UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

March 2, 2023

Margaret M. Madden
Pfizer Inc.

Re: Pfizer Inc. (the "Company")
Incoming letter dated December 16, 2022

Dear Margaret M. Madden:

This letter is in response to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by Tara Health Foundation and co-filer for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders.

The Proposal requests that the Company publish an annual report, at reasonable expense, analyzing the congruency of political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies, including the Company's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health," listing and explaining any instances of incongruent expenditures, and stating whether the identified incongruencies have led to a change in future expenditures or contributions.

We are unable to concur in your view that the Company may exclude the Proposal under Rule 14a-8(i)(10). Based on the information you have presented, it appears that the Company's public disclosures do not substantially implement the Proposal.

We are unable to concur in your view that the Company may exclude the Proposal under Rule 14a-8(i)(12)(ii). In our view, the Proposal does not address substantially the same subject matter as the proposals previously included in the Company's 2021 and 2022 proxy materials.

Copies of all of the correspondence on which this response is based will be made available on our website at https://www.sec.gov/corpfin/2022-2023-shareholder-proposals-no-action.

Sincerely,

Rule 14a-8 Review Team

cc: Sanford Lewis

Margaret M. Madden
Senior Vice President and Corporate Secretary
Chief Governance Counsel

Pfizer Inc. – Legal Division
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BY EMAIL (shareholderproposals@sec.gov)

December 16, 2022

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

RE: Pfizer Inc. – 2023 Annual Meeting
Omission of Shareholder Proposal of
Tara Health Foundation and Louise Davis

Ladies and Gentlemen:

We are writing pursuant to Rule 14a-8(j) promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), to request that the Staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") concur with our view that, for the reasons stated below, Pfizer Inc., a Delaware corporation ("Pfizer"), may exclude the shareholder proposal and supporting statement (the "Proposal") submitted by Tara Health Foundation ("Tara Health") and co-filed by Nia Impact Capital ("Nia"), on behalf of Louise Davis, from the proxy materials to be distributed by Pfizer in connection with its 2023 annual meeting of shareholders (the "2023 proxy materials"). Tara Health and Ms. Davis, together with their respective representatives, are collectively referred to as the "Proponents."

In accordance with Section C of Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D"), we are emailing this letter and its attachments to the Staff at shareholderproposals@sec.gov. In accordance with Rule 14a-8(j), we are simultaneously sending a copy of this letter and its attachments to the Proponents as notice of Pfizer's intent to omit the Proposal from the 2023 proxy materials.

Rule 14a-8(k) and Section E of SLB 14D provide that shareholder proponents are required to send companies a copy of any correspondence that the shareholder proponents elect to submit to the Commission or the Staff. Accordingly, we are taking this opportunity to remind the Proponents that if the Proponents submit correspondence to the Commission or the Staff with respect to the Proposal, a copy of that correspondence should concurrently be furnished to the undersigned.

I. The Proposal

The text of the resolution contained in the Proposal is set forth below:

> Resolved: Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies, including Pfizer's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." Such a report should list and explain any instances of incongruent expenditures, and state whether the identified incongruencies have led to a change in future expenditures or contributions.

II. Bases for Exclusion

We hereby respectfully request that the Staff concur with Pfizer's view that the Proposal may be excluded from the 2023 proxy materials pursuant to:

- Rule 14a-8(i)(10) because Pfizer has substantially implemented the Proposal; and

- Rule 14a-8(i)(12)(ii) because the Proposal deals with substantially the same subject matter as two previously submitted shareholder proposals, and the most recently submitted of those proposals did not receive the support necessary for resubmission.

III. Background

Pfizer received the Proposal via email on November 8, 2022, accompanied by a cover letter from Tara Health, dated November 8, 2022, and a letter from Merrill Lynch, dated November 8, 2022, verifying Tara Health's continuous ownership of at least the requisite amount of Pfizer common stock for at least the requisite period preceding and including the date of submission of the Proposal. On November 17, 2022, Pfizer sent a letter to Tara Health notifying them that Pfizer believed the Proposal exceeded 500 words and requesting that the Proposal be revised so that it does not exceed 500 words. On November 17, 2022, Pfizer received the Proposal from Nia, accompanied by a cover letter, dated November 14, 2022, and an authorization letter from Ms. Davis, dated November 11, 2022. On November 21, 2022, Pfizer received a revised version of the Proposal, under 500 words, submitted by the Proponents via email. Copies of the Proposal, cover letters, authorization letter and related correspondence are attached hereto as Exhibit A.

IV. The Proposal May be Excluded Pursuant to Rule 14a-8(i)(10) Because Pfizer Has Substantially Implemented the Proposal.

Rule 14a-8(i)(10) permits a company to exclude a shareholder proposal if the company has already substantially implemented the proposal. The Commission adopted the "substantially implemented" standard in 1983 after determining that the "previous formalistic application" of the rule defeated its purpose, which is to "avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management." *See* Exchange Act Release No. 34-20091 (Aug. 16, 1983) (the "1983 Release"); Exchange Act Release No. 34-12598 (July 7, 1976). Accordingly, the actions requested by a proposal need not be "fully effected" provided that they have been "substantially implemented" by the company.[1] *See* 1983 Release.

Applying this standard, the Staff has consistently permitted the exclusion of a proposal when it has determined that the company's policies, practices and procedures or public disclosures compare favorably with the guidelines of the proposal. *See, e.g., IDACORP, Inc.* (Apr. 1, 2022); *Edison International* (Feb. 23, 2022); *JPMorgan Chase & Co.* (Feb. 5, 2020); *The Allstate Corp.* (Mar. 15, 2019); *Johnson & Johnson* (Feb. 6, 2019); *United Cont'l Holdings, Inc.* (Apr. 13, 2018); *eBay Inc.* (Mar. 29, 2018); *Kewaunee Scientific Corp.* (May 31, 2017); *Wal-Mart Stores, Inc.* (Mar. 16, 2017); *Dominion Resources, Inc.* (Feb. 9, 2016); *Ryder System, Inc.* (Feb. 11, 2015).

In addition, the Staff has permitted exclusion under Rule 14a-8(i)(10) where a company already addressed the underlying concerns and satisfied the essential objective of the proposal, even if the proposal had not been implemented exactly as proposed by the proponent. For example, in *PG&E Corp.* (Mar. 10, 2010), the Staff permitted exclusion under Rule 14a-8(i)(10) of a proposal requesting that the company provide a report disclosing, among other things, the company's standards for choosing the organizations to which the company makes charitable contributions and specifically asked for disclosure of the "business rationale and purpose for each of the charitable contributions." In arguing that the proposal had been substantially implemented, the company referred to a website where the company had described its policies and guidelines for determining the types of grants that it makes and the types of requests that the company typically does not fund. Although the proposal appeared to contemplate disclosure of each and every charitable contribution, the Staff concluded that the company had substantially implemented the proposal. *See also, e.g., The Wendy's Co.* (Apr. 10, 2019) (permitting exclusion under Rule 14a-8(i)(10) of a proposal requesting a report assessing human rights risks of the company's operations, including the principles and methodology used to make the assessment, the frequency of assessment and how the company would use the assessment's results, where the company had a code of ethics and a code of conduct for suppliers and disclosed on its website the frequency and

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[1] While there is currently a proposed amendment to Rule 14a-8(i)(10) that would modify this standard, such proposal has not been adopted. Accordingly, the standard discussed above remains the current Commission-adopted standard.

methodology of its human rights risk assessments); *MGM Resorts Int'l* (Feb. 28, 2012) (permitting exclusion under Rule 14a-8(i)(10) of a proposal requesting a report on the company's sustainability policies and performance, including multiple objective statistical indicators, where the company published an annual sustainability report).

In particular, the Staff has permitted exclusion under Rule 14a-8(i)(10) where a company satisfied the essential objective of a proposal seeking disclosure relating to the company's political expenditures even if the proposal had not been implemented exactly as proposed by the proponent. For example, in *Exelon Corp.* (Feb. 26, 2010), the Staff permitted exclusion under Rule 14a-8(i)(10) of a proposal requesting that the company prepare a report disclosing its policies and procedures for political contributions and its monetary and non-monetary political contributions. In arguing that the proposal had been substantially implemented, the company referenced its political contributions guidelines and report, which provided information regarding the company's political contributions policies and procedures and monetary and nonmonetary political contributions. Although the actions taken by the company may not have exactly aligned with the requests made by the proponent, the Staff concluded that the company had substantially implemented the proposal.

In this instance, Pfizer has substantially implemented the Proposal, the essential objective of which is to obtain a report from Pfizer on how its political expenditures align with Pfizer's stated values and policies. In this respect, the Proposal's supporting statement explains that its request for disclosure is based on the view that "Pfizer's political expenditures appear to be misaligned with [Pfizer's] stated values and interests." As described below, Pfizer already publicly discloses how its political and lobbying contributions – both to trade associations and to candidates and political committees – align with its stated values and policies.

In particular, Pfizer's website already contains extensive disclosure regarding Pfizer's support of trade associations. In addition to disclosing the portion of its membership dues that are used for federal lobbying activity, Pfizer publishes on its "Political Partnership" webpage an Industry Associations – Report on Incongruencies (the "Congruency Report") that describes Pfizer's positions on important public policy matters and Pfizer's alignment with its "most significant trade association memberships" on each position.[2] The Congruency Report states that Pfizer "believe[s] that public policy engagement is an important and appropriate role for companies in open societies" and that "there is value in making sure [Pfizer's] positions on issues important to Pfizer and [its] industry are communicated and understood within those organizations."

In this respect, the Congruency Report includes the following summaries of Pfizer's alignment with its most significant trade association memberships, together with a detailed analysis of Pfizer's alignment with the associations "across six areas of key public policy and

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2 *See* Pfizer's Industry Associations – Report on Incongruencies, available at https://www.pfizer.com/about/programs-policies/political-partnerships and attached hereto as Exhibit B.

ESG significance for Pfizer: Climate Change; Patient Access to Healthcare; Trade; Tax; Diversity, Equity, and Inclusion; and Civic Integrity":

- **Biotechnology Innovation Organization.** "The policy goals of Pfizer and the Biotechnology Innovation Organization (BIO) are generally in alignment across the key areas reviewed. To the extent differences exist in the company and trade association's respective positions, such as on tax, they are largely because either Pfizer or BIO has taken a position on particular matters on which the other has not. Indeed, Pfizer has been more vocal than BIO on support of free trade, though both agree on the importance of intellectual property protections in trade agreements. On broad policy goals, Pfizer and BIO are well aligned. Pfizer engages with BIO on the following issues: (a) intellectual property/innovation protection; (b) vaccine policy and advocacy; (c) patient affordability solutions; and (d) FDA User Fee agreements (in partnership with PhRMA)."

- **Business Roundtable.** "The policy goals of Pfizer and the Business Roundtable (BRT) are generally in alignment across the key areas reviewed. To the extent there are differences in the company and trade association's respective positions, they are because Pfizer and BRT are focusing on different specific aspects of the issue. However, on broad policy goals, Pfizer and BRT are well aligned. Pfizer engages with the BRT on the following issues: (a) U.S. tax competitiveness; (b) global tax debate; (c) free trade policies and intellectual property protection; (d) employer health care and health equity solutions; and (e) enhancing diversity and inclusion in the workforce."

- **National Association of Manufacturers.** "The policy goals of Pfizer and the National Association of Manufacturers (NAM) are generally in alignment across the key areas reviewed. The alignment is less close in the areas of climate change and access to healthcare, largely because Pfizer and the NAM are focusing on different specific aspects of the issue. However, on broad policy goals, Pfizer and BRT are well aligned. Pfizer engages with NAM on the following issues: (a) high quality manufacturing; (b) international trade; and (c) to oppose governmental intervention in health care, including price controls in Medicare."

- **Pharmaceutical Research and Manufacturers of America.** "Pfizer and Pharmaceutical Research and Manufacturers of America (PhRMA) are closely aligned on policy goals and specific positions. The only notable exception is in the area of climate change, where PhRMA has not taken a public position. Pfizer engages with PhRMA on the following issues: (a) lead industry efforts to advance pro-patient policies and defeat negative drug pricing proposals at the federal level; (b) advance rebate pass-through, copay accumulator bans and out of pocket caps at state level; (c) protect intellectual property rights globally; and (d) advance FDA User Fee agreements (in partnership with BIO)."

- **U.S. Chamber of Commerce.** "The policy goals of Pfizer and the U.S. Chamber of Commerce (Chamber) are generally in alignment across the key areas reviewed. To the extent there are differences in the company and trade association's respective positions, they are generally because Pfizer and Chamber are focusing on different specific aspects of the issue. However, on broad policy goals, they are well aligned. Pfizer engages with the Chamber on the following issues: (a) promote and protect intellectual property/innovation through Global Innovation Policy Center; (b) drive narrative on counterfeits/product integrity; (c) lead on U.S. tax competitiveness; and (d) protect employer health care and drive policies to promote competition in health care."

In explaining how Pfizer aligns its trade association memberships with Pfizer's stated values and policies, the Congruency Report notes that "support of these organizations is evaluated annually by [Pfizer's] U.S. Government Relations leaders based on these organizations' expertise in healthcare policy and advocacy and support of key issues of importance to Pfizer." The Congruency Report also notes that Pfizer "monitor[s] where and to what extent [Pfizer's] trade associations are misaligned" with Pfizer on issues important to Pfizer and "will advocate for the trade association to come into alignment, but if an organization's misalignment is egregious, and the membership benefits to Pfizer and its stakeholders are outweighed by the misalignments, [Pfizer] will reduce or end [its] involvement with the organization."

In addition, Pfizer publishes on its website an annual report titled the Pfizer PAC and Corporate Contributions Report (the "Political Contributions Report"), which lists the candidates and political committees supported by either Pfizer Inc. or the Pfizer political action committee (the "Pfizer PAC") and clearly explains Pfizer's rationale and motivation for making such political expenditures.[3] In this regard, the Political Contributions Report indicates that the driving force behind Pfizer's political and electioneering expenditures is to "support candidates of both political parties who support state and federal policies that impact [Pfizer's] purpose: Breakthroughs that change patients' lives." Pfizer also explains in the Political Contributions Report how its political and electioneering expenditures align with Pfizer's policy priorities, stating that the "decision to contribute to any elected official is made based on [the candidate's] voting record on durable policies that support innovation, patient access to and affordability of their medicines, high quality manufacturing, a secure supply chain, a competitive tax code and a robust intellectual property system." The purpose of such evaluation is "to ensure Pfizer's values are upheld." The Political Contributions Report, therefore, clearly describes the manner in which Pfizer's political expenditures are aligned with its stated values and policies.

[3] *See* Pfizer's PAC and Corporate Political Contributions Report, available at https://cdn.pfizer.com/pfizercom/investors/corporate/2021_Pfizer_PAC_and_Corporate_Political_Contributions_Report.pdf and attached hereto as <u>Exhibit C</u>.

Moreover, the Political Contributions Report acknowledges that politicians will have a range of views about policy that are both related and unrelated to Pfizer's business. While the Political Contributions Report identifies recipients of contributions who hold a diversity of political positions, it clearly states that contributions made to such recipients "[do] not imply an endorsement of a candidate's position on any social or religious issue." Instead of focusing on candidates' political views concerning matters unrelated to Pfizer's business, the Political Contributions Report states that Pfizer's role is to "activat[e] those [elected officials] who support Pfizer's mission and advocat[e] for policymakers who align with policies that enable [Pfizer's] purpose."

The Political Contributions Report also describes Pfizer's corporate policy requiring "all PAC and corporate political contributions to be compiled and published annually in a report that is made available to employees, shareholders, and the public, and posted on [Pfizer's] website." In addition, the Political Contributions Report describes that Pfizer requests trade associations receiving $100,000 or more from Pfizer in a given year to report to Pfizer the portion of Pfizer dues or payments used for certain non-deductible expenditures, which amounts Pfizer discloses in the Political Contributions Report. Further, the Political Contributions Report describes the PAC Steering Committee's process of "evaluat[ing] candidates on a basis of their views on the issues that impact Pfizer and its colleagues." In addition, the Political Contributions Report describes that Pfizer traditionally does not make contributions to 527 Issue Organizations and that to the extent Pfizer does make those expenditures, such expenditures "would have to be reviewed and approved by the Political Contributions Policy Committee and subsequently disclosed." The Political Contributions Report also notes that Pfizer "has determined that it will not make any direct independent expenditures."

Given the extensive disclosure in the Congruency Report and the annual Political Contributions Report, Pfizer has already publicly disclosed how its political expenditures align with its stated values and policies. Therefore, Pfizer has satisfied the Proposal's essential objective – obtaining a report from Pfizer on the congruency between Pfizer's political expenditures and Pfizer's stated values and policies – and thus its public disclosures compare favorably with those requested by the Proposal.

Accordingly, Pfizer believes that the Proposal may be excluded from its 2023 proxy materials pursuant to Rule 14a-8(i)(10) as substantially implemented.

V. The Proposal May be Excluded Pursuant to Rule 14a-8(i)(12)(ii) Because It Deals with Substantially the Same Subject Matter as Two Previously Submitted Shareholder Proposals, and the Most Recently Submitted of Those Proposals Did Not Receive the Support Necessary for Resubmission.

Under Rule 14a-8(i)(12)(ii), a shareholder proposal may be excluded from a company's proxy materials if it deals with "substantially the same subject matter as a proposal, or proposals, previously included in the company's proxy materials within the preceding five calendar years if the most recent vote occurred within the preceding three calendar years," and the proposal received "[l]ess than 15 percent of the votes cast if previously voted on twice."

A. Precedent Regarding Exclusion under Rule 14a-8(i)(12).

The Staff has confirmed on numerous occasions that Rule 14a-8(i)(12) does not require that the proposals, or their subject matters, be identical in order for a company to exclude the later-submitted proposal. Although the predecessor to Rule 14a-8(i)(12) required a proposal to be "substantially the same proposal" as prior proposals, the Commission amended this rule in 1983 to permit exclusion of a proposal that "deals with substantially the same subject matter." The Commission explained the reason for, and meaning of, this revision in the 1983 Release:

> The Commission believes that this change is necessary to signal a clean break from the strict interpretive position applied to the existing provision. The Commission is aware that the interpretation of the new provision will continue to involve difficult subjective judgements, but anticipates that those judgements will be based upon a consideration of the *substantive concerns* raised by a proposal rather than the specific language or actions proposed to deal with those concerns.

(Emphasis added.)[4]

When considering whether proposals deal with substantially the same subject matter, the Staff has focused on the "substantive concerns" raised by the proposals. Thus, the Staff has concurred with the exclusion of proposals under Rule 14a-8(i)(12) when the proposal in question shares similar underlying issues with a prior proposal, even though the specific language or scope of the proposals differs or the proposals recommend different actions be taken by the company. *See, e.g., Pfizer, Inc.* (Jan. 20, 2022) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting that the board take the necessary steps to permit written consent by shareholders that dealt with substantially the same subject matter as a prior proposal requesting the same action but that contained different supporting statements); *Exxon Mobil Corp.* (Mar. 15, 2022) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting that the board take the necessary steps to lower the ownership threshold required to call a special shareholder meeting that dealt with substantially the same subject matter as a prior proposal requesting the same action but that did not include discussion of related issues such as application of the company's current policy with respect to special meetings and the use of virtual shareholder meetings); *Alphabet, Inc.* (Apr. 16, 2019) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting a review of the company's board composition and qualifications that dealt with substantially the same

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[4] While there is currently a proposed amendment to Rule 14a-8(i)(12) that would modify this standard, such proposal has not been adopted. Accordingly, the standard discussed above remains the current Commission-adopted standard.

subject matter as prior proposals containing minor differences in language that also requested review of the company's board composition and qualifications); *Apple Inc.* (Nov. 20, 2018) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting management review the company's policies relating to human rights to assess the need to adopt additional policies and report on its findings that dealt with substantially the same subject matter as prior proposals requesting that the company establish a human rights committee of its board); *JPMorgan Chase & Co.* (Jan. 27, 2017) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting a public study regarding whether divestiture of the company's non-core banking business segments would enhance shareholder value that dealt with substantially the same subject matter as a prior proposal requesting the board to appoint an independent committee of the board to address whether divestiture of non-core banking business segments would enhance shareholder value); *The Coca-Cola Co.* (Jan. 18, 2017) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting that the company prepare a report charting the number of Arab and non-Arab employees by job category in Israel and Palestine that dealt with substantially the same subject matter as a prior proposal requesting that the board make all possible lawful efforts to implement certain equal opportunity employment principles for corporations in Israel and Palestine); *Pfizer Inc.* (Jan. 9, 2013) (permitting exclusion under Rule 14(a)(i)(12) of a proposal requesting that the board authorize the preparation of a report on the company's lobbying contributions and expenditures that dealt with substantially the same subject matter as prior proposals requesting disclosure of both lobbying contributions and political contributions); *Exxon Mobil Corp.* (Mar. 23, 2012) (permitting exclusion under Rule 14a-8(i)(12) of a proposal requesting that the board create a policy articulating the company's commitment to the human right to water that dealt with substantially the same subject matter as prior proposals, one of which requested that the board report on how the company ensures that it is accountable for environmental impacts in communities where it operates).

B. The Proposal Deals with Substantially the Same Subject Matter as Two Previously Submitted Proposals.

Pfizer included the following shareholder proposal in its proxy materials for its 2022 annual meeting of shareholders (the "2022 Proposal," attached hereto as Exhibit D):

> **RESOLVED:** Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political and electioneering expenditures during the preceding year against the company's fundamental purpose and publicly stated company values and policies.

Pfizer also included the following shareholder proposal in its proxy materials for its 2021 annual meeting of shareholders (the "2021 Proposal," attached hereto as Exhibit E):

> Resolved: Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political and electioneering expenditures during the preceding year against publicly stated company values and policies.

As shown above, the resolved clauses of the 2022 Proposal and the 2021 Proposal (collectively, the "Prior Proposals") are virtually identical and overlap significantly with the current Proposal.

The substantive concern expressed in the Proposal, and in each of the 2022 Proposal and the 2021 Proposal, is the same – the congruency of Pfizer's political expenditures with Pfizer's stated values and policies. In this regard, the resolved clause of the Proposal is essentially the same as the resolved clause of each of the Prior Proposals, as is the action requested of Pfizer. Specifically, the Proposal asks Pfizer to analyze "the congruency of [its] political, lobbying, and electioneering expenditures during the preceding year against publicly stated [Pfizer] value and policies." Likewise, the 2022 Proposal asked Pfizer to analyze "the congruency of [its] political and electioneering expenditures during the preceding year against [Pfizer's] fundamental purpose and publicly stated [Pfizer] values and policies." The 2021 Proposal similarly asked Pfizer to analyze "the congruency of [its] political and electioneering expenditures during the preceding year against publicly stated [Pfizer] values and policies."

In addition, the supporting statements of the Proposal and the Prior Proposals demonstrate each proposal's shared concern with Pfizer's political expenditures and their congruency with Pfizer's stated values and policies. Each of the Proposal and the Prior Proposals assert that "Pfizer's political expenditures appear to be misaligned" with its "values and interests," that "Pfizer should establish policies and reporting systems that minimize risk to [Pfizer's] reputation and brand by addressing possible missteps in corporate electioneering and political spending" that contrast with its stated objectives and that Pfizer analyze "risks to [its] brand, reputation, or shareholder value of expenditures in conflict with publicly stated [Pfizer] values." While the respective supporting statements of the Proposal and the Prior Proposals contain differences in scope, this does not change the fundamental concern of each proposal – the congruency of Pfizer's political expenditures with Pfizer's stated values and policies. In this regard, the Proposal and the 2021 Proposal emphasize Pfizer's stated interest in "'[e]xpanded access to health insurance coverage,'" particularly for "'patients with under-diagnosed and undertreated conditions.'" The two proposals also focus on "women's access to reproductive health care," including to Pfizer-manufactured "contraceptives and a drug commonly prescribed for [medical abortion]." The 2022 Proposal, on the other hand, emphasizes Pfizer's non-discrimination policy, its stated opposition to forced labor and its recognition of rights to a healthy environment, life, health, water and sanitation. However, although the scope of the Proposal and the Prior Proposals may differ, such distinctions merely stem from the use of different examples of alleged incongruency to illustrate each proponent's underlying concern with the primary substantive concern of consistency between Pfizer's political expenditures and its stated values.

Similarly, minor additions to the Proposal's resolved clause to include specific examples of Pfizer's stated goals (to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health") and to provide specific guidelines for the report (to "list and explain any instances of incongruent expenditures, and state whether the identified incongruencies have led to a change in future expenditures or contributions") do not change the substantive concern of the Proposal.

Moreover, the Staff recently permitted Pfizer to exclude a nearly identical proposal to the current Proposal as substantially duplicative of the 2022 Proposal. In *Pfizer, Inc.* (February 22, 2022), the Staff determined that a proposal similarly requesting an analysis of "the congruency of [Pfizer's] political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies" was substantially duplicative under Rule 14a-8(i)(11) of the 2022 Proposal. Like the Proposal and the 2021 Proposal, the substantially duplicative proposal's supporting statement specifically addressed expanded access to health insurance coverage for patients with under-diagnosed and undertreated conditions and women's access to reproductive health care. Tara Health also acknowledged that the two proposals at issue were substantially duplicative. Both the Proponent's view and the Staff's decision are indicative of the substantial similarity between the Proposal and the 2022 Proposal. Accordingly, each proposal focuses on the same substantive concern of the congruency between Pfizer's political expenditures and its stated values and policies.

C. The Proposal Included in Pfizer's 2022 Proxy Materials Did Not Receive the Shareholder Support Necessary to Permit Resubmission.

Rule 14a-8(i)(12)(ii) provides that a company may exclude a proposal that deals with substantially the same subject matter as previously submitted proposals if the proposal received "[l]ess than 15 percent of the votes cast if previously voted on twice" within "the preceding five calendar years." Staff Legal Bulletin No. 14 (July 13, 2001) explains that only votes for and against a proposal are included in the calculation of the shareholder vote; abstentions and broker non-votes are not included. As disclosed in Pfizer's Current Report on Form 8-K, filed with the Commission on May 2, 2022 and attached hereto as <u>Exhibit F</u>, there were 393,729,907 votes cast in favor of the 2022 Proposal and 3,387,577,521 votes cast against the 2022 Proposal. This amounts to 10.41% of the votes cast in favor of the 2022 Proposal. Thus, the last time that Pfizer's shareholders considered a proposal substantially similar to the Proposal, it received less than 15% of the votes cast.

Accordingly, Pfizer believes the Proposal, dealing with substantially the same subject matter as the 2022 Proposal and the 2021 Proposal, is excludable under Rule 14a-8(i)(12)(ii) for failing to receive the requisite shareholder support.

VI. Conclusion

Based upon the foregoing analysis, we respectfully request that the Staff concur that it will take no action if Pfizer excludes the Proposal from its 2023 proxy materials.

Should the Staff disagree with the conclusions set forth in this letter, or should any additional information be desired in support of Pfizer's position, we would appreciate the opportunity to confer with the Staff concerning these matters prior to the issuance of the Staff's response. Please do not hesitate to contact me at (212) 733-3451 or Marc S. Gerber of Skadden, Arps, Slate, Meagher & Flom LLP at (202) 371-7233.

Very truly yours,

Margaret M. Madden

Enclosures

cc: Shelly Alpern
Director of Corporate Engagement
Rhia Ventures

Meredith Benton

EXHIBIT A

(see attached)

November 8, 2022

Margaret M. Madden
Senior Vice President, Corporate Secretary & Chief Governance Counsel
Pfizer Inc.
235 East 42nd Street
New York, NY 10017

Via email: [redacted]

Re: Shareholder Proposal for 2023 Annual Shareholder Meeting

Dear Ms. Madden,

On behalf of Tara Health Foundation, I am submitting the attached proposal (the "Proposal") pursuant to the Securities and Exchange Commission's Rule 14a-8 to be included in the proxy statement of Pfizer (the "Company") for its 2023 annual meeting of shareholders. Tara Health Foundation is the lead filer for the Proposal and may be joined by other shareholders as co-filers.

Tara Health Foundation has continuously beneficially owned, for at least one year as of the date hereof, at least $25,000 worth of the Company's common stock. Verification of this ownership is attached. Tara Health Foundation intends to continue to hold such shares through the date of the Company's 2023 annual meeting of shareholders.

I am available to meet with the Company in person or via teleconference on December 5, 2022 between 9:00 am and 10:00 am ET and December 8, 2022 between 9:00 am and 10:00 am ET.

We expect to be joined by a co-filer, who will be authorizing Tara Health to conduct the initial engagement meeting but may participate subject to their availability.

Please send future correspondence and communications regarding this proposal to my representative Shelley Alpern, director of corporate engagement at Rhia Ventures, who can be contacted at [redacted]

Please be advised that we will hereafter be using a representative regarding the management of this proposal. Please send any correspondence regarding this proposal including deficiency notices, no action requests or engagement scheduling to Shelley Alpern, director of corporate engagement at Rhia Ventures, who can be contacted at [redacted] I authorize Ms. Alpern to speak on my behalf, negotiate withdrawal of the proposal and engage with the company and its representatives.

Sincerely,

Dr. Ruth Shaber
President and Founder
Tara Health Foundation

Enclosures:

Shareholder proposal
Verification of share ownership

cc: Shelley Alpern, Rhia Ventures

Shareholder Proposal for Pfizer 2023 Proxy Ballot re Political Contributions Misalignment
Submitted by Tara Health Foundation

POLITICAL CONTRIBUTIONS MISALIGNMENT

Whereas:

Pfizer policy states that "political contributions are made to support the election of candidates, political parties and committees that support public policies important to the industry, such as innovation and access to medicines."

Pfizer listed "Gender Equality" as a Sustainable Development Goal in its ESG report stating: "We aim to end discrimination against women, ensure equal opportunities for leadership and access to reproductive health."

However, Pfizer's political expenditures appear to be misaligned with the company's stated values and interests.

Pfizer has stated that "Expanded access to health insurance coverage will help ensure that patients with under-diagnosed and undertreated conditions are able to address them; and that those who will benefit from Pfizer medicines are better able to have access to them." Yet in 2018, Pfizer was a top contributor to a 527 organization leading efforts to strike down the Affordable Care Act, which has made prescription drugs more accessible for millions, and contributes to PhRMA, which donates to numerous organizations opposing congressional efforts to reform drug pricing.

Pfizer manufactures contraceptives and a drug commonly prescribed for medication abortion. Yet the proponent estimates that since the beginning of the 2020 election cycle, Pfizer and its employee PACs have donated at least $5 million to politicians and political organizations working to weaken women's access to reproductive health care. In the South during this period, Pfizer's contributions to anti-choice state candidates exceeded those to other candidates by a ratio of 3:1, and its contributions to anti-choice federal candidates exceeded those to other candidates by a ratio of 2:1. For example, Pfizer contributed to multiple sponsors of bills passed in 2022 in Tennessee and Louisiana that will restrict access to medication abortion.

This pattern spending has drawn scrutiny from *STAT, Bloomberg News, Huffington Post, The Minnesota Daily, CQ ESG Briefing, Agenda* (a *Financial Times* publication) and *Forbes*.

Proponents believe Pfizer should establish policies and reporting systems that minimize risk to reputation and brand by addressing possible missteps in corporate electioneering and political spending that contrast with its stated healthcare objectives.

Resolved:

Resolved: Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies, including Pfizer's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." Such a report should list and explain any instances of incongruent expenditures, and state whether the identified incongruencies have led to a change in future expenditures or contributions.

Supporting Statement:

Proponents recommend that such report contain management's analysis of risks to our company's brand, reputation, or shareholder value of expenditures in conflict with publicly stated company values. “Expenditures for electioneering communications" means spending, from the corporate treasury and from the PACs, directly or through a third party, at any time during the year, on printed, internet or broadcast communications, which are reasonably susceptible to interpretation as in support of or opposition to a specific candidate.

