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Daniel P. Amos
President

Joey M. Loudermilk
Treasurer

Aflac PAC

David L. Pringle
Secretary

Aflac Incorporated
Political Action Committee

April 14, 2009

Mr. Christopher J. Morse
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Dear Mr. Morse,

Enclosed please find copies of your letter dated March 6, 2009 to Aflac PAC; Aflac PAC's letter to Alaskans for Begich, and the response letter from them.

This should complete Aflac PAC's response regarding your inquiry. Please do not hesitate to contact me if needed.

Sincerely yours,

Earlene Johnson

Earlene R. Johnson
Assistant to David L. Pringle
Aflac PAC

29030070551

Mark Begich for U.S. Senate

March 20, 2009

Mr. David Pringle
Secretary
Aflac PAC
1932 Wynnton Road
Columbus, GA 31999

Re: Alaskans for Begich
FEC ID No. C00446260

29030070552

Dear Mr. Pringle,

This is in response to the letter you received from the FEC in reference to your 2008 General Election Debt Retirement Contribution to Alaskans for Begich. The Committee received your contribution designated to debt retirement on December 26th, 2008 in the amount of $1,000

The Committee is amending the Schedule D Debts and Obligations section of our Form 3 Report of Receipts and Disbursements reflecting that the Committee did in fact have allowable debts at the time of your contribution.

Feel free to attach this letter to your response to the FEC.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee at 907-223-9994.

Very truly yours,

Kevin Wiley
Treasurer
Alaskans for Begich

Daniel P. Amos
President

Joey M. Loudermilk
Treasurer

Aflac Incorporated
Political Action Committee

David L. Pringle
Secretary

March 12, 2009

Ms. Jennifer Mueller
Alaskans for Begich
P.O. Box 240287
Anchorage, AK 99524

Dear Ms. Mueller,

On December 10, 2008, Aflac wrote a contribution for Mr. Begich's debt retirement based on a letter received from your office. Aflac has been notified by the Federal Election Commission that at the time of this contribution there was no debt outstanding.

As a result, Aflac requests a refund the amount of $1,000 for that debt retirement contribution. Time is of the essence, as the FEC requires a response promptly.

Sincerely yours,

David L. Pringle
Secretary, Aflac PAC

c: Christopher Morse, Federal Election Commission

29030070553

RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 6, 2009

Mr. Joey M. Loudermilk, Treasurer
AFLAC Incorporated Political Action Committee
1932 Wynnton Road
Columbus, GA 31999

Response Due Date:
April 6, 2009

Identification Number: C00034157

Reference: Year End Report (11/25/08-12/31/08)

29030070554

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 3 items:

1. 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.

2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the **2008 Primary** election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

29030070555

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund 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.

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 this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

3. Schedule B of your report discloses one or more contributions to "Alaskans for Begich" for the retirement of debts incurred by the **2008**

General election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund 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.

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, refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding this impermissible activity, 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.

29030070556

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) 694-1133.

Sincerely,

Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division

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29030070557

Excessive Contributions to a Candidate

Recipient Name	Date	Amount	Election	Report
Udall for Colorado	8/03/07	$1,500	General	2007 September Monthly
Udall for Colorado	12/13/07	$2,500	General	2007 Year End
Udall for Colorado	1/15/08	$1,000	General	2008 February Monthly
Udall for Colorado	12/10/08	$2,500	General*	2008 Year End

Refund Rec'd

* For General Election Debt Retirement

Primary Contributions Made After Election

Recipient Name	Date	Amount	Election	Election State - Date
Bill Cassidy for Congress	12/10/08	$2,000	Primary	LA – 10/04/08
Childers for Congress	12/10/08	$1,000	Primary	MS – 3/11/08

Refund Rec'd

Redesignated / explained

29030070558

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.

☐ Hand Delivered	Date of Receipt
☐ USPS First Class Mail	Postmarked
☐ USPS Registered/Certified	Postmarked (R/C)
☐ USPS Priority Mail	Postmarked
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☐ USPS Express Mail	Postmarked
☐ Postmark Illegible	
☐ No Postmark	
☑ Overnight Delivery Service (Specify): Fed Ex	Shipping Date 4/14/09
Next Business Day Delivery ☑	
☐ Received from House Records & Registration Office	Date of Receipt
☐ Received from Senate Public Records Office	Date of Receipt
☐ Received from Electronic Filing Office	Date of Receipt
☐ Other (Specify):	Date of Receipt or Postmarked
EM	4/15/09
PREPARER	DATE PREPARED

(3/2005)

29030070559