



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

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

MAY 14 2003

Identification Number: C00016683

Reference: 12 Day Pre-General Report (10/1/02-10/16/02)

Dear Mr. Passov:

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:

-Your report discloses the apparent disbursement of earmarked contributions outside the permissible time period. As a conduit or intermediary for an authorized committee, your committee must forward any earmarked contribution, along with a transmittal report, no later than ten (10) days after receiving the earmarked contribution. 11 CFR §§102.8(a) and (c) and 110.6(c)(1)(iii)

If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information.

Although the Commission may take further legal action regarding the untimely forwarding of earmarked contributions, your prompt action in addressing the concerns raised will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) from "Pfizer PAC - NY" and "Pfizer PAC - State". Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your

check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Please be advised that for each earmarked contribution forwarded in the form of the contributor's check, the information required by 11 CFR §110.6(c)(1)(iv)(A) through (C) should be disclosed as a memo schedule. Your report discloses an earmarked contribution on Schedule B supporting Line 23 which is not checked as a memo item. As reported, this apparent error inflates your Line 23 total. Please refer to the Campaign Guide for further guidance on the proper way to report earmarked contributions.

A response or 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. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Katie Perry
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 10 / 21	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input checked="" type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17			

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)
PFIZER INC. PAC

A. Full Name (Last, First, Middle Initial) Pfizer PAC - NY		Date of Receipt M / D / Y Y Y Y 10 / 14 / 2002	
Mailing Address 235 East 42nd St City State Zip Code New York NY 10017		Amount of Each Receipt this Period 250.00	
Name of Employer: Occupation _____		Refund from NYS PAC Acct. Funds origina	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 5700.00	
		Transaction ID: 2987800210174148173	

B. Full Name (Last, First, Middle Initial) Pfizer PAC - State		Date of Receipt M / D / Y Y Y Y 10 / 14 / 2002	
Mailing Address 235 East 42nd Street City State Zip Code New York NY 10017		Amount of Each Receipt this Period 3800.00	
Name of Employer: Occupation _____		Refund from State PAC Acct. Funds origi	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 15120.00	
		Transaction ID: 4998600210174124874	

C.

SUBTOTAL of Receipts This Page (optional)	4050.00
TOTAL This Period (last page this line number only)	4050.00

