

REPORTS ANALYSIS REFERRAL**TO****OFFICE OF GENERAL COUNSEL****DATE:** August 14, 1998**ANALYST:** Neil Evans

- I. COMMITTEE:** Federation of American Health Systems
Political Action Committee (C00002261)
Sylvia Urlich, Treasurer
1111 19th St., NW, Ste. 402
Washington, DC 20036
- II. RELEVANT STATUTE:** 2 U.S.C. 441a(f)
- III. BACKGROUND:** Excessive Contribution Received from a Political
Action Committee

The Federation of American Health Systems Political Action Committee ("the Committee") disclosed a \$5,000 contribution received on November 13, 1997 and a \$35,350 contribution received on December 31, 1997 for Tenet Healthcare Corporation PAC ("Tenet PAC") on Schedule A of the 1997 December Monthly and Year-End Reports (Attachment 2).

On February 18, 1998, a Request for Additional Information ("RFI") for the 1997 Year-End Report was sent to the Committee which advised that the Committee received a contribution which exceeded the limits set forth in the Act. The Committee was advised to provide clarifying information if the contribution was incorrectly disclosed, transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor committee (Attachment 3).

On February 23, 1998, Mr. Robert Goldstein, the Committee's lawyer, called the Reports Analysis Division ("RAD") analyst and stated that the apparent excessive contribution was in fact earmarked contributions from individuals as Tenet PAC acted as a collecting agent for the Committee. Mr. Goldstein stated that the Committee would provide an amendment with the individual itemization of the original donors (Attachment 4).

On February 24, 1998, the Committee filed a response with the Commission. The response stated that the Committee "miscategorized" the December 31, 1997 contribution as having been received directly from Tenet PAC. The contribution in question was actually individual contributions sent to Tenet PAC, but earmarked for the Committee. The Committee further contended that the "retribution rules contained in 11 CFR §110.1(k) permit these contributions to be treated as if they had been made directly to FedPAC." The Committee enclosed a list of the original donors and the amount of their earmarked contributions (Attachment 5).

On March 16, 1998, Tenet PAC's counsel faxed a response to the Commission. A duplication of the Committee's February 24, 1998 response was included along with a copy of the response given by Tenet PAC which stated that Tenet PAC believed that the Committee's response may have already been deemed acceptable (Attachment 6).

On April 17, 1998, a Second Notice was sent to the Committee acknowledging the identical responses received from the Committee and Tenet PAC. The RFAI explained that if the contributions were sent to Tenet PAC but earmarked for the Committee, they would not count against Tenet PAC's contribution limits. However, if Tenet PAC exercised direction or control over the contributor's choice of the recipient committee, or if the contributions were solicited by Tenet PAC's connected organization, the contributions would be considered to be from both the individual and from Tenet PAC. The Committee was advised to specify the method used by Tenet PAC to solicit the earmarked contributions in order to determine if the contributions count against Tenet PAC's contribution limit and that a copy of the original solicitation could be included in the Committee's response (Attachment 7).

On April 23, 1998, Mr. Tom Scully, the President and Chief Executive Officer of the Federation, called the analyst and stated that the Federation of American Health Systems is a trade group made up of corporations, some of which have their own political action committees. The member corporation PACs receive funds from individuals, but may suggest verbally, not in writing, that the contributors can make contributions to either the corporation PAC, or to the Committee, either directly, or by earmarking. Mr. Scully further stated that he would try to obtain a sample of the Tenet PAC solicitation. If the Commission deemed it necessary, he would return the money and request that the individuals contribute directly to the Committee (Attachment 8).

On May 4, 1998, the Commission received a third response from the Committee. The response stated that the December 31, 1997 contribution was received in the form of a single check from Tenet PAC, but that Tenet PAC collected contributions from senior employees of Tenet Healthcare who had chosen to earmark them for the Committee. Schedule A supporting Line 11(a)(i) showed \$35,450 in contributions from

individuals without indicating any earmarked contributions (Attachment 9).

On May 6, 1998, the analyst of the Committee and the analyst of Tenet PAC met with Mr. Scully in order to discuss the outstanding question of the excessive contribution. Mr. Scully explained that the Committee received one check from Tenet PAC and provided copies of checks from individuals which were given to Tenet PAC, but earmarked for the Committee. The analysts advised Mr. Scully on how to properly report earmarked contributions and provided him with a copy of Appendix D, Earmarked Contributions from the Campaign Guide for Corporations and Labor Organizations. Mr. Scully stated that, because Tenet PAC did not allow the Committee to solicit its members directly, Tenet PAC solicited its members on behalf of the Committee in order to reach the annual contribution goal. The analysts suggested that Mr. Scully provide a copy of the solicitation used by Tenet PAC in order to receive the earmarked contributions and to clarify the method of solicitation used by Tenet PAC. Mr. Scully had a copy of the solicitation from Tenet PAC in his possession at the time of the meeting, but declined to submit it, stating that he would provide a formal copy to the Commission after consulting with Tenet PAC's lawyers. He said that he would try to have a corrected amendment, including clarification of the solicitation sent by Monday, May 11, 1998 (Attachment 10).

On June 16, 1998, Mr. Scully and Mr. Goldstein called the analyst on a conference call. Mr. Scully stated that the Committee was still working on the corrections discussed during the May 6, 1998 meeting and would be filing an amendment to the 1997 Year-End Report shortly. The Committee's representatives checked their corrections against the analyst's instructions for the proper reporting of earmarked contributions received from another political action committee. Mr. Scully stated that the amendment could be delayed due to the mailing time necessary in order to receive the proper signatures on the report (Attachment 11).

