



THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE
120 Park Avenue
New York, NY 10017

Democracy is not a Spectator Sport

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

DEC 26 4 19 PM '96

HAND DELIVERED

December 26, 1996

Mr. Richard Ng
Reports Analyst
Reports Analyst Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Dear Sir:

Enclosed are the responses to your letters to the Philip Morris Companies Inc. Political Action Committee (PHIL-PAC) dated December 11, 1996, inquiring into certain items contained in our June, August, and September Monthly Reports.

As you can see, these letters are via telefax. The original signed letters were sent today via certified return receipt mail from New York, to accommodate today's deadline.

These enclosures were hand delivered to the FEC offices today to further ensure our compliance. If you have any questions regarding this information, please contact me at (202) 637-1552.

Sincerely,

John F. Ostronic
Administrator, PHIL-PAC

Delivered by Hand
Enclosures:



THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE
 120 Park Avenue
 New York, NY 10017

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December 26, 1996

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 FEDERAL ELECTION
 COMMISSION
 REPORTS ANALYSIS
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 Dec 26 4 19 PM '96

Mr. Richard Ng
 Reports Analyst
 Reports Analysis Division
 Federal Elections Commission
 999 E Street, NW
 Washington, DC 20463

Re: Philip Morris Companies Inc. Political Action Committee
FEC Identification No. C00089136

Dear Sir:

This letter responds to your letter dated December 11, 1996, inquiring into certain items contained in the June Monthly Report (5/1/96 - 5/31/96) of the Philip Morris Companies Inc. Political Action Committee ("PHIL-PAC"). As you requested via telephone on December 23, 1996, an explanation of the items in question is provided below and in the accompanying documentation. A copy of the relevant pages of the Report, as corrected, is enclosed.

Item #1: Contributions for 1996 Primaries that were disbursed after the elections had occurred, as reported on Schedule B supporting Line 23

Friends of Sam Johnson - contribution made 5/3/96 in the amount of \$500.

Explanation: PHIL-PAC designated this contribution for Sam Johnson's General Election, as shown in the enclosure, not for the Primary election as shown in the Report. The contribution thus was not made after the election for which it was designated had occurred. A correction has been made to the enclosed Schedule.

Mascara for Congress - contribution made on 5/3/96 in the amount of \$500.

Explanation: PHIL-PAC originally reported this contribution as having been designated for Mr. Mascara's Primary election, but the candidate's committee refunded the contribution to PHIL-PAC in August. PHIL-PAC reported receipt

Mr. Richard Ng
December 26, 1996
Page 2

of the refund in its September Monthly Report (8/1/96 - 8/30/96). A copy of the relevant page of the September Monthly Report is enclosed.

Keep McDade in Congress Committee - contribution made on 5/17/96 in the amount of \$1,000.

Explanation: PHIL-PAC has not received a refund of this contribution from the candidate's committee, nor has it been requested by the candidate's committee to redesignate this contribution. PHIL-PAC has contacted the candidate's committee to confirm the disposition of the contribution (for instance, whether it has been used for debt reduction or applied toward the General Election). As of the date of this letter, PHIL-PAC has not received a response to its inquiries. PHIL-PAC will inform the FEC and make any necessary corrections to its Monthly Report upon receiving word from the candidate's committee.

Pryce for Congress - contribution made on 5/3/96 in the amount of \$500.

Explanation: PHIL-PAC has not received a refund of this contribution from the candidate's committee, nor has it been requested by the candidate's committee to redesignate this contribution. PHIL-PAC has contacted the candidate's committee to confirm the disposition of the contribution (for instance, whether it has been used for debt reduction or applied toward the General Election). As of the date of this letter, PHIL-PAC has not received a response to its inquiries. PHIL-PAC will inform the FEC and make any necessary corrections to its Monthly Report upon receiving word from the candidate's committee.

Keep Nick Rahall in Congress Committee - contribution made on 5/17/96 in the amount of \$1,000.

Explanation: PHIL-PAC originally designated and reported this contribution for the candidate's Primary election contribution. The candidate's committee contacted PHIL-PAC in June to request redesignation of the contribution for the General election. PHIL-PAC redesignated the contribution as requested. The redesignation is indicated on the attached schedule.

