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Principal Life Insurance Company Political Action Committee

February 23, 2009

Corbin T. Jones  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.

Board of Directors  
Executive Committee

Washington, DC 20463

Chair

Karen Shaff

Identification Number: C00128918

Vice Chair

Shelly Meighan

RE: FEC Letter of August 1, 2008 and July Monthly Report (06/01/08-06/30/08)

Treasurer

Terry Tobin

Dear Mr. Jones:

Secretary

Sarah O'Brien

This is in response to your letter of August 1, 2008 concerning candidate contributions specified for Primary elections but for which funds were disbursed after the election dates. Specifically at issue are contributions, each in the amount of \$1,000 and disbursed on June 4, 2008, to Braley For Congress, Ed Royce for Congress, Friends of Gordon Smith, and Lee Terry for Congress.

Chair Emeritus

Jim Lang

Directors

Art Bacci

Chris Bowman

Andy Dalgliesh

Tim Minard

Merle Pederson

Lucia Riddle

Maria Volante

We apologize for our untimely attention to and reply to your August 1, 2008 letter and regret that it has been misplaced in our organization until February 17, 2009. We acknowledge that the above contributions may not be redesignated to the General Elections, as the requests for redesignation must be made within 60 days of the candidate committee treasurer's receipt of the contribution - 11CFR § 110.2(b). In accordance with your letter and as Jill Kempkes of our Government Relations department discussed with you on Tuesday, February 17, 2009, we have sent written requests to the campaign committees asking them to refund our Primary election contributions. A copy of each of these request letters is enclosed. After receipt of these refunds, we will disclose the refunded contributions on Schedule A supporting line 16 of the appropriate FEC report(s).

Our failure to issue these checks prior to the respective Primary election dates was an oversight and we are confident this situation will not reoccur in the future.

If you should have any questions, please contact Jill Kempkes at 1-(800) 325-2532 x. 8-3047 or [kempkes.jill@principal.com](mailto:kempkes.jill@principal.com) or you can reach me at the number or e-mail address provided below. Thank you very much for your assistance in this matter.

Sincerely,

Terry Tobin  
PrinPac Treasurer  
(515) 248-2998  
[tobin.terry@principal.com](mailto:tobin.terry@principal.com)

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PrinPac Treasurer, Government Relations Department  
Principal Financial Group®  
Des Moines, IA 50392-0220 515-283-8911

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Principal Life Insurance Company Political Action Committee

February 23, 2009

Braley For Congress  
P. O. Box 42169  
Arlington, VA 22204

Board of Directors  
Executive Committee  
Chair

Karen Shaff  
Vice Chair  
Shelly Meighan  
Treasurer  
Terry Tobin  
Secretary  
Sarah O'Brien  
Chair Emeritus  
Jim Lang

Directors  
Art Bacci  
Chris Bowman  
Andy Dalglish  
Tim Minard  
Merle Pederson  
Lucia Riddle  
Maria Volante

RE: June 4, 2008 Campaign Contribution

Dear Ms. Barrera:

As a follow-up to your phone conversation with Jill Kempkes of our Government Relations department, the Federal Election Commission notified PrinPac, the PAC of Principal Life Insurance Company, that its June 4, 2008 contribution to Braley for Congress was made subsequent to the June 3, 2008 Iowa Primary. This contribution, check number 1979, was made in the amount of \$1,000 and was designated by letter for the Primary election.

Unfortunately, the FEC has stated that this contribution may not be redesignated to the General Election, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of the contribution – 11CFR § 110.2(b). As directed by the FEC and as discussed with Jill, please refund this \$1,000 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause and are confident this situation will not reoccur in the future.

If you should have any questions, please contact Jill Kempkes at 1-(800) 325-2532 x. 8-3047 or [kempkes.jill@principal.com](mailto:kempkes.jill@principal.com) or you can reach me at the number or e-mail address provided below. Thank you very much for your assistance in this matter.

