver IMMEDIATELY to the above-named individual. If there are any problems with receipt of this transmission or quality of the copy received, please call me at (916) 442-7757.

ORIGINAL WILL FOLLOW BY:

Regular Mail ☒ Yes ☐ No

Overnight Mail ☐ Yes ☒ No

COMMENTS: \_\_\_\_\_

THIS COMMUNICATION IS INTENDED FOR THE USE OF THE PERSON TO WHOM IT IS ADDRESSED, AND MAY BE ATTORNEY/CLIENT PRIVILEGED. ANY UNAUTHORIZED DISCLOSURE, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED.

IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TO THE SENDER AT THE ABOVE ADDRESS VIA U.S. POSTAL SERVICE. WE WILL REIMBURSE YOU FOR THAT COST. THANK YOU.



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ATTORNEYS AND COUNSELORS AT LAW

400 CAPITOL MALL, SUITE 801

SACRAMENTO, CALIFORNIA 95814

(916) 442-7757

FAX (916) 442-7759

CHARLES H. BELL, JR.  
COLLEEN C. MCANDREWS  
THOMAS W. HILTACHK  
JEFFREY E. LANGAN  
JAMES P. SWEENEY  
OF COUNSEL

1441 FOURTH STREET  
SANTA MONICA, CA 90401  
(310) 458-1906  
FAX (310) 394-4028  
www.BMH&W.com

April 14, 1998

BY FACSIMILE AND U.S. MAIL

Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
999 E Street, N.W.  
Washington DC 20463

Re: Your Letters to Susan Limon, Treasurer  
Tenet Healthcare Corporation PAC  
No. C00119354 (Year End Report 12/31/97)

Dear Mr. Evans:

This letter is sent on behalf of Susan Limon, Treasurer, and the Tenet Healthcare Corporation Political Action Committee in response to your above-referenced letter.

This is to respond further to the letters concerning possible violation of 2 U.S.C. § 441a(a) from you and from John Gibson.

The committee is communicating with the recipient of the contribution in question, Federation of American Health Systems PAC, concerning reporting and possible refund. I will further advise you of the status of the response when we have completed communications with the recipient, which I expect will occur within the next few days.

As you may know, the committee believed it had fully complied with FECA and understood that the lack of FEC response to its own response to a similar inquiry last year reflected the FEC's conclusion that the explanation given last year was adequate, and had, justifiably, relied upon that response. However, the committee wishes to act with an abundance of caution, and fully comply with the FEC's conclusions and direction.

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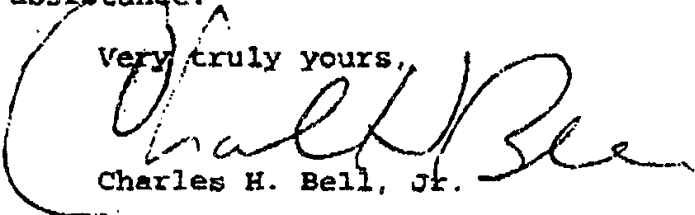
APR 15 12 43 PM '98

BY FACSIMILE AND U.S. MAIL

Letter to Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
April 14, 1998  
Page 2

Please contact me if you have any questions about this response. Thank you for your assistance.

Very truly yours,

  
Charles H. Bell, Jr.

CHB:ljs

1015.01

cc: Susan Limon, Treasurer

**TELECON**

<b>ANALYST:</b>	Neil Evans
<b>COMMITTEE:</b>	Tenet Healthcare Corporation Political Action Committee (C00119354)
<b>SUBJECT(S):</b>	Excessive contribution to FedPAC

<b>DATE:</b>	April 20, 1998
<b>CONVERSATION WITH:</b>	1. Susan Limon, Treasurer 2. Charles Bell, Jr.

1. The analyst called Susan Limon. The out-going message of her voice mail stated that she would be out of the office through April 27, 1998.
2. (a) The analyst called Charles Bell, Jr. and left a message for him to return the call concerning the Committee.  
  
(b) Mr. Bell returned the initial phone call. He was informed that the Committee had not provided an adequate response by clarifying the solicitor, had not informed the Commission if the solicitation mentions making contributions to FedPAC, provided a copy of the solicitation, or used the proper disclosure methods for earmarked contributions. The analyst faxed Mr. Bell a copy of the Second Notice, Appendix D. Earmarked Contributions of the Campaign Guide for Corporations and Labor Organizations, and an example of proper disclosure for earmarked contributions. Mr. Bell stated the Committee was eager to resolve this issue and that an amendment would be forthcoming.

ANALYST:	Neil Evans
COMMITTEE:	Federation of American Health Systems Political Action Committee (C00002261)
SUBJECT(S):	Excessive contribution to FedPAC

DATE:	May 6, 1998
CONVERSATION WITH:	Tom Scully, President and Executive Officer of the Federation of American Health Systems

The analyst of the Committee and the analyst of FedPAC met with Mr. Tom Scully, President and Executive Officer of the Federation of American Health Systems. He asked what further clarification was required by either committee in order to illustrate that the contributions were properly earmarked through the Committee for FedPAC. He showed the analysts copies of earmarked contribution checks from individuals which were consolidated by Tenet PAC into one earmarked check to FedPAC. Mr. Scully wanted to insure that the committees illustrated that the contributions should not count against the contribution limits of the Committee to Fed PAC.

