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FEB 9 10 11 AM '99

February 8, 1999

Ms. Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E. Street NW  
Washington D.C. 20463

Re: C00249896  
October Quarterly Report (7/1/98-9/30/98)

Dear Ms. Antoinette:

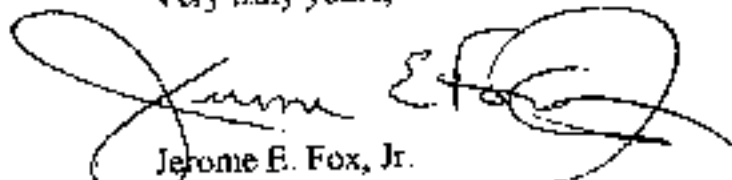
Please find enclosed a copy of your letter and materials sent to me on February 3, 1999 in which you have raised the question of our treatment of certain contributions designated for primary elections and a contribution to BAK/PAK. In accordance with your request the following is a written response to your questions.

Please be advised that our contribution to Friends of Max Cleland for U.S. Senate, designated as a primary contribution is for the primary election in the year 2002, and that the contribution to Bob Kerry for U.S. Senate Committee, designated as a primary contribution is for the primary election in the year 2000.

Please be advised that our contribution to BAK/PAK is a federal committee, but that the name should have been listed as BACKPAC (Building America's Conscience and Kids Political Action Committee). I am enclosing a letter from BACKPAC for additional information.

Thank you for your attention to this matter and do not hesitate to call me at 440-329-6102 or fax me at 440-366-9672 if you have any further questions.

Very truly yours,



Jerome E. Fox, Jr.  
Treasurer

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

FEB 3 1999

Jerome Fox, Jr., Treasurer  
Invacare Corporation Political Action Committee  
One Invacare Way  
Elyria, OH 44035

Identification Number: C00249896

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Fox:

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:

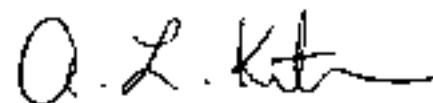
-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the 1998 primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to BAK/PAK. Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

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) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "A. L. Kitchen". The signature is written in black ink and is positioned above the typed name.

Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division

# BACKPAC

## BUILDING AMERICA'S CONSCIENCE & KIDS PAC

Senator Bob Kerrey, *Chair*  
Harlan Noddle, *Treasurer*

TO: Interested Supporters  
FROM: Harlan Noddle, National Treasurer, BACKPAC  
RE: Senator Bob Kerrey & BACKPAC

In March of this year, we founded BACKPAC (Building America's Conscience and Kids Political Action Committee) in order to take ideas like those of Senator Kerrey's for the future of America to a national audience and to financially support like-minded candidates in 1998 and beyond. I am honored to be the National Treasurer for this important endeavor to help promote Senator Kerrey's views on such critical issues as entitlement reform, education, health care and creating wealth for all Americans.

Senator Kerrey is a national leader with a strong vision of where our country ought to be headed. We want to bring ideas like his to the forefront of national agenda, and we want to support and contribute to candidates who share those ideas.

Many people are asking about the different ways that they can help BACKPAC achieve its goals for 1998. The most obvious and direct way is by making a contribution and encouraging others to do the same.

An individual can contribute up to \$5,000 in federal funds to BACKPAC annually. (NOTE: An individual may not exceed \$25,000 in federal contributions per year.) Federally registered Political Action Committees (PACs) can contribute \$5,000 to BACKPAC annually. BACKPAC may accept unlimited contributions to its non-federal account.

If you have any questions regarding these limits or about other ways you can help, please call Brian Hardwick at (202) 544-2232.

Please forward your contribution to:

**BACKPAC - Building America's Conscience and Kids**  
Attention: Harlan Noddle, Treasurer  
7602 Pacific Street  
Lower Level 103  
Omaha, NE 68114

We are also forming a National Finance Board for BACKPAC and I would be grateful if you would consider joining me as a founding member of this advisory board. Please feel free to contact me if you would like additional details regarding BACKPAC National Finance Board and our plans for the future.

Thank you for your serious consideration in helping to take ideas like Bob Kerrey's to the American people and support like-minded candidates and causes in 1998 and beyond.

7602 Pacific Street, Lower Level 103 - Omaha, NE 68114 • 402-398-9708  
227 Massachusetts Avenue, N.E. Suite 302 - Washington, D.C. 20002 • 202-544-2232 • (fax) 202-544-7712

Paid for by Building America's Conscience & Kids PAC (BACKPAC).  
Contributions are not tax-deductible.

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>2-9-95</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
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<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked _____ and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>Jm W</i> PREPARER	<i>2-9-95</i> DATE PREPARED