FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Brenda H. McLaughlin, Treasurer
Blue PAC (Captial Independence
Northeastern & Western
Pennsylvania Blue Cross Plans PAC)
2500 Emerson Avenue
Harrisburg, PA 17177

SEP 21 1994

Identification Number: C00270967

Reference: July Quarterly Report (4/21/94-6/30/94)

Dear Ms. McLaughlin:

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 H4 of your report (pertinent portion attached) discloses a transfer of $1,800 from the BluePAC State Cash Account which appears to be the non-federal account of your committee. Please be advised that the non-federal account is prohibited from paying for the federal portion of shared allocable expenses. These types of costs must be paid according to the allocation ratio derived from the appropriate method on Schedule H1.

If the transfer in question was incorrectly disclosed, please amend your report with clarifying information. If your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR § 106.5 and 106.6 and establish procedures to insure future compliance with allocation regulations.

Although the Commission may take further legal action regarding this improper allocation activity, your prompt action 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

94059233219

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,

Terry Reynolds

Terry Reynolds
Reports Analyst
Reports Analysis Division

244

94039120431

RECEIPT SCHEDULE H3
(effective 1/1/91)

TRANSFERS FROM NON-FEDERAL ACCOUNTS

PAGE	OF
1	1

FOR LINE 18

NAME OF COMMITTEE	TOTAL AMOUNT TRANSFERRED
BluePAC Pennsylvania Blue Cross Plans PAC	

NAME OF ACCOUNT	DATE OF RECEIPT	
BluePAC State Cash Account	4/25/94	$ 1,800.00

	BREAKDOWN OF TRANSFER RECEIVED		
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
i) Total Administrative/Voter Drive	1,800.00		
ii) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

NAME OF ACCOUNT	DATE OF RECEIPT	
		$

	BREAKDOWN OF TRANSFER RECEIVED		
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
i) Total Administrative/Voter Drive			
ii) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

	TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS	
SUBTOTAL THIS PAGE				
TOTAL THIS PERIOD				

9 4 0 3 9 2 3 3 2 2 2