The analyst explained the corrections which were necessary to correct FedPACs May 4, 1998 Amended Year End Report in order to correctly disclose earmarked contributions. Mr. Evans stated the need for clarification of the Committees' solicitation method, preferably by including a copy of the solicitation, in order for the committees to illustrate exactly who solicited the individuals (the Committee or the connected organization), and for whom money was solicited. Mr. Scully was provided with Appendix D. Earmarked Contributions of the Campaign Guide for Corporations and Labor Organizations.

Mr. Scully stated that he had a copy of the Tenet PAC solicitation, but he would like to further speak with the representatives of the Committee before turning a copy over to the Commission. Mr. Scully also stated that FedPAC was not permitted by the Committee to directly solicit its members. Instead, the Committee agreed to reach their \$35,000 contribution goal to FedPAC by earmarking contributions. He said that he hoped we were not naive, but what really happens is that he tells the Board of Directors of a member corporation that FedPAC needs money, and it is time to meet their financial goal of contributions that were previously agreed upon.

Mr. Scully stated that if necessary, they would return the contribution, and ask that the individuals write a check directly to FedPAC. But of course, they would like to avoid the additional work and potential loss of contributions. He also provided copies of several checks from individuals he knows, which were earmarked for FedPAC through the Committee. He asked what the Committee had provided the Commission. Mr. Evans told him that he had spoken with the attorney Mr. Charles Bell, but the Committee has not provided an adequate response to the Commission RFAI's. Mr. Scully said that he knew Mr. Bell, and that he knows that he is not familiar with campaign finance. He stated that he would get in touch with him regarding filing an amendment, and that he would provide amendments by Monday, May 11, 1998.

BELL, MCANDREWS, FORT & HILTACHN  
ATTORNEYS AND COUNSELORS AT LAW  
455 CAPITOL MALL, SUITE 801  
SACRAMENTO, CALIFORNIA 95833

(916) 442-7757

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www.BMHlaw.com

CHARLES H. BELL, JR.  
COLLEEN C. MCANDREWS  
THOMAS W. HILTACHN  
JEFFREY E. LANGAN

1441 FOURTH STREET  
SANTA MONICA, CA 90401  
(310) 456-1405  
FAX (310) 394-4026

May 19, 1998

FEDERAL EXPRESS

Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
999 E Street, N.W.  
Washington DC 20463

Re: Tenet Healthcare Corporation PAC  
No. C00119354 (Year End Report 12/31/97); monthly  
report due on February 20, 1998 (January 1, 1998 -  
January 31, 1998); and monthly report due on March 20,  
1998 (February 1, 1998 - February 28, 1998).

Dear Mr. Evans:

This letter is in response to the recent inquiries of Susan Limon, Treasurer, and the Tenet Healthcare Corporation Political Action Committee, and its transfer of earmarked contributions to the Federation of American Health Systems PAC ("Fed PAC").

We appreciate your efforts to help Tenet PAC accurately reflect the contributions, including your recent meeting with Mr. Tom Scully of Fed PAC last week to clarify the Commission's request for additional information.

After discussing the issues further with Mr. Scully, and in accordance with my earlier letter, Tenet PAC has attached an amended report that we hope will address and resolve all questions. The amendment includes:

- (1) Schedule A (of all three amended reports) receipts identifying all individual contributions to Tenet PAC who also earmarked their contributions to Fed PAC. There is a notation on each itemized contribution block noting that the contribution was earmarked for Fed PAC.
- (2) Schedule B on Year End Report, reports a \$35,350.00 transfer on December 22, 1998, from Tenet PAC to Fed

BY FACSIMILE AND U.S. MAIL

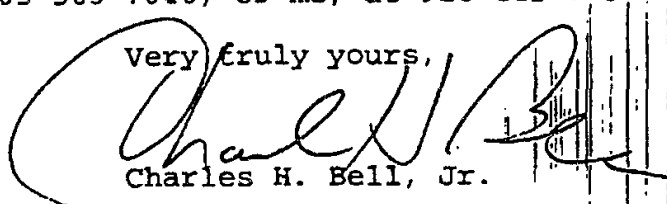
Letter to Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
May 19, 1998  
Page 2

PAC in a single check. Schedule B on February 20, 1998 report, reports a \$4,250.00 transfer from Tenet PAC to Fed PAC in a single check. Schedule B on March 20, 1998 report, reports a \$370.00 transfer from Tenet PAC to Fed PAC in a single check. Additionally, "memo entries" are reported on Schedule B (mirroring the Schedule A earmarked receipts) for each individual contribution that was earmarked for Fed PAC.

- (3) Additionally, per your request, the boilerplate version of the Tenet PAC solicitation that was sent to employees is attached. This letter shows that the solicitation was from Tenet PAC, not from the corporation.

It is our understanding that Fed PAC will also file clarifying amendments. Again, thank you for your additional guidance. If you have any questions, please feel free to contact Susan Limon, Treasurer, at 805-563-7046, or me, at 916-442-7757.

Very truly yours,

  
Charles H. Bell, Jr.

CHB:ljs

1015.01

Enclosure

cc: Susan Limon, Treasurer

Tenet  
Healthcare  
Corporation

DATE

FIELD(2) FIELD(3) FIELD(1)

FIELD(5)

FIELD(6)

Political  
Action  
Committee

Dear FIELD(4):

I am writing to ask for your support of Tenet-PAC, Tenet Healthcare Corporation's political action committee. Tenet is involved in the governmental process through employee participation in Tenet-PAC. A political action committee is the *only* way a corporation like Tenet can contribute to federal candidates and officeholders and to campaigns in certain states.