On June 18, 1998, the Committee filed a fourth response with the Commission. The response disclosed the December 31, 1997 contribution as a single check received from Tenet PAC which was comprised of twenty-seven (27) itemized contributions earmarked for the Committee from individuals. The Committee also stated that Tenet PAC collected contributions from senior employees of Tenet Healthcare who had chosen to earmark their contributions for the Committee (Attachment 12).

No further information has been received.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
				TYPE OF FILER		
FEDERATION OF AMERICAN HEALTH SYSTEMS POLITICAL ACTION COMMITTEE				ID #C00002261	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: FEDERATION OF AMERICAN HEALTH SYSTEMS						
	1997 FEBRUARY MONTHLY	10,160	500-	1JAN97 -31JAN97	8	97FEC/190/0653
	FEBRUARY MONTHLY - AMENDMENT	10,160	500-	1JAN97 -31JAN97	5	97FEC/248/1624
	NOTICE OF FAILURE TO FILE			1JAN97 -31JAN97	2	97FEC/190/1702
	REQUEST FOR ADDITIONAL INFORMATION			1JAN97 -31JAN97	3	97FEC/243/2826
	MARCH MONTHLY	347	10,000	1FEB97 -28FEB97	7	97FEC/192/2272
	APRIL MONTHLY	189	5,500	1MAR97 -31MAR97	5	97FEC/198/0194
	MAY MONTHLY	849	23,000	1APR97 -30APR97	8	97FEC/204/2735
	MAY MONTHLY - AMENDMENT	849	23,000	1APR97 -30APR97	1	97FEC/248/1629
	MAY MONTHLY - AMENDMENT	-	-	1APR97 -30APR97	2	97FEC/248/1630
	MAY MONTHLY - AMENDMENT	-	-	1APR97 -30APR97	1	97FEC/248/3217
	REQUEST FOR ADDITIONAL INFORMATION			1APR97 -30APR97	5	97FEC/243/2829
	JUNE MONTHLY	2,161	5,500	1MAY97 -31MAY97	8	97FEC/210/4564
	JUNE MONTHLY - AMENDMENT	2,161	5,500	1MAY97 -31MAY97	3	97FEC/248/1632
	JUNE MONTHLY - AMENDMENT	-	-	1MAY97 -31MAY97	1	97FEC/248/3216
	REQUEST FOR ADDITIONAL INFORMATION			1MAY97 -31MAY97	2	97FEC/243/2834
	JULY MONTHLY	16,231	14,503	1JUN97 -30JUN97	16	97FEC/219/2360
	JULY MONTHLY - AMENDMENT	16,231	14,503	1JUN97 -30JUN97	11	97FEC/248/1635
	JULY MONTHLY - AMENDMENT	-	-	1JUN97 -30JUN97	1	97FEC/248/3215
	JULY MONTHLY - AMENDMENT	-	-	1JUN97 -30JUN97	1	98FEC/258/2922
	REQUEST FOR ADDITIONAL INFORMATION			1JUN97 -30JUN97	3	97FEC/243/2836
	AUGUST MONTHLY	3,172	8,795	1JUL97 -31JUL97	10	97FEC/235/4409
	AUGUST MONTHLY - AMENDMENT	3,172	8,795	1JUL97 -31JUL97	5	97FEC/248/1646
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL97 -31JUL97	1	97FEC/248/3214
	REQUEST FOR ADDITIONAL INFORMATION			1JUL97 -31JUL97	2	97FEC/243/2839
	SEPTEMBER MONTHLY	58	0	1AUG97 -31AUG97	5	97FEC/241/4654
	OCTOBER MONTHLY	815	4,840	1SEP97 -30SEP97	7	97FEC/247/2038
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP97 -30SEP97	3	98FEC/258/2759
	REQUEST FOR ADDITIONAL INFORMATION			1SEP97 -30SEP97	9	97FEC/254/1331
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP97 -30SEP97	10	98FEC/258/0206
	NOVEMBER MONTHLY	6,673	5,382	1OCT97 -31OCT97	10	97FEC/252/1178
	DECEMBER MONTHLY	5,857	7,503	1NOV97 -30NOV97	9	97FEC/256/3920
	DECEMBER MONTHLY - AMENDMENT	-	-	1NOV97 -30NOV97	3	98FEC/273/4676
	REQUEST FOR ADDITIONAL INFORMATION			1NOV97 -30NOV97	3	98FEC/261/0806
	YEAR-END	35,517	6,000	1DEC97 -31DEC97	7	98FEC/260/2147
	YEAR-END - AMENDMENT	35,517	6,000	1DEC97 -31DEC97	8	98FEC/285/0793
	YEAR-END - AMENDMENT	35,517	6,000	1DEC97 -31DEC97	11	98FEC/287/1595
	YEAR-END - AMENDMENT	35,517	6,000	1DEC97 -31DEC97	9	98FEC/307/4935
	YEAR-END - AMENDMENT	35,517	6,000	1DEC97 -31DEC97	15	98FEC/319/4451
	REQUEST FOR ADDITIONAL INFORMATION			1DEC97 -31DEC97	5	98FEC/282/4856

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
				TYPE OF FILER		
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL97 -31DEC97	3	98FEC/302/1653
	REQUEST FOR ADDITIONAL INFORMATION			1DEC97 -31DEC97	2	98FEC/343/0151

