



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

George R. Lewis, Treasurer
Philip Morris Companies Inc.
Political Action Committee
(AKA PHIL-PAC)
120 Park Avenue
New York, NY 10017

DEC 11 1996

Identification Number: C00089136

Reference: September Monthly Report (8/1/96-8/31/96)

Dear Mr. Lewis:

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 supporting Line 23 of your report discloses a \$3,844.00 contribution to Philip Morris Management Corp., your apparent connected organization, which has been described as "effective gov't committee fundraiser." 2 U.S.C. Sc441b 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 Philip Morris Management Corp. was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by Philip Morris Management Corp. 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) 219-3580.

Sincerely,

Richard Ng
Reports Analyst

SCHEDULE B
ITEMIZED DISBURSEMENTS
LINE NUMBER 23
(SEE SEPARATE SCHEDULE(S) FOR
EACH CATEGORY OF THE DETAILED
SUMMARY PAGE)

ANY INFORMATION COPIED FROM SUCH REPORTS OR 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) | THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE (PHIL-PAC)

A. FULL NAME MAILING ADDRESS AND ZIP CODE | PURPOSE OF DISBURSEMENT | DATE (MM/DD/YY) | AMOUNT OF EACH DISBURSEMENT THIS PERIOD

RON LEWIS FOR CONGRESS '96
P.O. BOX 887
ELIZABETHTOWN NY 42701
RONALD E LEWIS
CONTRIBUTION/HOUSE
DISBURSEMENT FOR: - PRIMARY
X GENERAL - OTHER (SPECIFY):

B. FULL NAME MAILING ADDRESS AND ZIP CODE | PURPOSE OF DISBURSEMENT | DATE (MM/DD/YY) | AMOUNT OF EACH DISBURSEMENT THIS PERIOD
COMMITTEE TO RE-ELECT SUSAN MOLINARI
POST OFFICE BOX 860246
NEW ORLEANS STATION
STATEN ISLAND NY 10306
SUSAN MOLINARI
CONTRIBUTION/HOUSE
DISBURSEMENT FOR: X PRIMARY
- GENERAL - OTHER (SPECIFY):

C. FULL NAME MAILING ADDRESS AND ZIP CODE | PURPOSE OF DISBURSEMENT | DATE (MM/DD/YY) | AMOUNT OF EACH DISBURSEMENT THIS PERIOD
PHILIP MORRIS MANAGEMENT CORP.
128 PARK AVE
NEW YORK NY 10017
CONTRIBUTION/OTHER
DISBURSEMENT FOR: - PRIMARY
- GENERAL X OTHER (SPECIFY): EFFECTIVE NOV'T COMMITTEE FUNDRAISER

D. FULL NAME MAILING ADDRESS AND ZIP CODE | PURPOSE OF DISBURSEMENT | DATE (MM/DD/YY) | AMOUNT OF EACH DISBURSEMENT THIS PERIOD
BOB RILEY FOR CONGRESS
P.O. BOX 700
ASHLAND AL 36283
ROBERT RILEY
CONTRIBUTION/HOUSE
DISBURSEMENT FOR: - PRIMARY
X GENERAL - OTHER (SPECIFY):

E. FULL NAME MAILING ADDRESS AND ZIP CODE | PURPOSE OF DISBURSEMENT | DATE (MM/DD/YY) | AMOUNT OF EACH DISBURSEMENT THIS PERIOD
SHELBY FOR U.S. SENATE
P.O. BOX 1091
TUSCALOOSA AL 36405
RICHARD C SHELBY
CONTRIBUTION/SENATE
DISBURSEMENT FOR: X PRIMARY
- GENERAL - OTHER (SPECIFY): 1998 CYCLE

F. FULL NAME MAILING ADDRESS AND ZIP CODE | PURPOSE OF DISBURSEMENT | DATE (MM/DD/YY) | AMOUNT OF EACH DISBURSEMENT THIS PERIOD
THE SKELTON FOR CONGRESS COMMITTEE
POST OFFICE BOX A
HARRISBURG PA 17101
JKE SKELTON
CONTRIBUTION/HOUSE
DISBURSEMENT FOR: - PRIMARY
X GENERAL - OTHER (SPECIFY):

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... \$7,844.00

