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2010 JAN -5 AM 9:55



December 29, 2009

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

RE: Zeneca Inc. Political Action Committee  
ID: C00279455  
Mid-Year Report (4/21/09-6/30/09)

Dear Mr. Butler:

Zeneca Inc. Political Action Committee (the PAC) is in receipt of your inquiry dated November 18, 2009 regarding the PAC's Mid-Year Report (4/21/09-6/30/09) as it relates to contributions made to Citizens for Arlen Specter, Michael Burgess for Congress, Mikulski for Senate Committee, and People for Patty Murray US Senate Campaign.

After reviewing the subject contributions I'm in full agreement that the PAC has erroneously made excess contributions to each of these campaigns. Therefore, to comply with the requirements set out under 11 CFR § 110.2(b) the PAC has requested refunds of the excess contributions from each of the campaigns. Attached for your reference are copies of the refund requests sent to the Treasurers of the campaign committees.

The PAC regrets the administrative error that resulted in these excess contributions and will take steps in the future to insure that this does not occur again.

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, AZ PAC

10030210247



December 22, 2009

Citizens for Arlen Specter  
Attn: Diane Evans  
236 Massachusetts Ave NE  
Washington, DC 20002

RE: Excess Contribution to Citizens for Arlen Specter 2010 Primary Election Campaign  
ID: C00280206

Dear Ms. Evans:

The Zeneca Inc. Political Action Committee (the PAC) regrets to inform you that the PAC and our affiliate MedImmune Affairs, Inc. Employee Political Awareness Committee (the Affiliate) erroneously made excess contributions of \$1,000.00 in aggregate to the Citizens for Arlen Specter 2010 primary election campaign above the \$5,000.00 limit. The table below lists the contributions made by the PAC and the Affiliate.

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Citizens For Arlen Specter	7/27/07	\$1,000	P-2010*	2007 Year-End	C00399725
Citizens for Arlen Specter	12/10/07	\$1,000	P-2010	2007 Year-End	C00279455
Citizens for Arlen Specter	2/21/08	\$1,000	P-2010	2008 April Quarterly	C00279455
Citizens for Arlen Specter	3/21/08	\$1,000	P-2010	2008 April Quarterly	C00279455
Citizens for Arlen Specter	3/18/09	\$1,000	P-2010	2009 30 Day Post-Special	C00279455
Citizens for Arlen Specter	4/23/09	\$1,000	P-2010	2009 Mid-Year	C00279455

Pursuant to 11 CFR § 110.2(b) the PAC must request a refund of the excess contribution or provide a written authorization for a redesignation of the contribution within 60 days. Since the 60-day window has passed, the PAC respectfully requests that you refund the excess contribution of \$1,000.00 at your earliest convenience to the address listed below:

10030210248

Zeneca Inc. Political Action Committee  
c/o Zeneca Inc. – Kelly Rolison A2B-314A  
1800 Concord Pike, PO Box 15438  
Wilmington, DE 19850-5438

The PAC regrets the administrative error that resulted in this excess contribution and appreciates your understanding in this matter.

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

Sincerely,



Kelly Rolison  
Treasurer, AZ PAC

10030210249



December 22, 2009

Michael Burgess for Congress  
Attn: Robert Sherman  
P.O. Box 2334  
Denton, TX 76202

RE: Excess Contribution to Michael Burgess for Congress 2010 Primary Election Campaign  
ID: C00372532

Dear Mr. Sherman:

The Zeneca Inc. Political Action Committee (the PAC) regrets to inform you that the PAC and our affiliate MedImmune Affairs, Inc. Employee Political Awareness Committee (the Affiliate) erroneously made excess contributions of \$2,000.00 in aggregate to the Michael Burgess for Congress 2010 primary election campaign above the \$5,000.00 limit. The table below lists the contributions made by the PAC and the Affiliate.