Sincerely,

Terry Tobin  
PrinPac Treasurer  
(515) 248-2998  
[tobin.terry@principal.com](mailto:tobin.terry@principal.com)

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Principal Life Insurance Company Political Action Committee

February 23, 2009

Ed Royce for Congress  
P. O. Box 2525  
Orange, CA 92859

Board of Directors  
Executive Committee  
Chair

Karen Shaff  
Vice Chair  
Shelly Meighan

Treasurer  
Terry Tobin  
Secretary  
Sarah O'Brien

Chair Emeritus  
Jim Lang

Directors  
Art Bacci  
Chris Bowman  
Andy Dalgliesh  
Tim Minard  
Merle Pederson  
Lucia Riddle  
Maria Volante

RE: June 4, 2008 Campaign Contribution

Dear Madam or Sir:

Regarding the above referenced issue, as a courtesy, we have tried to reach you via phone and left messages, but haven't received a return call. The Federal Election Commission notified PrinPac, the PAC of Principal Life Insurance Company, that its June 4, 2008 contribution to Ed Royce For Congress was made subsequent to the June 3, 2008 California Primary. This contribution, check number 1973, was made in the amount of \$1,000 and was designated by letter for the Primary election.

Unfortunately, the FEC has stated that this contribution may not be redesignated to the General Election, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of the contribution – 11CFR § 110.2(b). As directed by the FEC, please refund this \$1,000 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause and are confident this situation will not reoccur in the future.

If you should have any questions, please contact Jill Kempkes at 1-(800) 325-2532 x. 8-3047 or [kempkes.jill@principal.com](mailto:kempkes.jill@principal.com) or you can reach me at the number or e-mail address provided below. Thank you very much for your assistance in this matter.

Sincerely,

Terry Tobin  
PrinPac Treasurer  
(515) 248-2998  
[tobin.terry@principal.com](mailto:tobin.terry@principal.com)

s:\cgrda\staff\hlm\prinpac\022309royccerefundrequest

29030044561



Principal Life Insurance Company Political Action Committee

February 23, 2009

Friends of Gordon Smith  
228 S. Washington, Suite 115  
Alexandria, VA 22314

Board of Directors  
Executive Committee  
Chair

Karen Shaff  
Vice Chair  
Shelly Meighan

Treasurer  
Terry Tobin  
Secretary  
Sarah O'Brien

Chair Emeritus  
Jim Lang

Directors  
Art Bacci  
Chris Bowman  
Andy Dalglish  
Tim Minard  
Merle Pederson  
Lucia Riddle  
Maria Volante

RE: June 4, 2008 Campaign Contribution

Dear Madam or Sir:

Regarding the above referenced issue, as a courtesy, we have tried to reach you via phone, however the phone number published for your office, (503) 210-2008, seems to be invalid. The Federal Election Commission notified PrinPac, the PAC of Principal Life Insurance Company, that its June 4, 2008 contribution to Friends of Gordon Smith was made subsequent to the May 20, 2008 Oregon Primary. This contribution, check number 1978, was made in the amount of \$1,000 and was designated by letter for the Primary election.

Unfortunately, the FEC has stated that this contribution may not be redesignated to the General Election, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of the contribution – 11CFR § 110.2(b). As directed by the FEC, please refund this \$1,000 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause.

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PrinPac Treasurer  
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29030044562



Principal Life Insurance Company Political Action Committee

February 23, 2009

Lee Terry for Congress  
Attention: Kendra  
P.O. Box 540098  
Omaha, NE 68154

Board of Directors  
Executive Committee:

Chair  
Karen Shaff  
Vice Chair  
Shelly Meighan

Treasurer  
Terry Tobin  
Secretary  
Sarah O'Brien

Chair Emeritus  
Jim Lang

Directors  
Art Bacci  
Chris Bowman  
Andy Dalglish  
Tim Minard  
Merle Pederson  
Lucia Riddle  
Maria Volante

RE: June 4, 2008 Campaign Contribution

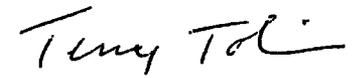
Dear Kendra:

As a follow-up to your phone conversation with Jill Kempkes of our Government Relations department, the Federal Election Commission notified PrinPac, the PAC of Principal Life Insurance Company, that its June 4, 2008 contribution to Lee Terry For Congress was made subsequent to the May 13, 2008 Nebraska Primary. This contribution, check number 1974, was made in the amount of \$1,000 and was designated by letter for the Primary election.

Unfortunately, the FEC has stated that this contribution may not be redesignated to the General Election, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of the contribution – 11CFR § 110.2(b). As directed by the FEC and as discussed with Jill, please refund this \$1,000 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause and are confident this situation will not reoccur in the future.

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Sincerely,

  
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PrinPac Treasurer  
(515) 248-2998  
[tobin.terry@principal.com](mailto:tobin.terry@principal.com)

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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.

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<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

*Jules*  
 PREPARER *3/1/09*  
DATE PREPARED

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