Your participation in Tenet-PAC gives us a strong voice in the legislative process through our support of candidates who understand our industry's needs and concerns. Tenet-PAC helps to ensure that the views and ideas of the corporation and its employees are heard in the political process. I am sure you have heard the saying, "there's strength in numbers." The same holds true in membership in Tenet-PAC. By pooling voluntary employee contributions, Tenet-PAC has a greater impact on the issues affecting our industry.

Healthcare continues to capture the public's attention. As a health services provider in 22 states, Tenet is concerned about the effects that state and federal legislation, regulation, and funding have on its ability to deliver high quality care and services. Through Tenet-PAC, we are able to voice our concerns, ideas and views to those who have the ability to impact our industry, namely elected officials at the federal, state and local levels.

The forthcoming campaign cycle will prove to be a significant drain on the PAC's financial resources. Tenet-PAC funds are used on an on-going basis, which is why you may want to consider using payroll deductions as a method of participation. Membership is *voluntary* and the amount you contribute is entirely up to you. To join, simply fill out the membership form and return it to Janelle Blanco in government relations at the Corporate Office in Santa Barbara by February 27, 1998.

The decisions made in Congress and in our state legislatures will have a dramatic impact on Tenet and the entire health care delivery system. By becoming an active member in Tenet's political program, you will be making a vital investment in your future and in the future of our industry. I urge you to return your completed enrollment form today.

Best wishes,



Michael H. Focht, Sr.

*Contributions to Tenet-PAC are not deductible for federal income tax purposes.*

3820 State Street  
Santa Barbara,  
California 93105  
(805) 563-7000

TENET



**REPORT OF RECEIPTS AND DISBURSEMENTS**For Other Than An Authorized Committee  
(Summary Page)RECEIVED  
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COMMISSION MAIL ROOM  
9 51 AM '98USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (In full) Tenet Healthcare Corporation Political Action Committee (Tenet PAC)		2. FEC IDENTIFICATION NUMBER C00119354
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 3820 State Street		
CITY, STATE and ZIP CODE Santa Barbara, CA 93105		
3. <input checked="" type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M) prior to 1/1/94		

**4. TYPE OF REPORT**

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

- ☐ 12-Day Pre-Election Report for the \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ 30-Day Post-Election Report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_

- (b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	07/01/97 through 12/31/97		
6. (a) Cash on Hand January 1, 1997			\$63,313.73
(b) Cash on Hand at Beginning of Reporting Period		\$ 69,674.48	
(c) Total Receipts (from Line 12)		\$ 57,618.00	\$75,478.75
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 127,292.48	\$138,792.48
7. Total Disbursements (from Line 30)		\$ 89,550.00	\$101,050.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 37,742.48	\$ 37,742.48
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 0.00	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20483 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 0.00	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			
Type or Print Name of Treasurer Susan Limon, Treasurer			
Signature of Treasurer <i>Susan Limon</i>			Date 5/18/98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

**FEC FORM 3X**  
(revised 9/93)

NAME OF COMMITTEE

Genet Healthcare Corporation Political Action Committee

REPORT COVERING PERIOD

FROM 07/01/97

TO 12/31/97

**I Receipts**

## 11. Contributions (other than loans) From:

## a. Individual/Persons Other Than Political Committees

I. Itemized (use Schedule A) .....

II. Unitemized .....

III. Total ..... (add I and II) &gt;

## b. Political Party Committees .....

## c. Other Political Committees (such as PACs) .....

d. Total Contributions ..... (add a II, b and c) &gt;

## 12. Transfers From Affiliated/Other Party Committees .....

## 13. All Loans Received .....

## 14. Loan Repayments Received .....

## 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) .....

## 16. Refunds of Contributions Made to Federal Candidates and Other Political Committees .....

## 17. Other Federal Receipts (Dividends, Interest, etc.) .....

## 18. Transfers from Nonfederal Account for Joint Activity .....

19. Total Receipts ..... (add 11d, 12, 13, 14, 15, 16, 17, and 18) &gt;

20. Total Federal Receipts ..... (subtract line 18 from line 19) &gt;

**II Disbursements**

## 21. Operating Expenditures:

## a. Shared Federal/Non-Federal Activity (from Schedule H4)

I. Federal Share .....

II. Non-Federal Share .....

## b. Other Federal Operating Expenditures .....

c. Total Operating Expenditures ..... (add a I, a II, and b) &gt;

## 22. Transfers to Affiliated/Other Party Committees .....

## 23. Contributions to Federal Candidates/Committees and Other Political Committees .....

## 24. Independent Expenditures (use Schedule E) .....

## 25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) ..

## 26. Loan Repayments Made .....

## 27. Loans Made .....

## 28. Refunds of Contributions To:

a. Individual/Persons Other Than Political Committees .....

b. Political Party Committees .....

c. Other Political Committees (such as PACs) .....

d. Total Contribution Refunds ..... (add a, b and c) &gt;

