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2008 DEC 23 PM 12:30

December 12, 2008

Jodi Winship  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RE: AZ PAC

Dear Ms. Winship:

Zeneca Inc. Political Action Committee is in receipt of your inquiry dated November 14, 2008 regarding an itemized receipt reported on FEC Form 3X by RED PAC in the amount of \$3,500 as having been received from AZ PAC.

In reviewing the matter we have determined that RED PAC did not properly identify that this receipt came from the Zeneca Inc. Political Action Committee, not AZ PAC. AZ PAC is a pseudonym used by the Zeneca Inc. Political Action Committee.

The Zeneca Inc. Political Action Committee is a continuing federal PAC, FEC ID C00279455.

Should you have any questions, I can be reached at 302-886-7517.

Sincerely,

A handwritten signature in black ink that reads 'Kelly Rolison'.

Kelly Rolison  
Treasurer

28039962100



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-U

November 14, 2008

Treasurer  
AZ PAC  
701 Pennsylvania Ave, NW, Suite 500  
Washington, DC 20004

**Response Due Date:  
December 15, 2008**

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures for the purpose of influencing any election for federal office aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. §431(4)

A review of the receipts reported by the RED PAC indicates that your organization may have made expenditures in excess of \$1,000 during the calendar year 2008 to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. 2 U.S.C. §431(9). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (Copies of FEC FORMs 1 and 3X can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413); or
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

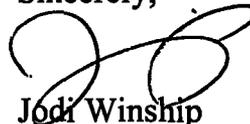
The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

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If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

**Please notify the Commission by the response due date noted above of your decision on this matter.** If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1136.

Sincerely,



Jodi Winship

Senior Campaign Finance Analyst  
Reports Analysis Division

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# SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 7 / 10

(check only one)

<input type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input checked="" type="checkbox"/>	11c	<input type="checkbox"/>	12	
<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>	16	
							<input type="checkbox"/>	17

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)

RED PAC

A.

Full Name (Last, First, Middle Initial)

AZ PAC

Mailing Address 701 PENNSYLVANIA AVE NW SUITE 500

City State Zip Code

WASHINGTON DC 20004

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼

3500.00

Date of Receipt

MM / DD / YYYY  
08 / 20 / 2008

Transaction ID: SA11C.5599

Amount of Each Receipt this Period

3500.00

2008 ANNUAL

B.

Full Name (Last, First, Middle Initial)

SOUTHERN COMPANY EMPLOYEES PAC

Mailing Address 241 RALPH MCGILL BLVD NE  
BIN 10111

City State Zip Code

ATLANTA GA 30308

FEC ID number of contributing federal political committee.

C C00144774

Name of Employer

Occupation

Receipt For:

Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼

2000.00

Date of Receipt

MM / DD / YYYY  
08 / 26 / 2008

Transaction ID: SA11C.5600

Amount of Each Receipt this Period

1000.00

2008 ANNUAL

SUBTOTAL of Receipts This Page (optional) .....

4500.00

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

4500.00

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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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked <i>12/16/08</i>
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
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 type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input 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
<i>Jru</i> PREPARER	<i>12/23/08</i> DATE PREPARED

(3/2005)

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