



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

FEB 3 1999

Ralph L. Rogers, Jr., Treasurer
Philip Morris Companies Inc. Political
Action Committee (AKA PHIL-PAC)
120 Park Avenue
New York, NY 10017

Identification Number: C00089136

Reference: Amended August Monthly Report (7/1/98-7/31/98), dated 10/16/98

Dear Mr. Rogers:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

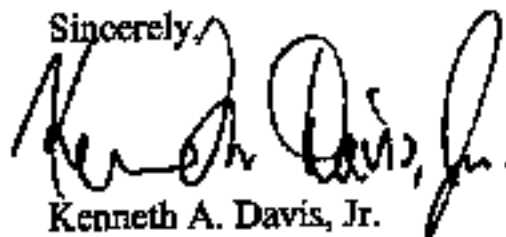
-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Line 23 of the Detailed Summary Page of your report discloses a total of \$50,000 in contributions to federal candidates/committees and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$55,500. Please amend your report to clarify the discrepancy.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for several primary elections; however, the funds were disbursed after the election date(s) (pertinent portion(s) 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. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Davis, Jr.", written in a cursive style.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule (a)
for each category of the
Detailed Summary PagePAGE 1 OF 8
FOR LINE NUMBER 23

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)
Philip Morris Companies Inc. Political Action Committee

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
American Frozen Food Institute Political 1764 Old Meadow Lane Suite 350 McLean, VA 22102-4399	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Other 1998	07/01/98	\$1000.00
American Success Pac 115 21st Street, NW Suite 300 Washington, DC 20036-	Purpose of Disbursement CONG. DAVID DRISLER Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Other 1998	07/22/98	\$1000.00
Baehler For Senate Committee 2365 Harrodsburg Rd Suite A-100 Lexington, KY 40504-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/20/98	\$2000.00
Baker for Congress PO Box 5284 Quincy, IL 62305-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$2000.00
Becker For Congress Committee Po Box 424 Lynbrook, NY 11563-	Purpose of Disbursement Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Sanford D Bishop Jr For Congress Po Box 909 Columbus, GA 31902-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$500.00
Friends Of John Boehner 7908-i Cincinnati Dayton Road West Chester, OH 45069-	Purpose of Disbursement primary election: 5/5/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00

SUBTOTAL of Disbursements This Page (optional)

\$8500.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE OF

2 8

FOR LINE NUMBER

23

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)

Philip Morris Companies Inc. Political Action Committee

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends Of Corrine Brown 3109 River Bend Court #d-102 Laurel, MD 20724-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Citizens For Hunning 1717 Dixie Highway Suite 180 Ft Wright, KY 41011-	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Friends Of Conrad Burns - 2000 Po Box 1532 Billings, MT 59103-	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Primary 2000	07/22/98	\$1000.00
Steve Chabot For Congress 105 W Fourth St #1133 Cincinnati, OH 45202-	Purpose of Disbursement primary election: 5/5/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$500.00
Eva Clayton Committee For Congress 307 W Franklin Street Warranton, NC 27589-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$500.00
Crane For Congress Committee Po Box 8534 Rolling Meadows, IL 50008-	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Democratic Congressional Campaign Commit 430 South Capitol Street Washington, DC 20003-	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Other 1998	07/22/98	\$5000.00

SUBTOTAL of Disbursements This Page (optional)

\$10000.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
detailed Summary PagePAGE 3 OF 8
FOR LINE NUMBER
23

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 PDC committees.

NAME OF COMMITTEE (In Full)

Philip Morris Companies Inc. Political Action Committee

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Duncan For Congress Po Box 2646 Knoxville, TN 37901-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$500.00
Ensign For Senate 9904 Glenrock Drive Las Vegas, NV 89134-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Faircloth For Senate Committee 1998 3901 Barrett Drive Suite 300 Raleigh, NC 27609-	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Fitzgerald For Senate Inc 50 North Brockway Street, Suite 4-5 Palatine, IL 60067-	Purpose of Disbursement: Primary election date: 3/17/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Majority Leader's Fund 4451 Brookfield Corporate Drive #209 Chantilly, VA 20151-	Purpose of Disbursement: Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Other 1998	07/22/98	\$2000.00
Green For Congress P.O. Box 12571 Green Bay, WI 54307-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$2000.00
Gutknecht For U S Congress Committee Po Box 642B Rochester, MN 55903-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$500.00

SUBTOTAL of Disbursements This Page (optional)