Friends of Bennie Thompson - contribution made on 5/17/96 in the amount of \$1,000.

Explanation: PHIL-PAC has not received a refund of this contribution from the candidate's committee, nor has it been requested by the candidate's

Mr. Richard Ng
December 26, 1996
Page 3

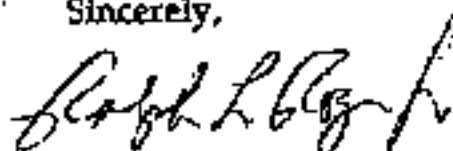
committee to redesignate this contribution. PHIL-PAC has contacted the candidate's committee to confirm the disposition of the contribution (for instance, whether it has been used for debt reduction or applied toward the General Election). As of the date of this letter, PHIL-PAC has not received a response to its inquiries. PHIL-PAC will inform the FEC and make any necessary corrections to its Monthly Report upon receiving word from the candidate's committee.

Item #2: Payment by PHIL-PAC on 5/13/96 of \$1,955.17 to Philip Morris Management Corp. ("PMMC") for "in-kind contribution to Rep. L. H. Hamilton (D-IN)," as reported on Schedule B

Explanation: PHIL-PAC made this payment to PMMC to cover the cost of certain corporate resources expended in connection with fundraising activity undertaken by PHIL-PAC on behalf of Rep. Hamilton. PMMC did not itself make any contribution, in-kind or otherwise, to Rep. Hamilton or to any other candidate for federal office or political committee supporting a candidate for federal office. The term "in-kind contribution" as it appears in the Report refers solely to the contribution from PHIL-PAC to Rep. Hamilton.

If you have any additional questions, or need further clarification, please contact me at (212) 878-2206.

Sincerely,



Ralph L. Rogers, Jr.
Assistant Treasurer,
PHIL-PAC

Enclosures

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/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
FRIENDS OF JIM IMHOFE 3035 NW 43RD AVE P.O. BOX 133 OKLAHOMA CITY OK 73116	JAMES H IMHOFE CONTRIBUTION/AGGREGATE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY)	08/03/96	91,000.00
B. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
INSTOCK FOR CONGRESS COMMITTEE '94 8400 NW GRAND BLVD., SUITE 500 OKLAHOMA CITY OK 73112	ERNEST INSTOCK CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY)	08/03/96	9500.00
C. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
FRIENDS OF SAM JOHNSON P.O. BOX 516145 DALLAS TX 75253	SAMUEL R JOHNSON CONTRIBUTION/HOUSE DISBURSEMENT FOR: X-SENATOR - GENERAL - OTHER (SPECIFY)	03/03/96	5000.00
D. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
SUE KELLY FOR CONGRESS 700 WHITE PLAINS ROAD SUITE 325 SCARSDALE NY 10583	SUE KELLY CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY)	05/17/96	5900.00
E. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
FRIENDS OF JACK KIMBETON P.O. BOX 2183 SAVANNAH GA 31402	JACK KIMBETON CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY)	03/03/96	61,000.00
F. FULL NAME MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
SCOTT KLUG FOR CONGRESS INC. POST OFFICE BOX 5619 MADISON WI 53705	SCOTT KLUG CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY)	05/03/96	6500.00

