

June 7, 1994

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

Dear Mr. Evans,

Thank you for your professional help and direction pertinent to my phone call to you on June 7, 1994 concerning the attached correspondence (attachment 1).

In this letter I will try to address the key points that are mentioned in attachment 1 and the items we covered in our phone conversation. If you have any questions after reading this letter, please call me at 419-247-5492

Before covering the items in attachment #1, I would like to cover two minor, but I believe helpful, administrative changes I believe we can make to improve our communication:

TWO MINOR ADMINISTRATIVE POINTS

First, a minor administrative point. I (David Roth) am the Treasurer of the Health Care and Retirement Corporation Good Citizenship Fund. Your system currently has Ms. Nevergall as the treasurer. To help with any future correspondence, please update your system to make me your contact person.

Second, from our discussion, in the future I will send all correspondence to you by certified mail. It appears that the issues covered in the correspondence deal with concern over not receiving the monthly reports. I believe that going to certified mail will help both of us.

ITEMS MENTIONED IN ATTACHMENT #1

Attachment #1 mentions six reports which were not received by your Department within the required due dates. The first 4 reports cover January through May of 1993 that, per your records, show that they were received Feb. 2 and 3 of 1994.

On Attachment #2 you will find correspondence that shows I first became aware that you did not receive these reports in a letter from John D. Gibson in January of 1994. In response to his letter I promptly mailed copies of these reports to your Office. (See Attachment #3 with copies of the reports.)

It is because of this situation, I would say is the reason that your records show the reports being submitted late. It is because I sent them to your Office on February 1, 1994 based on first being notified that you did not have them in January of 1994. When I got this notice in January, I called to get the details (similar to this situation) then promptly mailed the data to your office.

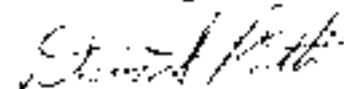
This was the first time I had ever been notified by your Office that you had not received our reports. By using certified mail in the future, I believe this will eliminate this concern for both of us.

The remaining two reports on attachment #1, for October 1993 and February 1994 show that these reports were due by the 20th and that you received them about 10 to 12 days later. From reading the instructions (Attachment # 4, I understood them to say that the reports were to be issued to you no later than 20 days after the last day of the month that the activity pertained to. Attached are copies of the reports which show (Attachments 5 & 6):

1. The September 1993 activity report, issued in October 1993 was issued to you October 26th. This report was sent to you 6 days late. I apologize to you for this 6 day late filing and regret that it occurred. To my knowledge, this was the first and only time that I mailed a report to you late. (Attachment #5)
2. The February 1994 report for January 1994 activity was issued on February 20, 1994. I don't know why this report took until March 1 of 1994 to get into your system. I believe that by going to certified mail we will at least be able to verify to you that we are filing our reports to you in a timely manner. (Attachment #6)

I hope that I have fully addressed your valid points of concern to your satisfaction. Thank you Mr. Evans for your help with this matter.

Sincerely,



David Roth
Treasurer, HCR Good Citizenship Fund.

Enclosures

free to contact Neil Evans on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

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RECEIVED JAN 20 1994



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BQ-7

JAN 21 1994

Deloris A. Nevergall, Treasurer
Health Care and Retirement Corporation (HCR)
Employees Good Citizenship
One Seagate
Toledo, OH 43604

Identification Number: C00260141

Reference: February Monthly (1/1/93-1/31/93), March Monthly
(2/1/93-2/28/93), April Monthly (3/1/93-3/31/93)
and May Monthly (4/1/93-4/30/93) Reports

Dear Ms. Nevergall:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Reports of Receipts and Disbursements. You were notified previously of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions regarding this matter, please contact Bebbie Manzano, Reports Analyst on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

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One WestGate
Toledo, Ohio 43604-2616
(419) 247-5300

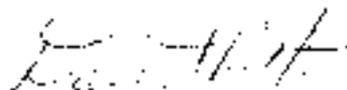
February 1, 1994

Ms. Debbie Manzano
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Manzano,

Thank you for your help in addressing certain items concerning my reporting of our PAC activity. Enclosed are the reports which you mentioned you had not received. If you have any questions concerning these reports, my phone number is 419-247-5492. Thank you.

Sincerely,



David Roth
Manager, Corporate Planning
Health Care & Retirement Corporation

Enclosures

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RECEIVED JAN 26 1994



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

RQ-7

JAN 21 1994

Deloris A. Nevergall, Treasurer
Health Care and Retirement Corporation (HCR)
Employees Good Citizenship
One Seagate
Toledo, OH 43604

Identification Number: C00260141

Reference: February Monthly (1/1/93-1/31/93), March Monthly
(2/1/93-2/28/93), April Monthly (3/1/93-3/31/93)
and May Monthly (4/1/93-4/30/93) Reports

Dear Ms. Nevergall:

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Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions regarding this matter, please contact Debbie Manzano, Reports Analyst on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Health Care and Retirement Corporation (HCR) Employees Good Citizenship Fund ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported One SeaGate CITY, STATE and ZIP CODE Toledo, OH 43604-2616	2. FEC IDENTIFICATION NUMBER C00260141 3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
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4. TYPE OF REPORT

(a) April 15 Quarterly Report Monthly Report Due On:

February 20 June 20 October 20
 July 15 Quarterly Report March 20 July 20 November 20
 October 15 Quarterly Report April 20 August 20 December 20
 January 31 Year End Report May 20 September 20 January 31

Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment? YES NO

	SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	Jan. 1, 1993 through Jan. 31, 1993		
6. (a) Cash on Hand January 1, 19 ⁹³			\$ 13,235.79
(b) Cash on Hand at Beginning of Reporting Period		\$ 13,235.79	
(c) Total Receipts (from Line 19)		\$ 2,604.20	\$ 2,604.20
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 15,839.99	\$ 15,839.99
7. Total Disbursements (from Line 30)		\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 15,839.99	\$ 15,839.99
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-	

For further information contact:
 Federal Election Commission
 999 E Street, NW
 Washington, DC 20463
 Toll Free 800-424-9530
 Local 202-376-3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

David R. Roth
 Type or Print Name of Treasurer

Signature of Treasurer: Asst Date: **Feb. 11, 1993**

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

