



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-3

November 14, 2002

Ronald B. Holroyd, Treasurer
Blue Shield of California
50 Beale Street
San Francisco, CA 94105

Identification Number: C00340364

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Holroyd:

This letter is to inform you that as of November 13, 2002, the Commission has not received your response to our request for additional information, dated October 23, 2002. 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).

An adequate response must be received at the Commission by December 4, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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, please contact Andrea Needles on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20453

RQ-2

Ronald B. Holroyd, Treasurer
Blue Shield of California
50 Beale Street
San Francisco, CA 94105

JUL 8 2002

Identification Number: C00340364

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Holroyd:

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 one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

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

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

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.

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

A 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. Electronic filers must file amendments (to include statements, designation 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Andrea S. Needles

Andrea S. Needles
Senior Campaign Finance Analyst
Reports Analysis Division

12037635100

SCHEDULE B (FEC Form 320)
ITEMIZED DISBURSEMENTS

FOR LINE 14B ONLY
Check any that apply
11b 12 13 14 15 16 17 18 19

Any information shown on this Schedule B and Disbursements may not be used by any person for the purpose of soliciting contributions or for non-financial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE OR FUND
EUSC School of California Political Action Committee

A. For Name (Last, First, Middle Initial)
Date of Disbursement: 06/15/2002
Amount of Each Disbursement This Period: 8000.00
Meeting Address: 1540 G Street N.W., Washington, DC 20002
Candidate Name:
Disbursement For: 2002 Primary X General Other (specify)
Transmission ID: 8820.8079

B. Full Name (Last, First, Middle Initial)
Date of Disbursement: 06/18/2002
Amount of Each Disbursement This Period: 1000.00
Meeting Address: 8995 Wilshire Blvd, Beverly Hills, CA 90211
Candidate Name:
Disbursement For: 2002 Primary X General Other (specify)
Transmission ID: 8820.8082

C. Full Name (Last, First, Middle Initial)
Date of Disbursement: 09/13/2002
Amount of Each Disbursement This Period: 8000.00
Meeting Address: 1188 20th Street N.W., Washington, DC 20002
Candidate Name:
Disbursement For: 2002 Primary X General Other (specify)
Transmission ID: 8820.8080

TOTAL OF DISBURSEMENTS THIS PERIOD (11b)(1)
TOTAL THIS PERIOD (Sub total and amount of)
FEC Schedule B

Vertical text on the left margin, possibly a date or reference number.

Handwritten signature or initials on the right side of the page.

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 24 / 49
	<input type="checkbox"/> 21b <input type="checkbox"/> 21 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26a <input type="checkbox"/> 26b <input type="checkbox"/> 26c <input type="checkbox"/> 29	

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)
Highmark Health PAC of Highmark Blue Cross Blue Shield

A. DEVIN NUNES FOR CONGRESS 2002

Full Name (Last, First, Middle Initial) _____ Date of Disbursement
 02 / 25 / 2002

Mailing Address
 PO BOX 891
 City PIXLEY State CA Zip Code 93256 Amount of Each Disbursement this Period
 1000.00

Purpose of Disbursement
 Contribution
 Candidate Name _____ Category/Type _____

Office Sought: House Senate President Disbursement For: 2002
 Primary General
 Other (specify) _____

State: CA District: 21 Transaction ID: SB23.7346

**B. HEALTH PLAN PAC OF THE AMERICAN ASSOC OF HEALTH PLANS
 FKA GROUP HEALTH ASSOC OF AMER PAC**

Full Name (Last, First, Middle Initial) _____ Date of Disbursement
 02 / 25 / 2002

Mailing Address
 1129 20TH STREET NW #800
 City WASHINGTON State DC Zip Code 20036 Amount of Each Disbursement this Period
 1000.00

Purpose of Disbursement
 Contribution
 Candidate Name _____ Category/Type _____

Office Sought: House Senate President Disbursement For: _____
 Primary General
 Other (specify) _____

State: _____ District: _____ Transaction ID: SB23.7345

C. PAT TOOMEY FOR CONGRESS COMMITTEE

Full Name (Last, First, Middle Initial) _____ Date of Disbursement
 03 / 25 / 2002

Mailing Address
 2720 JORDAN ROAD
 City OREFIELD State PA Zip Code 18069 Amount of Each Disbursement this Period
 500.00

Purpose of Disbursement
 Contribution
 Candidate Name _____ Category/Type _____

Office Sought: House Senate President Disbursement For: 2002
 Primary General
 Other (specify) _____

State: PA District: 15 Transaction ID: SB23.7472

SUBTOTAL of Disbursements This Page (all lines) 2500.00

TOTAL This Period (see page this line number only)

0922 - 10 22 - 2018 11 - 2018 11 - 2018