

GCD**Gardner Carton & Douglas**

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Washington, D.C. 20005-3317

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May 11, 2004

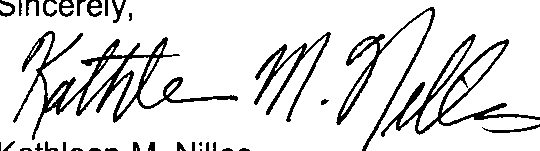
Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, D.C. 20510

Re: Notice of Noncompliance
for VHA, Inc. (Voluntary Hospitals of America, Inc.)
ID: 30255019
2000 Mid-Year Amended Lobbying Report

To Whom It May Concern:

In response to a April 30, 2004, letter from Jeff Trandahl, Office of the Clerk, House of Representatives (copy enclosed), please find enclosed an **Amended 2000 Year Report** for lobbying activity undertaken by Gardner Carton & Douglas on behalf of client, Voluntary Hospitals of America, Inc. I regret that the report originally filed August 11, 2000, inadvertently omitted the information required by line 18. Please feel free to contact me if you have any questions.

Sincerely,



Kathleen M. Nilles

Enclosures

- Notice of Noncompliance (April 30, 2004)
- Amended 2000 Mid-Year Report (May 10, 2004)

DC01/ 424063.1

Gardner Carton & Douglas LLP

JEFF TRANDAHL
CLERK

GERASIMOS C. VANS
DEPUTY CLERK

H-15

Office of the Clerk
U.S. House of Representatives
Washington, DC 20515-6601

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April 30, 2004

By Certified Mail Return Receipt

Gardner, Carton & Douglas
1301 K Street, NW, #900 East Tower
Washington, D.C. 20005

Re: Notice of Noncompliance
For: VHA, Inc. (Voluntary Hospitals of America, Inc.)
ID: 30255019

Pursuant to 2 U.S.C. §1605(7), this letter is to provide you with notice of noncompliance with the following requirements of the Lobbying Disclosure Act, 2 U.S.C. §1601, et seq.:

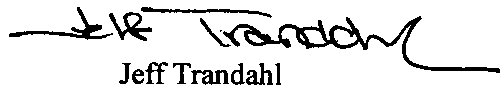
Failure to file a 2000 Midyear Amended Report to correct the following error or omission for VHA, Inc. (Voluntary Hospitals of America, Inc.) ID #30255019:

- **Line 18 was omitted. Please disclose the name of each employee who acted as lobbyist during the reporting period; or, if no lobbyist performed lobbying activity during the reporting period, state 'None'.**

You are required by law to provide an appropriate response within **60 days** of the date of this letter [2 U.S.C. §1605(8)]. Failure to do so will result in referral of this matter to the **United States Attorney for the District of Columbia** for legal action. Please be advised that violators of the Lobbying Disclosure Act are subject to a **civil fine** of up to \$50,000.

If you have any questions regarding this matter, please do not hesitate to call Steve Pingeton, Legislative Resource Center at 202-226-5200.

Sincerely,


Jeff Trandahl

Clerk of the House of Representatives
Legislative Resource Center
B-106 Cannon Building
Washington, DC 20515

Secretary of the Senate
Office of Public Records
232 Hart Building
Washington, DC 20510

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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant Name GARDNER CARTON & DOUGLAS LLP			
2. Registrant Address <input type="checkbox"/> Check if different than previously reported Address 1301 K Street, N.W. Suite 900, East Tower City Washington, D.C. State/Zip (or Country) 20005			
3. Principal Place of Business (if different from line 2) City Chicago State/Zip (or Country) IL 60610-4795			
4. Contact Name Kathleen M. Nilles	Telephone 202-230-5140	E-mail (optional) knilles@dc.gcd.com	5. Senate ID # 15805-265
7. Client Name <input type="checkbox"/> Self VHA (Voluntary Hospitals of America), Inc.			6. House ID # 30255019

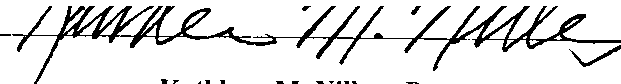
TYPE OF REPORT 8. Year 2000 Midyear (January 1-June 30) ☒ OR Year End (July 1-De

9. Check if this filing amends a previously filed version of this report ☒

10. Check if this is a Termination Report ☐ >> Termination Date _____ 11. No Lobby

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> >> \$ <u>\$20,000.00</u> Income (nearest \$20,000)</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000 of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this rep period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> >> \$ _____ Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description of</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definiti</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6032 the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(Internal Revenue Code</p>
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Signature  Date 5/10/2004
Printed Name and Title Kathleen M. Nilles - Partner Pag

Registrant Name: GARDNER CARTON & DOUGLAS LLP

Client Name: VHA (Voluntary Hospitals of America), Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code TAX (one per page)

16. Specific Lobbying issues

**H.R. 1914, To amend the Internal Revenue Code of 1986 to permit cooperatives to pay dividends on preferred without reducing patronage dividends,
Proposals involving tax treatment of health care providers.
Tax reform proposals affecting tax-exempt organizations.**

17. House(s) of Congress and Federal agencies contacted

☒ Check if None

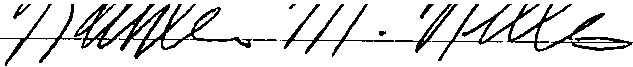
18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Nilles, Kathleen M.	

19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if None

K. A. A. M. M. A.

Signature  Date 5/10/2004

Printed Name and Title Kathleen M. Nilles - Partner Page