November 14. 2022

Margaret M. Madden
Senior Vice President and Corporate Secretary. Chief Governance Counsel
Pfizer Inc.
235 East 42nd Street, New York, New York 10017.

Attention: Corporate Secretary.

Also via email at: [redacted]

Re: Shareholder proposal for 2023 Annual Shareholder Meeting

Dear Corporate Secretary.

Nia Impact Capital is co-filing a shareholder proposal on behalf of Louise Davis ("co-filers"). who are shareholders of Pfizer Inc. for action at the next annual meeting of Pfizer Inc. The co-filers are submitting the enclosed shareholder proposal for inclusion in Pfizer Inc.'s 2023 proxy statement. for consideration by shareholders. in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. As lead filer. Tara Health Foundation is designated to conduct the initial engagement conversation with the company as required by amended SEC rules. The lead filer is designated to meet initially with the Company but the co-filer may join the meeting subject to their availability.

The co-filer has continuously beneficially owned. for at least two years and through today at least $15,000 of the Company's common stock. Verification of proof of ownership will follow. The co-filer intends to continue to hold such shares through the date of the Company's 2023 annual meeting of shareholders.

A letter from the co-filer authorizing Nia Impact Capital to act on their behalf is enclosed. A representative of the lead filer will attend the stockholders' meeting to move the resolution as required.

We are available to discuss this issue and appreciate the opportunity to engage and seek to resolve the Proponent's concerns. Please contact Meredith Benton [redacted] or [redacted] to schedule a meeting and to discuss any questions. Please address any future correspondence regarding the proposal through this address.

Sincerely.

Kristin Hull

Kristin Hull. PhD.

Encl: Authorization letters and Proposal

11/11/2022

Margaret M. Madden
Senior Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer Inc.
235 East 42nd Street, New York, New York 10017.

Attention: Corporate Secretary.

Also via email at: [redacted]

Dear Ms. Madden,

I hereby authorize Nia Impact Capital to co-file a shareholder resolution on my behalf for the Pfizer Inc. 2023 annual shareholder meeting. The proposal requests that the company publish an annual report analyzing the congruency of its political, lobbying, and electioneering expenditures against its stated company values and policies.

I support this proposal and give Nia Impact Capital full authority to engage with the company on my behalf regarding the proposal and the underlying issues, and to negotiate a withdrawal of the proposal to the extent the representative views the company's actions as responsive. I intend to hold the requisite number of shares required by Rule 14a-8 through the 2023 annual meeting.

I understand that I may be identified on the corporation's proxy statement as a filer or co-filer of the aforementioned resolution.

Sincerely,

DocuSigned by:
Louise Davis
F5DC63040D744FE

Louise Davis

From: Shelley Alpern <[redacted]>
Sent: Monday, November 21, 2022 1:55 PM
To: Rolon, Suzanne <[redacted]>
Cc: Madden, Margaret <[redacted]>
Subject: [EXTERNAL] Re: Shareholder Proposal Submitted to Pfizer - 2023

Please find attached a revised proposal that is under 500 words.

Best regards,

Shelley Alpern
Rhia Ventures | Director of Corporate Engagement
cell: [redacted] | www.rhiaventures.org

Rhia VENTURES
To schedule an appointment with me, visit my Calendly page.

From: Kelly Hall <[redacted]>
Sent: Monday, November 21, 2022 6:29 PM
To: Rolon, Suzanne <[redacted]>
Cc: Meredith Benton [redacted]>; Jaylen Spann <[redacted]>; Kristin Hull <[redacted]>; Shelley Alpern <[redacted]>; Madden, Margaret <[redacted]>
Subject: [EXTERNAL] Shareholder Proposal Submitted to Pfizer - 2023

Hello Suzanne,

I hope you're doing well!

Please see attached a revised proposal that is under 500 words.

Warm regards,
Kelly

--

Kelly Hall
[She/Her]
Operations & Communications Associate
Nia Impact Capital
www.niaimpactcapital.com

Shareholder Proposal for Pfizer 2023 Proxy Ballot re Political Contributions Misalignment
Submitted by Tara Health Foundation

POLITICAL CONTRIBUTIONS MISALIGNMENT

Whereas:

Pfizer has stated "political contributions are made to support the election of candidates, political parties and committees that support public policies important to the industry, such as innovation and access to medicines," and "[w]e aim to end discrimination against women, ensure equal opportunities for leadership and access to reproductive health."

However, Pfizer's political expenditures appear to be misaligned with the company's stated values and interests.

Pfizer has stated that "Expanded access to health insurance coverage will help ensure that patients with under-diagnosed and undertreated conditions are able to address them; and that those who will benefit from Pfizer medicines are better able to have access to them." Yet in 2018, Pfizer was a top contributor to a 527 organization leading efforts to strike down the Affordable Care Act, which has made prescription drugs more accessible for millions, and contributes to PhRMA, which donates to numerous organizations opposing congressional efforts to reform drug pricing.

Pfizer manufactures contraceptives and a drug commonly prescribed for medication abortion. Yet the proponent estimates that since the beginning of the 2020 election cycle, Pfizer and its employee PACs have donated at least $5 million to politicians and political organizations working to weaken women's access to reproductive health care. In the South during this period, Pfizer's contributions to anti-choice state candidates exceeded those to other candidates by a ratio of 3:1, and its contributions to anti-choice federal candidates exceeded those to other candidates by a ratio of 2:1. For example, Pfizer contributed to multiple sponsors of bills passed in 2022 in Tennessee and Louisiana that will restrict access to medication abortion.

This pattern spending has drawn scrutiny from *STAT, Bloomberg News, Huffington Post, The Minnesota Daily, CQ ESG Briefing, Agenda* (a *Financial Times* publication) and *Forbes*.

Proponents believe Pfizer should establish policies and reporting systems that minimize risk to reputation and brand by addressing possible missteps in corporate electioneering and political spending that contrast with its stated healthcare objectives.

Resolved:

Resolved: Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies, including Pfizer's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." Such a report should list and explain any instances of incongruent expenditures, and state whether the identified incongruencies have led to a change in future expenditures or contributions.

Shareholder Proposal for Pfizer 2023 Proxy Ballot re Political Contributions Misalignment
Submitted by Tara Health Foundation

Supporting Statement:

Proponents recommend that such report contain management's analysis of risks to our company's brand, reputation, or shareholder value of expenditures in conflict with publicly stated company values. “Electioneering expenditures" means spending, from the corporate treasury and from the PACs, directly or through a third party, at any time during the year which are reasonably susceptible to interpretation as in support of or opposition to a specific candidate.

EXHIBIT B

(see attached)

Industry Associations – Report on Incongruencies

Introduction

Pfizer Inc. (Pfizer) actively participates in the public policy arena because government policies affect our ability to meet patient needs and provide shareholder value. Barriers to access, counterfeit medicines, illegal importation and challenges to intellectual property protection challenge essential aspects of our business.. For this reason, we actively participate in public policy dialogues to explain our perspectives. We have extensive knowledge about health care and many ideas about improving its efficiency, as well as a global perspective on public health, disease prevention and health education. We believe that public policy engagement is an important and appropriate role for companies in open societies.

In furtherance of these goals, Pfizer is a member of various industry and trade groups that represent both the pharmaceutical industry and the business community at large to bring about consensus on broad policy issues that can impact Pfizer's business objectives and ability to serve patients. Our support of these organizations is evaluated annually by the company's U.S. Government Relations leaders based on these organizations' expertise in healthcare policy and advocacy and support of key issues of importance to Pfizer. In addition to their positions on health care policy issues, we realize these organizations may engage in a broad range of other issues that extend beyond the scope of what is of primary importance to Pfizer's business. If concerns arise about a particular issue, we convey our concerns, as appropriate, through our colleagues who serve on the boards and committees of these groups. We believe there is value in making sure our positions on issues important to Pfizer and our industry are communicated and understood within those organizations. Pfizer's participation as a member of these various industry and trade groups comes with the understanding that we may not always agree with each position taken by the larger organization and/or other members.

Our most significant trade association memberships are with the U.S. Chamber of Commerce (Chamber), the Business Roundtable (BRT), the National Association of Manufacturers (NAM), the Biotechnology Industry Association (BIO), and the

Pharmaceutical Research and Manufacturers of America (PhRMA). We work closely and are proud of our collaboration with each of these trade associations on core issues of great importance to Pfizer's business and our stakeholders. PhRMA and BIO lead the industry in promoting pro-patient and pro-innovation health care policies while fighting against harmful government price control policies. The BRT, Chamber and NAM are leading voices on US tax competitiveness. All of these trade associations are vocal advocates for robust protections for intellectual property rights.

Of course, because these trade associations represent so many members with a diversity of interests, at times their positions and efforts on certain issues are not perfectly aligned with our own. Some misalignment is an unavoidable consequence of any collective endeavor. Nevertheless, we monitor where and to what extent our trade associations are misaligned with the company on such issues. Where possible, we will advocate for the trade association to come into alignment, but if an organization's misalignment is egregious, and the membership benefits to Pfizer and its stakeholders are outweighed by the misalignments, we will reduce or end our involvement with the organization.

In addition, the Governance & Sustainability Committee of the Board has oversight of the company's issues related to public policy, political spending policies and practices and our lobbying activities. At least annually, the Committee receives a report from the company's U.S. Government Relations leaders regarding our public policies activities, including an overview of the benefits derived from the company's association with certain trade and other organizations.

That said, the following report outlines the public policy positions of Pfizer and the five trade associations across six areas of key public policy and ESG significance for Pfizer: Climate Change; Patient Access to Healthcare; Trade; Tax; Diversity, Equity, and Inclusion; and Civic Integrity. The report also compares Pfizer and the trade associations' positions and describes the degree of alignment and areas of misalignment. Please note that while some of these issues, such as healthcare access, tax and trade are core to Pfizer's business, the other issues are nevertheless important to the company although they may not be core to the company's business

Biotechnology Innovation Organization

The policy goals of Pfizer and the Biotechnology Innovation Organization (BIO) are generally in alignment across the key areas reviewed. To the extent differences exist in the company and trade association's respective positions, such as on tax, they are largely because either Pfizer or BIO has taken a position on particular matters on which the other has not. Indeed, Pfizer has been more vocal than BIO on support of free trade, though both agree on the importance of intellectual property protections in trade agreements. On broad policy goals, Pfizer and BIO are well aligned. Pfizer engages with BIO on the following issues: (a) intellectual property/innovation protection; (b) vaccine policy and advocacy; (c) patient affordability solutions; and (d) FDA User Fee agreements (in partnership with PhRMA).

	Pfizer	BIO	Gap Analysis
Climate Change	Pfizer understands and takes action to reduce the risks of adverse impacts from climate threats by recognizing that climate change is a defining issue of the times caused primarily by human activities. These values are illustrated through demonstrable policies and goals, supporting government efforts for market-based solutions aimed at achieving science-based emission reduction targets, while also taking steps at the company level, including becoming carbon neutral by 2030. The company also seeks to engage value chain partners to help them achieve target reductions in emissions.	BIO believes that climate change is one of the greatest public policy challenges facing this generation and that biotechnology has the potential to be a transformative asset in this struggle. It supports efforts to reduce greenhouse gas emissions as well as establishing a national low carbon fuels standard. BIO strongly supports the Growing Climate Solutions Act, including the establishment of a national carbon market, the U.S. rejoining the Paris Climate Accords, and the development of Sustainable Aviation Fuels. Lastly, BIO opposes the practice of granting small refinery	Pfizer and BIO are in close alignment on climate change, with both favoring market-based and scientific-evidence based solutions to climate change.

		hardship waivers under the Renewable Fuel Standard.	
Access to Healthcare	Pfizer seeks to maximize the use of its medicines and vaccines for supporting global public health efforts. This includes permitting, as safely as possible, access to investigational drugs still in development in limited circumstances. As a global company, Pfizer attempts to ensure that underserved patients around the world have access to essential medicines and vaccines. In addition, Pfizer seeks to educate underserved patients on health literacy to further health equity.	BIO believes that biotechnology can help provide healthcare solutions for a variety of problems, such as opioid addiction, vaccine access, and disease prevention. BIO member companies are committed to making innovative biotechnology medicines available to patients who need them through the efficient development of approved, safe and effective products. However, BIO opposes global drug price control schemes such as those found in H.R. 3. BIO favors expanding access to investigational drugs as long as proper safeguards remain in place. Lastly, BIO and its members often work together with patient advocacy organizations to better understand the patients it serves in order to help raise awareness and understanding of disease and to advance patient-focused public policies.	Pfizer and BIO are in close alignment in expanding access to healthcare, including expanded access to investigational drugs and COVID vaccines.
Trade	Pfizer balances the realities of encouraging trade, commerce, and patient access while protecting IP that is at the heart of the company's innovation engine. As a company that engages	BIO supports eliminating acute and systemic trade barriers to innovative biotechnology tools, particularly in important export markets, such as China, the European Union, and Mexico. It	Pfizer and BIO are in close alignment on the importance of intellectual property protections in trade agreements, but Pfizer has spoken more favorably of free trade

	heavily in R&D, it is imperative to the success of the company that products that are the result of costly research be given the appropriate market protections. This includes advocating for free trade agreements that provide legal certainty. Pfizer also emphasizes an ethical supply chain and following applicable antitrust laws, both in the U.S. and abroad.	believes that to fully leverage the potential of biotechnology, a level-playing field at the global level is essential. BIO also favors robust intellectual property protections for biotechnology companies. It has criticized the World Trade Organization's (WTO) proposed "TRIPS" waiver of intellectual property rights for technologies used to prevent, contain, or treat COVID-19. In addition, BIO supports pursuing biotechnology-specific outcomes in new trade agreements and modernizing older trade agreements to address biotechnology. It criticized the United States-Mexico-Canada Agreement (USMCA) for failing to include enhanced intellectual property standards for American biopharmaceutical products.	agreements generally than BIO has.
Tax	Pfizer opposes increasing the tax burden on U.S. companies through changes to the foreign minimum tax.	BIO supports a number of state-level tax credits, deductions, and exemptions. It supports seed capital tax credits and angel investor tax credits to encourage early-stage investment, tax credits to increase the availability of venture capital, tax credits for research and development, sales tax exemptions for	Pfizer and BIO have different focuses in the area of tax policy. BIO does not appear to have taken a position on the foreign minimum tax issue of most interest to Pfizer, but holds a number of other positions on tax policy that Pfizer has not addressed. Thus, Pfizer and BIO's positions are

		equipment used in research and development and manufacturing, capital investment tax incentives, innovation investment tax incentives, tax credit transferability, the option to carry forward net operating losses (NOL), and capital gains deductions. At the federal level, it supports a number of biofuel tax incentives, particularly the Second Generation Biofuel Producer Tax Credit, the Special Depreciation Allowance for Second Generation Biofuel Plant Property, the Biodiesel and Renewable Diesel Fuels Credit, and the Alternative Fuel Vehicle Refueling Property Credit. It also supports reform of limitations on NOL carryforwards under Section 382 of the federal tax code.	misaligned in this area, though not in conflict.
Diversity Equity & Inclusion	Pfizer has numerous company policies and reports that emphasize the importance of diversity, equity, and inclusion to the company and provide metrics that reflect the priority that the company places on such efforts. This emphasis on values related to DE&I is not illustrated only in policies addressing company personnel, but also related to patients, as	BIO supports increasing diversity, equity and inclusion (DE&I) in the biotechnology space. It has spearheaded several initiatives dedicated to improving diversity such as its BIOEquity Agenda and the Right Mix Matters campaign. BIO also believes that it is imperative to increase diversity in clinical trials in order to best reflect the population that will	Pfizer and BIO are in close alignment on matters of DE&I, in terms of the corporate workforce, clinical trials and access to healthcare.

	the company seeks to overturn longstanding inequities in healthcare systems, such as through inclusive drug trials.	ultimately be using the tested drugs. Lastly, BIO has committed to promoting health equity by enhancing clinical trial diversity, promoting access to vaccines and therapeutics for uninsured and underserved populations and fostering enhanced nutritional, environmental, and mental wellness opportunities in economically disadvantaged communities.	
Civic Integrity	Pfizer opposed the events at the Capitol on January 6, 2021 and paused Pfizer Political Action Committee (PAC) giving to the 147 Republicans who voted against certifying the election for the first half of 2021. Pfizer also supports ensuring every American citizen's right to vote, which is fundamental to our democracy.	BIO opposed the events that took place at the Capitol on January 6. As a result, it briefly paused all political giving in order to reassess the criteria it uses to make political donations.	Pfizer and BIO are in close alignment on civic integrity, with both condemning the events that took place at the Capitol on January 6, 2021.

Business Roundtable

The policy goals of Pfizer and the Business Roundtable (BRT) are generally in alignment across the key areas reviewed. To the extent there are differences in the company and trade association's respective positions, they are because Pfizer and BRT are focusing on different specific aspects of the issue. However, on broad policy goals, Pfizer and BRT are well aligned. Pfizer engages with the BRT on the following issues: (a) U.S. tax competitiveness; (b) global tax debate; (c) free trade policies and intellectual property protection; (d) employer health care and health equity solutions; and (e) enhancing diversity and inclusion in the workforce.

	Pfizer	Business Roundtable	Gap Analysis
Climate Change	Pfizer understands and takes action to reduce the risks of adverse impacts from climate threats by recognizing that climate change is a defining issue of the times caused primarily by human activities. These values are illustrated through demonstrable policies and goals, supporting government efforts for market-based solutions aimed at achieving science-based emission reduction targets, while also taking steps at the company level, including becoming carbon neutral by 2030. The company also seeks to engage value chain partners to help them achieve target reductions in emissions.	The Business Roundtable believes corporations should lead by example, support sound public policies, and drive innovation in order to best address climate change. However, the BRT asserts that effective change will not happen in a vacuum, and that it is imperative for the U.S. government to act in tandem with corporations. In particular, the BRT calls on the U.S. government to adopt a more comprehensive, coordinated, and market-based approach to emissions reduction. This approach should also place a premium on fostering innovation, U.S. competitiveness, and compliance flexibility. The BRT identifies global cooperation and diplomacy as the keys to achieving the collective	Both Pfizer and BRT favor market-based and scientific-evidence based solutions to climate change. Pfizer is committed to taking responsible climate action and reducing environmental impact; BRT also advocates for corporations to take such actions. BRT has been criticized in the press in recent months for opposing the Biden administration's Build Back Better legislation, despite its substantial investment in combating climate change. But this opposition is due to the onerous tax provisions included in the legislation; BRT has called for separate legislative action on climate change.

		global action that is necessary to address the climate change challenge. However, the BRT has received criticism in the press for opposing the Biden administration's Build Back Better legislation, despite its substantial investment in combating climate change.	
Access to Healthcare	Pfizer seeks to maximize the use of its medicines and vaccines for supporting global public health efforts. This includes permitting, as safely as possible, access to investigational drugs still in development in limited circumstances. As a global company, Pfizer attempts to ensure that underserved patients around the world have access to essential medicines and vaccines. In addition, Pfizer seeks to educate underserved patients on health literacy to further health equity.	The BRT believes that an affordable, innovative and efficient healthcare system is an essential factor in ensuring a better quality of life for all Americans as well as a more productive and competitive U.S. workforce. The BRT has established its own Health & Retirement committee to bring about its goals. The committee's purpose is to support health policy initiatives and the U.S. retirement system. The BRT also supports policies that will improve the affordability and quality of U.S. healthcare and is particularly interested in the intersection of racial equity and health. The BRT believes that by focusing on effective and inclusive healthcare and retirement policies, the U.S. will become a more attractive location for skilled workers and businesses. BRT has also	Pfizer and BRT are both focused on expanding access to healthcare. Pfizer largely focuses on expanding access to medicines and vaccines, including investigational drugs. BRT does not appear to have taken a position on these specific initiatives, except that it has been promoting access to COVID vaccines, and is instead focused on reducing the cost of, and expanding access to, health insurance. Both Pfizer and BRT support efforts to promote equity in access to healthcare.

		actively promoted use of COVID vaccines.	
Trade	Pfizer balances the realities of encouraging trade, commerce, and patient access while protecting IP that is at the heart of the company's innovation engine. As a company that engages heavily in R&D, it is imperative to the success of the company that products that are the result of costly research be given the appropriate market protections. This includes advocating for free trade agreements that provide legal certainty. Pfizer also emphasizes an ethical supply chain and following applicable antitrust laws, both in the U.S. and abroad.	The BRT believes that every sector of the U.S. economy benefits from free trade, and that future economic growth and jobs in the U.S. depend on expanding U.S. trade and investment opportunities around the world. In this same vein, the BRT is very supportive of friendly trade relations with Canada and Mexico. However, the BRT takes issue with China's trade and investment practices and supports the preservation of the Phase Agreement as well as working with U.S. allies and trading partners to press for further structural reforms in China such as stronger intellectual property protections. Lastly, the BRT opposes the Section 232 tariffs on steel and aluminum imports.	Pfizer and BRT are in close alignment on trade policy. Both favor free trade agreements and the protection of intellectual property rights through such agreements.
Tax	Pfizer opposes increasing the tax burden on U.S. companies through changes to the foreign minimum tax.	The BRT supports tax and fiscal policies that promote innovation and create more opportunity for America's workers, communities and job creators. It strongly supports the 2017 tax reform and believe that it has aligned the U.S. corporate tax rate with global competitors thereby allowing for low unemployment, better-	Pfizer and BRT are in close alignment on opposition to changes to the foreign minimum tax that would increase the tax burden on U.S. companies relative to foreign companies. BRT has positions on numerous other tax issues on which Pfizer has not taken a public position.

		than-expected growth in GDP, and the fastest two-year wage growth in 20 years (prior to the pandemic). Furthermore, the BRT believes that any U.S. minimum tax should be agreed upon at a global level instead of just applying to U.S. companies. Lastly, the BRT opposes an increase in corporate taxes being bundled into an infrastructure bill.	
Diversity Equity & Inclusion	Pfizer has numerous company policies and reports that emphasize the importance of diversity, equity, and inclusion to the company and provide metrics that reflect the priority that the company places on such efforts. This emphasis on values related to DE&I is not illustrated only in policies addressing company personnel, but also related to patients, as the company seeks to overturn longstanding inequities in healthcare systems, such as through inclusive drug trials.	The BRT strongly supports the DE&I efforts of its member companies. It also recommends that member companies increase transparency on corporate diversity by voluntarily disclosing their diversity metrics, including hiring and leadership. Furthermore, the BRT has taken a multi-faceted approach to DE&I initiatives and has created substantive policies that address DE&I issues in employment, finance, education, health, housing, and the justice system.	Pfizer and BRT are in close alignment on matters of DE&I, both in terms of the corporate workforce and access to healthcare.
Civic Integrity	Pfizer opposed the events at the Capitol on January 6, 2021and paused Pfizer Political Action Committee (PAC) giving to the 147 Republicans who voted against certifying the election for the first half of 2021. Pfizer also supports ensuring every American	The BRT strongly opposed claims that the results of the 2020 Presidential election were the product of fraud before, during, and after the events that took place at the Capitol on January 6, 2021. The BRT also supports greater access	Pfizer and BRT are in close alignment on civic integrity, with both condemning the events that took place at the Capitol on January 6, 2021, and supporting access to voting.

	citizen's right to vote, which is fundamental to our democracy.	to voting and encourages broad voter participation. In the same vein, the BRT encourages its member companies to allow their employees to take the day off of work in order to vote.	

National Association of Manufacturers

The policy goals of Pfizer and the National Association of Manufacturers (NAM) are generally in alignment across the key areas reviewed. The alignment is less close in the areas of climate change and access to healthcare, largely because Pfizer and the NAM are focusing on different specific aspects of the issue. However, on broad policy goals, Pfizer and BRT are well aligned. Pfizer engages with NAM on the following issues: (a) high quality manufacturing; (b) international trade; and (c) to oppose governmental intervention in health care, including price controls in Medicare.

	Pfizer	NAM	Gap Analysis
Climate Change	Pfizer understands and takes action to reduce the risks of adverse impacts from climate threats by recognizing that climate change is a defining issue of the times caused primarily by human activities. These values are illustrated through demonstrable policies and goals, supporting government efforts for market-based solutions aimed at achieving science-based emission reduction targets, while also taking steps at the company level, including becoming carbon neutral by 2030. The company	The NAM recognizes that climate change poses a serious threat to the planet. It has called for a clear and unified federal climate policy that is based on science-based metrics and that preempts conflicting and duplicative regulations. It supports increasing investments in public- and private-sector energy and water efficiency, scaling up the adoption of energy- and water-efficient products and technologies, and developing pathways for the deployment of new technologies like carbon	Both Pfizer and the NAM favor scientific evidence based solutions to climate change. There is some misalignment in how to achieve these solutions, with Pfizer focused on market-based mechanisms while the NAM supports greater regulatory clarity and consistency that supports innovation and a global approach to climate change.

	also seeks to engage value chain partners to help them achieve target reductions in emissions.	capture, utilization, and storage. It believes that any federal policy must be part of a broader global solution and has encouraged the U.S. to reengage with the international community in order to reduce greenhouse gas emissions collectively, rather than in isolation. The NAM is opposed to measures, such as the Green New Deal, that it believes would too quickly transition the U.S. from fossil fuels and would put U.S. manufacturers at a competitive disadvantage.	
Access to Healthcare	Pfizer seeks to maximize the use of its medicines and vaccines for supporting global public health efforts. This includes permitting, as safely as possible, access to investigational drugs still in development in limited circumstances. As a global company, Pfizer attempts to ensure that underserved patients around the world have access to essential medicines and vaccines. In addition, Pfizer seeks to educate underserved patients on health literacy to further health equity.	The NAM supports market-based solutions to lower healthcare costs. In particular, it supports moving the U.S. from a fee-for-service or volume-based healthcare system to a value-based healthcare system; enacting policies that allow employers to use innovative approaches to providing coverage for their employees, such as wellness programs, association health plans, and direct primary care; improving health savings accounts to reduce patient out-of-pocket costs; reducing Affordable Care Act–mandated reporting requirements; and maintaining the tax-	Pfizer and the NAM are in broad alignment on minimizing government intervention between patients and the drugs and vaccines they need. Pfizer largely focuses on expanding access to medicines and vaccines, including investigational drugs. The NAM does not appear to have taken a position on these specific initiatives, except that it has been promoting access to COVID vaccines, and is instead focused on reducing the cost of healthcare and health insurance, while combating

		exempt status of employee health benefits to avoid higher premiums for workers and families. The NAM is opposed to government price controls, which it argues will chill innovation and expose consumers to unsafe medicines.	government price controls.
Trade	Pfizer balances the realities of encouraging trade, commerce, and patient access while protecting IP that is at the heart of the company's innovation engine. As a company that engages heavily in R&D, it is imperative to the success of the company that products that are the result of costly research be given the appropriate market protections. This includes advocating for free trade agreements that provide legal certainty. Pfizer also emphasizes an ethical supply chain and following applicable antitrust laws, both in the U.S. and abroad.	The NAM supports free trade agreements to provide certainty in the global marketplace, open markets for U.S.-manufactured goods, and eliminate unfair barriers to trade. It believes that the U.S. needs to work with allies to shape the global rules for trade. It supports vigorous protection of intellectual property rights at home and abroad and targeted policies directed at China to reverse the country's illegal subsidies, intellectual property theft, and discriminatory industrial policies. It also supports modernizing U.S. and foreign customs operations to cut red tape and expedite legitimate trade in the U.S. and across foreign borders and implementing U.S. export control and investment review policies that promote the leadership, competitiveness, and strength of the U.S. manufacturing industry. The NAM is opposed to tariffs, which it argues	Pfizer and the NAM are in close alignment on trade policy. Both favor free trade agreements and the protection of intellectual property rights through such agreements.

		undermine economic growth by restricting trade.	
Tax	Pfizer opposes increasing the tax burden on U.S. companies through changes to the foreign minimum tax.	The NAM supports a competitive tax code that promotes economic growth and incentivizes investment in infrastructure, research and development, and human capital. It is opposed to increasing taxes, particularly the corporate tax and foreign minimum tax, and to limiting tax deductions, such as the business interest expense deduction.	Pfizer and the NAM are in close alignment on opposition to changes to the foreign minimum tax that would increase the tax burden on U.S. companies relative to foreign companies. The NAM has positions on numerous other tax issues on which Pfizer has not taken a public position.
Diversity Equity & Inclusion	Pfizer has numerous company policies and reports that emphasize the importance of diversity, equity, and inclusion to the company and provide metrics that reflect the priority that the company places on such efforts. This emphasis on values related to DE&I is not illustrated only in policies addressing company personnel, but also related to patients, as the company seeks to overturn longstanding inequities in healthcare systems, such as through inclusive drug trials.	The NAM supports diversity, equity, and inclusion policies. It encourages manufacturers to take proactive measures to hire more women, people of color, and members of the LGBT community and to make their workplaces more open and accepting.	Pfizer and the NAM are in close alignment on DE&I, matters in the corporate workforce, although the NAM does not appear to have focused on inequities in healthcare systems specifically.
Civic Integrity	Pfizer opposed the events at the Capitol on January 6, 2021 and paused Pfizer Political Action Committee (PAC) giving to the 147	The NAM encourages people to vote and spoke out against efforts after the 2020 general election to undermine the	Pfizer and the NAM are in close alignment on civic integrity, with both condemning the events that took place

	Republicans who voted against certifying the election for the first half of 2021. Pfizer also supports ensuring every American citizen’s right to vote, which is fundamental to our democracy.	presidential election results.	following the 2020 election.

Pharmaceutical Research and Manufacturers of America

Pfizer and Pharmaceutical Research and Manufacturers of America (PhRMA) are closely aligned on policy goals and specific positions. The only notable exception is in the area of climate change, where PhRMA has not taken a public position. Pfizer engages with PhRMA on the following issues: (a) lead industry efforts to advance pro-patient policies and defeat negative drug pricing proposals at the federal level; (b) advance rebate pass-through, copay accumulator bans and out of pocket caps at state level; (c) protect intellectual property rights globally; and (d) advance FDA User Fee agreements (in partnership with BIO).