1998 FEBRUARY MONTHLY	4,311	0	1JAN98 -31JAN98	6 98FEC/283/4133
MARCH MONTHLY	57	20,000	1FEB98 -28FEB98	7 98FEC/289/0477
APRIL MONTHLY	13,436	12,780	1MAR98 -31MAR98	9 98FEC/305/2877
APRIL MONTHLY - AMENDMENT	13,436	12,780	1MAR98 -31MAR98	13 98FEC/321/2582
REQUEST FOR ADDITIONAL INFORMATION			1MAR98 -31MAR98	6 98FEC/315/3999
REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAR98 -31MAR98	7 98FEC/320/3558
MAY MONTHLY	12,387	7,749	1APR98 -30APR98	7 98FEC/314/0656
JUNE MONTHLY	8,359	15,268	1MAY98 -31MAY98	9 98FEC/320/1715
REQUEST FOR ADDITIONAL INFORMATION			1MAY98 -31MAY98	2 98FEC/343/0153
JULY MONTHLY	6,847	7,000	1JUN98 -30JUN98	7 98FEC/334/4120
TOTAL	127,426	0 153,320 0		303 TOTAL PAGES

All reports except July Monthly reviewed.
 Cash-on-hand balance as of 6/30/98: \$77,214.52
 Debts owed by committee: \$0
 Debts owed to the committee: \$0

7032563923

SCHEDULE A ITEMIZED RECEIPTS

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

PAGE	OF
1	1
FOR LINE NUMBER	
11(a)(i)	

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)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code
Tenet Healthcare Corporation PAC
3820 State Street
Santa Barbara CA 93105

Name of Employer: THC

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: THC

11/13/97

5,000.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$ 5,000.00

B. Full Name, Mailing Address and ZIP Code
Mr. Fred L. Patrick
4560 Charlemagne Drive
Plano TX 75093

Name of Employer: Columbia/HCA

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: Healthcare Executive

11/13/97

50.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$50.00

C. Full Name, Mailing Address and ZIP Code
Ms. Sylvia Ulrich
235 Solano Prado
Coral Gables FL 33156

Name of Employer: Westchester
Gen'l HospitalDate (month,
day, year)Amount of Each
Receipt this Period

Occupation Pres & COB

11/21/97

750.00

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$750.00

D. Full Name, Mailing Address and ZIP Code

Name of Employer:

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer:

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer:

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation:

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer:

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation:

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional)

\$

\$5,000.00

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

PAGE	OF
1	1
FOR LINE NUMBER 11(a)(i)	

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)

Federation of American Health Systems Political Action Committee

C00002201

A. Full Name, Mailing Address and ZIP Code Tenet Healthcare Corporation PAC 3820 State Street Santa Barbara CA 93105	Name of Employer: THC	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: PAC	12/31/97	\$35,350.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$ 40,350.00		
B. Full Name, Mailing Address and ZIP Code Peter Marmarstein 6106 Soaring Pine Court Kingwood TX 77345	Name of Employer: Paracelsus	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: VP, Operations	12/31/97	\$ 100.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$100.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
	Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
	Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
	Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation:		
	Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation:		
	Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

\$

TOTAL This Period (last page this line number only)

\$35,450.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

FEB 18 1998

Sylvia Ulrich, Treasurer
Federation of American Health Systems
Political Action Committee
1111 19th Street NW, Suite 402
Washington, DC 20036

Identification Number: C00002261

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

Dear Ms. Ulrich:

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:

-Schedule A 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(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person 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 the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-The total listed on Line 21(b), 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.

-For your information, each category on the Detailed Summary Page for which your committee discloses activity must have a separate schedule. Please note this for future filings.

-For future filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity and duplicate reports may be omitted.

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) 219-3580.

Sincerely,



Melissa Hurd
Reports Analyst
Reports Analysis Division

TELECON

ANALYST: Melissa Hurd

CONVERSATION WITH: Robert Goldstein, Committee Lawyer

COMMITTEE: Federation of American Health Systems Political Action Committee

DATE: February 23, 1998

SUBJECTS(S): 1997 Year-End Report Request for Additional Information

Mr. Goldstein, the Committee's lawyer, called the analyst because he had questions regarding the RFAI for the 1997 Year-End Report. Mr. Goldstein explained that the contributions in question were from another committee, Tenet PAC, which was acting as a collecting agent for the Committee. The analyst instructed him to send an amendment which itemized the individuals who were the original donors of the earmarked contributions and explained the connection between the Committee and Tenet PAC. Mr. Goldstein stated that he would provide clarification as soon as possible.

FOLEY & LARDNERRECEIVED
FEDERAL ELECTION
COMMISSION

ATTORNEYS AT LAW

CHICAGO
JACKSONVILLE
LOS ANGELES
MADISON
MILWAUKEE
ORLANDO
SACRAMENTO
SAN DIEGO2029 CENTURY PARK EAST, 35TH FLOOR
LOS ANGELES, CALIFORNIA 90067-3021
TELEPHONE (310) 277-2223
FACSIMILE (310) 537-8475

WRITER'S DIRECT LINE

(310) 975-7733

FEB 27 12 10 PM '98

SAN FRANCISCO
TALLAHASSEE
TAMPA
WASHINGTON D.C.
WEST PALM BEACHLEON FOLEY (1994-1998)
LYNFORD LARDNER, JR. (1915-1993)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.