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Michael Burgess for Congress	3/11/09	\$2,500	P-2010	2009 April Monthly	C00399725
Michael Burgess for Congress	5/15/09	\$2,000	P-2010	2009 Mid-Year	C00399725
Michael Burgess for Congress	6/04/09	\$1,000	P-2010	2009 Mid-Year	C00279455
Michael Burgess for Congress	6/23/09	\$1,500	P-2010	2009 Mid-Year	C00279455

Pursuant to 11 CFR § 110.2(b) the PAC must request a refund of the excess contribution or provide a written authorization for a redesignation of the contribution within 60 days. Since the 60-day window has passed, the PAC respectfully requests that you refund the excess contribution of \$2,000.00 at your earliest convenience to the address listed below:

Zeneca Inc. Political Action Committee  
c/o Zeneca Inc. – Kelly Rolison A2B-314A  
1800 Concord Pike, PO Box 15438  
Wilmington, DE 19850-5438

10030210250

The PAC regrets the administrative error that resulted in this excess contribution and appreciates your understanding in this matter.

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

Sincerely,

A handwritten signature in cursive script that reads "Kelly Rolison".

Kelly Rolison  
Treasurer, AZ PAC

10030210251



December 22, 2009

Mikulski For Senate  
Attn: Saul Gilstein  
PO Box 13147  
Baltimore, MD 21203

RE: Contribution to Mikulski For Senate 2010 Primary Election Campaign  
ID: C00199273

Dear Mr. Gilstein:

The Zeneca Inc. Political Action Committee (the PAC) regrets to inform you that the PAC and our affiliate MedImmune Affairs, Inc. Employee Political Awareness Committee (the Affiliate) erroneously made excess contributions of \$1,000.00 in aggregate to the Mikulski For Senate 2010 primary election campaign above the \$5,000.00 limit. The table below lists the contributions made by the PAC and the Affiliate.

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Mikulski For Senate Committee	3/11/09	\$2,500	P-2010	2009 April Monthly	C00399725
Mikulski for Senate Committee	4/23/09	\$3,500	P-2010	2009 Mid-Year	C00279455

Pursuant to 11 CFR § 110.2(b) the PAC must request a refund of the excess contribution or provide a written authorization for a redesignation of the contribution within 60 days. Since the 60-day window has passed, the PAC respectfully requests that you refund the excess contribution of \$1,000.00 at your earliest convenience to the address listed below:

Zeneca Inc. Political Action Committee  
c/o Zeneca Inc. – Kelly Rolison A2B-314A  
1800 Concord Pike, PO Box 15438  
Wilmington, DE 19850-5438

The PAC regrets the administrative error that resulted in this excess contribution and appreciates your understanding in this matter.

10030210252

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

Sincerely,

A handwritten signature in black ink that reads "Kelly Rolison". The signature is written in a cursive style with a long horizontal flourish at the end.

Kelly Rolison  
Treasurer, AZ PAC

10030210253



December 22, 2009

People for Patty Murray  
Attn: Jay Petterson  
PO Box 3662  
Seattle, WA 98124

RE: Contribution to People for Patty Murray 2010 Primary Election Campaign  
ID: C00257642

Dear Mr. Petterson:

The Zeneca Inc. Political Action Committee (the PAC) regrets to inform you that the PAC and our affiliate MedImmune Affairs, Inc. Employee Political Awareness Committee (the Affiliate) erroneously made excess contributions of \$500.00 in aggregate to the People for Patty Murray 2010 primary election campaign above the \$5,000.00 limit. The table below lists the contributions made by the PAC and the Affiliate.

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
People for Patty Murray U S Senate Campaign	12/10/07	\$2,000	P-2010	2007 Year-End	C00279455
People for Patty Murray U S Senate Campaign	3/18/09	\$500	P-2010	2009 30 Day Post-Special	C00279455
People for Patty Murray U S Senate Campaign	3/18/09	\$500	P-2010	2009 30 Day Post-Special	C00279455
People For Patty Murray U S Senate Campaign	3/25/09	\$1,000	P-2010	2009 April Monthly	C00399725
People for Patty Murray U S Senate Campaign	6/04/09	\$1,500	P-2010	2009 Mid-Year	C00279455

