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May 17, 2006

2006 MAY 22 A 11:32

Andrea Needles
Senior Campaign Finance Analyst
Federal Election Commission
Washington, D.C. 20463

Re: I.D. # C00340364

Dear Ms. Needles:

I am writing in response to your letter of April 21, 2006. You report that FEC records show that contributions made by Blue Shield of California, in combination with those made by affiliated PACs, have exceeded the maximum limits in four instances.


Please note the following with regard to each of these cases:

- **Dreier for Congress Committee and Feinstein for Senate Committee.** Your records erroneously indicate that Pacificare Health System, Inc., Emp. PAC is an affiliate of ours. Blue Shield of California and Pacificare Health System are not affiliated in any way.
- **Friends of Max Baucus.** Excluding the reported contribution from Pacificare Health System PAC, our contribution of \$2,500 on October 10, 2005, exceeds the maximum by \$1500. We made this contribution unaware of the contribution made by WellChoice PAC, which is an affiliated committee. To correct this error, we requested a \$1,500 refund from Friends of Max Baucus. (See attached copies of letter and refund check.)
- **Kennedy for Senate 2006.** The Blue Cross Blue Shield Association PAC informed me that the \$2500 contribution they made on May 12, 2005 was mistakenly reported as a general election contribution. It should have been reported as a contribution of \$1000 to the primary election and \$1500 to the general election. The BCBSA PAC has filed an amendment to correct the error. (See attached except from amended report.) With this correction, Blue Shield of California's December 12, 2005, general election contribution of \$2,000 falls within the limit.

Please let me know if you have any questions regarding the above. I can be reached at 415-229-5891 or tin.nguyen@blueshieldca.com.

Thank you for your understanding.

Sincerely,


Tin Nguyen



**Blue Shield
of California**

An Independent Member
of the Blue Shield Association

May 5, 2006

Holly Giarraputo
Friends of Max Baucus
818 Connecticut Ave., N.W.
Suite 1100
Washington, DC 20006

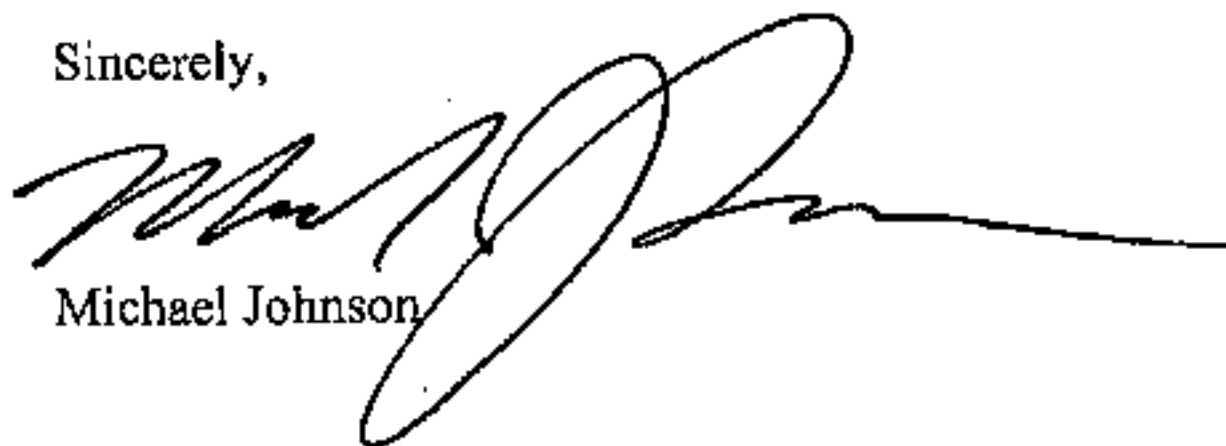
By Fax: 410-461-2077

Dear Ms. Giarraputo:

As we discussed, I am writing to request a refund of \$1500 from the \$2500 contribution made by the Blue Shield of California Political Action Committee on October 25, 2005. As a result of an earlier contribution we were unaware had been made by an affiliated PAC, our October contribution exceeded the \$5000 limit for the primary election by \$1500.

Thank you for your understanding.

Sincerely,



Michael Johnson

50 Beale Street, San Francisco, CA 94105-1819
Mail to: P.O. Box 7168, San Francisco, CA 94120-7168
www.mylifepath.com

26039083720

1417

FRIENDS OF MAX BAUCUS
PO BOX 586
HELENA, MT 59624

BANK OF AMERICA
02982 MD
7-163-520

5/5/2006

PAY TO THE ORDER OF Blue Shield of California PAC \$ ***1,500.00

One Thousand Five Hundred and 00/100 ***** DOLLARS

Blue Shield of California PAC
50 Beale Street
San Francisco, CA 94105
Attn: Mike Johnson



MEMO

refund

⑈001417⑈ ⑈052001633⑈ 003922656704⑈

Security Features included. Details on back.