## 29. Other Disbursements .....

30. Total Disbursements ..... (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) &gt;

31. Total Federal Disbursements ..... (subtract line 21 a II from line 30) &gt;

**III Net Contributions/Operating Expenditures**

## 32. Total Contributions (other than loans)(from line 11d) .....

## 33. Total Contribution Refunds (from line 28d) .....

## 34. Net Contributions (other than loans)(subtract line 33 from 32) .....

35. Total Federal Operating Expenditures ..... (add 21 a I and 21 b) &gt;

## 36. Offsets to Operating Expenditures (from line 15) .....

37. Net Operating Expenditures ..... (subtract line 36 from 35) &gt;

SCHEDULE A ITEMIZED RECEIPTS  
Contributions from Individuals/PersonsPAGE 1 OF 25  
FOR LINE NUMBER 11aNAME OF COMMITTEE(in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Richard Ahrens 1708 Cherrybrook Macogdoches, TX 75961-	Macogdoches Medical Center Chief Operating Officer	07/02/97	\$50.00
		07/25/97	\$50.00
		08/28/97	\$50.00
		10/03/97	\$25.00

Aggregate YTD &gt; \$450.00

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Steven Altmiller 6211 Edenbrook Drive Sugar Land, TX 77479-	Twelve Oaks Hospital Chief Executive Officer	07/02/97	\$40.00
		07/25/97	\$40.00
		08/28/97	\$40.00
		10/03/97	\$60.00
		10/31/97	\$40.00
		12/01/97	\$40.00
12/29/97	\$40.00		

Aggregate YTD &gt; \$520.00

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Frank Arambula 3003 Piedmont Avenue La Crescenta, CA 91214-	USC University Hospital Chief Financial Officer	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
12/29/97	\$20.00		

Aggregate YTD &gt; \$260.00

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Jeffrey C. Barbakow 1187 Coast Village Road Suite 1-166 Santa Barbara, CA 93108-	Tenet Healthcare Corp. Chief Executive Officer	11/13/97	\$3,000.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC  
Aggregate YTD > \$3,000.00

SUBTOTAL of Receipts This Page .....&gt; \$3,625.00

TOTAL This Period .....&gt;

SCHEDULE A ITEMIZED RECEIPTS  
Contributions from Individuals/Persons

PAGE 2 OF 25  
FOR LINE NUMBER 11a

NAME OF COMMITTEE (in Full)

Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Jeff Barron 1321 Kitchen, #2 Jonesboro, AR 72401-	Methodist Hosp. of Jonesboro	07/02/97	\$20.00
	Chief Financial Officer	07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$10.00

Aggregate YTD > \$210.00

John Bealle 10530 Hamlin Boulevard Largo, FL 34644-	Tenet Healthcare Corp.	07/02/97	\$20.00
	Director	07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD > \$260.00

Jim Biltz 2204 Crown Knoll Lane Plano, TX 75093-	Tenet Healthcare Corp. Senior Vice President	11/13/97	\$1,500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$1,500.00

Steven Blake 823 Buckingham Place Danville, CA 94506-	Tenet Healthcare Corp. Vice President	11/18/97	\$500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$500.00

SUBTOTAL of Receipts This Page > \$2,250.00

TOTAL This Period >

SCHEDULE A                      ITEMIZED RECEIPTS                      PAGE 3 OF 25  
Contributions from Individuals/Persons                      FOR LINE NUMBER 11a

NAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Janelle Blanco	Tenet Healthcare Corp.	07/02/97	\$20.00
1111 Atlee Drive	Government Relations	07/25/97	\$20.00
La Canada, CA 91011-		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD >      \$260.00

Norman S. Bobes, M.D. 3535 Gillespie Apt. 2D Dallas, TX 75219	Tenet Healthcare Corp. Senior Vice President	11/13/97	\$1,500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD >      \$1,500.00

Conley Boyd	Tenet Healthcare Corp.	07/02/97	\$24.00
631 St. Andrews Place	Director	07/25/97	\$24.00
Coppell, TX 75019-		08/28/97	\$24.00
		10/03/97	\$36.00
		10/31/97	\$24.00
		12/01/97	\$24.00
		12/29/97	\$24.00

Aggregate YTD >      \$312.00

SUBTOTAL of Receipts This Page .....>      \$1,830.00  
TOTAL This Period .....>

SCHEDULE A ITEMIZED RECEIPTS  
Contributions from Individuals/Persons  
PAGE 4 OF 25  
FOR LINE NUMBER 11aNAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Glenda Brogden 2085 Cahaba Crest Drive Hoover, AL 35242-	Brookwood Medical Center	07/02/97	\$20.00
	Chief Operating Officer	07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD &gt; \$260.00

Scott Brown 885 Park Lane Montecito, CA 93108-	Tenet Healthcare Corp. General Counsel	11/21/97	\$1,500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD &gt; \$1,500.00

Stephen Brown 636 Oakdale Drive Plano, TX 75025-	Tenet Healthcare Corp. Senior Vice President	11/17/97	\$1,500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD &gt; \$1,500.00

Mark H. Bryan 10378 N.W. 63rd Drive Parkland, FL 33076-	Tenet Healthcare Corp.	07/02/97	\$38.50
	Vice President, Finance	07/25/97	\$38.50
		08/28/97	\$38.50
		10/03/97	\$57.75
		10/31/97	\$38.50
		12/01/97	\$38.50
		12/29/97	\$38.46

Aggregate YTD &gt; \$500.46

SUBTOTAL of Receipts This Page &gt; \$3,438.71

TOTAL This Period &gt;

SCHEDULE A  
ITEMIZED RECEIPTS  
Contributions from Individuals/Persons

PAGE 5 OF 25  
FOR LINE NUMBER 11a

NAME OF COMMITTEE(In Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Albert Canete 671 Quincy Avenue Long Beach, CA 90804-	Tenet Healthcare Corp.	07/02/97	\$40.00
	Vice President, Finance	07/25/97	\$40.00
		08/28/97	\$40.00
		10/03/97	\$60.00
		10/31/97	\$40.00
		12/01/97	\$40.00
		12/29/97	\$40.00