	Pfizer	PhRMA	Gap Analysis
Climate Change	Pfizer understands and takes action to reduce the risks of adverse impacts from climate threats by recognizing that climate change is a defining issue of the times caused primarily by human activities. These values are illustrated through demonstrable policies and goals, supporting government efforts for market-based solutions aimed at achieving science-based emission reduction targets, while also taking steps at the company level, including becoming carbon neutral by 2030. The company also seeks to engage value chain partners to help them achieve target reductions in emissions.	No public policy or position identified.	PhRMA does not have public positions on climate change, so there is no material misalignment between Pfizer and PhRMA on this topic.
Access to Healthcare	Pfizer seeks to maximize the use of its medicines and vaccines for supporting global public health efforts. This	PhRMA is willing to work with all stakeholders to deliver a more resilient, stronger, affordable and equitable healthcare	Pfizer and PhRMA are in close alignment on expanding access to healthcare, including through greater access

	includes permitting, as safely as possible, access to investigational drugs still in development in limited circumstances. As a global company, Pfizer attempts to ensure that underserved patients around the world have access to essential medicines and vaccines. In addition, Pfizer seeks to educate underserved patients on health literacy to further health equity.	system for all. However, it believes that the current price setting proposals in Congress threaten Americans' access to crucial, breakthrough medicines, and that there should instead be a cap on out-of-pocket costs for seniors. It also focuses on lower cost sharing and making drugs prices more predictable. PhRMA wants to ensure that billions of dollars in rebates and discounts get passed on to patients – not kept by the insurance companies, hospitals and middlemen. PhRMA also supports expanded access to investigational drugs.	to investigational drugs.
Trade	Pfizer balances the realities of encouraging trade, commerce, and patient access while protecting IP that is at the heart of the company's innovation engine. As a company that engages heavily in R&D, it is imperative to the success of the company that products that are the result of costly research be given the appropriate market protections. This includes advocating for free trade agreements that provide legal certainty. Pfizer also emphasizes an ethical supply chain and following applicable antitrust laws,	PhRMA supports free and fair trade and believes that through trade agreements with other countries, medicines developed in the U.S. are able to reach patients around the world who otherwise would not be able to access the latest treatments and cures. However, it argues that some countries artificially limit the price of innovative U.S. pharmaceuticals, and fail to adequately protect intellectual property, thereby hampering access to new treatments in foreign countries and reducing investment in	Pfizer and PhRMA are in close alignment on trade policy, with both favoring free trade and strong intellectual property protections.

	both in the U.S. and abroad.	research and development. PhRMA argues that this ultimately harms patients and health systems. Therefore, PhRMA supports strong IP protection policies.	
Tax	Pfizer opposes increasing the tax burden on U.S. companies through changes to the foreign minimum tax.	PhRMA believes that increased taxes limit the ability of pharmaceutical companies to provide new treatments abroad and disincentivizes research and development for lifesaving cures. It engaged an outside auditor to estimate the effects of the Biden administration's federal income tax payment plan on the pharmaceutical industry. The analysis showed that the administration's tax proposals would increase tax payments on the pharmaceutical industry by more than $95 billion because of revisions to the global minimum tax regime and related proposals. This coupled, with the increase in the corporate income tax rate to 28%, would raise the pharmaceutical industry's taxes by an estimated $40.7 billion.	Pfizer and PhRMA are in close alignment on opposition to changes to the foreign minimum tax that would increase the tax burden on U.S. companies relative to foreign companies.
Diversity Equity & Inclusion	Pfizer has numerous company policies and reports that emphasize the importance of diversity, equity, and	PhRMA is committed to enhancing diversity, equity and inclusion in the pharmaceutical industry. It published the	Pfizer and PhRMA are in close alignment on matters of DE&I, both in terms of the corporate workforce,

	inclusion to the company and provide metrics that reflect the priority that the company places on such efforts. This emphasis on values related to DE&I is not illustrated only in policies addressing company personnel, but also related to patients, as the company seeks to overturn longstanding inequities in healthcare systems, such as through inclusive drug trials.	first ever industry-wide principles on clinical trial diversity. Further, it has consistently responded to government requests for information on diversity initiatives. PhRMA has also created a grant program that awards money to community-based projects to address inequities in diagnosis, treatment, and adherence. Lastly, PhRMA has published an open letter on equity, noting that systemic racism is as real as any disease and commits PhRMA to pursuing various measures in order to improve its diversity, equity and inclusion efforts.	access to healthcare and participation in clinical trials.
Civic Integrity	Pfizer opposed the events at the Capitol on January 6, 2021 and paused Pfizer Political Action Committee (PAC) giving to the 147 Republicans who voted against certifying the election for the first half of 2021. Pfizer also supports ensuring every American citizen's right to vote, which is fundamental to our democracy.	PhRMA's CEO issued a strong rebuke of the events at the Capitol on January 6. Soon after, PhRMA paused all political giving to those who voted to reject the outcome of the 2020 presidential election.	Pfizer and PhRMA are in close alignment on civic integrity, with both condemning the events that took place at the Capitol on January 6, 2021.

U.S. Chamber of Commerce

The policy goals of Pfizer and the U.S. Chamber of Commerce (Chamber) are generally in alignment across the key areas reviewed. To the extent there are differences in the company and trade association's respective positions, they are generally because Pfizer and Chamber are focusing on different specific aspects of the issue. However, on broad policy goals, they are well aligned. Pfizer engages with the Chamber on the following issues: (a) promote and protect intellectual property/innovation through Global Innovation Policy Center; (b) drive narrative on counterfeits/product integrity; (c) lead on U.S. tax competitiveness; and (d) protect employer health care and drive policies to promote competition in health care.

	Pfizer	Chamber	Gap Analysis
Climate Change	Pfizer understands and takes action to reduce the risks of adverse impacts from climate threats by recognizing that climate change is a defining issue of the times caused primarily by human activities. These values are illustrated through demonstrable policies and goals, supporting government efforts for market-based solutions aimed at achieving science-based emission reduction targets, while also taking steps at the company level, including becoming carbon neutral by 2030. The company also seeks to engage value chain partners to help them achieve target reductions in emissions.	The Chamber acknowledges the severity of the climate threat, that humans are contributing, and that steps needs to be taken to address the crisis. The organization recognizes the role that business and market-driven solutions can play in slowing the effects of climate change. In addition, governments and technological solutions should be leveraged but solutions must be realistic, durable, and reinforce U.S. economic competitiveness.	On climate change, both Pfizer and the Chamber favor market-based and technology-based solutions. Pfizer is committed to taking responsible climate action and reducing environmental impact; the Chamber also advocates for corporations to take such actions. The Chamber has been criticized for its history of opposition to legislation targeting climate change and opposing the Biden administration's Build Back Better legislation, which includes climate provisions. The Chamber testified before Congress in October and noted that combating climate change requires citizens, governments, and businesses to work together – and that inaction is not an option..
Access to Healthcare	Pfizer seeks to maximize the use of its medicines and vaccines for	The Chamber believes private business is a significant factor in what	Pfizer and the Chamber are in alignment on

	supporting global public health efforts. This includes permitting, as safely as possible, access to investigational drugs still in development in limited circumstances. As a global company, Pfizer attempts to ensure that underserved patients around the world have access to essential medicines and vaccines. In addition, Pfizer seeks to educate underserved patients on health literacy to further health equity.	makes America the leader in healthcare in the world. American innovation leads to better outcomes for both domestic and international patients and companies must be provided proper incentives and protection to allow research and development to continue. These protections should be balanced to increase affordability and optimize access for all patients. Employer-sponsored healthcare provides the best option for many Americans.	expanding access to healthcare. Pfizer largely focuses on expanding access to medicines and vaccines, including investigational drugs. The Chamber does not appear to have taken a position on these specific initiatives, except that it has been promoting access to COVID vaccines, and is instead focused on reducing the cost of, and expanding access to, health insurance.
Trade	Pfizer balances the realities of encouraging trade, commerce, and patient access while protecting costly IP that is at the heart of the company's profitability. As a company that engages heavily in R&D, it is imperative to the success of the company that products that are the result of costly research be given the appropriate market protections. This includes advocating for free trade agreements that provide legal certainty. Pfizer also emphasizes an ethical supply chain and following applicable antitrust laws, both in the U.S. and abroad.	The Chamber emphasizes free trade and opposes tariffs, providing American companies the opportunity to participate in the global marketplace. In addition to agreements that open the marketplace, it's important that these agreements also provide intellectual property protections that protect and encourage innovation.	Pfizer and the Chamber are in close alignment on trade policy. Both favor free trade agreements and the protection of intellectual property rights through such agreements.
Tax	Pfizer opposes increasing the tax burden on U.S.	The Chamber believes in tax policies that support	Pfizer and the Chamber are in close

	companies through changes to the foreign minimum tax.	business and promote the growth the economy. This generally means lower and stable tax rates for business that spurs job growth and investment. In addition, the Chamber supports repealing taxes on certain aspects of healthcare. Internationally, the Chamber supports tax agreements that establish fair systems by which American companies can compete globally, and opposes an increase to the global minimum tax for U.S. companies.	alignment on opposition to changes to the foreign minimum tax that would increase the tax burden on U.S. companies relative to foreign companies. The Chamber has positions on numerous other tax issues on which Pfizer has not taken a public position.
Diversity Equity & Inclusion	Pfizer has numerous company policies and reports that emphasize the importance of diversity, equity, and inclusion to the company and provide metrics that reflect the priority that the company places on such efforts. This emphasis on values related to DE&I is not illustrated only in policies addressing company personnel, but also related to patients, as the company seeks to overturn longstanding inequities in healthcare systems, such as through inclusive drug trials.	The Chamber supports and understands the role that diversity, equity, and inclusion play in creating a vibrant and dynamic economy. This includes by supporting member efforts, instituting programs, and creating studies that illustrate that diversity is a strength in America. The organization believes that DE&I efforts will be central to a growing economy in the future.	Pfizer and the Chamber are in close alignment on matters of DE&I, with respect to promoting diversity in the corporate workforce.
Civic Integrity	Pfizer opposed the events at the Capitol on January 6, 2021 and paused Pfizer Political Action Committee (PAC) giving to the 147	The Chamber condemned the attacks against the Capitol on January 6 and believes the 2020 presidential electoral	Pfizer and the Chamber both condemned the events of January 6, 2021. The Chamber has taken a

	Republicans who voted against certifying the election for the first half of 2021. Pfizer also supports ensuring every American citizen's right to vote, which is fundamental to our democracy.	college was won by Joe Biden. After the attacks, the organization announced that it would holistically consider future contributions to candidates, including their positions on issues related to democracy, but did not say it would categorically withhold funds from those who voted against certifying the electoral college. The Chamber opposes the For the People Act of 2021, Democrats' signature voting rights bill this session, taking the position that it would silence voices from the political process.	position against the For the People Act of 2021; although Pfizer has indicated its support for voting rights, it has not taken a public position on this bill.

Methodology

This report surveys the public policy positions of Pfizer and five national trade associations of which Pfizer is a member: the Biotechnology Innovation Organization, the Business Roundtable, the National Association of Manufacturers, the Pharmaceutical Research and Manufacturers of America, and the U.S. Chamber of Commerce (collectively the “Trade Associations”). The review included the notable written policies of Pfizer and the Trade Associations generally addressing six issues: Climate Change; Patient Access to Healthcare; Trade; Tax; Diversity, Equity, and Inclusion; and Civic Integrity.

The report draws from the policies maintained on the websites of Pfizer and the Trade Associations. The policies were identified through a review of the respective websites and targeted keyword searches of the websites. In addition, we compiled recent notable criticism of the Trade Associations’ positions featured in media outlets through keyword searches of media databases. Please note, this report is focused on current Pfizer and Trade Association policies as of Fall 2021 and we omitted policies and criticism that we could determine were written prior to 2019.

EXHIBIT C

(see attached)

Pfizer PAC

Leading the Conversation.

Pfizer PAC and Corporate Political Contributions Report

January 2021 – December 2021

Corporate Affairs
Government Relations

U.S. Government Relations & Pfizer PAC
Leading the Conversation and Making an Impact
A Message from Rady Johnson & Sally Susman, Co-Chairs, Pfizer PAC

We are pleased to share our 2021 election cycle political contributions report, which includes a list of candidates and political committees supported either by Pfizer Inc. or the Pfizer PAC from January 1, 2021, through December 31, 2021.

It has been an incredible year as our colleagues have once again delivered excellence by developing and advancing our COVID-19 vaccine and anti-viral as well as many other breakthrough medicines and vaccines. In 2021, we were able to defend against challenging policy proposals that would have inhibited patients' access to breakthroughs and support candidates of both political parties who support state and federal policies that impact our purpose: Breakthroughs that change patients' lives.

In 2021, Pfizer PAC and Pfizer Inc. supported 1,285 candidates and multiple political committees at all levels of government. Fifty-three percent of the Pfizer PAC disbursements in 2021 went to Republicans and 47% went to Democrats. We continue to advance our purpose to discover and deliver breakthrough medicines and vaccines in part thanks to our loyal Pfizer PAC members and our Pfizer U.S. Government Relations team who are on the ground educating elected officials about Pfizer's purpose, activating those who support Pfizer's mission and advocating for policymakers who align with policies that enable our purpose.

As Pfizer's Chief Compliance & Corporate Affairs Officers, we can tell you unequivocally that our decision to contribute to any elected official is made based on a candidates' voting record on durable policies that support innovation, patient access to and affordability of their medicines, high quality manufacturing, a secure supply chain, a competitive tax code and a robust intellectual property system. Our PAC support does not imply an endorsement of a candidate's position on any social or religious issue, and we always consider a candidate's ethical conduct in our evaluation to ensure Pfizer's values are upheld. Pfizer's ability to innovate requires a favorable regulatory and legislative framework. The Pfizer PAC helps ensure that framework is strong.

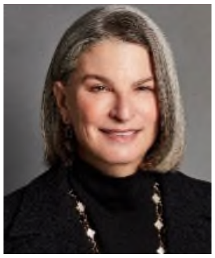
We hope you will take some time to review the report to see which candidates the PAC supported in your state and community. Our priority in 2022 is to help build a constructive discourse in the political and regulatory environment while supporting policies – and policymakers – who share these same ideals.

As Pfizer's PAC Co-Chairs, and through our interactions with elected officials, we see first-hand how decisions are made that impact our ability to bring breakthroughs to patients and healthcare providers who rely on us every day. When we lead the policy conversation, we can ensure our voice is heard and that we can continue to focus on putting patients first in everything we do.

Thank you for your support,

Rady Johnson

Rady Johnson
Executive Vice President
Chief Compliance, Quality & Risk Officer
Co-Chair, Pfizer PAC



Sally Susman

Sally Susman
Executive Vice President
Chief Corporate Affairs Officer
Co-Chair, Pfizer PAC

PFIZER PAC
Leading the Conversation.

What is a PAC?

PAC stands for Political Action Committee. A political action committee is a government-regulated organization that anyone can form to raise money for political campaign donations. PACs are formed by individuals, non-profits, and even many major corporations.

How Does Pfizer PAC Work?

The Pfizer political action committee, Pfizer PAC, is a nonpartisan organization that provides opportunities for employees to participate in the American political process. The Pfizer PAC is an employee-run organization with a Steering Committee made up of Pfizer employees from different divisions of the company. All corporate PACs are funded by voluntary employee contributions. Pfizer PAC is no different; it relies on the participation of Pfizer colleagues.

Who Receives Pfizer PAC Contributions?

Pfizer PAC is nonpartisan. It supports Democrats and Republicans alike. From January 2021 through Decmeber 2021, Pfizer PAC supported 1,285 candidates and committees. True to its nonpartisan values, Pfizer PAC is committed to support candidates from both political parties who share Pfizer's vision and values for healthcare. When choosing to make a contribution to a candidate, the Pfizer PAC considers candidates' views on issues that impact Pfizer and its employees as well as the presence of Pfizer facilities or employees in the candidate's district or state. A complete list of Pfizer PAC and state corporate political contributions for January 2021 - December 2021 is included in this report.

PFIZER PAC & POLITICAL CONTRIBUTIONS GOVERNANCE POLICY

Pfizer complies fully with all federal, state, and local laws and reporting requirements governing PAC and corporate political contributions.

Pfizer has a Corporate Policy Procedure (#802a) that requires all PAC and corporate political contributions to be compiled and published annually in a report that is made available to employees, shareholders, and the public, and posted on the Company's website at www.pfizer.com in "Lobbying and Political Contributions" under the "About Pfizer" tab within the "Corporate Governance" section. At the end of each Federal cycle (every two years), the Pfizer PAC is audited by Withum, a certified public accounting and advisory firm.

Pfizer also requests that trade associations receiving total payments of $100,000 or more from Pfizer in a given year report the portion of Pfizer dues or payments used for expenditures or contributions that, if made directly by Pfizer, would not be deductible under section 162(e)(1)(B) of the Internal Revenue Code. We are disclosing such information received from our trade associations in this report.

Pfizer has a PAC Steering Committee comprised of seven colleagues who review and approve all PAC and corporate political contributions on a monthly basis. Steering Committee members represent different divisions across the Pfizer organization. The PAC Steering Committee evaluates candidates based on issues that impact Pfizer and its colleagues. It also takes note of whether Pfizer facilities or colleagues reside in a candidate's district or state. In addition, all PAC and corporate contribution requests are shared with the Pfizer Political Contributions Policy Committee for review. The Political Contributions Policy Committee is responsible for governing the Pfizer PAC.

Pfizer does not traditionally make contributions to 527 Issue Organizations. If we were asked to make such a contribution, it would have to be reviewed and approved by the Political Contributions Policy Committee and subsequently disclosed in our semi-annual report.

Finally, in light of the Supreme Court decision in the Citizens United case, Pfizer has determined that it will not make any direct independent expenditures, a decision which has been discussed at the executive level as well as with the Governance & Sustainability Committee of our Board.

Political Contributions Policy Committee

CO CHAIR
Sally Susman
Executive Vice President
Chief Corporate Affairs Officer

CO CHAIR
Rady Johnson
Executive Vice President
Chief Compliance, Quality
& Risk Officer

TREASURER
Matthew Meehan
Director
U.S. Government Relations

SECRETARY
Barbara Bonfiglio
Assistant General Counsel
Corporate Governance

David Blackwell
Senior Director
Global General Toxicology
Research & Development

Josh Brown
Vice President
State Government Relations
Corporate Affairs

Sheryl Colyer
Vice President
People Experience

Navin Katyal
Global Franchise & Business Lead
Pfizer Vaccines, mRNA
Pfizer Biopharma Group

John Kelly
Vice President
Quality Operations & EHS
Pfizer Global Supply

Nick Lagunowich
Global President
Internal Medicine
Pfizer Biopharma Group

Margaret Madden
Senior Vice President
& Corporate Secretary
Chief Governance Counsel

Ed Nowicki
Senior Vice President
Deputy Chief Compliance Officer
Corporate Compliance

Andrew Schmeltz
Global President
Pfizer Oncology
Pfizer Biopharma Group

Jennifer Walton
Vice President
U.S. Government Relations
Corporate Affairs

Pfizer PAC Steering Committee

Leslie Black, DBA
Senior Manager
Oncology Training

Jim Cafone
Vice President
Pfizer Global Supply

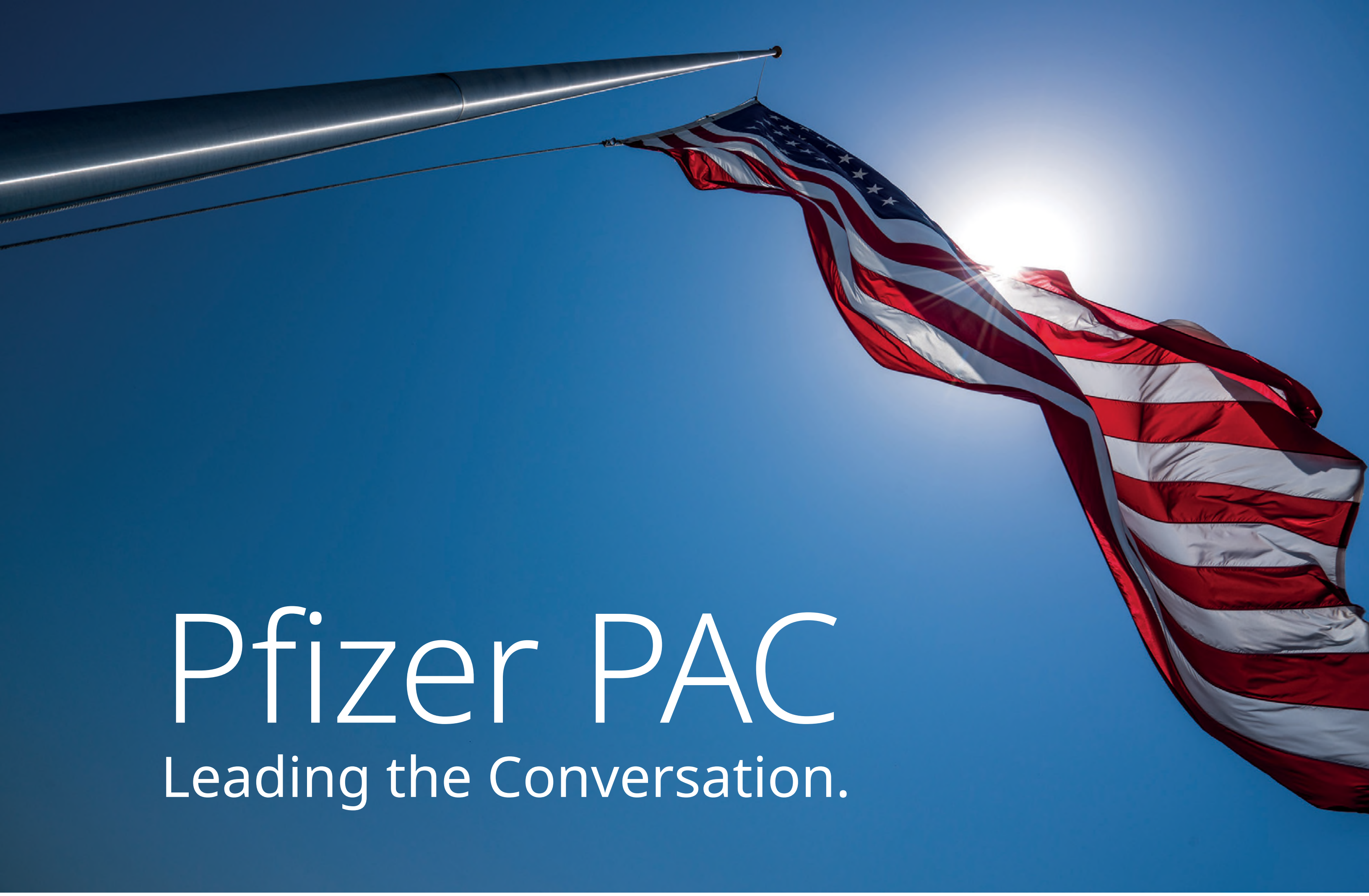
Sharon Castillo
Senior Director
Media Relations

Sam Gonzalez
Business/Scientific Operations Lead
Global Products Development

Mike Hoffman
Vice President
GBS Sourcing & Enterprise Services

Andrew Martin
Vice President
US Marketing Lead - Xeljanx
Pfizer Biopharma Group

Dezarie Mayers
Director, Colleague Programs
Corporate Affairs



Pfizer PAC

Leading the Conversation.

Political Contributions Recipients

January 2021 – December 2021

Pfizer
Corporate Affairs
Government Relations

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
ALABAMA									
US SENATE									
		Sen. Thomas H. Tuberville	Facility		Up in '26	R			$2,500.00
US HOUSE									
		Rep. Terri Andrea Sewell				D	007		$2,000.00
STATE SENATE									
		Sen. Gregory J. Reed				R	005	$1,500.00	
		Sen. Bobby D. Singleton				D	024	$1,000.00	
		Sen. Larry Stutts				R	006	$1,000.00	
		Sen. Garlan Gudger, Jr.				R	004	$500.00	
		Sen. Clay Scofield				R	009	$1,000.00	
STATE HOUSE									
		Rep. Laura Hall				D	019	$1,000.00	
		Rep. Paul W. Lee				R	086	$1,000.00	
		Rep. Joe Lovvorn				R	079	$500.00	
		Rep. Nathaniel Ledbetter				R	024	$1,500.00	
		Rep. Kyle South				R	016	$500.00	
		Rep. Anthony Daniels				D	053	$500.00	
ALASKA									
US SENATE									
		Sen. Lisa Ann Murkowski	Facility			R			$2,500.00
ARIZONA									
US HOUSE									
		Rep. Tom O'Halleran				D	002		$3,000.00
ARKANSAS									
US SENATE									
		Sen. Thomas Bryant Cotton	Facility		Up in '26	R			$1,000.00
		Sen. John Nichols Boozman	Facility			R			$5,000.00
US HOUSE									
		Rep. Stephen Allen Womack	Facility			R	003		$2,500.00
CALIFORNIA									
US SENATE									
		Sen. Alex Padilla	Facility			D			$5,000.00

W **Winner** NP **Non-Partisan** **Debt-Retirement** **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
US HOUSE									
		Rep. Peter Ray Aguilar				D	033		$1,000.00
		Rep. Nanette Diaz Barragan				D	044		$2,000.00
		Rep. Amerish B. Bera	△			D	006		$3,000.00
		Rep. Kenneth S. Calvert				R	041		$1,000.00
		Rep. Tony Cardenas				D	029		$6,000.00
		Rep. J. Luis Correa				D	046		$4,500.00
		Rep. Anna G. Eshoo				D	016		$2,000.00
		Rep. Michael Garcia				R	027		$1,000.00
		Rep. Jimmy Gomez				D	034		$7,000.00
		Rep. Barbara Jean Lee				D	013		$1,000.00
		Devin G. Nunes				R	022		$5,000.00
		Rep. James V. Panetta	△			D	019		$4,000.00
		Rep. Nancy Pelosi	△			D	012		$5,000.00
		Rep. Scott H. Peters				D	050		$5,000.00
		Rep. Raul Ruiz				D	025		$1,000.00
		Rep. Linda T. Sanchez	△			D	038		$3,000.00
		Rep. Michael C. Thompson				D	004		$2,000.00
		Rep. Norma Judith Torres				D	035		$1,000.00
		Rep. Lucille Roybal-Allard				D	040		$1,000.00
LIEUTENANT GOVERNOR									
		Sen. Toni G. Atkins	△		Up in ‘26	D		$2,000.00	
		Sen. Bill Dodd	△		Up in ‘26	D		$3,000.00	
		Sen. Steven M. Glazer	△		Up in ‘26	D		$1,500.00	
STATE ATTORNEY GENERAL									
		AG Rob Bonta	△			D		$5,000.00	
STATE TREASURER									
		Hon. Fiona Ma	△			D		$1,600.00	
STATE CONTROLLER									
		Sen. Bob M. Hertzberg				D		$1,500.00	
STATE SENATE									
		Sen. Josh Becker	△		Up in ‘24	D	013	$2,000.00	
		Sen. Melissa Hurtado				D	014	$1,400.00	

Winner **Non-Partisan** **Debt-Retirement** **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Monique Limon			Up in '24	D	019	$1,500.00	
		Sen. Josh Newman			Up in '24	D	029	$1,500.00	
		Sen. Susan Rubio				D	022	$3,000.00	
		Sen. David K. Min	▲		Up in '24	D	037	$1,500.00	
		Sen. Rosilicie Ochoa Bogh			Up in '24	R	023	$1,500.00	
STATE HOUSE									
		Assm. Cecilia M. Aguiar-Curry				D	004	$2,000.00	
		Assm. Joaquin Arambula				D	031	$2,500.00	
		Assm. Frank Bigelow				R	005	$1,500.00	
		Assm. Tasha Boerner Horvath				D	076	$1,500.00	
		Mia Bonta				D	018	$1,500.00	
		Autumn R. Burke				D	062	$2,000.00	
		Assm. Lisa Calderon	▲			D	057	$1,500.00	
		Assm. Wendy Carrillo				D	051	$2,000.00	
		Assm. Jim Cooper				D	009	$2,000.00	
		Assm. Jordan Cunningham				R	035	$1,500.00	
		Assm. Tom Daly				D	069	$2,000.00	
		Assm. Heath Flora				R	012	$2,000.00	
		Assm. Vince Fong				R	034	$2,000.00	
		Assm. Mike A. Gipson				D	064	$1,500.00	
		Lorena Gonzalez				D	080	$3,000.00	
		Assm. Timothy S. Grayson				D	014	$1,500.00	
		Assm. Jacqui Irwin				D	044	$2,000.00	
		Assm. Marc Levine				D	010	$1,500.00	
		Assm. Evan Low				D	028	$2,000.00	
		Assm. Brian Maienschein	▲			R	077	$1,500.00	
		Assm. Chad Mayes				I	042	$2,000.00	
		Assm. Jose Medina				D	061	$1,500.00	
		Assm. Kevin Mullin	▲			D	022	$1,500.00	
		Assm. Adrin Nazarian				D	046	$2,000.00	
		Assm. Patrick O'Donnell				D	070	$1,500.00	
		Assm. Cottie Petrie-Norris	▲			D	074	$2,000.00	
		Assm. James C. Ramos				D	040	$1,500.00	

W Winner NP Non-Partisan ● Debt-Retirement ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Assm. Eloise Gomez Reyes				D	047	$1,500.00	
		Assm. Robert Rivas				D	030	$1,500.00	
		Assm. Freddie Rodriguez				D	052	$1,500.00	
		Assm. Blanca E. Rubio				D	048	$3,000.00	
		Assm. Rudy Salas				D	032	$2,000.00	
		Assm. Miguel Santiago				D	053	$1,500.00	
		Assm. Marie Waldron				R	075	$1,500.00	
		Assm. Christopher M. Ward	▲			D	078	$1,500.00	
		Assm. Carlos Villapudua				D	013	$1,500.00	
		Assm. Marc Berman				D	037	$1,500.00	
		Assm. Suzette Martinez Valladares				R	038	$1,500.00	
	W	Assm. Akilah Weber				D	079	$1,500.00	
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION									
		Sen. Anthony J. Portantino			Up in '26	D		$2,000.00	
COLORADO									
US HOUSE									
		Rep. Kenneth R. Buck				R	004		$2,500.00
STATE SENATE									
		Sen. Bob Gardner			Up in '24	R	012		$200.00
		Sen. Chris Hansen	▲		Up in '24	D	031		$400.00
		Sen. Cleave Simpson, Jr.			Up in '24	R	035		$200.00
		Sen. Rob Woodward				R	015		$400.00
		Sen. Rachel Zenzinger	▲		Up in '24	D	019		$200.00
STATE HOUSE									
		Rep. Mark Baisley				R	039		$200.00
		Rep. Colin Larson				R	022		$200.00
		Rep. Hugh McKean				R	051		$200.00
		Rep. Matt Soper				R	054		$200.00
		Rep. Dan Woog				R	063		$200.00
		Rep. Tim Geitner				R	019		$200.00
		Rep. Tonya Van Beber				R	048		$200.00
CONNECTICUT									
US SENATE									
		Sen. Richard Blumenthal	▲			D			$2,500.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
US HOUSE									
		Rep. Joseph D. Courtney	▲			D	002		$1,000.00
		Rep. James Andrew Himes	▲			D	004		$1,000.00
		Rep. John Barry Larson	▲			D	001		$2,000.00
DELAWARE									
US SENATE									
		Sen. Christopher Andrew Coons	▲		Up in ‘26	D			$5,000.00
US HOUSE									
		Rep. Lisa Blunt Rochester	▲			D	001		$1,000.00
STATE SENATE									
		Sen. Nicole Poore	▲			D	012	$300.00	
		Sen. Bryan Townsend				D	011	$300.00	
		Sen. David P. Sokola				D	008	$300.00	
		Sen. Trey Charles Paradee, III	▲			D	017	$300.00	
		Sen. Gerald W. Hocker				R	020	$250.00	
STATE HOUSE									
		Rep. Andria L. Bennett				D	032	$200.00	
		Rep. Kevin S. Hensley				R	009	$200.00	
		Rep. Valerie J. Longhurst	▲			D	015	$300.00	
		Rep. Peter C. Schwartzkopf				D	014	$400.00	
		Rep. Ruth Briggs King				R	037	$200.00	
		Rep. Debra J. Heffernan				D	006	$250.00	
		Rep. David S. Bentz				D	018	$300.00	
FLORIDA									
US SENATE									
		Sen. Marco Antonio Rubio	▲			R			$1,500.00
US HOUSE									
		Rep. Gus Michael Bilirakis				R	012		$6,500.00
		Rep. Vernon Gale Buchanan				R	016		$10,000.00
		Rep. Stephanie N. Murphy				D	007		$4,500.00
		Rep. Darren Michael Soto				D	009		$1,000.00
		Rep. Greg Steube				R	017		$1,000.00
		Rep. Maria E. Salazar				R	027		$2,500.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
STATE TREASURER									
		Hon. Jimmy Patronis	▲			R		$1,000.00	
STATE SENATE									
		Rep. Colleen Burton				R	022	$500.00	
		Sen. Lori Berman				D	031	$500.00	
		Sen. Ben Albritton				R	026	$500.00	
		Sen. Manny Diaz, Jr.				R	036	$500.00	
STATE HOUSE									
		Rep. Kamia L. Brown				D	045	$1,000.00	
		Rep. Charles Wesley Clemons, Sr.				R	021	$500.00	
		Rep. Lawrence McClure				R	058	$500.00	
		Rep. William Cloud Robinson, Jr.				R	071	$500.00	
		Rep. Allison Tant				D	009	$1,000.00	
		Rep. Lauren Uhlich Melo				R	080	$500.00	
		Rep. Sam Garrison				R	018	$500.00	
		Rep. Wyman Duggan				R	015	$500.00	
		Rep. Daniel Anthony Perez				R	116	$500.00	
		Rep. Kelly Skidmore				D	091	$500.00	
GEORGIA									
US HOUSE									
		Rep. Earl L. B. Carter				R	001		$1,500.00
		Rep. A. Drew Ferguson, IV				R	003		$7,500.00
		Rep. Henry C. Johnson, Jr.	▲			D	004		$2,000.00
GOVERNOR									
		Gov. Brian P. Kemp	▲			R		$5,000.00	
STATE SENATE									
		Sen. Matthew Freeman Brass				R	028	$500.00	
		Sen. Dean Burke				R	011	$1,000.00	
		Sen. Gloria Singleton Butler				D	055	$1,000.00	
		Sen. Gail Davenport				D	044	$1,000.00	
		Sen. Michael Dugan				R	030	$1,000.00	
		Sen. Bo Hatchett				R	050	$500.00	
		Sen. Chuck Hufstetler				R	052	$500.00	

