



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

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

FEB 3 1999

Identification Number: C00089136

Reference: October Monthly Report (9/1/98-9/30/98)

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:

-Schedule B of your report discloses a \$1,007.40 payment to your connected organization for an in-kind contribution (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

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,

Kenneth A. Davis, Jr.

Reports Analyst

Reports Analysis Division

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE OF  
6 9  
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 (PHIL-PAC)

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Sam Johnson PO Box 860096 Plano, TX 75086-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09/21/98	\$500.00
Walter Jones Committee PO Box 99667 Raleigh, NC 27624-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09/21/98	\$1000.00
Friends of Ray Lahood 3311 N Sterling Av Ste 10 Peoria, IL 61604-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09/21/98	\$500.00
Larson For Congress 29 Ruff Circle Glastonbury, CT 06033-	Purpose of Disbursement CHECK RETURNED UNCOLLECTED Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	09/10/98	\$-1000.00
Lewis Fox Congress Committee PO Box 247 Redlands, CA 92373-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09/21/98	\$500.00
Philip Morris Management Corp. 120 Park Ave New York, NY 10017-	Purpose of Disbursement IN-KIND CONT. TO E. BATEMAN (R-VA/1) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Other 1998	09/21/98	\$1007.40 IN KIND
David McIntosh For Congress Post Office Box 2424 Muncie, IN 47307-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09/21/98	\$500.00

SUBTOTAL of Disbursements This Page (optional)

\$3007.40

TOTAL This Period (last page this line number only)