\$8000.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

See separate schedule(s)
for each category of the
Detailed Summary PagePAGE 4 OF 8
FOR LINE NUMBER
23Any 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)

Philip Morris Companies Inc. Political Action Committee

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hagel For Senate Committee Po Box 241497 Omaha, NE 68124-	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Primary 2002	07/20/98	\$1000.00
Hall For Congress Committee Ralph Hall Post Office Box 711 Rockwall, TX 75087-	Purpose of Disbursement primary election date: 3/10/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 07/22/98	Amount of Each Disbursement This Period \$500.00
Milliard For Congress Campaign Po Box 11705 Birmingham, AL 35202-	Purpose of Disbursement primary election date: 6/2/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 07/22/98	Amount of Each Disbursement This Period \$500.00
Hobson For Congress Committee 2525 N Limestone Springfield, OH 45503-	Purpose of Disbursement primary election date: 5/5/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 07/22/98	Amount of Each Disbursement This Period \$500.00
Delbert Rosemann For Congress Committee Po Box 13632 Jackson, MS 39236-	Purpose of Disbursement - Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 07/22/98	Amount of Each Disbursement This Period \$1000.00
Friends of Houghton Post Office Box 1107 Corning, NY 14830-	Purpose of Disbursement - Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 07/22/98	Amount of Each Disbursement This Period \$500.00
Sue Kelly For Congress 700 White Plains Road Suite 325 Scarsdale, NY 10583-	Purpose of Disbursement - Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 07/22/98	Amount of Each Disbursement This Period \$500.00

SUBTOTAL of Disbursements This Page (optional)

\$4500.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

See separate schedules for each category of the detailed Summary Page

PAGE 6 OF 8
FOR LINE NUMBER 23

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)

Philip Morris Companies Inc. Political Action Committee

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Neumann For US Senate PO Box 2830 Jansenville, WI 53547-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Ortiz For Congress Committee Po Box 7806 Corpus Christi, TX 78467-	primary election date: 3/10/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Oxley For Congress Box 1998 Findlay, OH 45839-	primary election date: 5/5/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Peass For Congress Committee PO Box 511 Seelyville, IN 47878-	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Peterson For Congress 928 Lake Ave Detroit Lakes, MN 56501-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$500.00
Republican Party Of Kentucky Victory '98 P.O. Box 1068 Frankfort, KY 40602-	Check # s/b 2352 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Other 1998	07/24/98	\$5000.00
Reynolds For Congress Po Box 141 Williamsville, NY 14231-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00

SUBTOTAL of Disbursements This Page (optional)

\$10500.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 7 OF 8
FOR LINE NUMBER 23

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 general purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Philip Morris Companies Inc. Political Action Committee

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Roth Senate Committee P.O. Box 105 Wilmington, DE 19899-	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> other (specify) Primary 2000	07/10/98	\$2000.00
Ryan For Congress Po Box 1919 Janesville, WI 53547-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> other (specify)	07/22/98	\$500.00
Committee To Re-elect Loretta Sanchez 9531 Via Ricardo Burbank, CA 91504-	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> other (specify)	07/22/98	\$500.00
Sensenbrenner Committee Po Box 575 Brookfield, WI 53008-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> other (specify)	07/22/98	\$500.00
Pete Sessions For Congress '96 PO Box 140970 Dallas, TX 75214-	Purpose of Disbursement primary election date: 3/10/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> other (specify)	07/22/98	\$1000.00
Ike Skelton For Congress Committee P.O. Box A Harrisonville, MO 64701-	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> other (specify)	07/22/98	\$500.00
Spance For Congress Committee Post Office Box 1475 Columbia, SC 29202-	Purpose of Disbursement primary election date: 6/9/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> other (specify)	07/22/98	\$1000.00

SUBTOTAL of Disbursements This Page (optional)

\$6000.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 8 OF 8
FOR LINE NUMBER 23

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)
Philip Morris Companies Inc. Political Action Committee

KD

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Spratt For Congress Committee PO Box 830 York, SC 29745-	primary election date: 6/9/98 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$1000.00
Lea Terry For Congress 1107 South 119th Street Omaha, NE 68144-	CK RETURNED UNCOLLECTED Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$-500.00
Re-elect Albert Wynn To Congress Po Box 5323 Capital Heights, MD 20791-	CK RETURNED UNCOLLECTED Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/22/98	\$-500.00
		/ /	
		/ /	
		/ /	
		/ /	
		/ /	

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	\$55500.00

