

RQ-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 25, 2004

Callen M. Lockett, Treasurer  
Wellpoint Health Networks WELLPAC  
1 Wellpoint Way T2-1a6  
Thousand Oaks, CA 91362

**Response Due Date:**  
**March 26, 2004**

Identification Number: C00197228

Reference: Year End Report (12/1/03-12/31/03)

Dear Mr. Lockett:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-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.

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.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))  
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

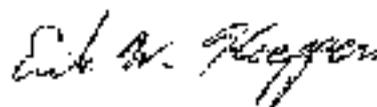
Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter.** 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 or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1136.

Sincerely,



Erik W. Koeppen  
Senior Campaign Finance Analyst  
Reports Analysis Division

Recipient Name	Date	Amount	Election	Report	Contributing Action
Earl Pomeroy for Congress	3/19/03	\$1,000	P-2004	2003 May Monthly	WILLPAC
Earl Pomeroy for Congress	4/4/03	\$1,000	P-2004	2003 Mid Year	BluePAC
Earl Pomeroy for Congress	5/15/03	\$1,000	P-2004	2003 June Monthly	WILLPAC
Earl Pomeroy for Congress	5/23/03	\$2,000	P-2004	2003 Mid Year	BluePAC
Earl Pomeroy for Congress	6/24/03	\$2,000	P-2004	2003 Mid Year	BluePAC
Earl Pomeroy for Congress	12/11/03	\$1,000	P-2004	2003 Year End	WILLPAC
Bush-Cheney '04 Inc	8/22/03	\$2,000	P-2004	2003 Year End	Regence BluePAC
Bush-Cheney '04 Inc	8/22/03	\$2,000	P-2004	2003 Year End	Regence BluePAC
Bush-Cheney '04 Inc	10/15/03	-\$1,000	P-2004	2003 Year End	BluePAC of Pennsylvania
Bush-Cheney '04 Inc	12/19/03	\$5,000	P-2004	2003 Year End	WILLPAC
Mike Dewine For US Senate	6/16/03	\$1,000	P-2006	2003 Mid Year	BluePAC
Mike Dewine For US Senate	11/25/03	\$2,500	P-2006	2003 Dec Monthly	WILLPAC
Mike Dewine For US Senate	12/9/03	\$2,500	P-2006	2003 Year End	BluePAC
Mike Dewine For US Senate	12/16/03	\$1,500	P-2006	2003 Year End	Arthem Insurance
Mike Dewine For US Senate	12/19/03	\$1,500	P-2006	2003 Year End	WILLPAC