Aggregate YTD > \$520.00

Thomas Casaday 4421 Knollview Drive Plano, TX 75024-	Tenet Healthcare Corp. Vice President, Operations	12/01/97	\$750.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$750.00

Harold E. Chilton 1032 Vista Grande Paso Robles, CA 93446-	Sierra Vista Reg. Medical Ctr.	07/02/97	\$80.00
	Chief Executive Officer	07/25/97	\$80.00
		08/28/97	\$80.00
		10/03/97	\$120.00
		10/31/97	\$80.00
		12/01/97	\$80.00
		12/29/97	\$80.00

Aggregate YTD > \$1,040.00

David Dearman 4836 Holly Tree Drive Dallas, TX 75287-	Tenet Healthcare Corp. Vice President, Finance	11/19/97	\$500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$500.00

SUBTOTAL of Receipts This Page .....> \$2,150.00

TOTAL This Period .....>

SCHEDULE A  
ITEMIZED RECEIPTS  
Contributions from Individuals/Persons  
PAGE 8 OF 25  
FOR LINE NUMBER 11a

NAME OF COMMITTEE(in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Alan Ewalt 396 Hot Springs Road Montecito, CA 93108-	Tenet Healthcare Corp. Senior Vice President	11/07/97	\$1,500.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$1,500.00

Trevor Fetter 1530 Mimosa Lane Santa Barbara, CA 93108-	Tenet Healthcare Corp.	07/02/97	\$80.00
	Chief Financial Officer	07/25/97	\$80.00
		08/28/97	\$80.00
		10/03/97	\$120.00
		10/31/97	\$80.00
		12/01/97	\$80.00
		12/29/97	\$80.00

Aggregate YTD > \$1,040.00

Michael Focht, Sr. P.O. Box 703 Santa Ynez, CA 93460-0703	Tenet Healthcare Corp.	07/02/97	\$77.00
	President	07/25/97	\$77.00
		08/28/97	\$77.00
		10/03/97	\$115.50
		10/31/97	\$77.00
		12/01/97	\$77.00
		12/05/97	\$3,000.00

Memo: Above contribution (\$3,000.00) earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$4,001.00

Douglas Fritsche 2142 S. Catarina Circle Mesa, AZ 85202-	Tenet Healthcare Corp. Vice President, Finance	11/19/97	\$500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$500.00

SUBTOTAL of Receipts This Page .....> \$6,177.50  
TOTAL This Period .....>



## SCHEDULE A ITEMIZED RECEIPTS

PAGE 9 OF 25

Contributions from Individuals/Persons

FOR LINE NUMBER 11a

## NAME OF COMMITTEE(in Full)

Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Mark Gable	Horton Reg. Medical Center	07/02/97	\$40.00
104 Blanton Court	Chief Financial Officer	07/25/97	\$40.00
Tulahoma, TN 37388-		08/28/97	\$40.00

Aggregate YTD &gt; \$340.00

Michael W. Gallo	Tenet Healthcare Corp.	12/29/97	\$750.00
1523 Rancho Encinitas Drive	Senior Vice President		
Encinitas, CA 92024-			

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD &gt; \$750.00

Truman Gates	Comm. Hospital of Los Gatos	07/02/97	\$40.00
21130 Ambic Knolls Road	Chief Executive Officer	07/25/97	\$40.00
Saratoga, CA 95070-		08/28/97	\$40.00
		10/03/97	\$60.00
		10/31/97	\$40.00
		12/01/97	\$40.00
		12/29/97	\$40.00

Aggregate YTD &gt; \$520.00

Stacey Gerig	Odessa Regional Hospital	07/02/97	\$20.00
3313 Cambridge	Chief Financial Officer	07/25/97	\$20.00
Odessa, TX 79761-		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD &gt; \$260.00

SUBTOTAL of Receipts This Page &gt; \$1,320.00

TOTAL This Period &gt;

SCHEDULE A ITEMIZED RECEIPTS PAGE 12 OF 25  
Contributions from Individuals/Persons FOR LINE NUMBER 11aNAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Reynold J. Jennings 236 Evangeline Drive Mandeville, LA 70471-	Tenet Healthcare Corp. Senior Vice President	11/17/97	\$1,500.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD &gt; \$1,500.00

Janet Johnson	Methodist Hospital of Jonesboro	07/02/97	\$20.00
9096 Valhalla Drive	Chief Operating Officer	07/25/97	\$20.00
Jonesboro, AR 72401-		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD &gt; \$260.00

Dennis Jorgensen	Tenet Healthcare Corp.	11/13/97	\$1,500.00
3325 Fawn Canyon Road	Senior Vice President		
Santa Ynez, CA 93460-			

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD &gt; \$1,500.00

Ben King	Tenet Healthcare Corp.	11/17/97	\$750.00
5724 Misted Breeze Drive	Senior Vice President		
Plano, TX 75093-			

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD &gt; \$750.00

SUBTOTAL of Receipts This Page .....&gt; \$3,900.00

TOTAL This Period .....&gt;

**SCHEDULE A**                      **ITEMIZED RECEIPTS**  
**Contributions from Individuals/Persons**

PAGE 13 OF 25  
 FOR LINE NUMBER 11a

NAME OF COMMITTEE (in Full)  
 Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Matthew Kurs 13629 Seward Street Omaha, NE 68154-	St. Joseph Hospital Chief Executive Officer	07/02/97	\$38.46
		07/25/97	\$38.46
		08/28/97	\$38.46
		10/03/97	\$19.23