FOLEY & 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\LETTR\234741.1

3050-465-40-66
04-04-94-0503

earmarked Tenet-PAC Contributors

Jeffrey Barbakow, Chairman & CEO 1187 Coast Village Road Suite 1-166 Santa Barbara, CA 93108	\$3,000.00
Jim Biltz, Senior Vice President 2204 Crown Knoll Lane Plano, TX 75093	\$1,500.00
Steve Blake, Vice President 823 Buckingham Place Danville, CA 94506	\$ 500.00
Norman S. Bobes, M.D. 3535 Gillespie, Apt. 2D Dallas, TX 75219	\$1,500.00
Stephen Brown, Senior Vice President 636 Oakdale Drive Plano, TX 75025	\$1,500.00
Scott Brown, Senior Vice President 885 Park Lane Santa Barbara, CA 93108	\$1,500.00
Thomas E. Casaday, Vice President 4421 Knollview Plano, TX 75024	\$ 750.00
David S. Dearman, Vice President 4836 Holly Tree Drive Dallas, TX 75287	\$ 500.00
Alan Ewalt, Senior Vice President 396 Hot Springs Road Montecito, CA 93108	\$1,500.00
Michael Focht, Sr., President & COO P.O. Box 703 Santa Ynez, CA 93460-0703	\$3,000.00

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

Reynold J. Jennings, Senior Vice President 236 Evangeline Drive Mandeville, LA 70471	\$1,500.00
--	------------

Dennis Jorgensen, Senior Vice President **\$1,500.00**
3325 Fawn Canyon Road
Santa Ynez, CA 93460

Ben F. King, Senior Vice President
5724 Misted Breeze Drive
Plano, TX 75093

Kenneth B. Love, Jr., Vice President \$ 500.00
16 Ashron
Mission Viejo, CA 92692

Thomas Mackey, Executive Vice President	\$2,500.00
P.O. Box 834	
Rancho Santa Fe, CA 92067	

William Murray, Senior Vice President \$1,600.00
10371 E. Desert Cove Avenue
Scottsdale, AZ 85260

Karen Poole, Vice President \$ 750.00
11555 N. 127th Way
Scottsdale, AZ 85259

* J. Scott Richardson, Vice President \$ 500.00
2400 Piedra Drive
Plano, TX 75023

Barry Schochet, Executive Vice President 5200 Keller Springs Road, #1212 Dallas, TX 75248	\$1,500.00
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W. Randolph Smith, Executive Vice President \$2,500.00
2908 Masters Circle
Plano, TX 75093

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

Kennerth K. Westbrook, Vice President
33801 Blessington 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

99-04-354-40-66

BELL, McANDREWS & HILTACH

Attorneys and Counselors at Law

423 CAPITOL MALL, SUITE 601
SACRAMENTO, CA 95834(916) 442-7751
FAX (916) 442-7750

MAR 16 3 24 PM '98

CHARLES H. BELL, JR.
COLLEEN C. McANDREWS
THOMAS W. HILTACH
JEFFREY D. ROAN3040 MOUNTAIN BLVD.
SANTA MONICA, CA 90404
(310) 398-1000JAMES F. SWINEY
COUNSELOR**FAX TRANSMITTAL**

DATE: March 16, 1998

TIME: 10:00 am PST

FROM: Charles H. Bell, Jr.

TO: Mr. Neil Evans

FAX #: 202-219-3496

Reports Analyst

Reports Analysis Division

Federal Election Commission

Number of pages (including this cover sheet):

NO

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) 442-7751.

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. IT MAY BE ATTORNEY-CLIENT PRIVILEGED AND UNAUTHORIZED DISCLOSURE, DISTRIBUTION OR COMMUNICATION IS STRICTLY PROHIBITED.

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REPORTS ANALYSIS
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BELL, MCANDREWS & HILTACH

ATTORNEYS AND COUNSELORS AT LAW

688 CAPITOL MALL, SUITE 801
SACRAMENTO, CALIFORNIA 95814

(916) 442-7787

FAX (916) 442-7788

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JEFFREY E. LANGAN1881 FOURTH STREET
SANTA MONICA, CA 90401
(310) 488-1405
FAX (310) 584-4080

MAR 16 3 24 PM '98

March 16, 1998

BY FACSIMILE AND U.S. MAILMr. Neal Evans
Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, N.W.
Washington DC 20463Re: 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.)

032871597

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.]

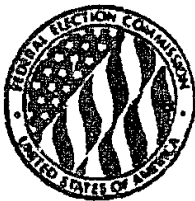
Thank you for your assistance.

Very truly yours,


Charles H. Bell, Jr.

CHB:ljjs
1015.01

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

April 17, 1998

Sylvia Ulrich, Treasurer
Federation of American Health Systems
Political Action Committee
1111 19th Street, NW, Suite 402
Washington, DC 20036

Identification Number: C00002261

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

Dear Ms. Ulrich:

On February 18, 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 February 24 and March 24, 1998 responses are incomplete because you have not provided all the requested information. For these responses to be considered adequate, the following information is still required.

-Your duplicate responses provided a breakdown of the individual contributors and amounts received for the earmarked contributions from Tenet Healthcare Corporation PAC ("Tenet PAC"). The donor committee, Tenet PAC, also filed responses on March 5, 16 and 24, 1998, which mimicked the information you provided. The method(s) used by Tenet PAC to solicit the earmarked contribution has not been clarified by either your committee, the Federation of American Health Systems PAC (Fed PAC), or the donor committee.

If these contributions were from individuals sent to Tenet PAC but earmarked for Fed PAC, they would not count against Tenet PAC's contribution 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 of the SSF's own contributions, unless the SSF exercises direction or control over the contributor's choice of the recipient committee (in this

case, Fed PAC) 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 (Tenet Healthcare Corporation) and was collected by its SSF, it is considered a contribution to both the SSF and the recipient committee, and from both the individual contributor and the SSF.

Please clarify the solicitation efforts (i.e., who makes the solicitation and is there any mention of contributing to Fed PAC in the solicitation) of Tenet PAC. You may provide a copy of Tenet PAC's solicitation to respond to this request.

