



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 9, 2019

JOSEPH GRUBER, TREASURER  
PFIZER INC. PAC  
235 EAST 42ND STREET  
NEW YORK, NY 10017

**Response Due Date**  
**08/13/2019**

IDENTIFICATION NUMBER: C00016683

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2019 - 01/31/2019)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached mailing address / employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand

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alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

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. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. 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 5 to reach the Reports Analysis Division) or my local number (202) 694-1140.

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Sincerely,

A handwritten signature in black ink that reads "Abigail Capps". The signature is written in a cursive, flowing style.

Abigail Capps  
Campaign Finance Analyst  
Reports Analysis Division

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**Inadequate Address Entries**  
**PFIZER INC. PAC (C00016683)**

<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip</b>
Pfizer Inc. Remote Location	Arizona	AZ	85001
Pfizer Inc. Remote Location	California	CA	90002
Pfizer Inc. Remote Location	Connecticut	CT	06001
Pfizer Inc. Remote Location	District Columb	DC	20001
Pfizer Inc. Remote Location	Florida	FL	32013
Pfizer Inc. Remote Location	Georgia	GA	30004
Pfizer Inc. Remote Location	Illinois	IL	60603
Pfizer Inc. Remote Location	Kentucky	KY	40003
Pfizer Inc. Remote Location	Louisiana	LA	70001
Pfizer Inc. Remote Location	Maryland	MD	20601
Pfizer Inc. Remote Location	Massachusetts	MA	01001
Pfizer Inc. Remote Location	Michigan	MI	48007
Pfizer Inc. Remote Location	Minnesota	MN	55001
Pfizer Inc. Remote Location	Mississippi	MS	38601
Pfizer Inc. Remote Location	Missouri	MO	63017
Pfizer Inc. Remote Location	New Jersey	NJ	07001
Pfizer Inc. Remote Location	New York	NY	10001
Pfizer Inc. Remote Location	North Carolina	NC	28092
Pfizer Inc. Remote Location	Ohio	OH	43001
Pfizer Inc. Remote Location	Oregon	OR	97003
Pfizer Inc. Remote Location	Pennsylvania	PA	15001
Pfizer Inc. Remote Location	Tennessee	TN	37015
Pfizer Inc. Remote Location	Texas	TX	73301
Pfizer Inc. Remote Location	Vermont	VT	05001
Pfizer Inc. Remote Location	Virginia	VA	20111
Pfizer Inc. Remote Location	Washington	WA	98001

**Inadequate Employer Entries**  
**PFIZER INC. PAC (C00016683)**

<b>Employer</b>	<b>Occupation</b>
(blank)	Alliance Development Manager
(blank)	Director, Federal Policy
(blank)	Director, Public Affairs a Gov
(blank)	Field Medical Director
(blank)	Forecasting Enablement Lead
(blank)	Head of Scientific Strategy
(blank)	Hospital Products External Medical Eng
(blank)	SD Global Clinical Lead (MD) Early Sta
(blank)	Senior Director, Federal Government Re
(blank)	Senior Director, International Governm
(blank)	Senior Director, Medical Affairs
(blank)	Senior Director, Medical Strategy Head
(blank)	Vice President, Corporate Affairs Lead
(blank)	VP, BU Lead, Vaccines a Global
(blank)	VPresident LearnTeain&Dev (M)