Pursuant to 11 CFR § 110.2(b) the PAC must request a refund of the excess contribution or provide a written authorization for a redesignation of the contribution within 60 days. Since the 60-day window has passed, the PAC respectfully requests that you refund the excess contribution of \$500.00 at your earliest convenience to the address listed below:

Zeneca Inc. Political Action Committee  
c/o Zeneca Inc. – Kelly Rolison A2B-314A  
1800 Concord Pike, PO Box 15438  
Wilmington, DE 19850-5438

AstraZeneca/Zeneca Inc. PAC | 701 Pennsylvania Avenue, NW, Suite 500, Washington, DC 20004

Tel: (202) 350-5500 | Fax: (202) 350-5510

10030210254

The PAC regrets the administrative error that resulted in this excess contribution and appreciates your understanding in this matter.

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

Sincerely,

A handwritten signature in cursive script that reads "Kelly Rolison".

Kelly Rolison  
Treasurer, AZ PAC

10030210255



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 18, 2009

Kelly J. Rolison, Treasurer  
Zeneca Inc. Political Action Committee  
c/o Zeneca Inc.  
1800 Concord Pike, PO Box 15437  
Wilmington, DE 19850

Response Due Date:  
December 23, 2009

Identification Number: C00279455

Reference: Mid-Year Report (4/21/09 – 6/30/09)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following item:

-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.

10030210256

ZENECA INC. POLITICAL ACTION COMMITTEE

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Please inform the Commission of your corrective action promptly 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.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. Requests for extensions of time in which to respond will not be considered.

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 5 to reach the Reports Analysis Division) or my local number (202) 694-1162.

Sincerely,



David Butler  
Campaign Finance Analyst  
Reports Analysis Division

10030210257

ZENECA INC. POLITICAL ACTION COMMITTEE

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**Excessive Contributions to Candidates with Contributing Affiliated Committees**

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Citizens For Arlen Specter	7/27/07	\$1,000	P-2010*	2007 Year-End	C00399725
Citizens for Arlen Specter	12/10/07	\$1,000	P-2010	2007 Year-End	C00279455
Citizens for Arlen Specter	2/21/08	\$1,000	P-2010	2008 April Quarterly	C00279455
Citizens for Arlen Specter	3/21/08	\$1,000	P-2010	2008 April Quarterly	C00279455
Citizens for Arlen Specter	3/18/09	\$1,000	P-2010	2009 30 Day Post-Special	C00279455
Citizens for Arlen Specter	4/23/09	\$1,000	P-2010	2009 Mid-Year	C00279455
Michael Burgess for Congress	3/11/09	\$2,500	P-2010	2009 April Monthly	C00399725
Michael Burgess for Congress	5/15/09	\$2,000	P-2010	2009 Mid-Year	C00399725
Michael Burgess for Congress	6/04/09	\$1,000	P-2010	2009 Mid-Year	C00279455
Michael Burgess for Congress	6/23/09	\$1,500	P-2010	2009 Mid-Year	C00279455
Mikulski For Senate Committee	3/11/09	\$2,500	P-2010	2009 April Monthly	C00399725
Mikulski for Senate Committee	4/23/09	\$3,500	P-2010	2009 Mid-Year	C00279455
People for Patty Murray U S Senate Campaign	12/10/07	\$2,000	P-2010	2007 Year-End	C00279455
People for Patty Murray U S Senate Campaign	3/18/09	\$500	P-2010	2009 30 Day Post-Special	C00279455
People for Patty Murray U S Senate Campaign	3/18/09	\$500	P-2010	2009 30 Day Post-Special	C00279455
People For Patty Murray U S Senate Campaign	3/25/09	\$1,000	P-2010	2009 April Monthly	C00399725
People for Patty Murray U S Senate Campaign	6/04/09	\$1,500	P-2010	2009 Mid-Year	C00279455

\*Schedule B of your affiliate's report discloses this contribution as designated to the 2008 Primary election; however, this candidate did not participate in a primary election in 2008. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2010 Primary.

10030210258

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 12/30/09
<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

  
PREPARER
1/5/10  
DATE PREPARED

10030210259