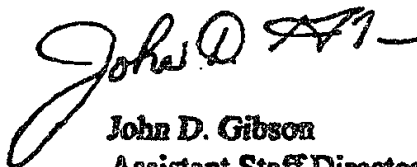
If the contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received an excessive contribution, you should notify the donor and refund the amount in excess of \$5000.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund check sent to the donor 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 Melissa Hurd 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

TELECON

ANALYST: Melissa Hurd

CONVERSATION WITH: Tom Scully, President and Executive Officer,
Federation of American Health Systems

COMMITTEE: Federation of American Health Systems Political Action Committee

DATE: April 23, 1998

SUBJECTS(S): Second Notice for the 1997 Year-End Report

Mr. Scully, the President and Executive Officer of the Federation of American Health Systems, called the analyst in order to clarify the organization of the Federation of American Health Systems and explain the solicitation methods of Tenet PAC. The Federation is a trade group which is made up of member corporations. Tenet PAC is a member corporation PAC that receives funds from individuals who are informed that they can make payments to either Tenet PAC, or to the Committee, directly or by earmarking the contributions. In all likelihood, the information regarding the Committee would be given to board members or individuals who are often solicited, and would be given verbally, not in a written solicitation. The analyst clarified this method with Mr. Scully and stated that a PAC could not solicit funds for another, unaffiliated PAC. The analyst suggested Mr. Scully provide the Commission with a copy of Tenet PAC's written solicitation, as well as a cover letter explaining the solicitation method used by Tenet PAC. Mr. Scully stated that he would reluctantly return the questionable money to Tenet PAC and then request that the individuals contribute directly to the Committee if required by the Commission. He further stated that he would shortly be sending an additional amendment in order to clarify the earmarked contributions.

Use separate schedule(s)
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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)

Federation of American Health Systems Political Action Committee

000002261

A. Full Name, Mailing Address and ZIP Code Jeffrey Barbakow 1187 Coast Village Road, Suite 1-166 Santa Barbara CA 93108	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation: Chairman & CEO	12/31/97	\$3,000.00
Aggregate Year-to-Date > \$ 3,000.00			
B. Full Name, Mailing Address and ZIP Code Jim Biltz 2204 Crown Knoll Lane Plano TX 75093	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation: SVP	12/31/97	\$ 1,500.00
Aggregate Year-to-Date > \$1,500.00			
C. Full Name, Mailing Address and ZIP Code Steve Blake 823 Buckingham Place Danville CA 94506	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation: Vice President	12/31/97	\$500.00
Aggregate Year-to-Date > \$500.00			
D. Full Name, Mailing Address and ZIP Code Norman S. Bobes, M.D. 3535 Gillespie, Apt. 2D Dallas TX 75219	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation:	12/31/97	\$1,500.00
Aggregate Year-to-Date > \$1,500.00			
E. Full Name, Mailing Address and ZIP Code Stephen Brown 836 Oakdale Drive Plano TX 75025	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation: Senior Vice President	12/31/97	\$1,500.00
Aggregate Year-to-Date > \$ 1,500.00			
F. Full Name, Mailing Address and ZIP Code Scott Brown 885 Park Lane Santa Barbara CA 93108	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation: SVP	12/31/97	\$1,500.00
Aggregate Year-to-Date > \$1,500.00			
G. Full Name, Mailing Address and ZIP Code Thomas E. Casaday 4421 Knollview Plano TX 75024	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Occupation: Vice President	12/31/97	\$ 750.00
Aggregate Year-to-Date > \$ 750.00			
SUBTOTAL of Receipts This Page (optional)			\$ 10,250.00
TOTAL This Period (last page this line number only)			

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code David S. Dearman 4836 Holly Tree Drive Dallas TX 75287	Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Aggregate Year-to-Date > \$ 500.00		
B. Full Name, Mailing Address and ZIP Code Alan Ewelt 396 Hot Springs Road Montecito CA 93108	Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period 1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Aggregate Year-to-Date > \$1,500.00		
C. Full Name, Mailing Address and ZIP Code Michael Focht, Sr. P.O. Box 703 Santa Ynez CA 93460-0703	Name of Employer: Tenet Occupation President & COO	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period 3,000.00
Receipt For: <input type="checkbox"/> X Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Aggregate Year-to-Date > \$3,000.00		
D. Full Name, Mailing Address and ZIP Code Douglas Fritache 2142 S. Catarina Circle Mesa AZ 85202	Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$ 500.00
Receipt For: <input type="checkbox"/> X Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Aggregate Year-to-Date > \$ 500.00		
E. Full Name, Mailing Address and ZIP Code Reynold J. Jennings 236 Evangeline Drive Mandeville LA 70471	Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Aggregate Year-to-Date > \$1,500.00		
F. Full Name, Mailing Address and ZIP Code Dennis Jorgensen 3325 Fawn Canyon Road Santa Ynez CA 93460	Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$1,500.00
Receipt For: <input type="checkbox"/> X Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1996	Aggregate Year-to-Date > \$1,500.00		
G. Full Name, Mailing Address and ZIP Code Ben F. King 5724 Misted Breeze Drive Plano TX 75093	Name of Employer: Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$ 750.00
Receipt For: <input type="checkbox"/> X Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998	Aggregate Year-to-Date > \$ 750.00		
SUBTOTAL of Receipts This Page (optional)			\$ 9,250.00
TOTAL This Period (last page this line number only)			