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Burt Jones				R	025	$2,000.00	
		Sen. John F. Kennedy				R	018	$500.00	
		Sen. Kay Kirkpatrick	▲			R	032	$500.00	
		Sen. Nancy Grogan Orrock	▲			D	036	$1,000.00	
		Sen. Blake Tillery				R	019	$500.00	
		Sen. Ben L. Watson				R	001	$1,000.00	
		Sen. Steve Gooch				R	051	$1,000.00	
		Sen. Jason R. Anavitarte				R	031	$500.00	
		Sen. Michelle Au				D	048	$500.00	
		Sen. Clint R. Dixon				R	045	$500.00	
STATE HOUSE									
		Rep. Patty J. Bentley				D	139	$500.00	
		Rep. Shaw Blackmon				R	146	$500.00	
		Rep. Jon G. Burns				R	159	$1,000.00	
		Rep. Joe Campbell				R	171	$500.00	
		Rep. Kasey Carpenter				R	004	$500.00	
		Rep. Sharon M. Cooper				R	043	$1,000.00	
		Rep. Katie M. Dempsey				R	013	$500.00	
		Rep. Chuck Efstration				R	104	$1,000.00	
		Rep. Terry England				R	116	$1,000.00	
		Rep. Barry A. Fleming				R	121	$500.00	
		Rep. Matthew Hatchett				R	150	$500.00	
		Rep. Carolyn Hugley				D	136	$500.00	
		Rep. William W. Mitchell	▲			D	088	$1,000.00	
		Rep. W. Mark Newton				R	123	$1,000.00	
		Rep. Larry J. Parrish				R	158	$500.00	
		Rep. Alan T. Powell				R	032	$500.00	
		Rep. David Ralston				R	007	$1,000.00	
		Rep. Richard H. Smith				R	134	$1,000.00	
		Rep. Tyler Paul Smith				R	018	$500.00	
		Rep. Calvin Smyre				D	135	$1,000.00	
		Rep. Al Williams				D	168	$500.00	
		Rep. Noel Williams				R	148	$500.00	

W Winner NP Non-Partisan ● Debt-Retirement ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Bruce Williamson				R	115	$500.00	
		Rep. James Beverly				D	143	$1,000.00	
		Rep. John L. Corbett				R	174	$500.00	
		Rep. Matthew Gambill				R	015	$500.00	
		Rep. Robert Pruitt				R	149	$500.00	
		Rep. Derek J. Mallow				D	163	$500.00	
		Rep. El-Mahdi Holly				D	111	$500.00	
		Rep. James D. Burchett				R	176	$500.00	
		Rep. Stan Gunter				R	008	$500.00	
		Rep. Jodi Lott				R	122	$500.00	
		Rep. Matthew S. Dubnik				R	029	$500.00	
		Rep. Robert F. Leverett				R	033	$500.00	
HAWAII									
US SENATE									
		Sen. Mazie Keiko Hirono	▲		Up in '24	D			$2,500.00
GOVERNOR									
		Hon. Joshua B. Green	▲			D		$2,000.00	
STATE SENATE									
		Sen. Donovan M. Dela Cruz				D	022	$200.00	
		Sen. Ronald D. Kouchi				D	008	$500.00	
		Sen. Dru Mamo Kanuha				D	003	$500.00	
		Sen. Jarrett K. Keohokalole				D	024	$500.00	
		Sen. Karl Rhoads				D	013	$250.00	
STATE HOUSE									
		Rep. Della Au Belatti				D	024	$500.00	
		Rep. Sylvia J. Luke				D	025	$500.00	
		Rep. Scott K. Saiki				D	026	$500.00	
		Rep. Takashi Ohno				D	027	$300.00	
		Rep. Mark M. Nakashima				D	001	$250.00	
		Rep. Ryan I. Yamane				D	037	$1,000.00	
		Rep. Aaron Ling Johanson				D	031	$1,000.00	
IDAHO									
GOVERNOR									

W Winner NP Non-Partisan ● Debt-Retirement ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Gov. Brad Little	▲			R		$5,000.00	
STATE SENATE									
		Sen. Jeff C. Agenbroad				R	013	$300.00	
		Sen. Mark R. Harris				R	032	$400.00	
		Sen. Abby Lee				R	009	$400.00	
		Sen. Fred S. Martin				R	015	$800.00	
		Sen. Peter J. Riggs				R	003	$300.00	
		Sen. Janie Ward-Engelking				D	018	$300.00	
		Sen. Chuck Winder				R	020	$400.00	
		Ali Rabe				D	017	$300.00	
STATE HOUSE									
		Rep. Scott C. Bedke				R	027	$1,000.00	
		Rep. Laurie Lickley				R	025	$400.00	
		Rep. Ilana S. Rubel				D	018	$400.00	
ILLINOIS									
US SENATE									
		Sen. L. Tammy Duckworth	▲			D			$5,000.00
US HOUSE									
		Rep. Sean Casten				D	006		$2,000.00
		Rep. Rodney Lee Davis				R	015		$2,500.00
		Rep. Robin Lynne Kelly				D	002		$3,000.00
		Rep. Darin M. LaHood				R	016		$10,000.00
		Rep. Bradley Scott Schneider	▲			D	010		$2,000.00
STATE SENATE									
		Sen. Omar Aquino				D	002	$500.00	
		Sen. Melinda Willden Bush				D	031	$250.00	
		Sen. William Cunningham				D	018	$3,000.00	
		Sen. Sara Feigenholtz				D	006	$1,000.00	
		Sen. Laura Fine				D	009	$1,000.00	
		Sen. Don Harmon				D	039	$2,500.00	
		Sen. Napoleon B. Harris, III				D	015	$1,000.00	
		Sen. Michael E. Hastings				D	019	$500.00	
		Sen. Linda Holmes				D	042	$250.00	

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Mattie Hunter				D	003	$1,000.00	
		Sen. Emil Jones, III				D	014	$250.00	
		Sen. Steven M. Landek				D	012	$500.00	
		Sen. Dan McConchie				R	026	$2,500.00	
		Sen. Julie A. Morrison	▲			D	029	$750.00	
		Sen. Antonio Munoz				D	001	$500.00	
		Sen. Chapin Rose				R	051	$250.00	
		Sen. Dave Syverson				R	035	$500.00	
		Sen. Celina Villanueva				D	011	$250.00	
		Sen. John F. Curran				R	041	$250.00	
		Sen. Win Stoller				R	037	$250.00	
		Sen. Cristina Castro				D	022	$250.00	
		Sen. Sue Rezin				R	038	$250.00	
STATE HOUSE									
		Rep. Jaime M. Andrade, Jr.				D	040	$500.00	
		Rep. Dan E. Brady				R	105	$250.00	
		Rep. Kambium Buckner				D	026	$250.00	
		Rep. Kelly M. Burke				D	036	$250.00	
		Rep. Tim Butler				R	087	$250.00	
		Rep. Kelly M. Cassidy				D	014	$250.00	
		Rep. Deborah O'Keefe Conroy				D	046	$250.00	
		Rep. Fred Crespo				D	044	$250.00	
		Rep. William Davis				D	030	$250.00	
		Rep. Anthony DeLuca				D	080	$1,000.00	
		Rep. Tom Demmer				R	090	$500.00	
		Rep. Jim Durkin				R	082	$1,000.00	
		Rep. Marcus C. Evans, Jr.				D	033	$750.00	
		Rep. Mary E. Flowers				D	031	$1,000.00	
		Rep. La Shawn K. Ford				D	008	$250.00	
		Rep. Robyn Gabel				D	018	$1,000.00	
		Rep. Jehan A. Gordon-Booth				D	092	$2,500.00	
		Rep. Latoya N. Greenwood				D	114	$500.00	
		Rep. Gregory Harris				D	013	$1,000.00	

W Winner   NP Non-Partisan   ● Debt-Retirement   ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Elizabeth Hernandez				D	024	$2,500.00	
		Rep. Jay C. Hoffman				D	113	$500.00	
		Rep. Frances Ann Hurley				D	035	$250.00	
		Rep. Thaddeus M. Jones				D	029	$1,000.00	
		Rep. Camille Lilly				D	078	$250.00	
		Rep. Natalie A. Manley				D	098	$250.00	
		Rep. Rita Mayfield				D	060	$250.00	
		Rep. Deanne Marie Mazzochi				R	047	$500.00	
		Rep. Bob Morgan	▲			D	058	$500.00	
		Rep. Martin J. Moylan				D	055	$250.00	
		Rep. Robert Rita				D	028	$1,000.00	
		Rep. Lamont J. Robinson, Jr.				D	005	$1,000.00	
		Rep. Nicholas K. Smith				D	034	$1,000.00	
		Rep. Ryan Spain				R	073	$250.00	
		Rep. Lawrence M. Walsh, Jr.				D	086	$1,000.00	
		Rep. Emanuel Chris Welch				D	007	$4,000.00	
		Rep. Keith R. Wheeler				R	050	$250.00	
		Rep. Ann M. Williams				D	011	$250.00	
		Rep. Kathleen Willis				D	077	$250.00	
		Rep. Michael J. Zalewski				D	023	$1,250.00	
		Rep. Sam Yingling				D	062	$250.00	
		Rep. Tony M. McCombie				R	071	$250.00	
		Rep. Eva-Dina Delgado				D	003	$250.00	
		Rep. Aaron M. Ortiz				D	001	$250.00	
CITY COUNCILPERSON									
		Ald. Howard B. Brookins, Jr.			Up in '23	D		$500.00	
INDIANA									
US HOUSE									
		Rep. Larry Dean Bucshon	▲			R	008		$8,000.00
		Rep. Gregory J. Pence				R	006		$2,500.00
		Rep. Jacqueline Walorski				R	002		$1,500.00
		Rep. Victoria Spartz				R	005		$1,000.00
		Rep. Frank J. Mrvan, Jr.				D	001		$2,000.00

W Winner NP Non-Partisan Debt-Retirement ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
STATE SENATE									
		Sen. Vaneta G. Becker			Up in '24	R	050		$500.00
		Sen. Jean D. Breaux			Up in '24	D	034		$250.00
		Sen. Edward E. Charbonneau			Up in '24	R	005		$1,000.00
		Sen. Michael R. Crider			Up in '24	R	028		$500.00
		Ronald T. Grooms				R	046		$500.00
		Sen. Kyle Walker				R	031		$500.00
		Sen. Mike Bohacek			Up in '24	R	008		$500.00
STATE HOUSE									
		Rep. Bradford J. Barrett				R	056		$1,000.00
		Rep. Martin J. Carbaugh				R	081		$1,000.00
		Rep. Todd Michael Huston				R	037		$1,000.00
		Rep. Donald Joseph Lehe				R	025		$500.00
		Rep. Dennis James Zent				R	051		$500.00
		Rep. Cindy Meyer Ziemke				R	055		$1,000.00
		Rep. Robert Allen Heaton				R	046		$250.00
		Rep. Ryan David Hatfield				D	077		$250.00
		Rep. Wendy Marie McNamara				R	076		$250.00
		Rep. Matthew Scott Lehman				R	079		$500.00
IOWA									
US SENATE									
		Sen. Charles E. Grassley	▲			R			$3,500.00
GOVERNOR									
		Gov. Kimberly Reynolds	▲			R			$2,000.00
STATE SENATE									
		Sen. Tony Bisignano				D	017		$500.00
		Sen. Dan Dawson			Up in '24	R	008		$200.00
		Sen. Pam Jochum			Up in '24	D	014		$250.00
		Sen. Kevin Kinney				D	039		$250.00
		Sen. Liz Mathis			Up in '24	D	034		$250.00
		Sen. Amanda Ragan				D	027		$250.00
		Sen. Amy Sinclair			Up in '24	R	014		$500.00
		Sen. Annette Sweeney				R	025		$500.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Jack Whitver				R	019		$500.00
		Sen. Zach Wahls				D	037		$750.00
		Sen. Chris Cournoyer				R	049		$250.00
		Sen. Nate Boulton			Up in ‘24	D	016		$250.00
		Sen. Carrie Koelker				R	029		$250.00
STATE HOUSE									
		Rep. Brian Best				R	012		$500.00
		Rep. Jane E. Bloomingdale				R	051		$500.00
		Wesley C. Breckenridge				D	029		$250.00
		Rep. Pat Grassley				R	050		$500.00
		Rep. Megan Hess Jones				R	002		$500.00
		Rep. Kenan Judge				D	044		$250.00
		Rep. Brian K. Lohse				R	030		$500.00
		Rep. Mary S. Mascher				D	086		$250.00
		Rep. Ann Meyer				R	009		$750.00
		Rep. Brian Meyer				D	033		$250.00
		Rep. Kristin Sunde				D	042		$500.00
		Rep. Jon Thorup				R	028		$500.00
		Rep. Matt W. Windschitl				R	017		$500.00
		Rep. Jacob Bossman				R	006		$200.00
		Rep. Lee Hein				R	096		$200.00
		Rep. Brent Siegrist				R	016		$200.00
		Rep. Dustin D. Hite				R	079		$200.00
		Rep. Jennifer Konfrst				D	043		$250.00
		Rep. John Forbes				D	040		$500.00
		Rep. Gary M. Mohr				R	094		$500.00
KANSAS									
US SENATE									
		Sen. Jerry W. Moran	▲			R			$500.00
US HOUSE									
		Rep. Ron Estes	▲			R	004		$1,500.00
		Rep. Jacob LaTurner	▲			R	002		$1,500.00
		Rep. Tracey Robert Mann	▲			R	001		$1,500.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
GOVERNOR									
		Gov. Laura Kelly	▲			D			$2,000.00
STATE SENATE									
		Sen. Beverly Gossage			Up in ‘24	R	009		$500.00
		Sen. Kristen O’Shea			Up in ‘24	R	018		$500.00
		Sen. Mark Steffen			Up in ‘24	R	034		$500.00
		Sen. Mike Thompson			Up in ‘24	R	010		$500.00
		Sen. Richard Hilderbrand			Up in ‘24	R	013		$500.00
		Sen. Molly Baumgardner			Up in ‘24	R	037		$500.00
KENTUCKY									
US SENATE									
		Sen. Rand Howard Paul	▲			R			$5,000.00
US HOUSE									
		Rep. Andy H. Barr, IV				R	006		$2,500.00
		Rep. S. Brett Guthrie				R	002		$5,000.00
STATE SENATE									
		Sen. Julie Raque Adams	▲			R	036		$1,000.00
		Sen. Ralph A. Alvarado				R	028		$1,000.00
STATE HOUSE									
		Rep. Kimberly Poore Moser				R	064		$1,000.00
		Rep. Bart T. Rowland				R	053		$1,000.00
LOUISIANA									
US SENATE									
		Sen. William Cassidy	▲		Up in ‘26	R			$1,000.00
		Sen. John Neely Kennedy	▲			R			$2,500.00
US HOUSE									
	W	Rep. Troy A. Carter				D	002		$1,000.00
		Rep. Stephen Joseph Scalise				R	001		$2,500.00
STATE SENATE									
		Sen. Regina Ashford Barrow			Up in ‘23	D	015	$1,000.00	
		Sen. Joseph Bouie, Jr.			Up in ‘23	D	003	$500.00	
		Sen. Gary M. Carter, Jr.			Up in ‘23	D	007	$1,000.00	
		Sen. Patrick Page Cortez			Up in ‘23	R	023	$1,000.00	

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Jimmy Harris			Up in '23	D	004	$1,000.00	
		Sen. Bob Hensgens			Up in '23	R	026	$500.00	
		Sen. Katrina R. Jackson			Up in '23	D	034	$500.00	
		Sen. Jay Luneau			Up in '23	D	029	$500.00	
		Sen. Fred H. Mills, Jr.			Up in '23	R	022	$1,000.00	
		Sen. Barrow Peacock			Up in '23	R	037	$500.00	
		Sen. Karen Carter Peterson			Up in '23	D	005	$500.00	
		Sen. J. Rogers Pope			Up in '23	R	013	$500.00	
		Sen. Gary L. Smith, Jr.			Up in '23	D	019	$500.00	
STATE HOUSE									
		Rep. Lawrence A. Bagley			Up in '23	R	007	$500.00	
		Rep. Raymond J. Crews			Up in '23	R	008	$250.00	
		Rep. Jason Hughes			Up in '23	D	100	$250.00	
		Rep. Mike Huval			Up in '23	R	046	$1,000.00	
		Edward C. James			Up in '23	D	101	$500.00	
		Rep. Edmond Jordan			Up in '23	D	029	$500.00	
		Rep. Dustin Miller			Up in '23	D	040	$250.00	
		Rep. Christopher Turner			Up in '23	R	012	$500.00	
		Rep. Cedric Bradford Glover			Up in '23	D	004	$250.00	
MAYOR									
	W	May. LaToya Cantrell			Up in '23	D		$5,000.00	
CITY COUNCILPERSON									
		Timolynn Sams				D		$2,500.00	
MARYLAND									
US SENATE									
		Sen. Christopher Van Hollen	▲			D			$2,000.00
US HOUSE									
		Rep. Steny Hamilton Hoyer	▲			D	005		$2,000.00
		Rep. Kweisi Mfume				D	007		$1,000.00
STATE SENATE									
		Sen. Malcolm L. Augustine				D	047		$250.00
		Sen. Pamela G. Beidle				D	032		$250.00
		Sen. Joanne Claybon Benson				D	024		$250.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Mary Beth Carozza				R	038		$250.00
		Sen. Arthur Carr Ellis				D	028		$250.00
		Sen. Brian Jeffrey Feldman				D	015		$500.00
		Sen. Bill Ferguson				D	046		$1,500.00
		Sen. Jason Charles Gallion				R	035		$250.00
		Sen. Antonio L. Hayes				D	040		$500.00
		Sen. Stephen S. Hershey, Jr.				R	036		$500.00
		Sen. Katie Fry Hester				D	009		$250.00
		Sen. J. B. Jennings				R	007		$500.00
		Sen. Cheryl Corinne Kagan				D	017		$500.00
		Sen. Delores G. Kelley				D	010		$750.00
		Sen. Katherine Klausmeier				D	008		$250.00
		Sen. Benjamin F. Kramer				D	019		$250.00
		Sen. Clarence K. Lam				D	012		$250.00
		Sen. Obie Patterson				D	026		$250.00
		Sen. Paul G. Pinsky				D	022		$750.00
		Sen. Edward Robert Reilly				R	033		$250.00
		Sen. Bryan W. Simonaire				R	031		$250.00
		Sen. Mary L. Washington				D	043		$250.00
STATE HOUSE									
		Del. Lisa Belcastro				D	011		$125.00
		Del. Harry Bhandari				D	008		$125.00
		Del. Alfred Clinton Carr, Jr				D	018		$125.00
		Del. Nick Charles				D	025		$125.00
		Del. Brian A. Chisholm				R	31B		$125.00
		Del. Bonnie L. Cullison				D	019		$500.00
		Del. Terri L. Hill				D	012		$125.00
		Del. Steve C. Johnson				D	34A		$125.00
		Del. Adrienne A. Jones				D	010		$1,500.00
		Del. Ariana Brannigan Kelly				D	016		$250.00
		Del. Ken Kerr				D	03B		$125.00
		Del. Nicholaus R. Kipke				R	31B		$500.00
		Del. Susan W. Krebs				R	09B		$250.00

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Del. Robbyn Lewis				D	046		$125.00
		Del. James Matthew Morgan				R	29A		$250.00
		Del. Joseline A. Pena-Melnyk				D	021		$500.00
		Del. Shane E. Pendergrass	▲			D	013		$750.00
		Del. Teresa Reilly				R	35B		$125.00
		Del. Samuel I. Rosenberg				D	42A		$250.00
		Del. Sid Saab				R	033		$250.00
		Del. Sheree Sample-Hughes				D	37A		$250.00
		Del. Kathryn Y. Szeliga				R	007		$500.00
		Del. Karen Lewis Young				D	03A		$250.00
		Del. Heather Alice Bagnall				D	033		$125.00
MASSACHUSETTS									
US HOUSE									
		Rep. Katherine M. Clark				D	005		$4,500.00
		Rep. Richard Edmund Neal	▲			D	001		$2,500.00
MICHIGAN									
US SENATE									
		Sen. Gary Charles Peters	▲		Up in '26	D			$2,500.00
US HOUSE									
		Rep. Daniel Timothy Kildee	▲			D	008		$3,000.00
		Rep. Frederick Stephen Upton	▲			R	006		$5,000.00
		Rep. John Moolenaar				R	004		$2,500.00
GOVERNOR									
		Gov. Gretchen Whitmer	▲			D			$1,000.00
STATE SENATE									
		Sen. Winnie Brinks				D	029		$500.00
		Sen. Rick Outman				R	033		$500.00
STATE HOUSE									
		Rep. Julie Calley				R	087		$500.00
		Rep. Matthew Hall				R	063		$500.00
		Rep. John Robert Roth				R	104		$250.00
		Rep. Mike Mueller				R	051		$250.00
		Rep. Patrick Outman				R	070		$250.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Andrew Fink				R	058		$500.00
MINNESOTA									
US HOUSE									
		Rep. Thomas Earl Emmer, Jr.				R	006		$2,500.00
MISSISSIPPI									
GOVERNOR									
		Gov. Tate Reeves	▲		Up in '23	R		$1,000.00	
LIEUTENANT GOVERNOR									
		Hon. Delbert Hosemann	▲		Up in '23	R		$1,000.00	
INSURANCE COMMISSIONER									
		Hon. Mike Chaney	▲		Up in '23	R		$1,000.00	
STATE SENATE									
		Sen. Kevin Blackwell			Up in '23	R	019	$500.00	
		Sen. Nicole Akins Boyd	▲		Up in '23	R	009	$250.00	
		Sen. Hob Bryan			Up in '23	D	007	$500.00	
		Sen. Dennis DeBar, Jr.			Up in '23	R	043	$500.00	
		Sen. Joey Fillingane			Up in '23	R	041	$250.00	
		Sen. Josh Harkins			Up in '23	R	020	$500.00	
		Sen. John A. Horhn			Up in '23	D	026	$250.00	
		Sen. Chris Johnson			Up in '23	R	045	$500.00	
		Sen. M. Dean Kirby			Up in '23	R	030	$500.00	
		Sen. J. Walter Michel			Up in '23	R	025	$1,000.00	
		Sen. Rita Potts Parks			Up in '23	R	004	$500.00	
		Sen. John A. Polk			Up in '23	R	044	$500.00	
		Sen. Brice Wiggins			Up in '23	R	052	$250.00	
		Sen. Angela Turner-Ford			Up in '23	D	016	$500.00	
STATE HOUSE									
		Rep. Richard Bennett			Up in '23	R	120	$500.00	
		Rep. Philip Gunn			Up in '23	R	056	$1,000.00	
		Rep. Joey Hood			Up in '23	R	035	$500.00	
		Rep. John Thomas Lamar			Up in '23	R	008	$500.00	
		Rep. Sam C. Mims, V			Up in '23	R	097	$500.00	
		Rep. John O. Read			Up in '23	R	112	$500.00	

W Winner NP Non-Partisan Debt-Retirement ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Jason M. White			Up in '23	R	048	$500.00	
		Rep. Lee Yancey			Up in '23	R	074	$500.00	
		Rep. Henry B. Zuber, III			Up in '23	R	113	$1,000.00	
MISSOURI									
US HOUSE									
		Rep. Jason Thomas Smith				R	008		$1,000.00
		Rep. Ann Louise Wagner	▲			R	002		$5,000.00
STATE TREASURER									
		Hon. Scott Fitzpatrick	▲		Up in '24	R			$1,000.00
STATE SENATE									
		Sen. Lincoln Hough				R	020		$900.00
		Sen. Holly Rehder			Up in '24	R	027		$1,000.00
		Sen. Caleb Rowden			Up in '24	R	019		$2,400.00
		Sen. Brian Williams				D	014		$1,000.00
STATE HOUSE									
		Rep. Rob Vescovo				R	112		$1,000.00
		Rep. Dean Plocher				R	089		$2,000.00
NEBRASKA									
US SENATE									
		Sen. Debra S. Fischer	▲		Up in '24	R			$1,000.00
US HOUSE									
		Rep. Adrian Michael Smith				R	003		$2,500.00
NEVADA									
US SENATE									
		Sen. Catherine Cortez Masto	▲			D			$1,000.00
US HOUSE									
		Rep. Steven Alexzander Horsford				D	004		$3,000.00
STATE TREASURER									
		Hon. Zachary Beare Conine	▲			D			$1,500.00
STATE SENATE									
		Sen. Scott Thomas Hammond			Up in '24	R	018		$1,000.00
		Sen. Ira D. Hansen				R	014		$1,000.00
		Sen. Heidi Seevers Gansert			Up in '24	R	015		$2,000.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Roberta Ann Lange			Up in '24	D	007		$1,000.00
		Sen. Keith F. Pickard				R	020		$1,000.00
STATE HOUSE									
		Assm. Gregory Hafen				R	036		$1,500.00
		Assm. Alexis M. Hansen				R	032		$1,500.00
		Assm. Melissa Hardy				R	022		$1,500.00
		Assm. Glen Kaimi Leavitt				R	023		$1,500.00
		Assm. Philip O'Neill	▲			R	040		$1,000.00
		Assm. Robin L. Titus, M.D.				R	038		$1,500.00
		Assm. Heidi Wathne Kasama				R	002		$1,000.00
		Assm. Lisa Krasner				R	026		$1,000.00
		Assm. Jill Dickman				R	031		$1,000.00
MAYOR									
		Sen. Patricia Ann Spearman				D			$1,000.00
NEW HAMPSHIRE									
US HOUSE									
		Rep. Ann McLane Kuster	▲			D	002		$3,000.00
STATE SENATE									
		Sen. Joseph E. Bradley, III				R	003	$1,000.00	
		Sen. Sharon M. Carson				R	014	$1,000.00	
		Sen. William M. Gannon				R	023	$1,000.00	
		Sen. Charles W. Morse				R	022	$1,000.00	
		Sen. Donna M. Soucy				D	018	$1,000.00	
NEW JERSEY									
US HOUSE									
		Rep. Joshua S. Gottheimer				D	005		$2,500.00
		Rep. Frank Pallone, Jr.	▲			D	006		$2,500.00
		Rep. William James Pascrell, Jr.				D	009		$2,000.00
		Rep. Mikie Sherrill	▲			D	011		$2,500.00
		Rep. Bonnie Watson Coleman	▲			D	012		$1,000.00
STATE SENATE									
		Dawn Marie Addiego				D	008	$500.00	
	W	Sen. Jon M. Bramnick				R	021	$1,000.00	

W **Winner** NP **Non-Partisan** **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
	W	Sen. Anthony M. Bucco				R	025	$750.00	
	W	Sen. Richard J. Codey	▲			D	027	$750.00	
	W	Sen. Kristin M. Corrado				R	040	$500.00	
	W	Sen. Joseph P. Cryan				D	020	$500.00	
	W	Sen. Sandra Bolden Cunningham				D	031	$500.00	
	W	Sen. Vin Gopal				D	011	$1,000.00	
	W	Sen. Linda R. Greenstein				D	014	$500.00	
	W	Sen. Gordon M. Johnson				D	037	$500.00	
	W	Sen. Joseph A. Lagana				D	038	$500.00	
	W	Sen. Fred H. Madden				D	004	$500.00	
	W	Sen. Steven V. Oroho				R	024	$500.00	
	W	Sen. Declan Joseph O'Scanlon, Jr.				R	013	$500.00	
	W	Sen. Nelida Pou				D	035	$1,000.00	
	W	Sen. M. Teresa Ruiz				D	029	$500.00	
	W	Sen. Paul A. Sarlo				D	036	$750.00	
	W	Sen. Holly T. Schepisi				R	039	$500.00	
	W	Sen. Robert W. Singer				R	030	$500.00	
	W	Sen. Troy Singleton				D	007	$500.00	
		Stephen M. Sweeney				D	003	$2,000.00	
	W	Sen. Joseph F. Vitale				D	019	$1,000.00	
	W	Sen. Andrew Zwicker				D	016	$1,000.00	
	W	Sen. Nicholas P. Scutari				D	022	$1,000.00	
	W	Sen. Patrick J. Diegnan, Jr.				D	018	$500.00	
STATE HOUSE									
	W	Assm. Daniel R. Benson				D	014	$750.00	
		John J. Burzichelli				D	003	$500.00	
	W	Assm. Herbert Conaway				D	007	$1,000.00	
	W	Assm. Craig J. Coughlin				D	019	$2,000.00	
	W	Assm. Joseph F. Danielsen	▲			D	017	$500.00	
		BettyLou DeCroce	▲			R	026	$500.00	
	W	Assm. Christopher P. DePhillips				R	040	$500.00	
	W	Assm. John DiMaio	▲			R	023	$500.00	
		Joann Downey				D	011	$500.00	

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
	W	Assm. Aura Kenny Dunn				R	025	$500.00	
	W	Assm. Roy Freiman				D	016	$500.00	
	W	Assm. Louis D. Greenwald				D	006	$1,000.00	
	W	Assm. Mila M. Jasey	Facility			D	027	$500.00	
	W	Assm. Angelica M. Jimenez				D	032	$500.00	
	W	Assm. Pamela Rosen Lampitt				D	006	$500.00	
	W	Assm. Yvonne M. Lopez				D	019	$500.00	
	W	Assm. John Francis McKeon	Facility			D	027	$1,000.00	
	W	Assm. Paul D. Moriarty				D	004	$500.00	
	W	Assm. Gabriela M. Mosquera				D	004	$500.00	
	W	Assm. Raj Mukherji				D	033	$500.00	
	W	Assm. Nancy F. Munoz				R	021	$500.00	
	W	Assm. Carol A. Murphy				D	007	$500.00	
	W	Assm. Erik Peterson	Facility			R	023	$500.00	
	W	Assm. Eliana Pintor Marin				D	029	$1,000.00	
	W	Assm. Annette Quijano				D	020	$500.00	
	W	Assm. Kevin J. Rooney				R	040	$500.00	
	W	Assm. Gary S. Schaer				D	036	$750.00	
	W	Assm. Sterley S. Stanley				D	018	$400.00	
	W	Assm. Shavonda E. Sumter				D	035	$500.00	
	W	Assm. Lisa Swain				D	038	$300.00	
		Adam J. Taliaferro				D	003	$500.00	
	W	Assm. P. Christopher Tully				D	038	$300.00	
	W	Assm. Anthony S. Verrelli	Facility			D	015	$500.00	
	W	Assm. Benjie E. Wimberly				D	035	$500.00	
	W	Assm. Harold J. Wirths				R	024	$500.00	
NEW MEXICO									
GOVERNOR									
		Gov. Michelle Lujan Grisham	Facility			D		$5,000.00	
LIEUTENANT GOVERNOR									
		Hon. Howie C. Morales	Facility			D		$3,400.00	
STATE SENATE									
		Sen. Gregory A. Baca			Up in ‘24	R	029	$500.00	

