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Beth R. Levine
Corporate Counsel

December 30, 1999

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00016683

Reference: November Monthly Report (10/1/99 - 10/31/99)

Dear Mr. Ciaraldi:

We are in receipt of your letter dated December 15, 1999 to Alan G. Levin, Treasurer, Pfizer Inc. PAC. Your letter raised two concerns: (1) transfers from non-federal accounts to the Pfizer PAC; and (2) apparent contributions to the Pfizer PAC in excess of statutory limits.

With respect to the first inquiry, please refer to our letter to you dated this same date with reference to the July Monthly report (6/1/99 - 6/30/99), which addresses this issue in full.

With respect to the second inquiry, please be advised that we have looked into the matter and found that two employees inadvertently contributed amounts in excess of the annual limit. Accordingly, on or about December 22, 1999, refunds were issued to Constantine L. Clemente in the amount of \$933.65 and David L. Shedlarz in the amount of \$659.07. The total amount of these refunds (\$1,592.72) will appear on Line 28A of Detailed Summary Page and a separate Schedule B.

If you have any further questions about this matter, please don't hesitate to call me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Beth F. Levine". The signature is written in black ink and includes a long horizontal flourish at the end.

Beth F. Levine

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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