



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

OCT 28 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

22037635100

SCHEDULE B (FEC Form 278)
ITEMIZED DISBURSEMENTS

Use separate sheet(s) for each of items of the Detailed Disbursement Table
FEDERAL ELECTION CAMPAIGN ACT OF 1971

Information stated on this form must be true and correct. Any false or misleading information may be cause for denial of any person for the purpose of receiving contributions for the campaign purposes. Donor furnishing the same will be liable for any and all consequences as set forth in the Federal Election Law.

A. Full Name (Last, First, Middle Initial)
to Barry Tarrish BOEVA Blue PAC
Date of Disbursement: 05/15/2002
Amount of Each Disbursement This Period: \$500.00
Category Type:
Office Designation:
Disbursement For: 2002
Priority: X General
Other (specify):

B. Full Name (Last, First, Middle Initial)
Legislative Outreach Campaign Committee
Date of Disbursement: 04/10/2002
Amount of Each Disbursement This Period: \$100.00
Category Type:
Office Designation:
Disbursement For: 2002
Priority: X General
Other (specify):

C. Full Name (Last, First, Middle Initial)
Health Plan PAC
Date of Disbursement: 05/01/2002
Amount of Each Disbursement This Period: \$500.00
Category Type:
Office Designation:
Disbursement For: 2002
Priority: X General
Other (specify):

ADDITIONAL DISBURSEMENTS THIS PERIOD:
TOTAL This Period (see page 278 for instructions only): \$1,000.00

05/15/2002

Jan

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

Use separate schedules for each category of the Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 26 / 49

<input type="checkbox"/> 21a	<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"/> 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

Full Name (Last, First, Middle Initial)
A. DEVIN NUNES FOR CONGRESS 2002

Date of Disbursement
02 / 25 / 2002

Mailing Address
PO BOX 891

City State Zip Code
PITNEY CA 93258

Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement
Contribution

Category/Type

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

Transaction ID: SB23.7349

Full Name (Last, First, Middle Initial)
B. HEALTH PLAN PAC OF THE AMERICAN ASSOC OF HEALTH PLANS
FKA GROUP HEALTH ASSOC OF AMER PAC

Date of Disbursement
02 / 25 / 2002

Mailing Address
1129 20TH STREET NW #800

City State Zip Code
WASHINGTON DC 20038

Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement
Contribution

Category/Type

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

Transaction ID: SB23.7545

Full Name (Last, First, Middle Initial)
C. PAT TOOMEY FOR CONGRESS COMMITTEE

Date of Disbursement
03 / 25 / 2002

Mailing Address
2720 JORDAN ROAD

City State Zip Code
OREFIELD PA 18089

Amount of Each Disbursement this Period
500.00

Purpose of Disbursement
Contribution

Category/Type

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

Transaction ID: SE23.7472

SUBTOTAL of Disbursements This Page (optional) 2500.00

TOTAL This Period (last page this line number only)

22.03.794.3.978