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Craig W. Brandt			Up in '24	R	040	$1,000.00	
		Sen. William F. Burt			Up in '24	R	033	$250.00	
		Sen. Joseph Cervantes, Joe			Up in '24	D	031	$500.00	
		Sen. David M. Gallegos			Up in '24	R	041	$250.00	
		Sen. Daniel A. Ivey-Soto			Up in '24	D	015	$1,000.00	
		Sen. Gay G. Kernan			Up in '24	R	042	$500.00	
		Sen. Mark D. Moores			Up in '24	R	021	$500.00	
		Sen. George K. Munoz			Up in '24	D	004	$500.00	
		Sen. Bill B. O'Neill			Up in '24	D	013	$500.00	
		Sen. Michael Padilla			Up in '24	D	014	$250.00	
		Sen. Cliff R. Pirtle			Up in '24	R	032	$250.00	
		Sen. Elizabeth Stefanics			Up in '24	D	039	$500.00	
		Sen. Bill G. Tallman			Up in '24	D	018	$300.00	
		Sen. Gerald P. Ortiz y Pino			Up in '24	D	012	$750.00	
STATE HOUSE									
		Rep. Gail Armstrong				R	049	$500.00	
		Alonzo Baldonado				R	008	$250.00	
		Rep. Zachary J. Cook				R	056	$500.00	
		Rep. Rebecca L. Dow				R	038	$500.00	
		Rep. Brian F. Egolf, Jr.				D	047	$500.00	
		Rep. Kelly K. Fajardo				R	007	$1,000.00	
		Rep. Jason Carl Harper				R	057	$400.00	
		Rep. Patricia A. Lundstrom				D	009	$500.00	
		Rep. Antonio Maestas				D	016	$250.00	
		Rep. Javier I. Martinez				D	011	$250.00	
		Rep. Rodney D. Montoya				R	001	$250.00	
		Rep. Roger Evan Montoya				D	040	$500.00	
		Rep. William R. Rehm				R	031	$250.00	
		Rep. Elizabeth L. Thomson				D	024	$500.00	
		Brittney Aileene Barreras				D	012	$500.00	
		Rep. Micaela Lara Cadena				D	033	$250.00	
		Rep. Ambrose M. Castellano				D	070	$500.00	

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
NEW YORK									
US SENATE									
		Sen. Charles E. Schumer	▲			D			$5,000.00
US HOUSE									
		Rep. John Michael Katko				R	024		$2,500.00
		Rep. Sean Patrick Maloney				D	018		$2,500.00
		Rep. Gregory Weldon Meeks				D	005		$3,500.00
		Rep. Joseph D. Morelle				D	025		$1,000.00
		Rep. Jerrold Lewis Nadler				D	010		$1,000.00
		Rep. Kathleen Maura Rice				D	004		$1,000.00
		Rep. Thomas R. Suozzi				D	003		$1,000.00
		Rep. Ritchie J. Torres				D	015		$2,000.00
		Rep. Nicole Malliotakis				R	011		$1,500.00
		Rep. Elise M. Stefanik	▲			R	021		$2,500.00
GOVERNOR									
		Gov. Kathleen C. Hochul	▲			D			$5,000.00
STATE SENATE									
		Sen. Jamaal T. Bailey				D	036		$500.00
		Sen. Philip M. Boyle				R	004		$500.00
		Sen. Neil D. Breslin	▲			D	044		$500.00
		Sen. Leroy G. Comrie, Jr.				D	014		$500.00
		Sen. Patrick M. Gallivan				R	059		$500.00
		Sen. Joseph A. Griffo				R	047		$500.00
		Sen. Peter B. Harckham				D	040		$500.00
		Sen. Brad M. Hoylman	▲			D	027		$500.00
		Sen. Robert Jackson				D	031		$500.00
		Sen. Brian P. Kavanagh				D	026		$500.00
		Sen. Timothy M. Kennedy				D	063		$500.00
		Sen. Andrew J. Lanza				R	024		$500.00
		Sen. Shelley B. Mayer				D	037		$500.00
		Sen. Robert G. Ortt				R	062		$500.00
		Sen. Kevin S. Parker				D	021		$500.00
		Sen. J. Gustavo Rivera				D	033		$1,000.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Diane J. Savino				D	023		$500.00
		Sen. James G. Skoufis				D	039		$500.00
		Sen. Toby Ann Stavisky				D	016		$500.00
		Sen. Andrea Stewart-Cousins				D	035		$1,000.00
		Sen. Kevin M. Thomas				D	006		$500.00
		Sen. Elijah Reichlin-Melnick	▲			D	038		$1,500.00
		Sen. Anna M. Kaplan				D	007		$500.00
		Sen. Michelle Hinchey				D	046		$500.00
		Sen. Simcha Felder				D	017		$500.00
		Sen. Sean M. Ryan				D	060		$500.00
STATE HOUSE									
		Assm. Peter J. Abbate, Jr.				D	049		$500.00
		Assm. Thomas J. Abinanti				D	092		$500.00
		Assm. Jeffrion L. Aubry				D	035		$500.00
		Assm. William A. Barclay				R	120		$500.00
		Assm. Didi Barrett				D	106		$500.00
		Assm. Edward C. Braunstein				D	026		$500.00
		Assm. Kevin M. Byrne				R	094		$500.00
		Assm. Kevin A. Cahill				D	103		$500.00
		Assm. Michael J. Cusick				D	063		$500.00
		Assm. Steven H. Cymbrowitz				D	045		$500.00
		Assm. Maritza Davila				D	053		$500.00
		Assm. Erik Martin Dilan				D	054		$500.00
		Assm. Jeffrey Dinowitz				D	081		$500.00
		Assm. Richard N. Gottfried				D	075		$1,000.00
		Assm. Aileen M. Gunther				D	100		$500.00
		Assm. Andrew D. Hevesi				D	028		$500.00
		Assm. Alicia L. Hyndman				D	029		$500.00
		Assm. Charles D. Lavine				D	013		$500.00
		Assm. William B. Magnarelli				D	129		$500.00
		Assm. John T. McDonald, III				D	108		$500.00
		Assm. Daniel J. O'Donnell				D	069		$500.00
		Assm. Amy R. Paulin				D	088		$500.00

W Winner NP Non-Partisan ● Debt-Retirement ▲ Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Assm. Crystal D. Peoples-Stokes				D	141		$500.00
		Assm. N. Nick Perry				D	058		$500.00
		Assm. Stacey G. Pheffer Amato				D	023		$500.00
		Victor M. Pichardo				D	086		$500.00
		Assm. J. Gary Pretlow				D	089		$500.00
		Assm. Dan Quart	Facility			D	073		$500.00
		Assm. Karines Reyes				D	087		$500.00
		Robert J. Rodriguez				D	068		$500.00
		Assm. Colin J. Schmitt				R	099		$500.00
		Assm. Michaelle C. Solages				D	022		$500.00
		Assm. Phillip G. Steck				D	110		$500.00
		Assm. Helene E. Weinstein				D	041		$500.00
		Assm. David I. Weprin				D	024		$500.00
		Assm. Kenneth Paul Zebrowski				D	096		$500.00
		Assm. Donna A. Lupardo				D	123		$500.00
		Assm. Patricia A. Fahy	Facility			D	109		$500.00
		Assm. Nily D. Rozic				D	025		$500.00
		Assm. Angelo L. Santabarbara				D	111		$500.00
		Assm. Judy A. Griffin				D	021		$500.00
		Assm. Albert A. Stirpe, Jr.				D	127		$500.00
		Assm. Daniel A. Rosenthal				D	027		$500.00
		Assm. Michael V. Lawler				R	097		$500.00
		Assm. Carl E. Heastie				D	083		$1,000.00
MAYOR									
	W	May. Eric L. Adams				D			$1,000.00
NORTH CAROLINA									
US HOUSE									
		Rep. George Kenneth Butterfield, Jr.	Facility			D	001		$4,500.00
		Rep. Richard Lane Hudson, Jr.				R	010		$5,000.00
		Rep. Patrick Timothy McHenry				R	010		$3,500.00
		Rep. Deborah K. Ross				D	005		$2,000.00
NORTH DAKOTA									

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
US HOUSE									
		Rep. Kelly M. Armstrong	▲			R	001		$2,500.00
GOVERNOR									
		Gov. Doug Burgum	▲		Up in '24	R			$1,000.00
INSURANCE COMMISSIONER									
		Hon. Jon Godfread	▲		Up in '24	R			$1,000.00
OHIO									
US HOUSE									
		Rep. Joyce Beatty				D	003		$1,000.00
		Rep. Bill L. Johnson				R	006		$1,500.00
		Rep. David Patrick Joyce				R	014		$1,500.00
		Rep. Robert E. Latta	▲			R	005		$5,000.00
		Steve Stivers				R	015		$5,000.00
		Rep. Brad R. Wenstrup				R	002		$2,500.00
		Rep. Troy Balderson	▲			R	012		$2,500.00
		Rep. Timothy John Ryan				D	013		$1,000.00
GOVERNOR									
		Gov. Mike DeWine	▲			R			$1,000.00
STATE SENATE									
		Sen. Niraj J. Antani			Up in '24	R	006		$350.00
		Sen. Nickie J. Antonio				D	023		$350.00
		Sen. Hearcel Ford Craig				D	015		$300.00
		Sen. Matthew J. Dolan			Up in '24	R	024		$500.00
		Sen. Theresa A. Gavarone	▲		Up in '24	R	002		$350.00
		Sen. Robert D. Hackett			Up in '24	R	010		$350.00
		Sen. Jay Hottinger	▲			R	031		$500.00
		Sen. Matt Huffman			Up in '24	R	012		$1,000.00
		Sen. Terry A. Johnson			Up in '24	R	014		$350.00
		Sen. George F. Lang	▲		Up in '24	R	004		$350.00
		Sen. Mark J. Romanchuk			Up in '24	R	022		$350.00
		Sen. J. Kirk Schuring				R	029		$350.00
		Sen. Cecil Thomas	▲			D	009		$300.00
		Sen. Steve Wilson	▲			R	007		$350.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Kenny Yuko	Facility			D	025		$300.00
		Sen. Robert McColley				R	001		$350.00
		Sen. Timothy O. Schaffer	Facility		Up in '24	R	031		$350.00
		Sen. Kristina Daley Roegner				R	027		$350.00
STATE HOUSE									
		Rep. Cindy Abrams				R	029		$350.00
		Rep. Thomas E. Brinkman, Jr.				R	027		$350.00
		Rep. Rick Carfagna				R	068		$350.00
		Rep. Robert R. Cupp				R	004		$1,000.00
		Rep. Alessandro Cutrona				R	059		$350.00
		Rep. Mark D. Fraizer				R	071		$350.00
		Rep. Timothy Edward Ginter				R	005		$500.00
		Rep. Adam Holmes				R	097		$350.00
		Rep. Don Jones				R	095		$350.00
		Rep. Kris Jordan				R	067		$350.00
		Rep. P. Scott Lipps	Facility			R	062		$750.00
		Rep. Susan Manchester				R	084		$500.00
		Rep. Phil Plummer				R	040		$350.00
		Rep. Bill Roemer				R	038		$350.00
		Rep. Allison Russo				D	024		$300.00
		Rep. William F. Seitz				R	030		$350.00
		Rep. Jason C. Stephens				R	093		$350.00
		Rep. Brian Stewart				R	078		$350.00
		Rep. Emilia Strong Sykes				D	034		$300.00
		Rep. Terrence Upchurch				D	010		$300.00
		Rep. Thomas E. West				D	049		$500.00
		Rep. Andrea J. White				R	041		$350.00
		Rep. Tom Young				R	042		$350.00
		Rep. Shane Wilkin				R	091		$350.00
		Rep. Brian Lampton				R	073		$350.00
		Rep. Jessica Miranda				D	028		$300.00
		Rep. Jon Cross				R	083		$350.00
OKLAHOMA									

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
US HOUSE									
		Rep. Thomas Jeffery Cole				R	004		$2,500.00
		Rep. Markwayne Mullin				R	002		$3,000.00
		Rep. Kevin R. Hern				R	001		$2,500.00
STATE SENATE									
		Sen. Chuck Hall				R	020		$500.00
		Sen. Brent Howard				R	038		$500.00
		Sen. Paul Rosino			Up in '24	R	045		$500.00
		Sen. Brenda Stanley				R	042		$500.00
		Sen. Zack Taylor				R	028		$500.00
		Sen. Darrell Weaver				R	024		$500.00
		Sen. John Haste				R	036		$500.00
		Sen. Darcy A. Jech				R	026		$500.00
STATE HOUSE									
		Rep. Mickey Dollens				D	093		$250.00
		Rep. Ronny Johns				R	025		$500.00
		Rep. Chris Kannady				R	091		$1,000.00
		Rep. Cyndi Munson				D	085		$500.00
		Rep. Ajay Pittman				D	099		$250.00
		Rep. Collin Walke				D	087		$500.00
		Rep. Josh West				R	005		$500.00
		Rep. Melissa Provenzano				D	079		$250.00
		Rep. Trish Ranson				D	034		$250.00
		Rep. Kevin W. Wallace				R	032		$1,000.00
		Rep. Danny J. Sterling				R	027		$500.00
		Rep. Marcus L. McEntire				R	050		$500.00
OREGON									
US HOUSE									
		Rep. Kurt Schrader				D	005		$5,000.00
STATE SENATE									
		Sen. Lynn P. Findley			Up in '24	R	030	$1,000.00	
		Sen. Fred F. Girod			Up in '24	R	009	$1,000.00	
		Sen. William S. Hansell			Up in '24	R	029	$1,000.00	

Winner **Non-Partisan** **Debt-Retirement** **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Betsy Johnson				D	016	$1,000.00	
		Sen. Tim R. Knopp			Up in '24	R	027	$1,000.00	
		Sen. Rob Wagner				D	019	$1,000.00	
		Sen. Lee Beyer				D	006	$1,000.00	
STATE HOUSE									
		Rep. Daniel G. Bonham				R	059	$1,000.00	
		Rep. Shelly Boshart Davis				R	015	$1,000.00	
		Rep. Vikki Breese-Iverson				R	055	$1,000.00	
		Rep. Janelle S. Bynum				D	051	$1,000.00	
		Christine Drazan				R	039	$1,000.00	
		Rep. Paul L. Evans				D	020	$1,000.00	
		Rep. Cedric R. Hayden				R	007	$1,000.00	
		Tina Kotek				D	044	$1,000.00	
		Rep. Rick Lewis				R	018	$1,000.00	
		Rep. Raquel Moore-Green				R	019	$1,000.00	
		Rep. Nancy L. Nathanson				D	013	$1,000.00	
		Rep. Ronald H. Noble				R	024	$1,000.00	
		Rep. Daniel A. Rayfield				D	016	$2,000.00	
		Rep. E. Werner Reschke				R	056	$1,000.00	
		Rep. David Brock Smith				R	001	$1,000.00	
		Rep. Gregory Vincent Smith				R	057	$1,000.00	
		Rep. Barbara Smith Warner				D	045	$1,000.00	
		Rep. Marty L. Wilde				D	011	$1,000.00	
		Rep. Brad K. Witt				D	031	$1,000.00	
		Rep. Mark W. Meek				D	040	$1,000.00	
		Rep. Julie Fahey				D	014	$1,000.00	
		Rep. Jason S. Kropf				D	054	$1,000.00	
		Rep. David Gomberg				D	010	$1,000.00	
		Rep. Bobby Levy				R	058	$1,000.00	
PENNSYLVANIA									
US HOUSE									
		Rep. Brendan Francis Boyle				D	002		$3,000.00
		Rep. Christina J. Houlahan	▲			D	006		$2,500.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. G. Mike J. Kelly				R	016		$2,500.00
		Rep. Guy L. Reschenthaler				R	014		$2,500.00
		Rep. Matthew A. Cartwright				D	008		$1,000.00
		Rep. Lloyd K. Smucker	Facility			R	011		$2,500.00
STATE SENATE									
		Sen. Lisa Baker				R	020		$500.00
		Sen. Michele Brooks				R	050		$500.00
		Sen. Patrick M. Browne				R	016		$1,000.00
		Sen. Jacob D. Corman, III				R	034		$1,500.00
		Sen. Jay Costa, Jr.			Up in '24	D	043		$1,000.00
		Sen. Vincent J. Hughes			Up in '24	D	007		$500.00
		Sen. Robert B. Mensch				R	024		$1,000.00
		Sen. Katie J. Muth	Facility			D	044		$500.00
		Sen. Kristin Lee Phillips-Hill				R	028		$1,000.00
		Sen. Judith F. Ward				R	030		$1,000.00
		Sen. Kim L. Ward			Up in '24	R	039		$1,000.00
		Sen. Eugene Yaw			Up in '24	R	023		$500.00
		Sen. John M. DiSanto	Facility			R	015		$500.00
		Sen. John R. Gordner				R	027		$500.00
STATE HOUSE									
		Rep. Kerry A. Benninghoff				R	171		$1,000.00
		Rep. Matthew D. Bradford				D	070		$500.00
		Rep. Tim P. Briggs	Facility			D	149		$500.00
		Rep. Bryan D. Cutler				R	100		$1,500.00
		Rep. Valerie S. Gaydos				R	044		$500.00
		Rep. Seth M. Grove				R	196		$500.00
		Rep. Jordan A. Harris				D	186		$500.00
		Rep. Mark A. Longietti				D	007		$500.00
		Rep. Joanna E. McClinton				D	191		$1,000.00
		Rep. Steven Curtis Mentzer				R	097		$500.00
		Rep. Donna R. Oberlander				R	063		$1,000.00
		Rep. Tina L. Pickett				R	110		$500.00
		Rep. Kathy L. Rapp				R	065		$500.00

W **Winner** NP **Non-Partisan** **Debt-Retirement** **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Stanley E. Saylor				R	094		$1,000.00
		Rep. Melissa L. Shusterman	▲			D	157		$500.00
		Rep. Martina A. White				R	170		$500.00
		Rep. Barbara J. Gleim	▲			R	199		$500.00
		Rep. George S. Dunbar				R	056		$500.00
RHODE ISLAND									
US HOUSE									
		Rep. David Nicola Cicilline	▲			D	001		$5,000.00
SOUTH CAROLINA									
US SENATE									
		Sen. Timothy Eugene Scott	▲			R			$5,500.00
US HOUSE									
		Rep. James Enos Clyburn	▲			D	006		$5,000.00
		Rep. Tom Rice				R	007		$2,500.00
GOVERNOR									
		Sen. Mia S. McLeod	▲			D		$1,000.00	
		Gov. Henry Dargan McMaster	▲			R		$3,500.00	
STATE HOUSE									
		Rep. James H. Lucas				R	065	$1,000.00	
		Rep. J. Todd Rutherford				D	074	$1,000.00	
		Rep. Russell L. Ott				D	093	$500.00	
SOUTH DAKOTA									
STATE SENATE									
		Sen. R. Blake Curd				R	012		$500.00
		Sen. Lee A. Schoenbeck				R	005		$500.00
		Sen. Wayne H. Steinhauer				R	009		$500.00
		Sen. Erin Tobin				R	021		$500.00
		Sen. Troy E. Heinert				D	026		$500.00
STATE HOUSE									
		Rep. Sydney Davis				R	017		$250.00
		Rep. Kent S. Peterson				R	019		$1,000.00
		Rep. Jennifer Healy Keintz				D	001		$250.00
		Rep. Paul R. Miskimins				R	020		$250.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Taylor Rae Rehfeldt				R	014		$250.00
		Rep. Erin K. Healy				D	014		$500.00
TENNESSEE									
US SENATE									
		Sen. Marsha Wedgeworth Blackburn	▲		Up in ‘24	R			$1,500.00
		Sen. Bill Hagerty	▲		Up in ‘26	R			$2,500.00
GOVERNOR									
		Gov. Bill Lee	▲			R			$5,000.00
STATE SENATE									
		Sen. Paul Bailey				R	015		$500.00
		Sen. Richard Briggs				R	007		$1,000.00
		Sen. Rusty Crowe, II				R	003		$500.00
		Sen. Ferrell Haile			Up in ‘24	R	018		$1,000.00
		Sen. Joey Hensley			Up in ‘24	R	028		$1,000.00
		Sen. Jon C. Lundberg	▲		Up in ‘24	R	004		$1,000.00
		Sen. Randy McNally, III				R	005		$1,500.00
		Sen. Shane Reeves			Up in ‘24	R	014		$1,500.00
		Sen. Art Swann			Up in ‘24	R	002		$1,000.00
		Sen. Bo Watson				R	011		$500.00
		Sen. Ken Yager			Up in ‘24	R	012		$1,000.00
		Sen. Jeff Yarbro				D	021		$500.00
STATE HOUSE									
		Rep. Clark Boyd				R	046		$1,000.00
		Rep. Michael G. Curcio				R	069		$500.00
		Rep. Ron M. Gant				R	094		$500.00
		Rep. Mark Hall				R	024		$500.00
		Rep. David B. Hawk				R	005		$500.00
		Rep. Patsy Hazlewood				R	027		$1,000.00
		Rep. Esther Helton				R	030		$500.00
		Rep. Gary W. Hicks, Jr.				R	009		$500.00
		Rep. Curtis G. Johnson				R	068		$1,000.00
		Rep. Kelly T. Keisling				R	038		$500.00

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Sabi Kumar				R	066		$500.00
		Rep. William G. Lamberth				R	044		$1,000.00
		Rep. Pat Marsh				R	062		$1,000.00
		Rep. Cameron Sexton				R	025		$1,500.00
		Rep. Mike Stewart				D	052		$500.00
		Rep. Bryan Terry				R	048		$1,000.00
		Rep. Kevin Vaughan				R	095		$1,000.00
		Rep. Mark White	Facility			R	083		$1,000.00
		Rep. Sam Whitson				R	065		$1,000.00
		Rep. Iris Rudder				R	039		$1,000.00
		Rep. Robert L. Ramsey				R	020		$500.00
		Rep. Greg Vital				R	029		$500.00
TEXAS									
US HOUSE									
		Rep. Jodey Cook Arrington				R	019		$1,000.00
		Rep. Kevin Patrick Brady				R	008		$5,000.00
		Rep. Michael Clifton Burgess	Facility			R	026		$2,500.00
		Rep. Daniel Crenshaw				R	002		$2,500.00
		Rep. Henry Roberto Cuellar				D	028		$1,000.00
		Rep. Veronica Escobar				D	016		$1,000.00
		Rep. Sylvia R. Garcia				D	029		$1,000.00
		Rep. Vicente Gonzalez				D	034		$3,000.00
		Rep. Marc A. Veasey				D	033		$1,000.00
STATE TREASURER									
		Hon. Glenn Hegar	Facility			R			$5,000.00
STATE SENATE									
		Sen. Cesar Blanco				D	029		$1,000.00
		Sen. Donna Campbell				R	025		$1,000.00
		Sen. C. Brandon Creighton				R	004		$1,000.00
		Sen. Joan Huffman				R	017		$1,500.00
		Sen. Nathan Johnson	Facility			D	016		$1,500.00
		Sen. Lois W. Kolkhorst				R	018		$1,500.00
		Sen. Jose Menendez				D	026		$1,000.00

W **Winner** NP **Non-Partisan** **Debt-Retirement** **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Borris L. Miles				D	013		$1,000.00
		Sen. Beverly Powell				D	010		$1,000.00
		Sen. Judith Zaffirini	▲			D	021		$1,000.00
		Sen. Carol Alvarado				D	006		$1,000.00
		Sen. Charles Schwertner				R	005		$1,000.00
		Sen. Juan Hinojosa				D	020		$1,000.00
STATE HOUSE									
		Rep. Steve Allison				R	121		$1,000.00
		Rep. Rafael Anchia				D	103		$500.00
		Rep. Trenton E. Ashby				R	057		$1,000.00
		Rep. Greg Bonnen				R	024		$1,000.00
		Rep. Elizabeth Campos				D	119		$500.00
		Rep. Giovanni Capriglione	▲			R	098		$1,000.00
		Rep. Mary E. Gonzalez				D	075		$1,000.00
		Rep. Justin Holland				R	033		$500.00
		Rep. Donna Howard				D	048		$1,000.00
		Rep. Ann Johnson				D	134		$500.00
		Rep. Julie Johnson	▲			D	115		$1,000.00
		Rep. Tracy O. King				D	080		$500.00
		Rep. Stephanie Klick				R	091		$1,000.00
		Rep. Jeff Leach				R	067		$1,000.00
		Rep. John Lujan				R	118		$500.00
		Rep. Joseph E. Moody				D	078		$500.00
		Rep. Tom Oliverson				R	130		$1,000.00
		Rep. W. Four Price				R	087		$1,000.00
		Rep. Richard Pena Raymond				D	042		$1,000.00
		Rep. Toni Rose				D	110		$1,000.00
		Rep. Carl O. Sherman, Sr.				D	109		$500.00
		Rep. Reggie Smith				R	062		$500.00
		Rep. Lynn Stucky				R	064		$500.00
		Rep. Senfronia Thompson				D	141		$1,000.00
		Rep. Chris Turner				D	101		$1,000.00
		Rep. Hubert Vo				D	149		$1,000.00

W Winner NP Non-Partisan Debt-Retirement Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Gene Wu				D	137		$500.00
		Rep. John H. Bucy, III				D	136		$500.00
		Rep. Will Metcalf				R	016		$1,000.00
		Rep. Erin Zwiener				D	045		$1,000.00
		Rep. John Kuempel				R	044		$500.00
		Rep. Brooks Landgraf				R	081		$500.00
		Rep. David Spiller				R	068		$500.00
		Rep. Nicole Collier				D	095		$1,000.00
		Rep. Charlie Geren				R	099		$500.00
		Rep. Dade Phelan				R	021		$5,000.00
		Rep. Gina Hinojosa				D	049		$1,000.00
		Rep. Ernest Bailes				R	018		$500.00
		Rep. Kyle J. Kacal				R	012		$500.00
UTAH									
US SENATE									
		Sen. Michael Shumway Lee	▲			R			$4,000.00
US HOUSE									
		Rep. John R. Curtis				R	003		$8,500.00
STATE SENATE									
		Sen. J. Stuart Adams				R	022		$750.00
		Sen. Curtis S. Bramble			Up in '24	R	016		$500.00
		Sen. Kirk A. Cullimore, Jr.				R	009		$500.00
		Sen. Wayne A. Harper			Up in '24	R	006		$500.00
		Sen. Michael S. Kennedy			Up in '24	R	014		$500.00
		Sen. Scott D. Sandall				R	017		$500.00
		Sen. Evan J. Vickers				R	028		$750.00
		Sen. Chris H. Wilson			Up in '24	R	025		$500.00
		Sen. Jacob L. Anderegg			Up in '24	R	013		$500.00
		Sen. Keith Grover				R	015		$500.00
		Sen. Daniel McCay				R	011		$500.00
		Sen. Todd Weiler			Up in '24	R	023		$500.00
		Sen. Lincoln Fillmore			Up in '24	R	010		$500.00
		Sen. Karen Mayne				D	005		$500.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Sen. Luz Escamilla			Up in '24	D	001		$500.00
STATE HOUSE									
		Rep. James A. Dunnigan				R	039		$500.00
		Rep. Steven Eliason				R	045		$250.00
		Rep. Brian S. King				D	028		$250.00
		Rep. Kelly B. Miles				R	011		$500.00
		Rep. Calvin R. Musselman				R	009		$250.00
		Rep. Mike Schultz				R	012		$500.00
		Rep. Robert Spendlove				R	049		$500.00
		Rep. Steve Waldrip				R	008		$250.00
		Rep. Raymond Ward				R	019		$250.00
		Rep. Ryan D. Wilcox				R	007		$250.00
		Rep. Brad R. Wilson				R	015		$750.00
		Rep. Mike Winder				R	030		$250.00
		Rep. Joel Ferry				R	001		$500.00
		Rep. Timothy D. Hawkes				R	018		$250.00
		Rep. Cheryl K. Acton				R	043		$250.00
		Rep. Jen Dailey-Provost				D	024		$250.00
		Rep. Stephen G. Handy				R	016		$250.00
		Rep. Candice B. Pierucci				R	052		$500.00
		Rep. Karianne Lisonbee				R	014		$250.00
		Rep. Brady Brammer				R	027		$250.00
		Rep. Stewart E. Barlow				R	017		$250.00
		Rep. Jordan Teuscher				R	042		$250.00
VIRGIN ISLANDS									
US HOUSE									
		Rep. Stacey Elizabeth Plaskett				D	001		$1,000.00
VIRGINIA									
US SENATE									
		Sen. Timothy Michael Kaine			Up in '24	D			$500.00
US HOUSE									
		Rep. H. Morgan Griffith				R	009		$1,000.00
		Rep. Benjamin L. Cline				R	006		$500.00

Winner   Non-Partisan   Debt-Retirement   Facility

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
GOVERNOR									
	W	Gov. Glenn Youngkin	▲			R		$25,000.00	
STATE SENATE									
		Sen. George L. Barker			Up in ‘23	D	039	$1,000.00	$1,000.00
		Sen. Siobhan S. Dunnavant	▲		Up in ‘23	R	012	$1,000.00	
		Sen. Janet Denison Howell	▲		Up in ‘23	D	032	$1,000.00	$2,000.00
		Sen. Lynwood W. Lewis, Jr.			Up in ‘23	D	006		$1,500.00
		Sen. Mamie E. Locke			Up in ‘23	D	002		$1,500.00
		Sen. L. Louise Lucas			Up in ‘23	D	018	$1,000.00	$2,000.00
		Sen. Stephen D. Newman			Up in ‘23	R	023		$750.00
		Sen. Thomas K. Norment, Jr.			Up in ‘23	R	003		$750.00
		Sen. Mark J. Peake			Up in ‘23	R	022		$750.00
		Sen. Todd E. Pillion			Up in ‘23	R	040		$750.00
		Sen. Richard L. Saslaw			Up in ‘23	D	035	$1,000.00	$1,000.00
		Sen. William M. Stanley, Jr.	▲		Up in ‘23	R	020		$750.00
		Sen. Scott A. Surovell			Up in ‘23	D	036		$1,000.00
STATE HOUSE									
	W	Del. Dawn M. Adams				D	068		$1,500.00
		Lashrecse D. Aird				D	063		$1,500.00
	W	Del. Jeff M. Bourne	▲			D	071		$1,000.00
	W	Del. Kathy J. Byron				R	022		$1,000.00
	W	Del. Carrie Emerson Coyner				R	062		$1,000.00
	W	Del. Karrie K. Delaney				D	067		$1,000.00
	W	Del. Eileen Filler-Corn				D	041		$2,000.00
	W	Del. C. Todd Gilbert				R	015		$750.00
	W	Del. C.E. Cliff Hayes, Jr.				D	077		$1,000.00
	W	Del. Christopher T. Head				R	017		$1,000.00
	W	Del. Charniele L. Herring				D	046		$1,000.00
	W	Del. M. Keith Hodges				R	098		$1,000.00
	W	Del. Patrick A. Hope				D	047		$1,000.00
	W	Del. Terry G. Kilgore				R	001		$1,000.00
	W	Del. Michael P. Mullin				D	093		$750.00
	W	Del. Robert D. Orrock, Sr.				R	054		$750.00