Aggregate YTD > \$346.14

Susan Landrum 5364 Southern Avenue Dallas, TX 75209-	Tenet Healthcare Corp. Manager	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
	12/29/97	\$20.00	

Aggregate YTD > \$260.00

David Layne 3061 Green Hill Drive Plano, TX 75093-	Tenet Healthcare Corp. Vice President	07/02/97	\$16.00
		07/25/97	\$16.00
		08/28/97	\$16.00
		10/03/97	\$24.00
		10/31/97	\$16.00
		12/01/97	\$16.00
	12/29/97	\$16.00	

Aggregate YTD > \$208.00

Kenneth B. Love, Jr. 16 Ashton Mission Viejo, CA 92692-	Tenet Healthcare Corp. Vice President, Finance	11/19/97	\$500.00
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Memo: Above contribution earmarked for  
 Federation of American Health Systems Federal PAC

Aggregate YTD > \$500.00

SUBTOTAL of Receipts This Page .....> \$904.61

TOTAL This Period .....>

SCHEDULE A                      ITEMIZED RECEIPTS                      PAGE 14 OF 25  
Contributions from Individuals/Persons                      FOR LINE NUMBER 11a

NAME OF COMMITTEE(in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Jerry Mabry 105 Hi Lo Terrace Hot Springs, AR 71901-	National Park Medical Center Chief Executive Officer	07/02/97	\$40.00
		07/25/97	\$40.00
		08/28/97	\$40.00
		10/03/97	\$60.00
		10/31/97	\$40.00
		12/01/97	\$40.00
		12/29/97	\$40.00

Aggregate YTD > \$520.00

Thomas Mackey P.O. Box 834 Rancho Santa Fe, CA 92067-	Tenet Healthcare Corp. Executive Vice President	12/22/97	\$2,500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$2,500.00

John Mainieri 2901 Swann Avenue Tampa, FL 33609-	Town & Country Hospital Chief Financial Officer	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$10.00

Aggregate YTD > \$210.00

Candace Markwith PO Box 1001 Templeton, CA 93465-	Twin Cities Comm. Hospital Chief Operating Officer	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD > \$260.00

SUBTOTAL of Receipts This Page > \$3,050.00

TOTAL This Period >

SCHEDULE A                      ITEMIZED RECEIPTS                      PAGE 16 OF 25  
Contributions from Individuals/Persons                      FOR LINE NUMBER 11a

NAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Marlene McCormick 17910 Kelly Boulevard, #252 Dallas, TX 75287-6023	Tenet Healthcare Corp. Manager	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD > \$260.00

William M. Murray 10371 E. Desert Cove Avenue Scottsdale, AZ 85260-	Tenet Healthcare Corp. Senior Vice President	11/17/97	\$1,600.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$1,600.00

Edith Novak 3207 Merrick Houston, TX 77025-	Park Plaza Hospital Chief Executive Officer	07/02/97	\$40.00
		07/25/97	\$40.00
		08/28/97	\$40.00
		10/03/97	\$60.00
		10/31/97	\$40.00
		12/01/97	\$40.00
		12/29/97	\$40.00

Aggregate YTD > \$520.00

SUBTOTAL of Receipts This Page .....> \$2,050.00

TOTAL This Period .....>

SCHEDULE A ITEMIZED RECEIPTS PAGE 18 OF 25  
Contributions from Individuals/Persons FOR LINE NUMBER 11a

NAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Karen S. Poole 11555 N 127th Way Scottsdale, AZ 85259-	Tenet Healthcare Corp. Vice President	11/17/97	\$750.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$750.00

Michael Rembis 211 Augusta Palm Desert, CA 92211-	John F. Kennedy Memorial	07/02/97	\$40.00
	Chief Executive Officer	07/25/97	\$40.00
		08/28/97	\$40.00
		10/03/97	\$60.00
		10/31/97	\$40.00
		12/01/97	\$40.00
		12/29/97	\$40.00

Aggregate YTD > \$520.00

Norma Resnader 25217 Markel Santa Clarita, CA 91321-	Tenet Healthcare Corp.	07/02/97	\$50.00
	Director	07/25/97	\$50.00
		08/28/97	\$50.00
		10/03/97	\$75.00
		10/31/97	\$50.00
		12/01/97	\$50.00
		12/29/97	\$25.00

Aggregate YTD > \$625.00

Scott Richardson 2400 Piedra Dr. Plano, TX 75023-	Tenet Healthcare Corp. Vice President, Finance	12/05/97	\$500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$500.00

SUBTOTAL of Receipts This Page .....> \$1,900.00

TOTAL This Period .....>

SCHEDULE A ITEMIZED RECEIPTS PAGE 20 OF 25  
Contributions from Individuals/Persons FOR LINE NUMBER 11a

NAME OF COMMITTEE(In Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Richard Royer 404 Keene Street Columbia, MO 65201-	Columbia Regional Hospital Chief Executive Officer	07/02/97	\$50.00
		07/25/97	\$50.00
		08/28/97	\$50.00
		10/03/97	\$75.00
		10/31/97	\$25.00
		12/29/97	\$25.00