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RECEIVED
FED. MAIL
OPERATIONS CENTER

2006 MAY 22 A 11:32

FEC
FORM 3X

REPORT OF RECEIPTS
AND DISBURSEMENTS
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) USE FEC MAILING LABEL OR TYPE OR PRINT Example: If typing, type over the lines

BLUEPAC - BLUE CROSS BLUE SHIELD ASSOCIATION PAC

ADDRESS (number and street)

1310 G STREET, NW

Check if different than previously reported. (ACC)

WASHINGTON

DC

20005

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00194748

3. IS THIS REPORT NEW (N) OR AMENDED (A)

X

4. TYPE OF REPORT (Choose One)
(a) Quarterly Reports:
April 15 Quarterly Report (Q1)
July 15 Quarterly Report (Q2)
October 15 Quarterly Report (Q3)
January 31 Quarterly Report (YE)
X July 31 Mid-Year Report (Non-election Year Only) (MY)
Termination Report (TER)
(b) Monthly Report Due On:
Feb 20 (M2)
Mar 20 (M3)
Apr 20 (M4)
May 20 (M5)
Jun 20 (M6)
Jul 20 (M7)
Aug 20 (M8)
Sep 20 (M9)
Oct 20 (M10)
Nov 20 (M11) (Non-Election Year Only)
Dec 20 (M12) (Non-Election Year Only)
Jan 31 (YE)
(c) 12-Day PRE-Election Report for the:
Primary (12P)
General (12G)
Runoff (12R)
Convention (12C)
Special (12G)
Election on in the State of
(d) 30-Day Post-Election Report for the:
General (30G)
Runoff (30R)
Special (30S)
Election on in the State of

5. Covering Period 01 01 2005 through 06 30 2005

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer KATHY DIDAWICK

Signature of Treasurer Electronically Filed by KATHY DIDAWICK Date 05 09 2006

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

26039083721

**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 72 / 88

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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)
BLUEPAC - BLUE CROSS BLUE SHIELD ASSOCIATION PAC

Full Name (Last, First, Middle Initial) A. Kennedy for Senate 2006		Transaction ID: 50517.E1163	
Mailing Address 301 4th Street, NE Suite 202		Date of Disbursement 04 / 07 / 2005	
City Washington	State DC	Zip Code 20002-	Amount of Each Disbursement this Period 2500.00
Purpose of Disbursement DIRECT CONTRIBUTION		Category/ Type	
Candidate Name EDWARD MOORE SENATOR KENNEDY		DIRECT CONTRIBUTION	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2006 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State: MA	District: 00		

Full Name (Last, First, Middle Initial) B. Kennedy for Senate 2006		Transaction ID: 50517.E1164	
Mailing Address 301 4th Street, NE Suite 202		Date of Disbursement 05 / 11 / 2005	
City Washington	State DC	Zip Code 20002-	Amount of Each Disbursement this Period -2500.00
Purpose of Disbursement VOID		Category/ Type	
Candidate Name		VOID	
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2006 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State:	District:		

Full Name (Last, First, Middle Initial) C. Kennedy for Senate 2006		Transaction ID: 50517.E1165	
Mailing Address 301 4th Street, NE Suite 202		Date of Disbursement 05 / 12 / 2005	
City Washington	State DC	Zip Code 20002-	Amount of Each Disbursement this Period 1500.00
Purpose of Disbursement DIRECT CONTRIBUTION		Category/ Type	
Candidate Name EDWARD MOORE SENATOR KENNEDY		DIRECT CONTRIBUTION	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2006 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State: MA	District: 00		

SUBTOTAL of Disbursements This Page (optional)	1500.00
TOTAL This Period (last page this line number only)	

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**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 73 / 88				
	<input type="checkbox"/> 21b <input type="checkbox"/> 27	<input type="checkbox"/> 22 <input type="checkbox"/> 28a	<input checked="" type="checkbox"/> 23 <input type="checkbox"/> 28b	<input type="checkbox"/> 24 <input type="checkbox"/> 28c	<input type="checkbox"/> 25 <input type="checkbox"/> 29	<input type="checkbox"/> 26 <input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
BLUEPAC - BLUE CROSS BLUE SHIELD ASSOCIATION PAC

A. Kennedy for Senate 2006

Full Name (Last, First, Middle Initial)
 Kennedy for Senate 2006

Transaction ID: 60509.E1425
 Date of Disbursement
 05 / 12 / 2005

Mailing Address 301 4th Street, NE
 Suite 202

City Washington State DC Zip Code 20002-

Purpose of Disbursement
 DIRECT CONTRIBUTION

Candidate Name
 EDWARD MOORE SENATOR KENNEDY

Office Sought: House Senate President
 Disbursement For: 2008 Primary General Other (specify) ▼

State: MA District: 00

Amount of Each Disbursement this Period
 1000.00

DIRECT CONTRIBUTION

B. Kennedy for Senate 2006

Full Name (Last, First, Middle Initial)
 Kennedy for Senate 2006

Transaction ID: 50801.E1223
 Date of Disbursement
 06 / 24 / 2005

Mailing Address 301 4th Street, NE
 Suite 202

City Washington State DC Zip Code 20002-

Purpose of Disbursement
 DIRECT CONTRIBUTION

Candidate Name
 EDWARD MOORE SENATOR KENNEDY

Office Sought: House Senate President
 Disbursement For: 2008 Primary General Other (specify) ▼

State: MA District: 00

Amount of Each Disbursement this Period
 1500.00

DIRECT CONTRIBUTION

C. Kilpatrick For U.s. Congress

Full Name (Last, First, Middle Initial)
 Kilpatrick For U.s. Congress

Transaction ID: 50517.E1141
 Date of Disbursement
 03 / 15 / 2005

Mailing Address P.o. Box 32175

City Detroit State MI Zip Code 48232-

Purpose of Disbursement
 DIRECT CONTRIBUTION

Candidate Name
 CAROLYN CHEEKS KILPATRICK

Office Sought: House Senate President
 Disbursement For: 2008 Primary General Other (specify) ▼

State: MI District: 13

Amount of Each Disbursement this Period
 1000.00

DIRECT CONTRIBUTION

SUBTOTAL of Disbursements This Page (optional) ▶ 3500.00

TOTAL This Period (last page this line number only) ▶

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

26039083724

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>Fedex</i>	Shipping Date <i>5/19/06</i> Next Business Day Delivery <input checked="" type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

del
 PREPARER
 (3/2005)

5/22/06
 DATE PREPARED