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
	W	Del. Margaret Bevans Ransone				R	099		$1,000.00
	W	Del. Roxann L. Robinson				R	027		$1,000.00
	W	Del. Mark D. Sickles				D	043		$2,000.00
	W	Del. Marcus B. Simon				D	053		$1,000.00
	W	Del. Richard C. Sullivan, Jr.				D	048		$1,000.00
	W	Del. Luke E. Torian				D	052		$1,000.00
	W	Del. R. Lee Ware, Jr.				R	065		$1,000.00
	W	Del. Rodney T. Willett	▲			D	073		$1,000.00
		Anne Ferrell Tata				R	082	$1,000.00	
WASHINGTON									
US SENATE									
		Sen. Patricia Lynn Murray	▲			D			$7,500.00
US HOUSE									
		Rep. Suzan Kay DelBene				D	001		$1,000.00
		Rep. Cathy McMorris Rodgers				R	005		$7,500.00
		Rep. Marilyn Strickland	▲			D	010		$4,000.00
STATE SENATE									
		Sen. John E. Braun			Up in '24	R	020	$1,000.00	
		Sen. Kevin Van De Wege			Up in '24	D	024	$1,000.00	
		Sen. Keith L. Wagoner			Up in '24	R	039	$1,000.00	
		Sen. Judith Warnick				R	013	$1,000.00	
		Sen. Jesse Salomon				D	042	$1,000.00	
		Sen. Jeff Holy				R	006	$1,000.00	
		Sen. Marko Liias				D	021	$1,000.00	
		Sen. Shelly Short				R	007	$1,000.00	
		Sen. Patty Kuderer				D	048	$1,000.00	
STATE HOUSE									
		Rep. Michelle Caldier				R	026	$1,000.00	
		Rep. Jeremie Dufault				R	015	$1,000.00	
		Rep. Roger E. Goodman				D	045	$1,000.00	
		Rep. Paul Harris				R	017	$1,000.00	
		Rep. Laurie Jinkins				D	027	$1,000.00	
		Rep. Nicole Macri				D	043	$1,000.00	

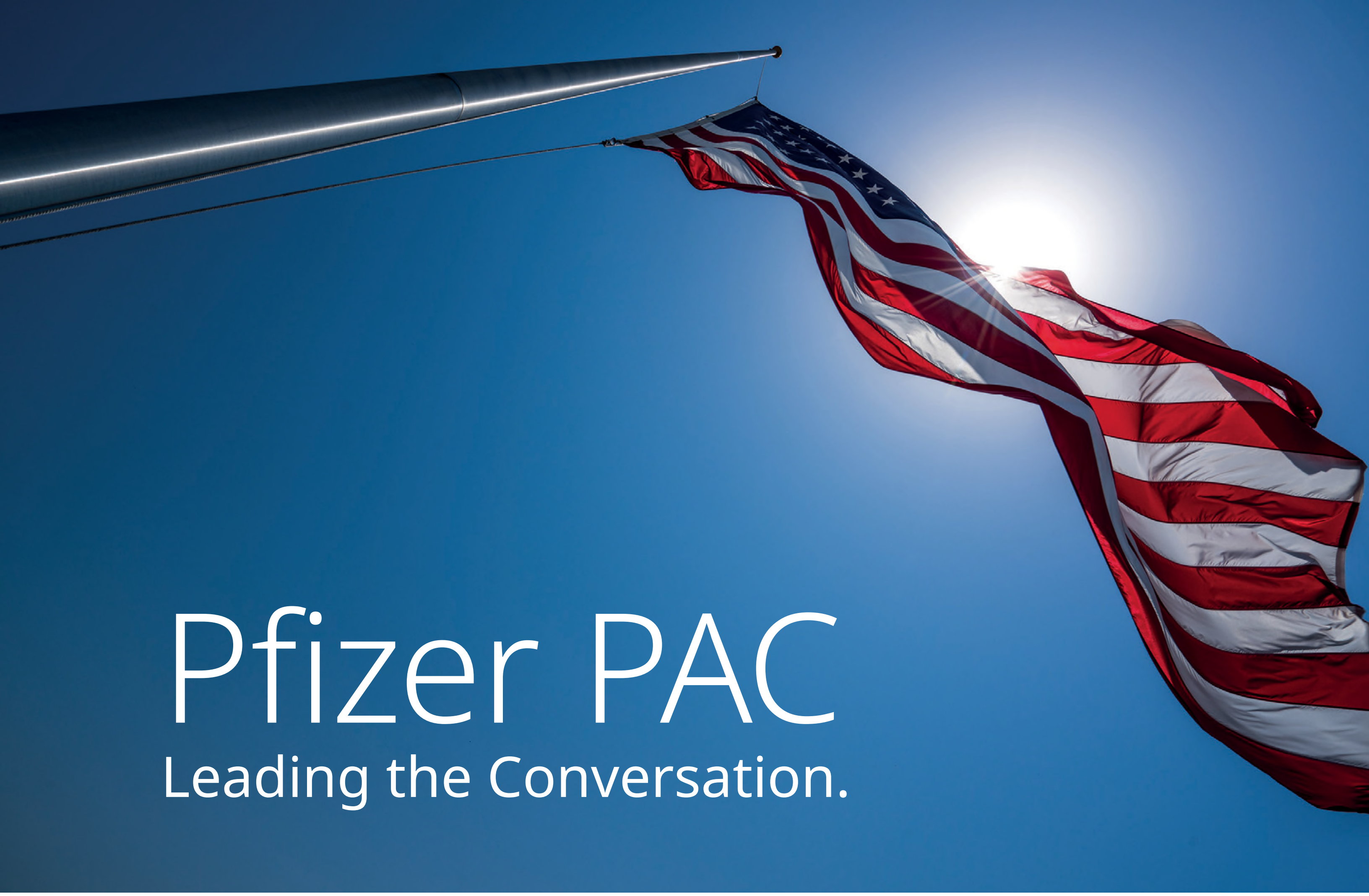
W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
		Rep. Jacquelin Maycumber				R	007	$1,000.00	
		Rep. Joe Schmick				R	009	$1,000.00	
		Rep. Vandana Slatter				D	048	$1,000.00	
		Rep. Larry S. Springer				D	045	$1,000.00	
		Rep. Drew Stokesbary				R	031	$1,000.00	
		Rep. Monica Jurado Stonier				D	049	$1,000.00	
		Rep. Pat Sullivan				D	047	$1,000.00	
		Rep. My-Linh Thai				D	041	$1,000.00	
		Rep. Amy Walen				D	048	$1,000.00	
		Rep. J.T. Wilcox				R	002	$1,000.00	
		Rep. Dan Bronoske				D	028	$1,000.00	
		Rep. Greg Gilday				R	010	$1,000.00	
		Rep. Alex Ybarra				R	013	$1,000.00	
		Rep. Marcus Riccelli				D	003	$1,000.00	
WEST VIRGINIA									
US SENATE									
		Sen. Joseph Manchin, III	▲		Up in '24	D			$5,000.00
US HOUSE									
		Rep. Carol Devine Miller	▲			R	003		$1,500.00
STATE SENATE									
		Sen. David C. Sypolt				R	014		$1,000.00
		Sen. Tom Takubo				R	017		$1,000.00
		Sen. Eric J. Tarr				R	004		$1,000.00
		Sen. Charles S. Trump, IV				R	015		$1,000.00
		Sen. Michael Thomas Azinger				R	003		$1,000.00
STATE HOUSE									
		Del. Vernon Criss				R	010		$1,000.00
		Del. Roger Glen Hanshaw				R	033		$1,000.00
		Del. Eric Lee Householder				R	064		$1,000.00
		Del. Matthew Alan Rohrbach				R	017		$1,000.00
		Jeffrey Pack				R	028		$1,000.00
WISCONSIN									

W **Winner** NP **Non-Partisan** **Debt-Retirement** ▲ **Facility**

State/Office	Win	Full Name	Facility	Debt Retirement	Future Election	Party	District	Corp	PAC
US HOUSE									
		Rep. Ronald James Kind				D	003		$2,000.00
GOVERNOR									
		Gov. Tony S. Evers	▲			D			$1,000.00
STATE SENATE									
		Sen. Janet Bewley				D	025		$500.00
		Sen. John Jagler				R	013		$500.00
		Sen. Devin LeMahieu				R	009		$500.00
WYOMING									
US HOUSE									
		Rep. Elizabeth Cheney	▲			R	001		$2,500.00
GOVERNOR									
		Gov. Mark Gordon	▲			R			$750.00
SECRETARY OF STATE (STATE LEVEL)									
		Hon. Edward A. Buchanan	▲			R			$300.00
STATE SENATE									
		Sen. Stephan Pappas				R	007		$200.00
		Sen. Bill Landen				R	027		$200.00
		Sen. Drew A. Perkins				R	029		$200.00
		Sen. Ogden Driskill				R	001		$200.00
STATE HOUSE									
		Rep. Landon J. Brown				R	009		$200.00
		Rep. Shelly Duncan				R	005		$200.00
		Rep. John Eklund, Jr.				R	010		$150.00
		Rep. Mike Greear				R	027		$200.00
		Rep. Bill Henderson				R	041		$200.00
		Rep. Lloyd Charles Larsen				R	054		$200.00
		Rep. Sandy Newsome				R	024		$200.00
		Rep. Jared Olsen				R	011		$200.00
		Rep. Tom Walters				R	038		$200.00
		Rep. Cyrus Western				R	051		$200.00
		Rep. Dan Zwonitzer				R	043		$200.00
TOTAL – CANDIDATE COMMITTEES								**$427,900.00**	**$779,075.00**
TOTAL CANDIDATE COMMITTEES – PAC AND CORPORATE COMBINED									**$1,206,975.00**

W **Winner** NP **Non-Partisan** ● **Debt-Retirement** ▲ **Facility**



Pfizer PAC

Leading the Conversation.

Leadership PACs, Trade Associations, and Party Committees

January 2021 – December 2021

Pfizer
Corporate Affairs
Government Relations

State	Committee Name	Party	Corp	PAC
CALIFORNIA	BioCom PAC	NP	$4,000.00	
	California Democratic Party (Non-Federal)	D	$35,000.00	
	California Life Sciences	NP	$0.00	
	California Life Sciences Association PAC (CLSA PAC)	NP	$6,000.00	
	Conference of Western Attorneys General (CWAG)	NP	$25,000	
	Democrats Reshaping America (DREAMPAC) (Rep. Linda T. Sanchez)	D		$4,000.00
	Majority Committee PAC--Mc PAC (Rep. Kevin Owen McCarthy)	R		$2,500.00
	PAC To the Future (Rep. Nancy Pelosi)	D		$1,000.00
	Pharmaceutical Research & Manufacturers Association of America PAC (PhRMA PAC)	NP	$8,100.00	
	Supporting House Problem Solvers - Shp PAC (Rep. Scott H. Peters)	D		$5,000.00
	Susan Eggman for Senate 2020 Officeholder Account (Sen. Susan Talamantes Eggman)	D	$2,000.00	
	Victory By Investing Building And Empowering (VIBE) PAC (Rep. Tony Cardenas)	D		$2,000.00
COLORADO	Coloradans for Western Values Leadership PAC (Sen. Larry G. Liston)	R		$525.00
	Joann Ginal for Colorado Leadership PAC (Sen. Joann Ginal)	D		$200.00
	Liberty Leadership PAC (Sen. Dennis Hisey)	R		$400.00
	Lundeen Leadership Fund (Sen. Paul Lundeen)	R		$625.00
	Majorities Matter! (Sen. Rob Woodward)	R		$625.00
	NOCO Leadership PAC (Rep. Hugh McKean)	R		$625.00
	Putting Colorado First (Sen. Barbara Kirkmeyer)	R		$200.00
	Senate Majority Fund (527)	R	$10,000.00	
	Values First Colorado	R	$10,000.00	
CONNECTICUT	Connecticut Democratic State Central Committee	D		$5,000.00
	Connecticut Republican Party	R		$5,000.00
	Nutmeg PAC (Sen. Richard Blumenthal)	D		$5,000.00
DELAWARE	First State PAC (Sen. Thomas Richard Carper)	D		$5,000.00
DISTRICT OF COLUMBIA	Across The Aisle PAC	D		$5,000.00
	Alliance for Regenerative Medicine	NP	$0.00	

NP **Non-Partisan**

State	Committee Name	Party	Corp	PAC
	Aspire PAC	D		$5,000.00
	Biosimilars Forum	NP	$0.00	
	Biotech Industry Association	NP	$0.00	
	Biotechnology Innovation Organization PAC (BIO PAC)	NP		$5,000.00
	Business Roundtable	NP	$0.00	
	Chamber Of Commerce Of The United States Of America PAC (US CHAMBER PAC)	NP		$5,000.00
	CHC BOLD PAC	D		$5,000.00
	Congressional Black Caucus PAC	D		$5,000.00
	DCCC	D		$15,000.00
	Democratic Governors Association (DGA)	D	$15,000.00	
	Democratic Legislative Campaign Committee (DLCC)	D	$25,000.00	
	DNC Services Corporation/Democratic National Committee	D		$15,000.00
	DSCC	D		$15,000.00
	DSCC (Building Fund)	D		$25,000.00
	DSCC (Recount and Legal Fund)	D		$5,000.00
	Elect Democratic Women	NP		$5,000.00
	Equality PAC	NP		$5,000.00
	Healthcare Leadership Forum	NP	$0.00	
	Lgbtq Victory Fund Federal PAC	D		$2,500.00
	NAM	NP	$0.00	
	National Association Of Manufacturers PAC (NAM-PAC)	NP		$5,000.00
	New Democrat Coalition Action Fund	D		$5,000.00
	NRCC	R		$15,000.00
	NRSC	R		$15,000.00
	NRSC (Building Fund)	R		$30,000.00
	Pharmaceutical Research & Manufacturers of America (PhRMA)	NP	$411,577	
	Pharmaceutical Research & Manufacturers Of America Better Government Committee	NP		$5,000.00
	Republican Attorneys General Association (RAGA)	R	$50,000.00	
	Republican State Leadership Committee (RSLC)	R	$260,000.00	
	U.S. Chamber	NP	$0.00	

NP **Non-Partisan**

State	Committee Name	Party	Corp	PAC
FLORIDA	Building on Your Dreams Political Committee (Sen. Jim Boyd)	R	$2,000.00	
	Building the Bay PC (Sen. Janet R. Cruz)	D	$1,500.00	
	Citizens for Solutions (Sen. Jason T. Brodeur)	R	$500.00	
	Conservatives for a Better Florida (Rep. Daniel Anthony Perez)	R	$5,000.00	
	Ethics and Honesty in Government (Sen. Ana Maria Rodriguez)	R	$2,000.00	
	Florida 2020 (Sen. Loranne Ausley)	D	$2,000.00	
	Florida House Republican Campaign Committee	R	$20,000.00	
	Florida Republican Senatorial Committee	R	$10,000.00	
	Friends of Colleen Burton (Rep. Colleen Burton)	R	$2,000.00	
	Friends of Ed Hooper (Sen. Ed Hooper)	R	$2,000.00	
	Friends of Ron DeSantis	R	$5,000.00	
	Honest Leadership (Rep. Sam Garrison)	R	$2,000.00	
	Living Life With Purpose (Rep. Thomas J. Leek)	R	$2,000.00	
	Republican Party of Florida (Non-Federal)	R	$10,000.00	
GEORGIA	Building Bridges PAC	R		$5,000.00
	Democratic Party of Georgia (Non-Federal)	D	$1,000.00	
	Georgia Senate Democratic Caucus	D	$2,500.00	
HAWAII	Pineapple PAC (Sen. Mazie Keiko Hirono)	D		$5,000.00
IDAHO	Freedom Fund (Sen. Michael Dean Crapo)	R		$5,000.00
	PNW PhRMA PAC	NP	$3,000.00	
ILLINOIS	Perimeter PAC (Sen. L. Tammy Duckworth)	D		$5,000.00
INDIANA	Oorah! Political Action Committee (Sen. Todd Christopher Young)	R		$5,000.00
IOWA	Jobs Opportunity And New Ideas PAC (Sen. Joni Kay Ernst)	R		$3,500.00
KANSAS	Defend Our Conservative Senate PAC (DOC'S PAC) (Sen. Roger W. Marshall)	R		$5,000.00
	Free State PAC (Sen. Jerry W. Moran)	R		$2,500.00
	Liberty First Project	NP		$2,000.00
	Lift up Kansas PAC	R		$5,000.00
KENTUCKY	Bluegrass Committee (Sen. Mitch McConnell)	R		$5,000.00
	House Republican Caucus Campaign Committee	R		$5,000.00
	Republican Party of Kentucky (Non-Federal)	R		$5,000.00
	Senate Republican Caucus Campaign Committee	R		$5,000.00

NP **Non-Partisan**

State	Committee Name	Party	Corp	PAC
LOUISIANA	Continuing America's Strength And Security PAC (Sen. William Cassidy)	R		$3,500.00
	Louisiana Republican Legislative Delegation Campaign Committee	R	$7,500.00	
MAINE	House Republican Majority Fund	R		$3,000.00
	Maine Senate Republican Majority	R		$10,000.00
	One Maine (Rep. Kathleen Rose J. Dillingham)	R		$1,000.00
	Still Fed Up With Taxes PAC (Sen. Jeffrey L. Timberlake)	R		$2,000.00
	Taking Care of Maine Business PAC	NP		$1,000.00
MARYLAND	AMERIPAC The Fund for a Greater America (Rep. Steny Hamilton Hoyer)	D		$5,000.00
	Blue Dog Political Action Committee	D		$5,000.00
	Future Forum PAC	D		$1,000.00
	Maryland Senate Republican Caucus Committee	R		$2,000.00
MASSACHUSETTS	Fair Shot PAC (Rep. Katherine M. Clark)	D		$5,000.00
	Massachusetts Democratic State Committee	D		$5,000.00
	The Madison PAC (Rep. Richard Edmund Neal)	D		$5,000.00
MICHIGAN	Bizon Majority Fund (Sen. John Bizon)	R		$500.00
	Building Experience Now PAC (Rep. Ben Frederick)	R		$1,000.00
	EMBOLDEN PAC (Rep. Kyra Bolden)	D		$500.00
	Hauck Majority Fund (Rep. Roger Hauck)	R		$500.00
	Joe Tate Leadership PAC (Rep. Joseph Tate)	D		$250.00
	Kahle Majority Fund (Rep. Bronna Kahle)	R		$1,000.00
	McCann for Michigan (Sen. Sean A. McCann)	D		$500.00
	Motor City PAC (Sen. Gary Charles Peters)	D		$5,000.00
	Nesbitt Majority Fund (Sen. Aric Nesbitt)	R		$1,000.00
	VanderWall Majority Fund (Sen. Curt VanderWall)	R		$1,000.00
	VanWoerkom Solutions PAC (Rep. Greg VanWoerkom)	R		$500.00
	Wentworth Majority Fund (Rep. Jason Wentworth)	R		$1,000.00
	Witwer for Michigan (Rep. Angela Witwer)	D		$250.00
MINNESOTA	House Republican Campaign Committee	R		$5,000.00
	Minnesota Dfl Senate Caucus	D		$2,500.00
	Minnesota House Dfl Caucus	D		$2,500.00

NP **Non-Partisan**

State	Committee Name	Party	Corp	PAC
	Senate Victory PAC	R		$5,000.00
MISSOURI	Missouri United (Rep. Dean Plocher)	R	$2,500.00	
	Uniting Missouri PAC	R	$5,000.00	
MONTANA	Big Sky Opportunity PAC (Sen. Steve David Daines)	R		$1,500.00
	Montana Democratic Legislative Campaign Committee (MDLCC)	D		$1,000.00
	Montana Democratic Party	D		$1,000.00
	Montana Red (Sen. Steve David Daines)	R		$3,000.00
	Montana Republican Legislative Campaign Committee (MRLCC)	R		$1,500.00
	Montana Republican Party	R		$1,500.00
	Treasure State PAC (Sen. Jon Tester)	D		$5,000.00
NEBRASKA	Sensible American Solutions Supporting Everyone PAC (Sen. Benjamin Eric Sasse)	R		$3,500.00
NEVADA	All For Our Country Leadership PAC (Sen. Catherine Cortez Masto)	D		$5,000.00
	Assembly Republican Caucus PAC	R		$2,500.00
	Senate Republican Leadership Conference	R		$2,500.00
	Smart Solutions PAC (Sen. Jacky Rosen)	D		$5,000.00
NEW HAMPSHIRE	Committee to Elect House Republicans	R	$2,000.00	
	Granite Values PAC (Sen. Margaret Wood Hassan)	D		$1,000.00
	New Hampshire Senate Democratic Caucus	D	$5,000.00	
	New Hampshire Senate Republicans Political Action Committee	R	$5,000.00	
NEW JERSEY	New Jobs	NP	$1,000.00	
	New Millennium PAC (Sen. Robert Menendez)	D		$5,000.00
	Senate Republican Majority	R	$500.00	
NEW MEXICO	LOBO PAC (Sen. Martin Heinrich)	D		$5,000.00
NEW YORK	AVAC	NP	$0.00	
	Democratic Assembly Campaign Committee	D	$2,500.00	$5,000.00
	Democratic Assembly Campaign Committee Housekeeping Account	D	$2,000.00	
	Hudson Valley PAC (Rep. Sean Patrick Maloney)	D		$3,000.00
	IMPACT (Sen. Charles E. Schumer)	D		$5,000.00

NP **Non-Partisan**

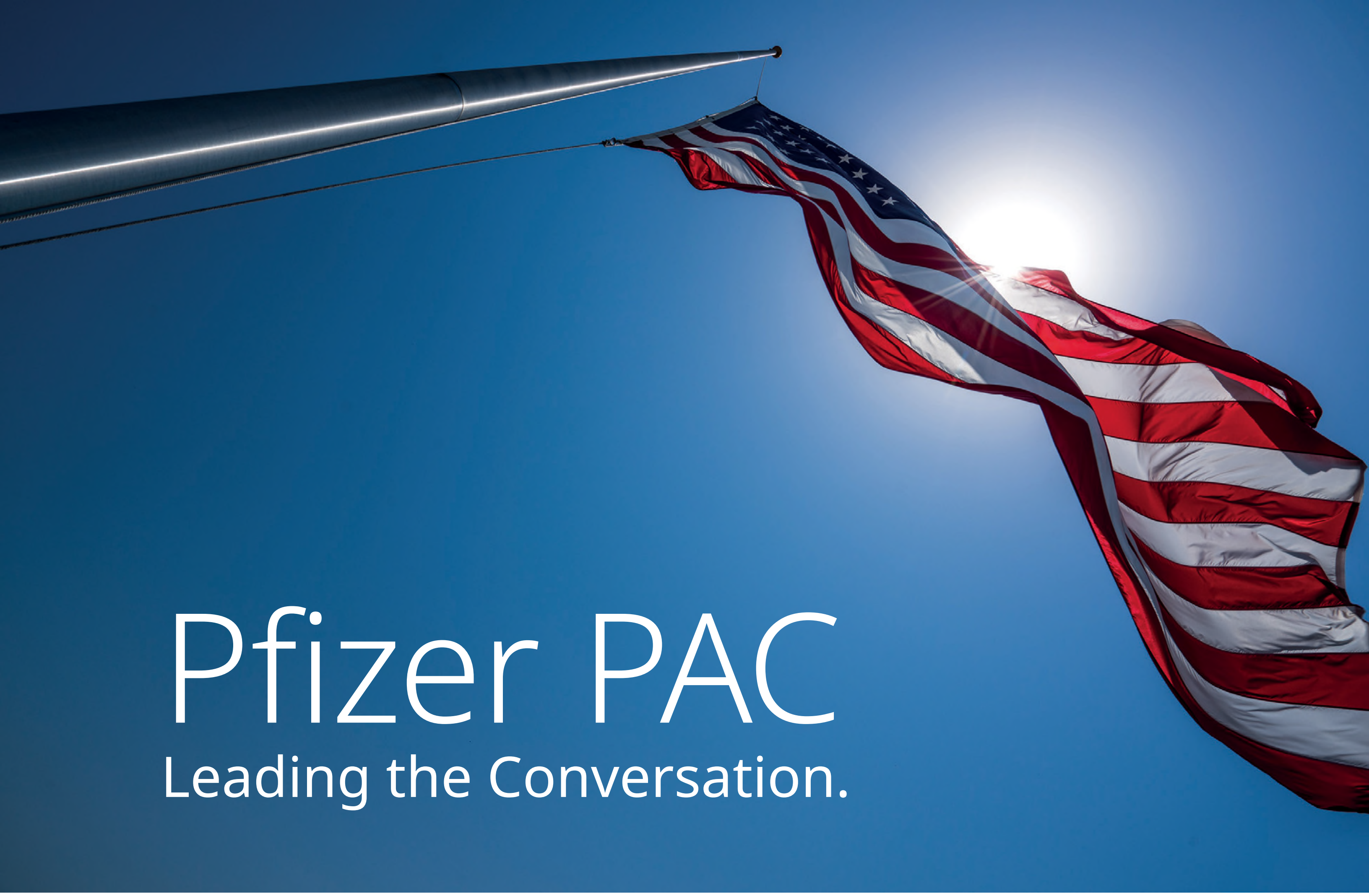
State	Committee Name	Party	Corp	PAC
	New York State Democratic Committee (Non-Federal)	D		$5,000.00
	NYS Democratic Senate Campaign Committee	D	$2,500.00	$5,000.00
	NYS Democratic Senate Campaign Committee - Housekeeping	D	$2,000.00	
	NYS Senate Republican Campaign Committee	R		$1,500.00
	Republican Assembly Campaign Committee	R		$1,500.00
NORTH CAROLINA	Together Holding Our Majority PAC (Sen. Thomas Roland Tillis)	R		$3,500.00
NORTH DAKOTA	Dakota PAC (Sen. John Henry Hoeven, III)	R		$1,000.00
	North Dakota House Republican Leadership Fund	R		$5,000.00
OHIO	Ohio Chamber of Commerce PAC	NP		$5,000.00
	Ohio House Democratic Caucus Fund	D		$350.00
	Ohio Republican Party (Non-Federal)	R		$1,000.00
	Republican Senate Campaign Committee	R		$800.00
OKLAHOMA	Leadership And Accountability Are National Keys PAC (Sen. James Paul Lankford)	R		$4,500.00
OREGON	Three Rivers Political Action Committee (Rep. Kurt Schrader)	D		$5,000.00
	Votevets	D		$5,000.00
PENNSYLVANIA	Campaign for Compassion	D		$500.00
	House Democratic Campaign Committee (HDCC)	D		$1,000.00
	House Republican Campaign Committee (HRCC)	R		$1,500.00
	Keystone America PAC (Sen. Robert P. Casey, Jr.)	D		$2,500.00
	Senate Democratic Campaign Committee	D		$1,000.00
	Senate Republican Campaign Committee (SRCC)	R		$1,500.00
SOUTH CAROLINA	Building Relationships In Diverse Geographic Environments PAC (BRIDGE PAC) (Rep. James Enos Clyburn)	D		$5,000.00
	Tomorrow Is Meaningful PAC (Sen. Timothy Eugene Scott)	R		$2,000.00
SOUTH DAKOTA	Heartland Values PAC (Sen. John Randolph Thune)	R		$5,000.00
	House GOP PAC	R		$1,000.00
	Senate Republican Campaign Committee	R		$1,000.00
TENNESSEE	Making A Responsible Stand For Households In America PAC (Sen. Marsha Wedgeworth Blackburn)	R		$2,500.00
	Tennessee Chamber of Commerce and Industry PAC	NP		$1,000.00
TEXAS	Alamo PAC (Sen. John Cornyn, III)	R		$5,000.00
	Making America Prosperous PAC (Rep. Kevin Patrick Brady)	R		$2,500.00

NP **Non-Partisan**

State	Committee Name	Party	Corp	PAC
	Manufacturers PAC of Texas	NP		$1,000.00
VERMONT	Green Mountain PAC (Sen. Patrick Joseph Leahy)	D		$5,000.00
	The Campaign Research Center	NP	$2,000.00	
VIRGINIA	Common Ground PAC (Sen. Timothy Michael Kaine)	D		$5,000.00
	Forward Together PAC (Sen. Mark Robert Warner)	D		$5,000.00
WASHINGTON	M-PAC (Sen. Patricia Lynn Murray)	D		$5,000.00
	The Jackson Legacy Fund	D	$2,000.00	
	The Reagan Fund	R	$1,000.00	
	Washington State Democratic Central Committee	D		$5,000.00
WEST VIRGINIA	Wild And Wonderful PAC (Sen. Shelley Moore Capito)	R		$5,000.00
WISCONSIN	Committee to Elect a Republican Senate	R		$7,000.00
	Republican Assembly Campaign Committee (RACC)	R		$7,000.00
WYOMING	Common Values PAC (Sen. John Anthony Barrasso)	R		$5,000.00
TOTAL – LEADERSHIP PACS, TRADE ASSOCIATIONS, AND PARTY COMMITTEES			**$976,677.00**	**$553,850.00**
TOTAL LEADERSHIP PACS, TRADE ASSOCIATIONS, AND PARTY COMMITTEES – PAC AND CORPORATE COMBINED				**$1,530,527.00**

Summary of 2021 Political Contributions	Corp	PAC
Total – Candidate Committees	$427,900.00	$779,075.00
Total – Leadership PACs, Trade Associations and Party Committees	$976,677.00	$553,850.00
Total 2021 Political Contributions	$1,404,577.00	$1,332,925.00
TOTAL PAC AND CORPORATE POLITICAL CONTRIBUTIONS IN 2021		**$2,737,502.00**

NP Non-Partisan



Pfizer PAC

Leading the Conversation.

Financial Statements

January 2021 – December 2021

Pfizer
Corporate Affairs
Government Relations

Pfizer Inc. PAC
Combined Statement of Assets and Liabilities
Arising from Cash Transactions

Assets	2021
Cash	$644,758.83
Net Assets	**$644,758.83**

See accompanying notes to the combined financial statements

Combined Statement of Revenues & Expenditures
Arising from Cash Transactions

Revenues: Contributions	
Payroll Deductions	1,167,773.04
Checks	23,020.00
Credit Cards	1,122.00
Refunds from Candidates	6,000.00
Other (Ret Checks Prior Cycle)	14,180.00
Total Revenues	**1,212,095.04**
Expenditures: Support of Candidates	
Federal	431,000.00
State & Local	348,075.00
Political Parties & Other PAC's	553,850.00
Fundraising Expense	0.00
Interest & Other	100.00
Expenditures	**1,333,025.00**
Excess of Support over Expenditures	**($120,929.96)**

Fund Available: Cash Balance	
Beginning of Year	$765,688.79
End of Year	**$644,758.83**

See accompanying notes to the combined financial statements

Pfizer Inc. PAC
Disbursements

Support of Candidates:	2021
Contributions to:	
U.S. Senate Candidates	83,000.00
U.S. House Candidates	348,000.00
State & Local Candidates	348,075.00
	$779,075.00

Other Expenditures:	
Political Parties & Other PAC's	553,850.00
Fundraising Expense	0.00
Interest & Other	100.00
	553,950.00
Total Expenditures	**$1,333,025.00**

Pfizer Inc. PAC
Notes to the Financial Statements

1. FUND DESCRIPTION

The Pfizer Inc. PAC (the Fund) was formed by Pfizer Inc. (the Company) to solicit and receive voluntary political contributions from employees and stockholders of the Company and certain subsidiaries to assist candidates for elective office. The Fund was registered with the Federal Election Commission in April 1976.