Aggregate YTD > \$550.00

Paul Russell 4244 Avenida DeLa Encinal Malibu, CA 90265-	Tenet Healthcare Corp. Senior Vice President	07/02/97	\$50.00
		07/25/97	\$50.00
		08/28/97	\$50.00
		10/03/97	\$75.00
		10/31/97	\$50.00
		12/01/97	\$50.00
		12/29/97	\$50.00

Aggregate YTD > \$650.00

Arnold R. Schaffer 179 Annandale Road Pasadena, CA 91105-	Encino-Tarzana Reg. Med. Ctr. Chief Executive Officer	07/02/97	\$40.00
		07/25/97	\$20.00

Aggregate YTD > \$280.00

Barry Schochet 5200 Keller Springs Road #1212 Dallas, TX 75248-	Tenet Healthcare Corp. Executive Vice President	12/15/97	\$1,500.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$1,500.00

SUBTOTAL of Receipts This Page .....> \$2,210.00

TOTAL This Period .....>

SCHEDULE A ITEMIZED RECEIPTS  
Contributions from Individuals/Persons

PAGE 22 OF 25  
FOR LINE NUMBER 11a

NAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
W. Randolph Smith 2908 Masters Circle Plano, TX 75093-	Tenet Healthcare Corp. Executive Vice President	12/12/97	\$2,500.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$2,500.00

Neil Sorrentino 4440 Deer Ridge Road Danville, CA 94506-	Tenet Healthcare Corp. Senior Vice President	11/10/97	\$1,500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$1,500.00

Don S. Steigman 837 N.W. 110th Avenue Coral Springs, FL 33071-	Tenet Healthcare Corp. Senior Vice President	07/02/97	\$150.00
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		07/25/97	\$150.00
		08/28/97	\$150.00
		10/03/97	\$225.00
		10/31/97	\$150.00
		11/07/97	\$1,500.00
		12/01/97	\$75.00

Memo: Above contribution (\$1,500.00) earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$3,225.00

Diana Takvam 2121 Beloit Avenue #212 Los Angeles, CA 90025-	Tenet Healthcare Corp. Senior Director	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$20.00
		12/29/97	\$20.00

Aggregate YTD > \$260.00

SUBTOTAL of Receipts This Page .....> \$6,550.00

TOTAL This Period .....>



SCHEDULE A ITEMIZED RECEIPTS PAGE 23 OF 25  
Contributions from Individuals/Persons FOR LINE NUMBER 11a

NAME OF COMMITTEE(in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
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Ed Tudanger 415 Laurel Chase Court Atlanta, GA 30327-	Tenet Healthcare Corp. Regional Director	11/19/97	\$1,000.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$1,000.00

Michael Tyson 13917 St. Michael Drive Little Rock, AR 72211-	Tenet Healthcare Corp. Vice President, Finance	12/01/97	\$500.00
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Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$500.00

Gustavo Valdespino 5 Sunburst Irvine, CA 92612-	Los Alamitos Medical Center Chief Executive Officer	07/02/97 07/25/97 08/28/97 10/03/97 10/31/97 12/01/97 12/29/97	\$40.00 \$40.00 \$40.00 \$60.00 \$40.00 \$40.00 \$40.00
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Aggregate YTD > \$520.00

Philip Walkley, Jr. 2505 Cottonwood Jonesboro, AR 72401-	Methodist Hospital of Jonesboro Chief Executive Officer	07/02/97 07/25/97 08/28/97 10/03/97 10/31/97 12/01/97 12/29/97	\$40.00 \$40.00 \$40.00 \$60.00 \$40.00 \$40.00 \$40.00
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Aggregate YTD > \$520.00

SUBTOTAL of Receipts This Page .....> \$2,100.00

TOTAL This Period .....>

SCHEDULE A ITEMIZED RECEIPTS PAGE 24 OF 25  
Contributions from Individuals/Persons FOR LINE NUMBER 11a

NAME OF COMMITTEE(In Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Steve Wasserman 6432 Fallon Court Plano, TX 75093-	Tenet Healthcare Corp. Director, MSO Systems	07/02/97	\$30.00
		07/25/97	\$30.00
		08/28/97	\$30.00
		10/03/97	\$45.00
		10/31/97	\$30.00
		12/01/97	\$30.00
		12/29/97	\$30.00

Aggregate YTD > \$390.00

Jaime Wesolowski 4024 Lennox Drive New Orleans, LA 70131-	Meadowcrest Hospital Chief Executive Officer	07/02/97	\$38.46
		07/25/97	\$38.46
		08/28/97	\$38.46
		10/03/97	\$57.69
		10/31/97	\$38.46
		12/01/97	\$38.46
		12/29/97	\$38.46

Aggregate YTD > \$499.98

Kenneth K. Westbrook 33801 Blessington Lane San Juan Capistrano, CA 92675-	Tenet Healthcare Corp. Vice President, Operations	12/01/97	\$750.00

Memo: Above contribution earmarked for  
Federation of American Health Systems Federal PAC

Aggregate YTD > \$750.00

Terry Wheeler 343 Parkwood Coppell, TX 75019-	RHD Memorial Medical Center Chief Financial Officer	07/02/97	\$20.00
		07/25/97	\$20.00
		08/28/97	\$20.00
		10/03/97	\$30.00
		10/31/97	\$20.00
		12/01/97	\$10.00

Aggregate YTD > \$230.00

SUBTOTAL of Receipts This Page .....	\$1,383.45
TOTAL This Period .....	

