

## ETEXT ATTACHMENT

12/30/2002 11 : 27

Ms. Julie Perry, Reports Analyst  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

FEC ID#: C00016683  
September Monthly Report (8/01/02 - 8/31/02) 33RQ-2

Dear Ms. Perry:

□ We are in receipt of your letter dated December 11, 2002, which presented specific questions regarding Pfizer's FEC report. This letter is intended to respond and further clarify this inquiry.

You inquired about a \$4,500 transfer from Pfizer's affiliated state PAC to its federal PAC. The \$4,500 presumed to be a "transfer" from the non-federal account was actually the disclosure of a refund from a contribution made earlier in the year from the federal PAC to Pfizer's state PAC. On February 27, 2002 and June 27, 2002, the federal PAC transferred funds to its state PAC. On August 7, 2002, the state PAC refunded \$4,500 to the federal PAC. These funds were raised pursuant to federal law, originated from the federal PAC, and may be traced back to the federal PAC's transfer to Pfizer's affiliated state PAC on February 27, 2002 and June 27, 2002. The September Monthly Report identifies this transaction as "Refund from State PAC Acct. Funds originated from the Federal PAC 2/27/02 and 6/27/02".

□ We hope this clarifies your inquiry. Please feel free to contact us with any additional questions or comments.

Sincerely,

Richard A. Passov  
Treasurer