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Kenneth B. Love, Jr. 18 Ashton Mission Viejo CA 92692	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: Vice President	12/31/97	\$ 500.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$ 500.00		
B. Full Name, Mailing Address and ZIP Code Thomas Mackey P.O. Box 834 Rancho Santa Fe CA 92067	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: EVP	12/31/97	\$ 2,500.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$2,500.00		
C. Full Name, Mailing Address and ZIP Code William Murray 10371 E. Desert Cove Avenue Scottsdale AZ 85260	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: SVP	12/31/97	\$1,600.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$1,600.00		
D. Full Name, Mailing Address and ZIP Code Karen Poole 11555 N. 127th Way Scottsdale AZ 85269	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: Vice President	12/31/97	\$ 750.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$ 750.00		
E. Full Name, Mailing Address and ZIP Code J. Scott Richardson 2400 Piedra Drive Plano TX 75023	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: Vice President	12/31/97	\$ 500.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$ 500.00		
F. Full Name, Mailing Address and ZIP Code Barry Schochet 5200 Keller Springs Road, #1212 Dallas TX 75248	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: EVP	12/31/97	\$1,500.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$1,500.00		
G. Full Name, Mailing Address and ZIP Code W. Randolph Smith 2908 Masters Circle Plano TX 75093	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation: EVP	12/31/97	\$2,500.00
	Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998 Aggregate Year-to-Date > \$2,500.00		

SUBTOTAL of Receipts This Page (optional)

\$ 9,850.00

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Neil Sorrentino 4440 Deer Ridge Road Danville CA 94506		Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period 1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$1,500.00		
B. Full Name, Mailing Address and ZIP Code Don S. Steigman 837 N.W. 110th Avenue Coral Springs FL 33071		Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period 1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$1,500.00		
C. Full Name, Mailing Address and ZIP Code Ed Tudanger 415 Laurel Chase Court Atlanta GA 30327		Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period 1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$1,000.00		
D. Full Name, Mailing Address and ZIP Code Michael E. Tyson 13917 St. Michael Drive Little Rock AR 72211		Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$ 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$ 500.00		
E. Full Name, Mailing Address and ZIP Code Kenneth K. Westbrook 33801 Blessington Lane San Juan Capistrano CA 92675		Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$ 750.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$ 750.00		
F. Full Name, Mailing Address and ZIP Code Barry A. Wolfman 20 Callender Court Laguna Niguel CA 92677		Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$ 750.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$ 750.00		
G. Full Name, Mailing Address and ZIP Code Peter Marmerstein 8106 Scaring Pine Court Kingwood TX 77345		Name of Employer: Paracelsus Occupation: VP, Operations	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$ 100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): 1998		Aggregate Year-to-Date > \$ 100.00		
SUBTOTAL of Receipts This Page (optional)				\$ 6100.00
TOTAL This Period (last page this line number only)				\$35,450.00

Addendum to Schedule A
Federation of American Health Systems
Political Action Committee
Amended Monthly Report For December, 1997

The December 1997 monthly report originally disclosed the receipt of a \$35,700 contribution from Tenet Healthcare Corporation Political Action Committee. This amended report is being filed now to clarify that although the check was received from the Tenet PAC, that entity collected contributions from senior employees of Tenet Healthcare who had chosen to earmark them for the Federation of American Health Systems Political Action Committee. Thus, the amounts reflected on the amended Schedule A, Itemized Receipts, reflect these earmarked contributions.

MEETING

ANALYST: Melissa Hurd and Neil Evans

MEETING WITH: Tom Scully, President and Executive Officer,
Federation of American Health Systems

COMMITTEE: Federation of American Health Systems
Political Action Committee

DATE: May 6, 1998

SUBJECTS(S): Second Notice for 1997 Year-End Report

The analyst of the Committee and the analyst of Tenet PAC met with Mr. Scully, the President and Executive Officer of the Federation of American Health Systems. Mr. Scully asked what further clarification was required by either committee in order to illustrate that the contributions were given initially to Tenet PAC, but earmarked by individuals for the Committee. Mr. Scully wanted to insure that the committees illustrated that the contributions should not count against the contribution limits of Tenet PAC to the Committee.

The analyst explained the corrections which were necessary to the Committee's May 4, 1998 Amendment in order to correctly report earmarked contributions from individuals to the Committee which originally passed through Tenet PAC's account. The analysts stated the need for clarification of Tenet PAC's solicitation method, preferably including a copy of the solicitation, in order for the committees to illustrate exactly who solicited the individuals (Tenet PAC or its 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 a Tenet PAC solicitation, but he would like to further speak with the representatives of Tenet PAC before turning a copy over to the Commission. Mr. Scully also stated that the Committee was not permitted by Tenet PAC to directly solicit its members. Instead, Tenet PAC agreed to reach their \$35,000 contribution goal to the Committee by having individuals earmark their contributions. He said that he hoped the analysts were not naive and realized that he would tell the Board of Directors of a member organization that the Committee needed money and it was time to meet the financial goal of contributions which were arranged by the Committee and the member organization.

Mr. Scully stated that, if necessary, the Committee would return the contribution to Tenet PAC and then ask that the individuals write a check directly to the Committee. Of course, they would like to avoid the additional work and potential loss of contributions. He also provided copies of several individual checks earmarked for the Committee through Tenet PAC which he had obtained from Tenet PAC. He stated that he would provide the amendments for both committees as advised, and provide the Commission with a copy of the solicitation after he further consulted with Tenet PAC representatives. Mr. Scully thought that he would be able to provide the necessary amendments by Monday, May 11, 1998.

