

BEFORE THE FEDERAL ELECTION COMMISSION

May 14 10 13 AM '99

In the Matter of )  
 ) MUR 4886  
Tenet Healthcare Corporation )  
Tenet Healthcare Corporation Political Action Committee )  
and Susan Limon, as treasurer )

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. DISCUSSION

On March 23, 1999, the Federal Election Commission found reason to believe that Tenet Healthcare Corporation ("Tenet Healthcare") violated 2 U.S.C. § 441b(a) by making in-kind corporate contributions to the Federation of American Health Systems Political Action Committee ("FedPAC") in the form of solicitation and other costs. The Commission also found reason to believe that Tenet Healthcare Corporation Political Action Committee and Susan Limon, as treasurer ("TenetPAC") violated 2 U.S.C. § 432(b)(2)(B) by not timely forwarding contributions to FedPAC. On the same date, the Commission determined to enter into preprobable cause conciliation and approved conciliation agreements for Tenet Healthcare and TenetPAC, which included admissions of the violations and civil penalties

Accordingly, this Office recommends that the Commission accept the attached signed conciliation agreements and close the file in this matter.

**II. RECOMMENDATIONS**

1. Accept the attached signed conciliation agreement from Tenet Healthcare Corporation.
2. Accept the attached signed conciliation agreement from Tenet Healthcare Corporation Political Action Committee and Susan Limon, as treasurer.
3. Approve the appropriate letters.
4. Close the file.

Lawrence M. Noble  
General Counsel

5/13/99  
Date

BY:

Lois G. Lerner  
Lois G. Lerner  
Associate General Counsel

**Attachments:**

1. Signed conciliation agreement from Tenet Healthcare
2. Signed conciliation agreement from TenetPAC
3. Copies of civil penalty checks

Staff Assigned: Thomas J. Andersen