2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Presentation

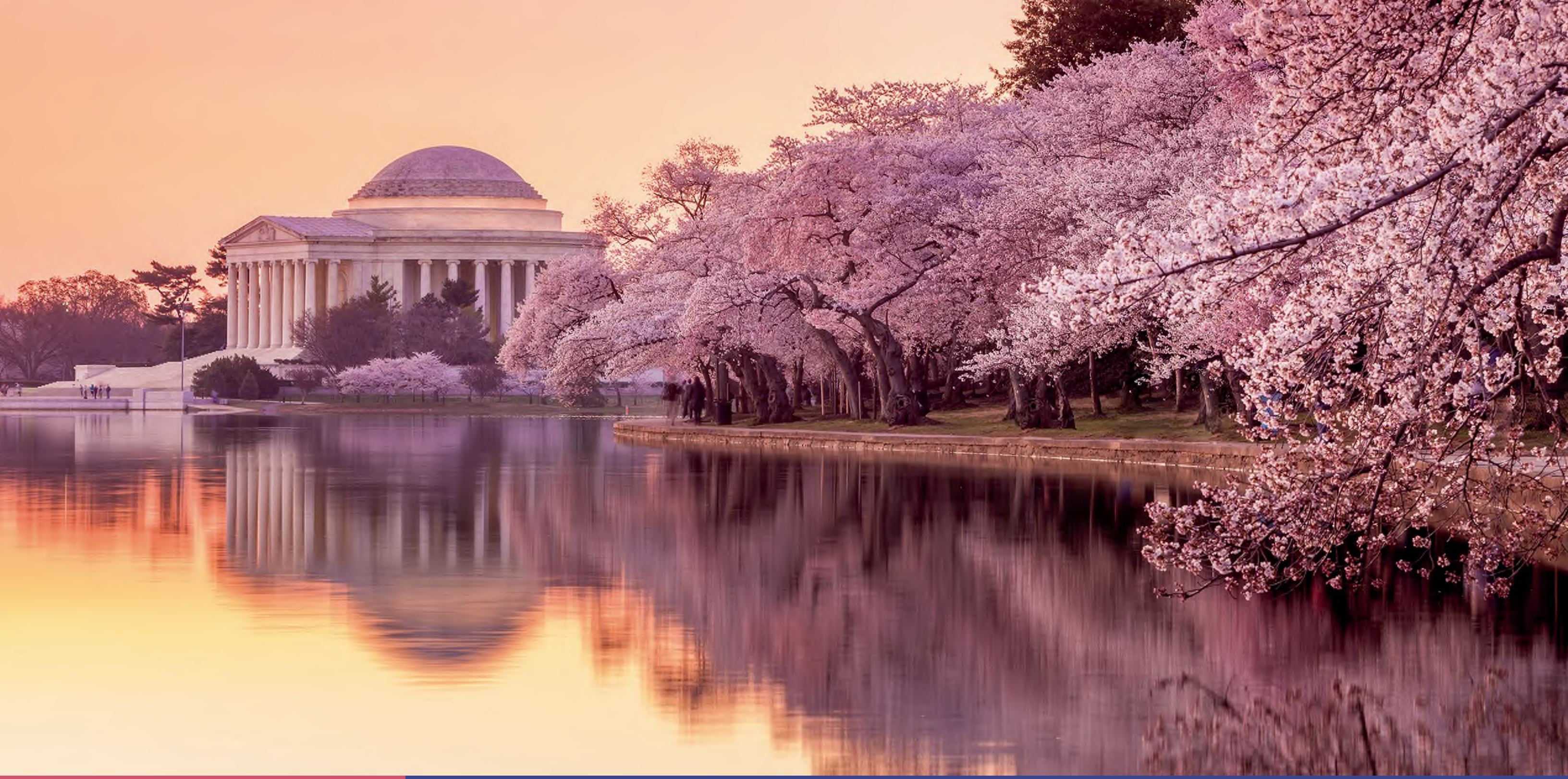
The combined financial statement activities of the Fund include several political action committees which were formed to comply with certain state laws. The accounts of the Fund are maintained on a cash basis. All administrative costs of the Fund are borne by the Company in accordance with federal law.

Tax Status

The Fund is registered as a political organization and, as such, is subject to tax on non-exempt function income, which includes interest income, if any.

3. EXTERNAL FINANCING

The Fund may borrow cash, as necessary, to contribute to candidates in anticipation of employee contributions. The fund did not have any borrowings during the period January 2021 – December 2021.



Pfizer PAC

Leading the Conversation.

235 East 42nd Street,
New York, NY 10017

www.pfizer.com/about/corporate_governance/political_action_committee_report

Pfizer
Corporate Affairs
Government Relations

EXHIBIT D

(see attached)

We expect the following proposal (Item 5 on the proxy card) to be presented by shareholders at the Annual Meeting. The company is not responsible for any inaccuracies this shareholder proposal may contain. As explained below, the Board unanimously recommends that you vote "AGAINST" this shareholder proposal.

Item 5 – Report on Political Expenditures Congruency

National Center for Public Policy Research, 20 F Street NW Suite 700, Washington DC 20001, which represents that it owns at least $2,000 worth of Pfizer common stock, has notified Pfizer that it will present the following proposal at the 2022 Annual Meeting:

The Shareholder's Resolution

RESOLVED: Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political and electioneering expenditures during the preceding year against the company's fundamental purpose and publicly stated company values and policies.

SUPPORTING STATEMENT

The Pfizer Inc. Board's Governance and Sustainability Committee is responsible for "maintain[ing] an informed status on the Company's issues related to public policy, including political spending policies and practices, through ...periodic reports from management; and [for] monitor[ing] emerging issues potentially affecting the reputation of the pharmaceutical industry and the Company." Company policy states that "political contributions are made to support the election of candidates, political parties and committees that support public policies important to the industry, such as innovation and access to medicines."

However, Pfizer's politically focused expenditures appear to be misaligned with the company's purpose, values, and interests.

- Pfizer's fundamental purpose and legal duty, as a Delaware business corporation, are to maximize long-term shareholder value by deft development, production, and sale of pharmaceuticals. Yet it has supported many candidates who support government-run single-payer or universal health-care programs that will stifle innovation and resources that support research and development, all while increasing taxes exponentially.[1] This will undermine Pfizer's long-term prospects.
- Pfizer's non-discrimination policy states that "[a]ll workplace decisions are made without regard to personal characteristics protected under applicable laws and Pfizer policy, including race, age, gender, religion, etc. We do not tolerate discrimination, harassment, or retaliation of any kind."[2] Yet it has supported many candidates and advocacy organizations that support legislation and regulation that would force Pfizer and other companies into facial discrimination against white and male employees, while demeaning the talents and responsibility of other employees.
- Pfizer opposes the "use of all forms of forced, bonded, indentured, or compulsory labor," and recognizes that "the risks of modern slavery are particularly likely where our business partners rely upon migrant workers," but it supports many candidates who have failed to support legislation that would end Uyghur forced labor and who fuel the vulnerable migrant worker problem here by opposing sensible border security.[3]
- Pfizer recognizes "the rights to a healthy environment, ***life,*** health, water and sanitation, and standard of living," but it supports many candidates who oppose even minimal, common-sense pro-life policies to protect society's most vulnerable members.

Proponents believe Pfizer should establish policies and reporting systems that minimize risk to the firm's reputation and brand by addressing possible missteps in corporate electioneering and political spending that contrast with its fundamental fiduciary purpose and stated policy objectives.

Proponents recommend that the report also contain management's analysis of risks to our company's brand, reputation, or shareholder value of expenditures in conflict with publicly stated company values. "Expenditures for electioneering communications" means spending, from the corporate treasury and from PACs, directly or through a third party, at any time during the year, which are reasonably interpretable as in support of or opposition to a specific candidate.

[1] https://cdn.pfizer.com/pfizercom/investors/corporate/2019-2020_Pfizer_PAC_and_Corporate_Political_Contributions_Report.pdf; https://www.opensecrets.org/political-action-committees-pacs/pfizer-inc/C00016683/candidate-recipients/2020; https://www.congress.gov/bill/116th-congress/house-bill/1384/cosponsors; https://www.hhs.gov/sites/default/files/Reforming-Americas-Healthcare-System-Through-Choice-and-Competition.pdf; https://www.heritage.org/health-care-reform/report/the-real-price-public-health-plan-less-innovation-and-lower-quality; https://bigthink.com/videos/government-regulation-stifles-innovation; https://americansforprosperity.org/government-option-is-the-wrong-approach-to-health-care-at-the-wrong-time/; https://www.rand.org/pubs/research_reports/RR2424.html.
[2] https://cdn.pfizer.com/pfizercom/about/Human-Rights-Policy-Aug-2020.pdf.
[3] https://www.rubio.senate.gov/public/index.cfm/2021/1/rubio-merkley-colleagues-re-introduce-uyghur-forced-labor-prevention-act; https://www.washingtonexaminer.com/opinion/the-new-guard-of-the-democratic-party-absolutely-supports-open-borders; https://www.huffpost.com/entry/decriminalizing-border-crossing-democrats-2020_n_5d15884ee4b03d6116392906.

EXHIBIT E

(see attached)

Item 5 – Shareholder Proposal Regarding Political Spending Report

Tara Health Foundation, 47 Kearny Street, San Francisco, CA 94108, which represents that it owns no less than 1,840 shares of Pfizer common stock, has notified Pfizer that it will present the following proposal at the 2021 Annual Meeting:

The Shareholder's Resolution

Whereas:

The Pfizer Inc. Board's Governance and Sustainability Committee is responsible for "maintain[ing] an informed status on the Company's issues related to public policy, including political spending policies and practices, through...periodic reports from management; and [for) monitor[ing] emerging issues potentially affecting the reputation of the pharmaceutical industry and the Company." Company policy states that "political contributions are made to support the election of candidates, political parties and committees that support public policies important to the industry, such as innovation and access to medicines."

However, Pfizer's politically focused expenditures appear to be misaligned with the company's values and interests.

- Pfizer has stated that "Expanded access to health insurance coverage will help ensure that patients with under-diagnosed and undertreated conditions are able to address them; and that those who will benefit from Pfizer medicines are better able to have access to them." Yet the report Conflicted Consequences revealed that in 2018, Pfizer was a top contributor to a 527 organization that has been leading efforts to strike down the Affordable Care Act, which has made prescription drugs more accessible for millions of Americans.
- Pfizer manufactures contraceptives and a drug commonly prescribed for use as an abortifacient. Yet the above-cited report notes that Pfizer was a top contributor to a 527 organization that funds state legislators' efforts to implement extreme anti-abortion measures. The 2019 report Funding the Bans estimated that Pfizer donated more than $50,000 to politicians in six states responsible for that year's wave of abortion bans. The proponent estimates that in the last three election cycles, Pfizer and its employee PACs have made political donations totaling at least $8.4 million to politicians and political organizations working to weaken women's access to reproductive health care.
- Pfizer has committed to achieving science-based greenhouse gas reduction targets, yet is a member of the U.S. Chamber of Commerce, which has consistently lobbied to roll back specific US climate regulations and promote regulatory frameworks that would slow the transition towards a low GHG emissions energy mix. This raises questions about whether Pfizer is also supporting electioneering efforts that conflict with its environmental commitments.

Proponents believe that Pfizer should establish policies and reporting systems that minimize risk to the firm's reputation and brand by addressing possible missteps in corporate electioneering and political spending that are in contrast to its stated healthcare and environmental objectives.

Resolved:

Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political and electioneering expenditures during the preceding year against publicly stated company values and policies.

SUPPORTING STATEMENT

Proponents recommend that such report also contain management's analysis of risks to our company's brand, reputation, or shareholder value of expenditures in conflict with publicly stated company values. "Expenditures for electioneering communications" means spending, from the corporate treasury and from the PACs, directly or through a third party, at any time during the year, on printed, internet or broadcast communications, which are reasonably susceptible to interpretation as in support of or opposition to a specific candidate.

EXHIBIT F

(see attached)

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM 8-K

CURRENT REPORT

PURSUANT TO SECTION 13 OR 15(d) OF THE
SECURITIES EXCHANGE ACT OF 1934

Date of report (Date of earliest event reported): April 28, 2022

PFIZER INC.

(Exact name of registrant as specified in its charter)

Delaware	1-3619	13-5315170
(State or other jurisdiction of incorporation)	(Commission File Number)	(I.R.S. Employer Identification No.)

235 East 42nd Street 10017
New York, New York (Zip Code)
(Address of principal executive offices)

Registrant's telephone number, including area code:
(212) 733-2323

Not Applicable
(Former name or former address, if changed since last report)

Check the appropriate box below if the Form 8-K filing is intended to simultaneously satisfy the obligation of the registrant under any of the following provisions (see General Instruction A.2. below):

☐ Written communication pursuant to Rule 425 under the Securities Act (17 CFR 230.425)

☐ Soliciting material pursuant to Rule 14a-12 under the Exchange Act (17 CFR 240.14a-12)

☐ Pre-commencement communications pursuant to Rule 14d-2(b) under the Exchange Act (17 CFR 240.14d-2 (b))

☐ Pre-commencement communications pursuant to Rule 13e-4(c) under the Exchange Act (17 CFR 240.13e-4(c))

Securities registered pursuant to Section 12(b) of the Act:

Title of each class	Trading Symbol(s)	Name of each exchange on which registered
Common Stock, $.05 par value	PFE	New York Stock Exchange
1.000% Notes due 2027	PFE27	New York Stock Exchange

Indicate by check mark whether the registrant is an emerging growth company as defined in Rule 405 of the Securities Act of 1933 (§230.405 of this chapter) or Rule 12b-2 of the Securities Exchange Act of 1934 (§240.12b-2 of this chapter).

Emerging growth company ☐

If an emerging growth company, indicate by check mark if the registrant has elected not to use the extended transition period for complying with any new or revised financial accounting standards provided pursuant to Section 13(a) of the Exchange Act. ☐

Item 5.07 Submission of Matters to a Vote of Security Holders

(a) The Pfizer Inc. (the "Company") Annual Meeting of Shareholders was held on April 28, 2022.
(b) Shareholders voted on the matters set forth below.

1. The nominees for election to the Company's Board of Directors set forth in Item 1 to the Company's Proxy Statement filed with the U.S. Securities and Exchange Commission on March 17, 2022 were elected to hold office until the Company's next Annual Meeting of Shareholders, based upon the following votes:

Nominee	Votes For	Votes Against	Abstentions	Broker non-vote
Ronald E. Blaylock	3,701,357,646	97,026,302	10,925,480	849,628,501
Albert Bourla	3,577,655,169	204,869,446	26,783,357	849,628,501
Susan Desmond-Hellmann	3,744,546,772	54,872,805	9,887,325	849,628,501
Joseph J. Echevarria	3,315,350,611	483,108,900	10,848,394	849,628,501
Scott Gottlieb	3,775,202,986	23,651,661	10,414,283	849,628,501
Helen H. Hobbs	3,704,020,993	95,742,430	9,505,507	849,628,501
Susan Hockfield	3,773,537,829	25,701,939	10,029,162	849,628,501
Dan R. Littman	3,741,506,546	57,146,873	10,615,511	849,628,501
Shantanu Narayen	3,766,994,058	31,021,763	11,292,326	849,628,501
Suzanne Nora Johnson	3,605,854,757	193,599,113	9,854,277	849,628,501
James Quincey	3,729,849,039	68,041,486	11,406,359	849,628,501
James C. Smith	3,694,497,573	103,133,820	11,676,754	849,628,501

2. The proposal to ratify the selection of KPMG LLP as the Company's independent registered public accounting firm for the 2022 fiscal year was approved based upon the following votes:

Votes for approval	4,440,636,499
Votes against	204,291,133
Abstentions	14,009,991
Broker non-votes	n/a

3. The proposal to approve, on an advisory basis, the compensation of the Company's Named Executive Officers was approved based upon the following votes:

Votes for approval	3,509,011,827
Votes against	275,230,428
Abstentions	25,057,788
Broker non-votes	849,628,501

4. The shareholder proposal regarding amending proxy access was not approved based upon the following votes:

Votes for approval	1,096,172,490
Votes against	2,686,465,588
Abstentions	26,655,147
Broker non-votes	849,628,501

5. The shareholder proposal regarding report on political expenditures congruency was not approved based upon the following votes:

Votes for approval	393,729,907
Votes against	3,387,577,521
Abstentions	27,996,591
Broker non-votes	849,628,501

6. The shareholder proposal regarding report on transfer of intellectual property to potential COVID-19 manufacturers was not approved based upon the following votes:

Votes for approval	1,023,141,083
Votes against	2,714,524,824
Abstentions	71,640,637
Broker non-votes	849,628,501

7. The shareholder proposal regarding report on board oversight of risks related to anticompetitive practices was not approved based upon the following votes:

Votes for approval	1,138,551,810
Votes against	2,600,688,619
Abstentions	70,069,294
Broker non-votes	849,628,501

8. The shareholder proposal regarding report on public health costs of protecting vaccine technology was not approved based upon the following votes:

Votes for approval	325,762,383
Votes against	3,415,442,745
Abstentions	68,096,240
Broker non-votes	849,628,501

SIGNATURE

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

PFIZER INC.

By: /s/ Margaret M. Madden
Margaret M. Madden
Senior Vice President and Corporate Secretary
Chief Governance Counsel

Dated: May 2, 2022

Sanford Lewis & Associates

PO Box 231
Amherst, MA 01004-0231
413 549-7333
sanfordlewis@strategiccounsel.net

January 17, 2023

Via electronic mail

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Shareholder Proposal to Pfizer Inc. Regarding Political Contributions Congruency by Tara Health Foundation

Ladies and Gentlemen:

Tara Health Foundation has submitted a shareholder proposal (the "Proposal") to Pfizer Inc. (the "Company"). We have been asked by the Proponent to respond to the letter dated December 16, 2022 ("Company Letter") sent to the Securities and Exchange Commission by Margaret M. Madden, Senior Vice President and Corporate Secretary. In that letter, the Company contends that the Proposal may be excluded from the Company's 2023 proxy statement.

We have redacted personal information consistent with the Staff's guidance. A copy of this letter is being emailed concurrently to Margaret M. Madden at margaret.m.madden@pfizer.com.

SUMMARY

The Proposal requests that the Company issue a report analyzing the congruency of its political expenditures against its own publicly stated company values, including its stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." The Supporting Statement further recommends that the report contain an analysis of the risk posed to the Company brand, reputation, or shareholder value in making political expenditures that conflict with the Company's publicly stated goals and values. The full proposal is appended.

Following the *Dobbs v. Jackson Women's Health Organization* decision and the enablement of state laws prohibiting access to abortion, the proposal notes that it appears that Pfizer's political contributions are in stark conflict with its stated goal to "ensure… access to reproductive health." This should be of concern to the Company's investors as Pfizer is donating to extremist politicians and committees undertaking policy initiatives in conflict with the Company's publicly stated values, product offerings, and reputation. The "instruments of shareholder democracy," here, seeking disclosure of how the board is navigating these incongruities, are the critical tool reserved for protection of shareholder risk management and free speech interests.

The Company Letter asserts that the Proposal has been substantially implemented under Rule 14a-8(i)(10) and constitutes an excludable resubmission of previous proposals under Rule 14a-8(i)(12).

However, the Proposal has not been substantially implemented. The Company's existing actions have met neither the guidelines nor the essential purpose of the Proposal. Although the Company does some reporting on its analysis of congruency of contributions to trade associations, that analysis does not focus on the focal issue of the Proposal and further there is no analysis of the congruency of Pfizer's political donations. Year after year, Pfizer has apparently donated to candidates that conflict with the Company's interests, particularly candidates who have actively worked to eliminate women's rights to reproductive healthcare. Yet, there is no analysis provided regarding the congruency of supporting these political candidates, several of whom have led the fight to constrain reproductive rights in their states.

Further, the Proposal does not constitute resubmission under Rule 14a-8(i)(12) because it focuses on a materially different subject matter than previous shareholder proposals voted upon at the Company. The prior proposals were not focused principally on congruency of political contributions with the Company's stake in the issue of reproductive rights. The distinguishing importance of the focal issue of this contributions congruency proposal is evidenced by the dramatically different votes on prior proposals due to the dramatically different focal issues in the background statements, with the 2021 proposal receiving 47% support and the 2022 proposal receiving only 10% support. It is evident that investors recognize the difference between the prior proposals and that it is entirely appropriate to allow them the opportunity to vote on the subject matter of the current Proposal.

ANALYSIS

In the 2010 Citizens United ruling, the Supreme Court declined to support a ban on electioneering spending by corporations and trade associations despite the "[g]overnment's asserted interest in protecting shareholders from being compelled to fund corporate speech." The ruling suggested that that disclosure and shareholder democracy are sufficient to defend the risk management and free-speech rights of shareholders. Disclosure of political spending, Justice Kennedy wrote, "can provide shareholders…with the information needed to hold corporations…accountable," and "to react to the speech of corporate entities in a proper way."

Thus, corporate support of politicians through PACs, and via dark money organizations enabled by the Citizens United decision, has elevated the importance of shareholder oversight of corporate political spending. The courts have recognized the interest of investors in using the instruments of shareholder democracy, including transparency and voting on proposals like the present one, to ensure accountability on corporate political spending. Of particular concern is the prospect that a corporate board or management might use the corporate treasury or PAC to support personal favorite politicians or organizations that support extremist positions out of line with the company's interests and professed values, and also out of line with the company's own consumer's perspectives.

In June of 2022, the Supreme Court overturned longstanding precedent in *Roe v. Wade* and the subsequent patchwork of state laws has shifted the legal landscape for reproductive health.

Pfizer has a proactive commitment to women's rights and health, and produces products that are used in medication abortions, yet it has apparently supported numerous politicians that are leading or supporting legislative efforts to restrict reproductive rights.

The Proposal focuses on this issue. As noted in the background section of the Proposal, Pfizer's political donations appear to contradict its stated goal to "ensure… access to reproductive health." The Proposal notes that Pfizer's political donations also appear to contradict its own interests. Pfizer manufactures contraceptives and a medication commonly prescribed for medication abortion. However, since the start of the 2020 election cycle, the Proponent estimates that Pfizer and its employee PACs have donated at least $5 million to politicians and organizations that are actively working to weaken access to reproductive health. In the South, Pfizer donated to anti-choice state candidates at a ratio of 3:1 to its donations to other candidates and to anti-choice federal candidates at a ratio of 2:1. The Company continues to donate to politicians who are working to make access to Pfizer's product more difficult or even illegal. For example, Pfizer contributed to multiple sponsors of 2022 bills in Tennessee and Louisiana which restrict access to medication abortion.[1]

This apparent incongruence has been scrutinized by publications such as STAT, Bloomberg News, Huffington Post, The Minnesota Daily, CQ ESG Briefing, Agenda (a Financial Times publication) and Forbes.

Accountability is necessary where the board and management appear to be supporting politicians who are advancing major policy initiatives that are contrary to the Company's interested and articulated values. The failure of the board or management to explain why these incongruities are acceptable to the Company is a strong impetus for investors to support the current Proposal and to clarify whether and why the board and management may believe that maintaining support for such political leaders is consistent with investor interests.

I. The Proposal has not been substantially implemented.

In order for the Company to meet its burden of proving substantial implementation pursuant to Rule 14a-8(i)(10), it must show that its activities meet the guidelines and essential purpose of the Proposal. The Staff has noted that a determination that a company has substantially

[1] In addition, Pfizer was a top contributor to a 527 organization that lead the effort to strike down the Affordable Care Act, which has made prescription drugs, such as the ones manufactured by Pfizer, more accessible for millions of people. Pfizer also contributes to PhRMA, which donates to numerous organizations which oppose the congressional efforts to reform drug pricing.

implemented a proposal depends upon whether a company's particular policies, practices, and procedures compare favorably with the guidelines of the proposal. *Texaco, Inc.* (Mar. 28, 1991). Substantial implementation under Rule 14a-8(i)(10) requires a company's actions to have satisfactorily addressed both the proposal's guidelines and its essential objective. See, e.g., *Exelon Corp.* (Feb. 26, 2010).

Thus, when a company can demonstrate that it has already taken actions that meet most of the guidelines of a proposal and meet the proposal's essential purpose, the Staff has concurred that the proposal has been "substantially implemented." In the current instance, the Company has substantially fulfilled *neither* the guidelines nor the essential purpose of the Proposal.

A. The essential objective of the proposal, Pfizer's political contribution congruency related to its own stated goals, especially regarding reproductive rights, has not been addressed by the Company.

The Company argues that it has substantially implemented the Proposal and it describes the Proposal's "essential objective" as being "to obtain a report from Pfizer on how its political expenditures align with Pfizer's stated values and policies." This distorts the Proposal's essential objective. The Resolved Clause itself requests a report on congruency of political expenditures **specifically against Pfizer's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access for reproductive health.**"

The background section of the Proposal also speaks to the primacy of reproductive rights as an essential focus of the Proposal. All of the background information provided focuses on women's rights and reproductive healthcare. It appears from available information that Pfizer's political donations are not congruent with its stated goal to "end discrimination against women, ensure equal opportunities for leadership and access for reproductive health." Existing disclosures referenced by the Company do not appear to provide an assessment of the congruency of its political contributions in support of politicians that are leading the effort to restrict reproductive rights.

As explained in the Proposal, Pfizer has donated to an organization which led efforts to strike down the Affordable Care Act, to politicians and organizations who worked to limit women's access to reproductive healthcare, and even disproportionately donated to anti-choice candidates in the South.

Pfizer manufactures contraceptives and a drug commonly prescribed for use as an abortifacient. The contradictory and potentially self-defeating impact of Pfizer's support for anti-choice politicians has been noted in media coverage.[2]

The Sustainable Investments Institute ("SI2") found that Pfizer was a top funder of anti-abortion candidates in states banning abortion with $357,699 in donations in the last two election

[2] https://www.businessinsider.com/healthcare-corporations-and-pharma-give-big-to-anti-abortion-movement-2022-5

cycles. SI2 also found that Pfizer was a top contributor to five attorneys general who played key roles in the effort to ban abortion.[3]

In the last two election cycles, Pfizer's expenditures in the South and Midwest have been largely in favor of anti-choice candidates. 74% of Pfizer's political donations in the South and 66% of its donations in the Midwest went to anti-choice politicians.[4]

The above review of numerous unexplained political contributions which are in direct contrast to company policies and values demonstrates the need for investors to demand accounting from the board on its apparent failure to evaluate and manage significant incongruencies in political contributions.

B. The Company's current disclosures are insufficient to satisfy the request of the Proposal.

While the Company argues substantial implementation, it admits throughout the no-action letter that its Congruency Report addresses only trade associations. Pfizer implemented this Congruency Report after a previous shareholder proposal received significant support from shareholders. However, this report does not satisfy the request of the Proposal because there is no discussion of the congruency of the $1,333,025 Pfizer donated to candidates and political committees.[5]

Instead, for donations to candidates and political committees, the Company publishes only the Pfizer PAC and Corporate Contributions Report (the "Political Contributions Report"). This is distinct from the Congruency Report because it focuses on the amounts given to individual candidates, but it does not address the incongruence of donations. The Company argues that this report explains Pfizer's rationale and motivation for making such political expenditures.

First, the report does not actually provide the rationale and motivation for any particular candidate and instead gives broad rationale such as "candidates of both political parties who support state and federal policies that impact [Pfizer's] purpose: Breakthroughs that change patients' lives." This statement of the company's internal policy for deciding how to direct political contributions is not equivalent to a statement by management explaining glaring incongruities in donations, some of which might threaten to overwhelm the benefits to the company associated with company donations.

As important as the decision to donate money to a candidate is, the discernment involved in recognizing the congruency and in deciding to halt donations to candidates because their actions do not align with the Company's stated goals and policies is equally important. While the Company may support politicians who advance company-supportive policies on some matters, if those same politicians are well known as leaders of policy initiatives that directly undercut

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[3] Divided States of America - Heavily Tilted Company Support for State Abortion Ban Politicians (October 17, 2022) Heidi Welsh, https://siinstitute.org/reports.html
[4] Id.
[5] Pfizer's PAC and Corporate Political Contributions Report, available at https://cdn.pfizer.com /pfizercom/investors/corporate/2021_Pfizer_PAC_and_Corporate_Political_Contributions_Report.pdf at Page 58.

company interests or values, investors may appropriately ask for an explanation of whether support for those individuals is appropriate and congruent and can reasonably, through this Proposal, seek explanation from management.

Investors have a right to transparency when Pfizer chooses to donate money to a candidate or committee which makes decisions that harm Pfizer's publicly stated goal and its own product offerings.

The existing reports from the Company do not analyze the incongruence of the donations to politicians. Proponents believe that Pfizer should establish policies and reporting systems that minimize risk to the firm's reputation and brand by providing an accounting of any possible missteps in corporate electioneering and political spending in the prior year that are in contrast to its stated healthcare and environmental objectives, and ensuring midcourse corrections when needed.

Under the framework of the Proposal, it does not rest with the Proponent to determine which donations were incongruent; rather it rests with the company to explain the incongruence of specific donations, and what overriding considerations cause it to provide donations despite incongruent voting records of some donation recipients.

The Proponent believes that these examples illustrate that while the Company may have put in place evaluation procedures in advance of making political contributions, the Company has not published an analysis explaining its assessments of congruency and whether and where it is making exceptions in contributions between its stated values priorities and the contributions to political candidates and campaigns.

Review of Staff precedents confirms that failure to publish a core analysis requested by a Proposal, especially on political contributions, precludes substantial implementation.

The Staff has confirmed repeatedly that proposals will not be excluded despite a claim of substantial implementation if a core analysis requested by the proposal has not been performed and published.

The courts have long acknowledged the challenges posed by the corporate form that board and management might use the corporate treasury to advance their own political predilections, and therefore the right of shareholders to weigh in and demand transparency. For instance, in *Medical Committee for Human Rights v. SEC,* 432 F.2d 659 (D.C. Cir. 1985) in which the D.C. Circuit Court found that shareholder proposals are proper (not ordinary business) when they raise issues of corporate social responsibility or question the unaccountable exercise of "political and moral predilections" of board or management in the management of the company.

In more recent years, this responsibility and right of shareholders was amplified and echoed by Justice Anthony Kennedy in *Citizens United*, who described the need and potential for shareholders to hold their companies accountable for misdirected corporate political spending. The *Citizens United* majority wrote that the rights of shareholders dissenting to political spending by board and management would be protected "through the procedures of corporate democracy." *Citizens United*, 558 U.S. 310 (2010).

Since *Citizens United,* institutional and individual investors and coalitions have recognized their responsibility to monitor political spending transparency and to demand disclosure across all publicly traded companies. A rulemaking petition to the SEC for standardized mandatory disclosure of corporate political spending, including disclosure of trade association funding and other lobbying initiatives, received a record level of support: more than 1.2 million comment letters have been submitted on the petition, the vast majority in support of the proposed rule.[9]

A key staff precedent is *CVS Health Corporation* (February 9, 2015, recon denied, March 23, 2015) where the company made similar assertions on a very similar proposal requesting a report on congruency between the corporate values and electioneering contributions. CVS had asserted that the Company's existing disclosures of amounts contributed to candidates would allow shareholders to assess for themselves the issues of congruency should they choose to. ***Proponents successfully argued that since the essential purpose of the Proposal is for the management to publish its own analysis of the congruency of its donations and to explain the exceptions made, the Company's actions fail to constitute substantial implementation for purposes of Rule 14a-8(i)(10).*** *The same is true in the present instance.*

Strict scrutiny of substantial implementation in proposals on political contributions

The Staff has utilized rigorous standards in assessing substantial implementation on proposals relating to political contributions and lobbying, because these are issues that are of major concern to many investors, and implicated by *Citizens United* as issues meriting engagement through the "instruments of shareholder democracy."

Investors have frequently asserted in recent years that in light of the Supreme Court ruling of *Citizens United* and ongoing public backlash against corporate political spending, disclosure of how companies are managing these issues and risks of merits rigorous and comparable disclosure for shareholders to assess potential exposure to risks caused by our future electioneering contributions.

