



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 2003

RQ-2

Richard A. Passov, Treasurer
Pfizer Inc. PAC
235 East 42nd Street
New York, NY 10017

Response Due Date:
December 19, 2003

Identification Number: C00016683

Reference: October Monthly Report (9/1/03-9/30/03)

Dear Mr. Passov:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

- Schedule A of your report discloses refunded contributions from "Pfizer PAC - NY" and "Pfizer PAC - State" which are not political committees registered with the Commission. Also, the memo text for these transactions indicates that your previously filed reports disclosed contributions made to these entities originating from your federal account. Please be advised that refunded contributions received must be comprised of federally permissible funds to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b).

If any apparently prohibited refunded contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the refunds received from the referenced entities are federally permissible. To the extent that your committee has received prohibited funds, you may have to make a refund.

Although the Commission may take further legal action concerning the acceptance of prohibited funds, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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. 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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Maureen Benitz
Campaign Finance Analyst
Reports Analysis Division