SCHEDULE A      ITEMIZED RECEIPTS      PAGE 25 OF 25  
Contributions from Individuals/Persons      FOR LINE NUMBER 11a1

NAME OF COMMITTEE(in Full)  
Tenet Healthcare Corporation PAC C00119354

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Anthony P. Whitehead 795 Aran Drive Roswell, GA 30076-	Tenet Healthcare Corp. Vice President, Finance	12/23/97	\$500.00
Memo: Above contribution earmarked for Federation of American Health Systems Federal PAC			
Aggregate YTD >		\$500.00	
William Wilson 1809 Sienna Canyon Drive Encinitas, CA 92024-	Tenet Healthcare Corp. Vice President	07/02/97 07/25/97 08/28/97 10/03/97 10/31/97 12/01/97 12/29/97	\$52.00 \$52.00 \$52.00 \$78.00 \$52.00 \$52.00 \$52.00
Aggregate YTD >		\$676.00	
Thomas Wolf 2501 Ohio Drive #B18 Plano, TX 75093-	Tenet Healthcare Corp. Manager	07/02/97 07/25/97 08/28/97 10/03/97 10/31/97 12/01/97 12/29/97	\$32.00 \$32.00 \$32.00 \$48.00 \$32.00 \$32.00 \$32.00
Aggregate YTD >		\$416.00	
Barry Wolfman 20 Callender Court Laguna Niguel, CA 92677-	Tenet Healthcare Corp. Vice President	11/21/97	\$750.00
Memo: Above contribution earmarked for Federation of American Health Systems Federal PAC			
Aggregate YTD >		\$750.00	
SUBTOTAL of Receipts This Page >			\$1,880.00
TOTAL This Period >			\$53,793.08

SCHEDULE B ITEMIZED DISBURSEMENTS  
Contributions to Candidates/Committees

PAGE 2 OF 3  
FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)  
Tenet Healthcare Corporation PAC CDD119354

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Friends of Bob Livingston P.O. Box 6329 New Orleans, LA 70174-6329	Bob Livingston, LA, U.S. House, CD-01	09/11/97	\$2,000.00
Disbursement for [X] Primary			
Ashcroft 2000 911 Main Street Suite 1710 Kansas City, MO 64105-	John Ashcroft, MO, U.S. Senate	09/11/97	\$500.00
Disbursement for [X] Primary			
Democratic Senatorial Campaign 430 South Capitol Street, SE Washington, DC 20003-	DSCC	10/16/97	\$5,000.00
Disbursement for [X] Primary			
Democratic Senatorial Campaign 430 South Capitol Street, SE Washington, DC 20003-	DSCC	10/17/97	\$5,000.00
Disbursement for [X] Primary			
FedPac 1111 19th Street, N.W. Washington, DC 20036-	Federation of American Health Systems PAC	10/23/97	\$5,000.00
Disbursement for [X] Primary			
Coverdell Good Govt. Comm. 3091 Maple Drive Suite 200 Atlanta, GA 30305-	Paul Coverdell, GA, U.S. Senate	11/26/97	\$1,000.00
Disbursement for [X] Primary			
AHAPAC 325 7th Street, NW Washington, DC 20004-	American Hospital Association Political Action Committee	11/26/97	\$5,000.00
Disbursement for [X] Primary			
SUBTOTAL of Disbursements This Page .....			\$23,500.00
TOTAL This Period .....			

**SCHEDULE B**  
**ITEMIZED DISBURSEMENTS**  
 Contributions to Candidates/Committees

 PAGE 3 OF 3  
 FOR LINE NUMBER 23

 NAME OF COMMITTEE (in Full)  
 Tenet Healthcare Corporation PAC C00119354

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

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
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Wyden for Senate P.O. Box 3498 Portland, OR 97208-	Ron Wyden, OR, U.S. Senate	12/10/97	\$1,000.00
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Disbursement for DQ Primary

Mary Landrieu for Senate Comm. PO Box 7037 Metairie, LA 70821-	Mary Landrieu, LA, U.S. Senate	12/17/97	\$1,000.00
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Disbursement for DQ Primary

FedPac 1111 19th Street, N.W. Washington, DC 20036-		12/22/97	\$35,350.00
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(Memo) Above contribution earmarked by Jeffrey C. Barbakow (\$3,000), Jim Biltz (\$1,500), Steven Blake (\$500), Norman S. Bobes, M.D. (\$1,500), Scott Brown (\$1,500), Stephen Brown (\$1,500), Thomas Casaday (\$750), David Dearman (\$500), Alan Ewelt (\$1,500), Michal Focht, Sr. (\$3,000), Douglas Fritzsche (\$500), Reynold J. Jennings (\$1,500), Dennis Jorgensen (\$1,500), Ben King (\$750), Kenneth B. Love, Jr. (\$500), Thomas Mackey (\$2,500), William M. Murray (\$1,600), Karen S. Poole (\$750), Scott Richardson (\$500), Barry Schochet (\$1,500), W. Randolph Smith (\$2,500), Neil Sorrentino (\$1,500), Dan S. Steigman (\$1,500), Ed Tudanger (\$1,000), Michael Tyson (\$500), Kenneth K. Westbrook (\$750) and Barry Wolfman (\$750) and transmitted by committee check.

Disbursement for DQ Primary

Van Hilleary for Congress 104 Short Springs Road Tullahoma, TN 37388-	Van Hilleary, TN, U.S. House, CD-04 Uncashed Contribution from 11/3/95. Stop payment placed on check.	12/31/97	\$250.00
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SUBTOTAL of Disbursements This Page .....	\$37,100.00
TOTAL This Period .....	\$76,650.00