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... 64,000.00

ITEMIZED DISBURSEMENTS

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
ROBERT L. LIVINGSTON FRIENDS OF BOB LIVINGSTON BOX 6525 NEW ORLEANS LA 70174	LA /001	CONTRIBUTION/HOUSE DISBURSEMENT FOR: K PRIMARY - GENERAL - OTHER (SPECIFY):	05/17/96	\$2,000.00
THOMAS J. MANTON MANTON FOR CONGRESS INC. 46-72 QUEENS BOULEVARD SUITE 211 SUNNYSIDE NY 11104	NY /100	CONTRIBUTION/HOUSE DISBURSEMENT FOR: K PRIMARY - GENERAL - OTHER (SPECIFY):	05/03/96	\$500.00
WILLIAM J. MARTINI MARTINI FOR CONGRESS 1804 POMPTON AVENUE CEDAR GROVE NJ 07009	NJ /080	CONTRIBUTION/HOUSE DISBURSEMENT FOR: K PRIMARY - GENERAL - OTHER (SPECIFY):	05/03/96	\$500.00
FRANK MASCARA MASCARA FOR CONGRESS 852 LINCOLN AVENUE CHARLESTON PA 15922	PA /028	CONTRIBUTION/HOUSE DISBURSEMENT FOR: K PRIMARY - GENERAL - OTHER (SPECIFY):	05/03/96	\$500.00
WITCH MCCONNELL MCCONNELL SENATE COMMITTEE '96 P.O. BOX 1496 LOUISVILLE KY 40201	KY /402	CONTRIBUTION/SENATE DISBURSEMENT FOR: - PRIMARY K GENERAL - OTHER (SPECIFY):	05/08/96	\$1,000.00
WITCH MCCONNELL MCCONNELL SENATE COMMITTEE '96 P.O. BOX 1496 LOUISVILLE KY 40201	KY /402	CONTRIBUTION/SENATE DISBURSEMENT FOR: - PRIMARY K GENERAL - OTHER (SPECIFY):	05/17/96	\$1,000.00

Check refunded 8/96

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... \$9,500.00

SCHEDULE A

PAGE 1 OF 1 FOR
 LINE NUMBER 16
 (USE 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 NAME OF EMPLOYER

WILLIAM N EMERSON
 P.O. BOX 822

CAPE GIRARDEAU MO 63701

RECEIPT FOR: PRIMARY

OTHER (SPECIFY)

GENERAL

OCCUPATION:

AGGREGATE YEAR-TO-DATE - \$1,500.00

DATE (MMDDYY) RECEIPT THIS PERIOD

08/02/96 \$500.00

08/02/96 \$1,000.00

B. FULL NAME, MAILING ADDRESS AND ZIP CODE NAME OF EMPLOYER

FRANK MASCARA

851 LINCOLN AVENUE

CHARLEROI PA 15022

RECEIPT FOR: PRIMARY

OTHER (SPECIFY)

GENERAL

OCCUPATION:

AGGREGATE YEAR-TO-DATE - \$500.00

DATE (MMDDYY) RECEIPT THIS PERIOD

08/20/96 \$500.00

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... \$2,000.00
 TOTAL THIS PERIOD (LAST PAGE THIS LINE NUMBER ONLY)..... \$2,000.00

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)	DISBURSEMENT THIS PERIOD	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
MCCREY FOR CONGRESS 1900 CHB TOWER 333 TEXAS STREET SHREVEPORT LA 71101		JAMES O MCCREY, III CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY):	05/17/96		91,000.00
KEEP MCDADE IN CONGRESS COMMITTEE 111N FLOOR BANK TOWERS SCRANTON PA 18503		JOSEPH R MCDADE CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY):	05/17/96		91,000.00
COMMITTEE TO ELECT MCNUGH P.O. BOX 6161 WATERLOO NY 13601		JOHN R MCNUGH CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY):	05/17/96		91,000.00
MCNEULTY FOR CONGRESS P.O. BOX 1560 GREEN ISLAND NY 12185		MCNEULTY R MCNEULTY CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY):	05/03/96		9500.00
CARRIE MEEK FOR CONGRESS P.O. BOX 01-6012 MIAMI FL 33101		CARRIE MEEK CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY):	05/03/96		91,000.00
MCCA FOR CONGRESS - 1996 P.O. BOX 101546 CARSELBERRY FL 32718		JOHN MCCA CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY - GENERAL - OTHER (SPECIFY):	05/03/96		9500.00

