



GAYLORD ENTERTAINMENT COMPANY

RECEIVED POLITICAL ACTION COMMITTEE
FEDERAL ELECTION
COMMISSION MAIL ROOM

Dec 4 11 14 AM '97

December 3, 1997

Ms. Andrea Wilkens
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

12/3/97 11:14 AM

Re: Gaylord Entertainment Company
Political Action Committee C00183707

Dear Ms. Wilkens:

Please refer to your November 20 correspondence. As we discussed on 12/3/97, and as you can see from the attached correspondence, a portion of the 3rd quarter 1995 contributions to Bill Frist should have been re-allocated to the Frist 2000 Campaign Fund. As you can further see from our correspondence the correction was made on our records, but we failed to advise the FEC.

Please accept my apology for the oversight and advise me if any other steps are required to remedy this situation. You may reach me at (615)316-6331. Thank you.


Rod Connor

Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

999 E STREET NW
WASH DC
ATTN ANDREA WILKENS

Fed Ex
ADDRESS

RQ-3

November 20, 1997

Rod Connor, Treasurer
Gaylord Entertainment Company
Political Action Committee
One Gaylord Drive
Nashville, TN 37214

RECEIVED NOV 24 1997

Identification Number: C00183707

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Connor:

This letter is to inform you that as of November 19, 1997, the Commission has not received your response to our request for additional information, dated October 29, 1997. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received 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 regarding this matter, please contact Andrea Wilkens on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

✓ copy -> Alan Hall -
Alan - pls advise
ASAP
- [Signature]
11/24/97

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

OCT 29 1997

Rod Connor, Treasurer
Gaylord Entertainment Company
Political Action Committee
One Gaylord Drive
Nashville, TN 37214

Identification Number: C00183707

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Connor:

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 of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A

supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Andrea Wilkens

Andrea Wilkens
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 23

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)

Gaylord Entertainment Company PAC ID #1095

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frist 2000, Inc. 4205 Hillsboro Rd Suite 306 Nashville, TN 37215-3336	Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-20-97	500
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frist 2000, Inc. 4205 Hillsboro Rd. Suite 306 Nashville, TN 37215	Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-20-97	5,000
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

5,500

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 23

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)

Gaylord Entertainment Company PAC ID #1095

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Frist for U. S. Senate, Inc. 4205 Hillsboro Rd. Suite 306 Nashville, TN 37215	U. S. Senate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/16/95	5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congressman Bob Clement Committee P. O. Box 150608 Nashville, TN 37215	U. S. Congress Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/23/95	1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Comm to Elect Bart Gordon P. O. Box 2008 Murfreesboro, TN	U. S. Representative Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/13/95	500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Larry Pressler P. O. Box 77166 Washington, D.C.	U. S. Senate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/13/95	1,000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic National Committee Cummins Station 209 10th Ave. S, Suite 226 Nashville, TN 37203	President Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/29/95	5,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

12,500.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
27

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)

Gaylord Entertainment Company PAC ID #1095

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frist for U. S. Senate 1922 West End Ave. Nashville, TN 37203	U. S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	01/09/95	2,500
B. Full Name, Mailing Address and ZIP Code Frist for U. S. Senate 1922 West End Ave. Nashville, TN 37203	Purpose of Disbursement U. S. Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	01/09/95	1,500
C. Full Name, Mailing Address and ZIP Code Alexander for President Exploratory Comm Suite 92B 1808 West End Ave. Nashville, TN 37203	Purpose of Disbursement President Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	01/23/95	5,000
D. Full Name, Mailing Address and ZIP Code Tennesseans for Thompson Suite 901 1808 West End Ave. Nashville, TN 37203	Purpose of Disbursement Senator Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	05/01/95	1,000
E. Full Name, Mailing Address and ZIP Code Congressman Bob Clement Committee P. O. Box 150608 Nashville, TN 37215	Purpose of Disbursement U. S. Congress Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	05/22/95	1,000
F. Full Name, Mailing Address and ZIP Code Tennesseans for Thompson '96 1808 West End Suite 901 Nashville, TN 37203	Purpose of Disbursement Senate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	06/16/95	2,500
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

13,500

TOTAL This Period (last page this line number only)

13,500

27

MEMO

To: Alan Hall
316-6555
From: Linus Catignani
Subject: PEC Letter
Date: November 26, 1997

Linus

The supporting documentation, attached, indicates that "Bill Frist for Senate" requested and received permission from Gaylord Entertainment Company, PAC to reallocate \$4,000 of a \$5,000 contribution to the Frist 2000 Primary election account.

This information was reported to the Federal Election Commission by Frist 2000 and Gaylord Entertainment Company, PAC should have filed the same "reallocation of funds" document.

Please call me directly at 615/386-0045 if you have any questions or need any additional information.

Thanks for your help.

cc: Rod Connor

received 9/6/95



FILE

December 5, 1995

Gaylord Entertainment Company, PAC
Mr. Richard H. Evans
One Gaylord Place
Nashville, TN 37214

Dear Dick:

We wrote you on October 4, 1995 concerning your contributions to Bill Frist for Senate.

Our records indicate that on September 6, 1995 you reached the maximum amount allowed to be donated to a campaign, which is \$10,000 (\$5,000 designated for the Primary Election and \$5,000 designated for the General Election).

The strict regulations of the Federal Election Campaign Act limit Political Action Committee contributions to \$5,000 per committee per election. Would you allow us to transfer these funds to the FRIST 2000 Campaign Funds? Just sign the attached form and return it to us in the enclosed, postage-paid envelope, as soon as possible. It is very important to our reporting procedure that we receive this form before year end.

Should you prefer, we will refund the excess amount of your contribution in the amount of \$4,000.00 to you.

Thank you again for your generous support for Bill Frist for Senate.

Sincerely,

Sallie Norton
Finance Director

Enclosures

REALLOCATION OF FUNDS

RECD DEC 26 1995

Reference: 090798

To: Sallie Norton, Finance Director

I hereby authorize Frist 2000 Campaign to reallocate our contribution of \$4,000.00 on check number 0920 as follows:

- \$4,000 from Bill Frist for Senate to Frist 2000
- We would prefer a refund.

Signature: Date: Dec 1, 1995

Richard H. Evans
Gaylord Entertainment Company

Gaylord Entertainment Company, PAC
Mr. Richard H. Evans
One Gaylord Place
Nashville, Tennessee 37214

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>12-4-97</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<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>AS</i> PREPARER	<i>12-5-97</i> DATE PREPARED