TELECON

ANALYST: Melissa Hurd

CONVERSATION WITH: Tom Scully, President and Executive Officer, and Robert Goldstein, Lawyer, Federation of American Health Systems

COMMITTEE: Federation of American Health Systems Political Action Committee

DATE: June 16, 1998

SUBJECTS(S): Second Notice for 1997 Year-End Report

Mr. Scully and Mr. Goldstein, the President and Lawyer for the Federation of American Health Systems, respectively, called the analyst on a conference call in order to discuss the amendment still needed for the 1997 Year-End Report. Mr. Scully stated that the Committee was still working on the corrections discussed during the May 6, 1998 meeting. In order to insure that the Committee reported earmarked contributions properly, they wanted to check their corrections against the analyst's instructions. The analyst explained in detail the proper reporting methods for earmarked contributions received from another political action committee. Mr. Scully and Mr. Goldstein reviewed the changes they would need and stated that they would correct the report appropriately as soon as possible. Mr. Scully foresaw slight delays as he planned on sending the report to California and Florida in order to receive the proper signatures, but then the amended report would be forward on to the Federal Election Commission.

Federation of American Health Systems

FedPac
Political Action Committee1111 19th Street N.W.
Suite 402
Washington, DC 20036
202-833-3090

June 10, 1998

Melissa Hurd
Reports Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Federation of American Health Systems Political Action Committee

Dear Ms. Hurd:

Thank you for meeting with Tom Scully of FedPAC recently to clarify the need for amendments to our report for the period December 1, 1997 through December 31, 1997. In following up with your discussions with Tom, the following information is included in the attached amendment.

- The receipt of a single check from TENET PAC for \$35,350 is noted on Schedule A, along with "memo entries" showing each of the individuals who contributed to TENET PAC, but earmarked the contribution for FedPAC.

It is my understanding that TENET PAC is also filing amended reports with the Commission to clarify the flow of the contributions from the individuals to FedPAC.

Thank you for your assistance in remedying the initial reporting errors. If you have any questions, you may call me or Tom Scully in the FedPAC Washington office.

Sincerely


Sylvia Ulrich
TreasurerSU:cg
attachment

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DETAILED SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS

PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE Federation of American Health Systems Political Action Committee 000002261		REPORT COVERING PERIOD FROM: 12/01/97 TO: 12/31/97	
I. Receipts		COLUMN A Total This Period	COLUMN B Calendar Year
11. Contributions (other than loans From:			
a. Individual Persons Other Than Political Committees			
i. Itemized (use Schedule A)		100.00	64,040.00
ii. Unitemized			205.00
iii. Total	(add i and ii) ▶	100.00	64,245.00
b. Political Party Committees			
c. Other Political Committees (such as PACs)		35,350.00	14,382.00
d. Total Contributions		35,450.00	79,627.00
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 (Dividends, Interest, etc.)		67.80	2,408.24
18. Transfers from Nonfederal Account for Joint Activity			
19. Total Receipts		35,817.80	82,035.24
20. Total Federal Receipts		35,817.80	82,035.24
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			1,751.08
c. Total Operating Expenditures			1,751.08
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 (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			
29. Other Disbursements			3.00
30. Total Disbursements		6,000.00	90,525.08
31. Total Federal Disbursements		6,000.00	90,525.08
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans) (from line 11d)		35,450.00	79,627.00
33. Total Contribution Refunds (from line 28d)		-0-	
34. Net Contributions (other than loans) (from line 33 from 32)		35,450.00	79,627.00
35. Total Federal Operating Expenditures		-0-	1,751.08
36. Offsets to Operating Expenditures (from line 15)		-0-	
37. Net Operating Expenditures		-0-	1,751.08

Page 3 of 3		PAGE 1 OF 3
a separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER 11(a)(i)

CONTRIBUTIONS FROM INDIVIDUALS

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)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Tenet Healthcare Corporation PAC 3820 State Street Santa Barbara CA 93105	Earmarked contributions from employees of Tenet Healthcare Corp. See memo entries below. Occupation: PAC	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period \$35,350.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$35,350.00		
B. Full Name, Mailing Address and ZIP Code Jeffrey Barbakow 1187 Coast Village Road, Suite 1-166 Santa Barbara CA 93108	Name of Employer: Tenet Occupation: Chairman and CEO	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$3,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$3,000.00		
C. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code Jim Blitz 2204 Crown Knoll Lane Plano TX 75093	Name of Employer: Tenet Occupation SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1,500.00		
E. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code Steve Blake 823 Buckingham Place Danville CA 94508	Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
G. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
SUBTOTAL of Receipts This Page (optional)			\$ 5,000.00

98033194454

separate schedule(s)
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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code

Norman S. Bobas, M.D.
3535 Gillespie, Apt. 2D
Dallas TX 75219

Name of Employer: Tenet

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: VP

12/31/97

Memo Entry

\$1,500.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$1,500.00

B. Full Name, Mailing Address and ZIP Code

Above contribution earmarked for Federation of American
Health Systems Political Action Committee.

Name of Employer: FAHS

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: Pres & CEO

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date >

C. Full Name, Mailing Address and ZIP Code

Stephen Brown
636 Oakdale Drive
Plano TX 75025

Name of Employer: Tenet

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: Senior Vice President

12/31/97

\$1,500.00

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$1,500.00

D. Full Name, Mailing Address and ZIP Code

Above contribution earmarked for Federation of American
Health Systems Political Action Committee.

Name of Employer:

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation:

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Scott Brown
885 Park Lane
Santa Barbara CA 93108

Name of Employer: Tenet

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: Senior Vice President

12/31/97

\$1,500.00

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$1,500.00

F. Full Name, Mailing Address and ZIP Code

Above contribution earmarked for Federation of American
Health Systems Political Action Committee.