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... 95,000.00

ITEMIZED DISBURSEMENTS

SCHEDULE B

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/DDYY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
MICHAEL G OXLEY	OXLEY FOR CONGRESS P.O. BOX 1994 FINDLAY OH 45859	CONTRIBUTION/HOUSE DISBURSEMENT FOR: PRIMARY X GENERAL - OTHER (SPECIFY):	08/03/96	\$1,000.00
COLLIN C PETERSON	PETERSON FOR CONGRESS 920 LAKE AVENUE DETROIT LAKES MI 48501	CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY X GENERAL - OTHER (SPECIFY):	05/17/96	\$1,000.00
PHILIP MORRIS MANAGEMENT CORP.	120 PARK AVE NEW YORK NY 10017	CONTRIBUTION/OTHER DISBURSEMENT FOR: X PRIMARY X GENERAL - OTHER (SPECIFY): IN-KIND CONTRIBUTION FOR REP. L.H. HAMILTON (D-IL)	05/18/96	\$1,955.17
DEBORAH PRYCE	PRYCE FOR CONGRESS 840 EAST GAY STREET COLUMBUS OH 43218	CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY X GENERAL - OTHER (SPECIFY):	05/03/96	\$500.00
GEORGE P RADANOVICH	RADANOVICH FOR CONGRESS 612 E. SHIELDS FRESNO CA 95704	CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY X GENERAL - OTHER (SPECIFY):	08/03/96	\$800.00
MICK J RAYMALL	KEEP MICK RAYMALL IN CONGRESS COMMITTEE POST OFFICE BOX 64 BERKELEY CA 94702	CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY X GENERAL - OTHER (SPECIFY):	05/17/96	\$1,000.00

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... \$8,955.17

ITEMIZED DISBURSEMENTS

SCHEDULE B

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 (PUBL-PAC)

A. FULL NAME	MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DD/YY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
CHARLES TAYLOR FOR CONGRESS COMMITTEE 8 SOUTH MARKET STREET POST OFFICE BOX 12165 ASHEVILLE NC 28801		CHARLES H TAYLOR NC /011 CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY GENERAL - OTHER (SPECIFY):	05/03/96	\$1,000.00
F. FULL NAME	MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DD/YY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
FRIENDS OF BENJIE THOMPSON P.O. BOX 108 BOLTON MS 39001		BENJIE THOMPSON MS /002 CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY GENERAL - OTHER (SPECIFY):	05/17/96	\$1,000.00
E. FULL NAME	MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DD/YY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
TENNESSEANS FOR THOMPSON '96 1008 WEST END AVENUE SUITE 402 NASHVILLE TN 37203		FRED D THOMPSON TN /J01 CONTRIBUTION/SENATE DISBURSEMENT FOR: PRIMARY GENERAL - OTHER (SPECIFY):	05/18/96	\$1,000.00
D. FULL NAME	MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DD/YY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
REFLECT THOMPSON COMMITTEE P.O. BOX 11693 COLUMBIA SC 29211		STROE THOMPSON SC /SR. CONTRIBUTION/SENATE DISBURSEMENT FOR: X PRIMARY GENERAL - OTHER (SPECIFY):	03/05/96	\$1,000.00
E. FULL NAME	MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DD/YY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
COMMITTEE TO REELECT ED TOMBS 188 HUNTABLE ST. STATE 808 BROOKLYN NY 11201		EDDUMPLIS TOMBS NY /010 CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY GENERAL - OTHER (SPECIFY):	05/17/96	\$1,000.00
F. FULL NAME	MAILING ADDRESS AND ZIP CODE	PURPOSE OF DISBURSEMENT	DATE (MM/DD/YY)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
LIFTON FOR ALL OF US P.O. BOX 490 ST. JOSEPH MI 49085		FRED UFTON MI /006 CONTRIBUTION/HOUSE DISBURSEMENT FOR: X PRIMARY GENERAL - OTHER (SPECIFY):	05/17/96	\$1,000.00

SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)..... \$6,000.00



THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE
 120 Park Avenue
 New York, NY 10017

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December 26, 1996

RECEIVED
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 COMMISSION
 REPORTS ANALYSIS
 DIVISION
 DEC 26 4 19 PM '96

Mr. Richard Ng
 Reports Analyst
 Reports Analysis Division
 Federal Elections Commission
 999 E Street, NW
 Washington, DC 20463

Re: Philip Morris Companies Inc. Political Action Committee
FEC Identification No. C00089136

Dear Sir:

This letter responds to your letter dated December 11, 1996, inquiring into certain items contained in the August Monthly Report (7/1/96 - 7/31/96) of the Philip Morris Companies Inc. Political Action Committee ("PHIL-PAC"). As you requested via telephone on December 23, 1996, an explanation of the items in question is provided below.

