Comerica Bank

June 25, 2008

FEC MAIL CENTER

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Ms. Sylvette Seay
Federal Election Commission
Campaign Finance Analyst
Reports Analysis Division
Washington, D.C. 20463

Re: Premera Blue Cross Political Action Committee/Premera PAC

FEC # C00409227

Dear Ms. Seay:

This letter is being sent in response to your letter dated May 9, 2008 regarding the Year End Report (07/01/07 - 12/31/07) for the Premera PAC.

Per your letter we had unknowingly exceeded the limits for "People for Patty Murray" in the 2010 Primary Election prohibiting a multicandidate committee and its affiliates from making a contribution to a federal candidate in excess of \$5,000.00 per election.

Due to the conditions of exceeding the 60 day period for redesignation, we had to request a refund from the candidate. On June 10, 2008 a misc form 99 was electronically filed to notify you of our intentions on this matter.

Therefore attached please find the following copies for your records:

- FEC letter, dated 05/09/08
- Copy of misc form 99, filed 06/10/08
- Copy of the refund check, received & deposited 06/25/08

We will be reflecting the above mentioned refund on our Quarterly FEC report that is due on July 15, 2008.

Should you have any further questions or concerns regarding this matter please feel free to contact me at 248-371-7271. I will be happy to assist you.

Respectfully,

PAC Account Analyst

CC: Judson Greif, Premera Blue Cross

Encl.



FEDERAL ELECTION COMMISSION

May 9, 2008

Jack McRae, Treasurer
Premera Blue Cross Political
Action Committee/Premera PAC
7001 220th Street SW, MS 355
Mountlake Terrace, WA 98043

Response Due Date: June 09, 2008

Identification Number: C00409227

Reference: Year End Report (7/1/07-12/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following item:

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

PREMERA BLUE CROSS POLITICAL ACTION COMMITTEE/PREMERA PAC Page 2

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1393.

Sylvette Seay

Sincerely.

Campaign Finance Analyst

Reports Analysis Division

PREMERA BLUE CROSS POLITICAL ACTION COMMITTEE/ PREMERA PAC Page 3

Excessive Contribution to a Candidate/Committee with an Affiliated Committee

| Recipient Name | Date | Amount | Election | Report | Contributing Affiliate |
|---|---------------------|------------------|----------|------------------------|------------------------|
| People for Patty Murray. US Senate Campaign | 3/21/06 | \$1,000 | P-2010 | 2006 April Quarterly | C00252684 |
| People for Patty Murray US Senate Campaign | 6/6/06 [™] | \$1,000 | P-2010 | 2006 July Quarterly | C00409227 |
| People for Patty Murray US Senate Campaign | 3/6/07 | \$1,000 | P-2010 | 2007 Mid-Year | C00409227 |
| People for Patty Murray US Senate Campaign | 3/22/07 | \$1,000 | P-2010 | 2007 Mid-Year | C00252684 |
| People for Patty Murray US Senate Campaign | 6/14/07 | \$1,000 | P-2010 | 2007 Mid-Year | C00252684 |
| People for Patty Murray | 9/7/07 | \$2,500 <i>;</i> | P-2010 | 2007 Year End | C00409227 |

ETEXT ATTACHMENT

This is being sent in response to your letter dated May 9th, 2008 regarding exceeding the limits for the 2010 Primary Election for the candidate "People for Patty Murray". We are in the process of requesting a refund from the above mentioned candidate. We will be reflecting this refund in our Quarterly FEC due July 15, 2008.

FEC-344201

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| Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMIN The FEC added this page to the end of this filing to indicate | _ |
|---|-----------------------|
| Hand Delivered | Date of Receipt |
| USPS First Class Mail | Postmarked |
| USPS Registered/Certified | Postmarked (R/C) |
| USPS Priority Mail | Postmarked |
| Delivery Confirmation™ or Signature Conf | firmation™ Label |
| USPS Express Mail | Postmarked |
| Postmark Illegible | |
| No Postmark | |
| Overnight Delivery Service (Specify): Fed 6 | Shipping Date |
| Next Busine | ess Day Delivery |
| Received from House Records & Registration Office | Date of Receipt |
| Received from Senate Public Records Office | Date of Receipt |
| Received from Electronic Filing Office | Date of Receipt |
| Other (Specify): | Receipt or Postmarked |
| 5~ | 6/26/-8 |
| (3/2005) | DATE PREPARED |