Name of Employer:

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation:

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Thomas E. Casadey
4421 Knollview
Plano TX 75024

Name of Employer: Tenet

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation: Vice President

12/31/97

750.00

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 750.00

SUBTOTAL of Receipts This Page (optional)

\$5,250.00

TOTAL This Period (last page this line number only)

a separate schedule(s)
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FOR LINE NUMBER 11(a)(i)

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NAME OF COMMITTEE (In Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Preceding contribution earmarked for Federation of American Health Systems Political Action Committee	Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code David S. Dearman 4836 Holly Tree Drive Dallas TX 75287	Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
C. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code Alan Ewalt 396 Hot Springs Road Montecito CA 93107	Name of Employer: Tenet Occupation SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1,500.00		
E. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code Michael Focht, Sr. P.O. Box 703 Santa Ynez CA 93460-0703	Name of Employer: Tenet Occupation: President & COO	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$3,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$3,000.00		
G. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
SUBTOTAL of Receipts This Page (optional)			\$ 5,000.00

SCHEDULE A ITEMIZED RECEIPTSAttachment 12
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for each category of the
Detailed Summary PagePAGE 4 OF 8
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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)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Douglas Fritsche 2142 S. Catarina Circle Mesa AZ 85202	Name of Employer: Tenet Occupation: VP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
B. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date >		
C. Full Name, Mailing Address and ZIP Code Reynold J. Jennings 236 Evangeline Drive Mandeville LA 70471	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$1,500.00		
D. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code Dennis Jorgensen 3325 Fawn Canyon Road Santa Ynez CA 93460	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$1,500.00		
F. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code Ben F. King 5724 Misted Breeze Drive Plano TX 75093	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry 750.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 750.00		
SUBTOTAL of Receipts This Page (optional)			\$ 4250.00
TOTAL This Period (last page this line number only)			

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Preceding contribution earmarked for Federation of American Health Systems Political Action Committee	Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code Kenneth B. Love, Jr. 16 Ashton Mission Viejo CA 92692	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period Memo Entry
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Vice President	12/31/97	\$ 500.00
C. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
D. Full Name, Mailing Address and ZIP Code Thomas Mackey P.O. Box 834 Rancho Santa Fe CA 92067	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period Memo Entry
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation EVP	12/31/97	\$2,500.00
E. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
F. Full Name, Mailing Address and ZIP Code William Murray 10371 E. Desert Cove Avenue Scottsdale AZ 85260	Name of Employer: Tenet	Date (month, day, year)	Amount of Each Receipt this Period Memo Entry
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: SVP	12/31/97	\$1,600.00
G. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		
SUBTOTAL of Receipts This Page (optional)			\$ 4600.00

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002281

A. Full Name, Mailing Address and ZIP Code Karen Poole 11555 N. 127th Way Scottsdale AZ 85259	Name of Employer: Tenet Occupation: VP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 750.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 750.00		
B. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date >		
C. Full Name, Mailing Address and ZIP Code J. Scott Richardson 2400 Piedra Drive Plano TX 75023	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
D. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code Barry Schochet 5200 Keller Springs Road, #1212 Dallas TX 75248	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$1,500.00		
F. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code W. Randolph Smith 2908 Masters Circle Plano TX 75093	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$2,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$2,500.00		
SUBTOTAL of Receipts This Page (optional)			\$5250.00
TOTAL This Period (last page this line number only)			

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Preceding contribution earmarked for Federation of American Health Systems Political Action Committee	Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date >		
B. Full Name, Mailing Address and ZIP Code Neil Sorrentino 4440 Deer Ridge Road Danville CA 94506	Name of Employer: Tenet Occupation: Senior Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$1,500.00		
C. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code Don S. Steigman 837 N.W. 110th Avenue Coral Springs FL 33071	Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1,500.00		
E. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date >		
F. Full Name, Mailing Address and ZIP Code Ed Tudanger 415 Laurel Chase Court Atlanta GA 30327	Name of Employer: Tenet Occupation: SVP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$1,000.00		
G. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
SUBTOTAL of Receipts This Page (optional)			\$4,000.00

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE (in Full)

Federation of American Health Systems Political Action Committee

C00002261

A. Full Name, Mailing Address and ZIP Code Michael E. Tyson 13917 St. Michael Drive Little Rock AR 72211	Name of Employer: Tenet Occupation: VP	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
B. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date >		
C. Full Name, Mailing Address and ZIP Code Kenneth K. Westbrook 33801 Blessington Lane San Juan Capistrano CA 92675	Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 750.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 750.00		
D. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code Barry A. Wolfman 20 Callender Court Laguna Niguel CA 92677	Name of Employer: Tenet Occupation: Vice President	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry \$ 750.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 750.00		
F. Full Name, Mailing Address and ZIP Code Above contribution earmarked for Federation of American Health Systems Political Action Committee.	Name of Employer: Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code Peter Marmarstein 8106 Soaring Pine Court Kingwood TX 77345	Name of Employer: Paracelsus Occupation: VP, Operations	Date (month, day, year) 12/31/97	Amount of Each Receipt this Period Memo Entry 100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 100.00		
SUBTOTAL of Receipts This Page (optional)			\$2100.00
TOTAL This Period (last page this line number only)			\$34,450.00

Addendum to Schedule A
Federation of American Health Systems
Political Action Committee
Amended Monthly Report For December, 1997

The December 1997 monthly report originally disclosed the receipt of a \$35,700 contribution from Tenet Healthcare Corporation Political Action Committee. This amended report is being filed now to clarify that although the check was received from the Tenet PAC, that entity collected contributions from senior employees of Tenet Healthcare who had chosen to earmark them for the Federation of American Health Systems Political Action Committee. Thus, the amounts reflected on the amended Schedule A, Itemized Receipts, reflect these earmarked contributions.