Item #1: Payment by PHIL-PAC on 7/11/96 of \$389.87 to Philip Morris Management Corp. ("PMMC") for "in-kind contribution to Rep. C. Dooley (D-CA)," as reported on Schedule B

Explanation: PHIL-PAC made this payment to PMMC to cover the cost of certain corporate resources expended in connection with a 7/16/96 fundraising event sponsored by PHIL-PAC on behalf of Rep. Dooley. PMMC did not make any contribution, in-kind or otherwise, to Rep. Dooley or to any other candidate for federal office or political committee supporting a candidate for federal office. The term "in-kind contribution" as it appears in the Report refers solely to the contribution from PHIL-PAC to Rep. Dooley.

Item #2: Payment by PHIL-PAC on 7/12/96 of \$347.68 to Philip Morris Management Corp. ("PMMC") for "in-kind contribution to Rep. P. Roberts (R-KS)," as reported on Schedule B

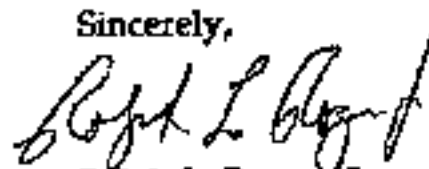
Explanation: PHIL-PAC made this payment to PMMC to cover the cost of certain corporate resources expended in connection with a 7/22/96 fundraising event sponsored by PHIL-PAC on behalf of Rep. Roberts. PMMC did not make

Mr. Richard Ng
December 26, 1996
Page 2

any contribution, in-kind or otherwise, to Rep. Roberts or to any other candidate for federal office or political committee supporting a candidate for federal office. The term "in-kind contribution" as it appears in the Report refers solely to the contribution from PHIL-PAC to Rep. Roberts.

If you have any additional questions, or need further clarification, please contact me at (212) 878-2206.

Sincerely,



Ralph L. Rogers, Jr.
Assistant Treasurer,
PHIL-PAC



THE PHILIP MORRIS COMPANIES INC. POLITICAL ACTION COMMITTEE
120 Park Avenue
New York, NY 10017

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December 26, 1996

Mr. Richard Ng
Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

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FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

DEC 26 4 19 PM '96

Re: Philip Morris Companies Inc. Political Action Committee
FEC Identification No. C00089136

Dear Sir:

This letter responds to your letter dated December 11, 1996, inquiring into certain items contained in the September Monthly Report (8/1/96 - 8/31/96) of the Philip Morris Companies Inc. Political Action Committee ("PHIL-PAC"). As you requested via telephone on December 23, 1996, an explanation of the items in question is provided below.

Item: Payment by PHIL-PAC on 8/27/96 of \$3,844.00 to Philip Morris Management Corp. ("PMMC") for "in-kind contribution to Effective Government Committee," as reported on Schedule B

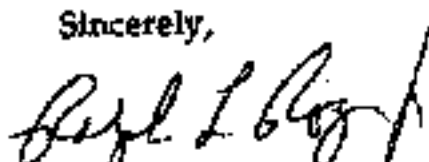
Explanation: PHIL-PAC made this payment to PPMC to cover the cost of certain corporate resources expended in connection with a planned 9/16/96 fundraising event sponsored by PHIL-PAC on behalf of the Effective Government Committee. The event did not, in fact, occur.

PMMC did not make any contribution, in-kind or otherwise, to the Effective Government Committee or to any candidate for federal office or political committee supporting a candidate for federal office. The term "in-kind contribution" as it appears in the Report refers solely to the contribution from PHIL-PAC to the Effective Government Committee.

Mr. Richard Ng
December 26, 1996
Page 2

If you have any additional questions, or need further clarification, please contact me at (212) 878-2206.

Sincerely,



Ralph L. Rogers, Jr.
Assistant Treasurer,
PHIL-PAC

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.

Hand Delivered

DATE OF RECEIPT

12-26-96

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

SEM
PREPARED

12-27-96
DATE PREPARED