Numerous efforts by companies to claim substantial implementation of political spending disclosure proposals when the companies had only done disclosure that partially fulfilled the request have been rejected by the Staff. For example, see *NextEra Energy, Inc.* (February 24, 2020); *Exxon Mobil Corp.* (April 2, 2019); *Goldman Sachs Group, Inc.* (March 14, 2013*); EQT Corp.* (January 23, 2013); *Nike, Inc.* (July 5, 2012); *Southwestern Energy Co.* (March 15, 2011); *The Boeing Co.* (February 14, 2011); *Citigroup Inc.* (March 9, 2007); *Bristol-Myers Squibb Co.* (February 18, 2005); *Exxon Mobil Corp.* (March 5, 2004); *Wells Fargo Co.* (February 11, 2004). For instance, in *Nike, Inc.* (July 5, 2012) the company's failure to provide a breakdown of itemized political contributions, as was requested in that proposal, led the SEC Staff to find that the company had not substantially implemented the proposal.

In addition, numerous other company attempts to exclude proposals under Rule 14a-8(i)(10) have failed where the company has provided public disclosure of some, but not all, of the elements of reporting requested. See for instance *Marathon Oil Corporation* (January 22, 2013); *Dominion Resources, Inc.* (February 28, 2014), *Nike, Inc.* (July 5, 2012) (requesting reports on lobbying or political contributions and expenditures).

Internal assessment without disclosure of core requested elements does not constitute substantial implementation

A request for publication of an assessment, even if the assessment may have been conducted internally but not published, does not yield substantial implementation on a proposal seeking reporting. For instance, in *McDonalds Corp.* (March 14, 2012) the proposal requested the board issue a report assessing the company's policy responses to growing evidence of linkages between fast food and childhood obesity, diet related diseases and other impacts on children's health. The proposal also specified that the report should include an assessment of the potential impacts of public concerns and evolving public policy on the company's finances and operations. The company's substantial implementation argument was rejected, even though the company may have internally or implicitly conducted some of the assessments requested by the Proposal. Its reporting to shareholders did not fulfill the guidelines of the Proposal in disclosure of an assessment.

II. The Proposal is not an excludable resubmission because it does not deal with the same subject matter as previous shareholder proposals at the Company.

Rule 14a-8(i)(12), the resubmission exclusion, provides that a shareholder proposal may be excluded from a company's proxy materials if it "addresses substantially the same subject matter as a proposal, or proposals, previously included in the company's proxy materials within the preceding five calendar years if the most recent vote occurred within the preceding three years," and the proposal received "[l]ess than 15 percent of the votes cast if previously voted on twice."

The Company argues that current Proposal addresses substantially the same subject matter as the 2021 Proposal, also filed by Tara Health, and the 2022 Proposal, filed by the National Center for Public Policy Research.

In 2022, the proposal submitted by the National Center for Public Policy Research received 10.41% of the vote, a stark contrast to the 47.2% vote of the 2021 Tara Health (current proponent) proposal that Pfizer argues addresses substantially the same subject matter.

Each of the three Proposals are distinct. The 2021 Proposal requested a congruency report on Pfizer's political contributions due to the Company's apparent misalignment in contributions and its publicly stated values and interests including the Affordable Care Act, Pfizer's contraceptive and abortifacient medications, and its commitment to greenhouse gas reduction targets.

In contrast, the 2022 Proposal requested a congruency report based on that proponent's argument that Pfizer's contributions were misaligned because of allegations that supporting universal health-care programs would stifle innovation and resources; that Pfizer's nondiscrimination policy would force the company to discriminate against white and male employees; that Pfizer's contributions went to candidates who did not support legislation to end Uyghur forced labor or "sensible border security"; and finally, that Pfizer supports candidates "who oppose even minimal, common-sense pro-life policies to protect society's most vulnerable members." For most of these issues, the 2021 and 2022 Proposals take completely opposing stances on major topics - which is the best available explanation for the dramatic shift in voting support among shareholders.

While the 2021 and 2022 Proposals share the same resolved clause, the 2023 Proposal has a distinct resolved clause to reflect the core focus of the Proposal. Looking at the background section of the three proposals shows even more contrast, with the 2023 Proposal focusing entirely on reproductive health. In response to the significant *Dobbs v. Jackson Women's Health Organization* decision, the Proponent in the 2023 Proposal is requesting that Pfizer provide transparency to its shareholders on how it is ensuring that its political contributions align with its publicly stated goal to "ensure . . . access to reproductive health." This subject matter is distinct from the previous proposals.

Unlike the current Proposal, in the precedents cited by the Company, the resubmitted proposals focused on the same substantive core concerns. For example, in *Exxon Mobil Corporation* (March 15, 2022), the proposals at issue were so similar that the Company was able to create a chart showing that the only edits to the proposals were minor additions or deletions and the four proposals all had identical resolved clauses. Similarly, in *Alphabet Inc.* (April 16, 2019), the proposals at issue were virtually identical, with only minor additions or edits, in both the resolved clause and supporting statements. In *JPMorgan Chase & Co.* (January 27, 2017), the proposals at issue were so similar that the proponent even stated in this proposal, "this resolution drew scant support last year." It is clear that these proposals had the same substantive concerns because the proposals shared nearly identical language. That is not the case here because the proposals have different resolved clauses and the background sections of the current Proposal raises a unique subject matter concern.

In another precedent cited by the Company, *Apple Inc.* (November 20, 2018), the proposals addressed the same policy concern regarding human rights implications of the Company's operations in China. In contrast, the current Proposal addresses a different policy concern than the previously submitted proposals.

The shareholders in the cited precedent had multiple years to vote on the nearly identical proposals and they made their lack of interest in the proposals obvious. In contrast, this Proposal provides an opportunity for investor support on the hot button issue of the Company's incongruent political expenditures that undermines reproductive rights.

The Proponent further notes the twisted effect that would result from the Company's argument – a proponent could effectively stifle the voice of a future proponent with a different perspective by filing a shareholder proposal on an issue that is peppered with arguments that are counter to prevalent perspectives of investors and therefore fails miserably. The point of the resubmission rule is to maintain efficiency by preventing yearly resubmissions of a proposal that clearly does not evoke shareholder interest. It would be counterproductive to prevent submission of a new proposal which contains an entirely different subject matter and perspective.

The purpose of the resubmission rule as articulated by the Staff is to relieve the management of the necessity of including proposals which have been previously submitted to security holders without evoking any substantial security holder interest therein. This purpose is not served by excluding the 2023 proposal. Based on the drastic contrast in shareholder support, it is evident that shareholders recognize the difference between the two previous proposals, and that regardless, the current proposal with its focus on congruency of company contributions affecting reproductive rights is a substantially different core focus from both of the prior proposals submitted at the Company in the past five years and therefore it is not eligible for exclusion.

CONCLUSION

The Company has not met its burden that the Proposal is excludable under Rule 14a-8(i)(10) or Rule 14a-8(i)(12). Therefore, we request that the Staff inform the Company that the SEC proxy rules require denial of the Company's no-action request. Please call me at (413) 549-7333 with respect to any questions in connection with this matter, or if the Staff wishes any further information.

Sincerely,

Sanford Lewis

Brittany Blanchard Goad

cc: Margaret M. Madden

POLITICAL CONTRIBUTIONS MISALIGNMENT

Whereas:

Pfizer has stated "political contributions are made to support the election of candidates, political parties and committees that support public policies important to the industry, such as innovation and access to medicines," and "[w]e aim to end discrimination against women, ensure equal opportunities for leadership and access to reproductive health."

However, Pfizer's political expenditures appear to be misaligned with the company's stated values and interests.

Pfizer has stated that "Expanded access to health insurance coverage will help ensure that patients with under-diagnosed and undertreated conditions are able to address them; and that those who will benefit from Pfizer medicines are better able to have access to them." Yet in 2018, Pfizer was a top contributor to a 527 organization leading efforts to strike down the Affordable Care Act, which has made prescription drugs more accessible for millions, and contributes to PhRMA, which donates to numerous organizations opposing congressional efforts to reform drug pricing.

Pfizer manufactures contraceptives and a drug commonly prescribed for medication abortion. Yet the proponent estimates that since the beginning of the 2020 election cycle, Pfizer and its employee PACs have donated at least $5 million to politicians and political organizations working to weaken women's access to reproductive health care. In the South during this period, Pfizer's contributions to anti-choice state candidates exceeded those to other candidates by a ratio of 3:1, and its contributions to anti-choice federal candidates exceeded those to other candidates by a ratio of 2:1. For example, Pfizer contributed to multiple sponsors of bills passed in 2022 in Tennessee and Louisiana that will restrict access to medication abortion.

This pattern spending has drawn scrutiny from STAT, Bloomberg News, Huffington Post, The Minnesota Daily, CQ ESG Briefing, Agenda (a Financial Times publication) and Forbes.

Proponents believe Pfizer should establish policies and reporting systems that minimize risk to reputation and brand by addressing possible missteps in corporate electioneering and political spending that contrast with its stated healthcare objectives.

Resolved: Pfizer publish an annual report, at reasonable expense, analyzing the congruency of political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies, including Pfizer's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." Such a report should list and explain any instances of incongruent expenditures, and state whether the identified incongruencies have led to a change in future expenditures or contributions.

Supporting Statement:

Proponents recommend that such report contain management's analysis of risks to our company's brand, reputation, or shareholder value of expenditures in conflict with publicly stated company values. “Electioneering expenditures" means spending, from the corporate treasury and from the PACs, directly or through a third party, at any time during the year which are reasonably susceptible to interpretation as in support of or opposition to a specific candidate.

Margaret M. Madden
Senior Vice President and Corporate Secretary
Chief Governance Counsel

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BY EMAIL (shareholderproposals@sec.gov)

January 24, 2023

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

RE: Pfizer Inc. – 2023 Annual Meeting
Supplement to Letter dated December 16, 2022
Relating to Shareholder Proposal of
Tara Health Foundation and Louise Davis

Ladies and Gentlemen:

We refer to our letter dated December 16, 2022 (the "No-Action Request"), pursuant to which we requested that the Staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") concur with our view that the shareholder proposal and supporting statement (the "Proposal") submitted by Tara Health Foundation ("Tara Health") and co-filed by Nia Impact Capital, on behalf of Louise Davis, may be excluded from the proxy materials to be distributed by Pfizer Inc., a Delaware corporation ("Pfizer"), in connection with its 2023 annual meeting of shareholders (the "2023 proxy materials"). Tara Health and Ms. Davis are collectively referred to as the "Proponents."

This letter is in response to the letter to the Staff, dated January 17, 2023, submitted on behalf of Tara Health (the "Proponents' Letter"), and supplements the No-Action Request. In accordance with Rule 14a-8(j), a copy of this letter also is being sent to the Proponents.

The Proponents' Letter argues that the Proposal is not an excludable resubmission under Rule 14a-8(i)(12) because it does not deal with the same subject matter as the 2022 and 2021 proposals voted on by Pfizer's shareholders (together, the "Prior Proposals"). The Proponents' Letter also claims that the Proposal has not been substantially implemented by Pfizer and thus may not be excluded under Rule 14a-8(i)(10). Neither argument is persuasive.

I. The Proposal Deals with Substantially the Same Subject Matter as the Prior Proposals.

In arguing that the Proposal does not address substantially the same subject matter as the Prior Proposals, the Proponents' Letter mischaracterizes the Proposal as "focus[ed] entirely on reproductive health." This characterization requires ignoring the plain text of the Proposal.

The Proposal, seeking a report on the congruency of Pfizer's political expenditures with Pfizer's stated values and policies, references at least six different "stated values and policies" of Pfizer. Alongside the discussion of (1) reproductive health, the Proposal references Pfizer stated values such as (2) "innovation," (3) "access to medicines," (4) "end[ing]discrimination against women," (5) "ensur[ing] equal opportunities for leadership" and (6) "[e]xpand[ing] access to health insurance coverage." The Proposal text clearly conveys that Pfizer has a number of publicly stated values and policies and provides no basis to conclude that the Proposal focuses on a single publicly stated value or policy to the exclusion of other publicly stated values and policies.

The variety of publicly stated values and policies referenced in the Proposal is entirely consistent with the Proposal's resolved clause, which not only does not contain any limitation on the analysis to a single publicly stated value or policy but sets forth as examples three different publicly stated values and policies to be included in any analysis – "publicly stated company values and policies, including Pfizer's stated goal to 'end discrimination against women, ensure equal opportunities for leadership and access to reproductive health.'" Moreover, this resolved clause remains substantively unchanged from the Prior Proposals, simply adding an "including" clause to provide examples of publicly stated values and policies (three examples, to be precise). Like the Prior Proposals, the Proposal is not focused on a single policy issue and the decision to append an "including" clause does nothing to limit the substantive concern of the Proposal to the congruency of Pfizer's political expenditures exclusively with one of the three examples set forth in the "including" clause.

As described in the No-Action Request, where proposals address the same substantive concern, the Staff has concluded that the proposals cover substantially the same subject matter. Here, all three proposals express the same substantive concern, namely "the congruency of [Pfizer's] political . . . expenditures" with "publicly stated company values and policies." The fact that the Staff determined, and Tara Health acknowledged, less than a year ago that a proposal nearly identical to the current Proposal was substantially duplicative of the 2022 proposal under Rule 14a-8(i)(11) is further indication of the substantial similarity between the Proposal and the 2022 proposal. To accept the Proponents' argument that the Proposal is unique and only about reproductive health would require the Staff to ignore the actual text of the Proposal and its own prior determination regarding the substantial overlap between two of the proposals under consideration.

The Proponents' Letter also attempts to draw a conclusion regarding the "drastic contrast in shareholder support" received by the Prior Proposals as definitive evidence that the two Prior Proposals are substantially different. This conclusion is not only baseless, but it ignores the most logical explanation – shareholders became less concerned about this topic following Pfizer's responsive actions to the vote on the 2021 proposal. Regardless of investors' motives for voting differently in 2022, shifting levels of shareholder support does not alter the language of the proposals, each of which expresses the same concern with consistency between Pfizer's political expenditures and its stated values and policies. Because the Proposal and the Prior Proposals address substantially the same subject matter, and the shareholder vote on the 2022 proposal was less than 15% of the votes cast, the Proposal is excludable under Rule 14a-8(i)(12)(ii) for failing to receive the requisite shareholder support.

II. Pfizer Has Substantially Implemented the Proposal.

The Proponents' Letter also misinterprets the Staff's view on the substantial implementation basis for exclusion. The Proponents' Letter details the perceived shortcomings of Pfizer's extensive disclosures regarding the alignment of its political expenditures with its stated values and policies, claiming that "strict scrutiny of substantial implementation" is warranted where proposals relate to political contributions and lobbying. This view has no basis in either law or Staff no-action decisions. The substantial implementation test under Rule 14a-8(i)(10) does not require differing levels of scrutiny depending on subject matter. As noted in the No-Action Request, a company may exclude a proposal pursuant to Rule 14a-8(i)(10) if the company has already substantially implemented the proposal. Applying this standard, the Staff consistently has permitted the exclusion of a proposal when it has determined that the company's policies, practices and procedures or public disclosures compare favorably with the guidelines of the proposal. Moreover, as demonstrated in countless no-action determinations, the Staff also has permitted exclusion under Rule 14a-8(i)(10) where a company already addressed the underlying concerns and satisfied the essential objectives of the proposal, even if the proposal had not been implemented exactly as proposed by the proponent. As elaborated above, the substantive concern of the Proposal is disclosure about political expenditure congruency generally, and not with respect to any one particular value or policy issue.[1] Accordingly, the appropriate inquiry is whether Pfizer's political expenditure congruency disclosures as a whole—not solely those disclosures with respect to reproductive rights—compare favorably with the disclosures requested in the Proposal. As described in the No-Action Request, Pfizer has satisfied the Proposal's essential objective of providing disclosure regarding political expenditure congruency, and given the nature and extent of Pfizer's reporting, such

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1 We note the Proponents' Letter discussion of the Supreme Court's decision in *Citizens United*. To the extent that the Proponents are concerned with Pfizer's contributions to 527 Issue Organizations, as stated in the No-Action Request, Pfizer discloses in its Political Contributions Report that (i) it traditionally does not make contributions to 527 Issue Organizations, and if such a contribution is requested, such expenditures must be reviewed and approved by the Political Contributions Policy Committee and subsequently disclosed and (ii) it has determined that it will not make any direct independent expenditures. The Political Contributions Report also notes that the decision to refrain from making direct independent expenditures has been discussed at the executive level as well as with the Governance & Sustainability Committee of Pfizer's Board.

disclosures compare favorably with those requested by the Proposal. Accordingly, the Proposal is excludable under Rule 14a-8(i)(10).

For the reasons stated above and in the No-Action Request, we respectfully request that the Staff concur that it will take no action if Pfizer excludes the Proposal from its 2023 proxy materials.

Should the Staff disagree with the conclusions set forth in this letter, or should any additional information be desired in support of Pfizer's position, we would appreciate the opportunity to confer with the Staff concerning these matters prior to the issuance of the Staff's response. Please do not hesitate to contact me at (212) 733-3451 or Marc S. Gerber of Skadden Arps, Slate, Meagher & Flom LLP at (202) 371-7233.

Very truly yours,

Margaret M. Madden

Margaret M. Madden

Enclosures

cc: Shelly Alpern
Director of Corporate Engagement

Meredith Benton

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February 6, 2023

Via electronic mail

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Supplemental Response Regarding Shareholder Proposal to Pfizer Inc. Regarding Political Contributions Congruency by Tara Health Foundation

Ladies and Gentlemen:

Tara Health Foundation has submitted a shareholder proposal (the "Proposal") to Pfizer Inc. (the "Company"). We previously responded to the Company's No-Action Request of December 16, 2022 on January 17, 2023.

We have been asked by the Proponent to respond to the letter dated January 24, 2023 ("Company Supplemental Letter") sent to the Securities and Exchange Commission by Margaret M. Madden, Senior Vice President and Corporate Secretary. In that letter, the Company supplements its No-Action Request provided on December 16, 2022 (the "No-Action Request"). A copy of this letter is being emailed concurrently to Margaret M. Madden at margaret.m.madden@pfizer.com.

We are grateful for the opening provided by the Supplemental Letter to add additional information to the decision-making record on this No-Action Request. Prompted by the Supplemental Letter, we re-examined the record of the company's actions and the requests of the proposal. We stand by our original arguments, and appreciate the opportunity to provide additional analysis for the Staff's consideration.

The Company's original letter and supplement assert that its existing actions implement the Proposal. But further examination of the Company's actions demonstrates that there is no support for the idea that the current proposal is substantially implemented - the Company has not conducted the actions requested by the guidelines of the proposal. The clear and compelling evidence for lack of substantial implementation also demonstrates clearly that the *subject matter of the proposal* is not the same as prior submitted proposals on which the company bases its resubmission argument.

In this instance, **the Proposal's clear focus on the element of women's reproductive and economic rights** resoundingly rebukes both the substantial implementation and resubmission arguments. There is no evidence provided by the Company that it implemented the focal question raised by the proposal in assessing congruency of either trade association or political contributions on the issue of reproductive rights, and as we will show further below, there is ample evidence of the need for such an assessment.

Substantial Implementation

The Proposal requests that the Company publish an annual report, at reasonable expense, analyzing the congruency of political, lobbying, and electioneering expenditures during the preceding year against publicly stated company values and policies, including Pfizer's stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." Such a report should list and explain any instances of incongruent expenditures, and state whether the identified incongruencies have led to a change in future expenditures or contributions.

Congruency with rights to contraception and reproductive health not evaluated in existing reporting

The Supplemental Letter from the Company which alleged that shareholder support previously declined for the 2022 congruency proposal due to the Company's "responsive actions." Further evaluation demonstrates that it certainly does not implement the current Proposal, because it was not prepared with an eye toward the current proposal's focal issue which includes reproductive rights. We can find no evidence whatsoever of any action by the company that would appear to evaluate the congruence of contributions against the request of the proposal to assess against Pfizer's stated goal to "ensure … access to reproductive health."

Pfizer produces and sells one of the leading birth control products, the injectable product, Depo-Provera. The apparent incongruence in its support for politicians that have opposed contraception rights makes the Proposal's request for ongoing reporting on this issue a necessity.

In its 2021 ESG report, the Company touts its role as is a producer of contraceptive products, including Sayana® Press, Pfizer's long-acting, injectable and reversible contraceptive. As the Company notes in the report, page 21:

> The all-in-one prefilled, single-use, auto-disable system eliminates the need to prepare a needle and syringe. It also allows the contraceptive to be administered by a health worker outside of a clinical setting, or it can be self-injected if approved locally and after health care worker instruction.

Notably, the Company website highlights the manner in which this product improves contraceptive access, particularly for low income women:

> Because of its unique contraceptive delivery technology – enabling the product to be compact, discreet, and easily transportable – Sayana® Press can be provided in low- resource, non-clinic settings, potentially transforming the way in which women can access and receive their preferred method of contraception.[1]

Despite these important products, the Company's existing disclosures did not entail any congruency analysis regarding the fact that Pfizer's PAC donated to numerous politicians[2] who opposed and blocked the federal Right to Contraception Act, which

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[1] Also, this is a substantial and touted initiative of the company on contraception:

> Pfizer completed its investment in 2021 to establish a new automated filling line for the UnijectTM injection system, which delivers the contraceptive. In total, Pfizer allocated $39 million from the bond proceeds to fund the capital expense. Once operational, this new filling line will allow for capacity to scale from 23 million units per year to up to 30 million units per year. The new automated filling line will undergo process validation and EU regulatory review in 2022, and is expected to enter into commercial production in 2023.

[2] Pfizer's PAC and Corporate Political Contributions Report lists that the PAC donated $3,500 to "Jobs Opportunity And New Ideas PAC (Sen. Joni Kay Ernst)." Senator Ernst blocked efforts to pass the Right to Contraception Act in the Senate. https://iowacapitaldispatch.com/2022/07/27/ernst-blocks-bill-guaranteeing-right-to-birth-control/

The Report also lists PAC donations to the following Congress members who voted against the Act in the House: $2,500 to Rep. Kelly Armstrong; $1,000 to Rep. Jodey Cook Arrington; $2,500 to Rep. Troy Balderson; $2,500 to Rep. Andy Barr; $6,500 to Rep. Gus Michael Bilirakis; $5,000 to Rep. Kevin Patrick Brady; $10,000 to Rep. Vernon Gale Buchanan; $2,500 to Rep. Kenneth Buck; $8,000 to Rep. Larry Dean Bucshon; $2,500 to Rep. Michael Clifton Burgess; $1,000 to Kenneth Calvert; $1,500 to Rep. Earl L. B. Carter; $500 to Rep. Benjamin L. Cline; $2,500 to Rep. Thomas Jeffrey Cole; $2,500 to Rep. Daniel Crenshaw; $8,500 to Rep. John R. Curtis; $2,500 to Rep. Thomas Earl Emmer, Jr.; $1,500 to Rep. Ron Estes; $7,500 to Rep. A. Drew Ferguson; $1,000 to Rep.

would have established a federal right to contraception, from passing in Congress last year.[3] This Act was particularly important compared to other bills about contraception because it would protect the right to access and use contraception even if the Supreme Court overturns the constitutional right to contraception and state laws are enacted to restrict or ban birth control.

Such concern regarding the right to all forms of birth control have been placed at risk by the recent Supreme Court decision in Dobbs. As one expert noted in a recent article:

> "Over the years, some abortion opponents have put forth a narrative about contraceptives that is not consistent with medical and scientific consensus," she told us. "So the question is who gets to decide if a particular product induces abortion? We see language in this decision about letting the states decide. Can a state label something as an abortifacient even if the science said it is not? This decision has opened up uncertainty and could well mean that companies have shot themselves in the foot."[4]

The crux of the lack of substantial implementation is that there is no evidence that the Company has performed and published an analysis of incongruency on this issue of support for contraception and other reproductive rights. The potential threat directly to the company's own contraception products is an issue which is expected to deepen in coming years and creates a compelling argument for the current proposal. For Pfizer this is recognized by media as a major point of controversy and congruency with the company's business needs, as demonstrated by the STAT coverage headlined: **'A slippery slope': Pfizer sells a contraceptive and donated to political groups that could come after the company.**

> Generally speaking, a company would not want to contribute to a politician whose actions could hurt its sales. But one of the biggest drugmakers may have set itself up for

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Michael Garcia; $1,000 to Rep. H. Morgan Griffith; $5,000 to Rep. S. Brett Guthrie; $2,500 to Rep. Kevin R. Hern; $5,000 to Rep. Richard Lane Hudson; $1,500 to Rep. Bill Johnson; $1,500 to Rep. David Patrick Joyce; $10,000 to Rep. Darin LaHood; $5,000 to Rep. Robert E. Latta; $1,500 to Rep. Jacob LaTurner; $1,500 to Rep. Nicole Malliotakis; $1,500 to Rep. Tracey Robert Mann; $3,500 to Rep. Patrick Timothy McHenry; $2,500 to Rep. John Moolenaar; $3,000 to Rep. Markwayne Mullin; $2,500 to Rep. Gregory J. Pence; $2,500 to Rep. Guy L. Reschenthaler; $2,500 to Rep. Tom Rice; $7,500 to Rep. Cathy McMorris Rodgers; $2,500 to Rep. Stephen Joseph Scalise; $1,000 to Rep. Jason Thomas Smith; $2,500 to Rep. Adrian Michael Smith; $2,500 to Rep. Lloyd Smucker; $1,000 to Rep. Victoria Spartz; $2,500 to Rep. Elise Stefanik; $5,000 to Rep. Ann Louise Wagner; $1,500 to Rep. Jacqueline Walorski; $2,500 to Rep. Brad Wenstrup; $2,500 to Rep. Stephen Allen Womack.

https://clerk.house.gov/Votes/2022385

[3] https://www.help.senate.gov/chair/newsroom/press/republican-senator-blocks-bill-to-codify-americans-right-to-contraception-

[4] https://www.politicalaccountability.net/wp-content/uploads/2022/07/STAT-Contraceptive-makers-donated-to-political-groups-that-could-target-them-7.1.22.pdf

> that kind of dichotomy. Since 2018, Pfizer contributed to three groups that, in turn, played a notable role in overturning Roe v. Wade through their support of elected officials. And a future item on the politically conservative agenda may be contraceptives sold by the company, a scenario that could suggest they acted against its own financial interest. [5]

In addition, although we have not conducted a comprehensive review of trade association positions related to reproductive rights we note that a proposed national comprehensive data privacy bill quite relevant to current reproductive rights controversies was opposed by the US Chamber of Commerce and is not described in the Company's congruency report on trade associations. The bill would have helped to ameliorate the threat to reproductive healthcare posed by sensitive individual consumer data. Under the legislation, consumer consent would be required prior to data being shared with data brokers and, potentially, with law enforcement. Companies would not be able to provide law enforcement with certain sensitive data as they would be prohibited from retaining it in the first place. Finally, individuals would be entitled to request to delete data that may implicate them in abortion-related prosecutions, as for instance, information about abortion medication that was legally obtained in a jurisdiction that does not criminalize the procedure. In opposing this legislation, the Chamber undercut the implementation of additional protections that would have strengthened the privacy of persons seeking abortions, including through the use of Pfizer's own products.

The specificity of the current proposal on the controversial topic of reproductive health - *as it affects the company's own customers*, in particular, is neglected by the company's purported congruency analysis. The Chamber publicly opposed the bipartisan American Data Privacy and Protection Act ("ADPPA").[6] The ADPPA would support reproductive rights by providing a nationwide comprehensive consumer privacy framework that would protect personal data such as reproductive and sexual health information.[7] Information protected under the Act includes: (1) any information that describes or reveals the past, present, or future physical health, mental health, disability, diagnosis, or healthcare condition or treatment of an individual; (2) biometric

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[5] https://www.statnews.com/pharmalot/2022/07/01/abortion-contraception-pfizer-political-donations

[6] *See* https://www.cnbc.com/2022/06/09/bipartisan-privacy-proposal-is-unworkable-chamber-of-commerce-says.html; *see also* https://www.uschamber.com/technology/data-privacy/u-s-chamber-letter-on-national-privacy-legislation

[7] *See* https://www.brookings.edu/blog/techtank/2022/07/07/how-comprehensive-privacy-legislation-can-guard-reproductive-privacy/

information; (3) genetic information; and, (4) precise geolocation information.[8] The ADPPA would also require covered entities to obtain consumer consent before transferring "sensitive covered data" -- like the above mentioned categories of information – to a third party. In addition, the Act would provide consumers with myriad controls over data that is held by covered companies, such as a right to access, correct and delete their data.

This policy opposed by the Chamber is hindering safe access to reproductive health care that is dependent on digital privacy. Following the revocation of federal constitutional rights in June 2022, various states have criminalized or severely restricted abortion access. To enforce such criminal abortion laws, it is pivotal that states are relying on personal digital data. For instance, law enforcement is seeking to access data about all individuals who were near an abortion clinic in order to identify people who may have aided or received an abortion.[9]

Strict Scrutiny of Substantial Implementation

The Company further argues that there is "no basis in either law or Staff no-action decisions" for the Proponent to assert that strict scrutiny of substantial implementation is warranted where proposals related to political contributions and lobbying.

The Proponent rests on its previous arguments in its response to the Company's no action request to show that, in fact, there is significant precedent at the SEC to support the Proponent's assertion that the Staff has utilized rigorous standards in assessing substantial implementation on proposals relating to political contributions and lobbying, because these are issues that are of major concern to many investors. The influential *Citizens United* case decided by the United States Supreme Court similarly supports the Proponent's assertion that shareholders have a right and responsibility to hold companies responsible for misdirected corporate political spending "through the procedures of

[8] https://www.congress.gov/bill/117th-congress/house-bill/8152/text#toc-H13C0EF0ECD5A46F8A9BCC8714B8A2FC9

[9] Law enforcement typically obtain such personal digital data by submitting informal information requests to companies, since companies can voluntarily share the data without running afoul of Fourth Amendment search warrant requirements. Law enforcement may also obtain these data indirectly from data brokers, as was the case with Fog Data Science – a company that the Federal Trade Commission accused of selling raw geolocation information, including individual presence at a reproductive health clinic, to law enforcement agencies.

corporate democracy"[10] which includes shareholder proposals such as this one. As we demonstrated in the prior citations, failure to rigorously meet each of the guidelines in a political contributions disclosure proposal has often been sufficient to deny the claim of substantial implementation.

Resubmission

The Company also reiterates its arguments that the proposal deals with substantially the same subject matter as the prior proposals.

Last year's proposal was not a resubmission of the proposal submitted in the prior year because, regardless of the similarities of the resolved clauses, shareholders would have understood the proposals quite differently. The conflicting background statements of the 2021 and 2022 proposals told a different story for voting shareholders regarding the thrust four implementation of a congruency analysis, leaning into issues like racial diversity and reproductive rights in the analysis contemplated by the 2021 proposal, and into concerns about discrimination against white men and ensuring a "pro-life" orientation based on the background statement of the 2022 proposal. Shareholders would have understood that they were engaging in very different signaling to the board and management in their support of the different proposals, and one would anticipate significantly different implementation based on the emphasis of the background statements. As such, the proposals were in effect addressing different subject matters.

Moving beyond the proposal of last year, this year's Proposal clearly did not address the same subject matter as last year's given the important focus on reproductive rights – a challenging issue for the company especially given its contributions records. As demonstrated in our discussion of substantial implementation above, the current proposal cannot be seen as substantially implemented in part because the Company's existing actions did not address the new focal element of the proposal. Contrary to the current Proposal, the 2022 NCPPR proposal did not center or even address the issue of reproductive rights and instead was explicitly anti-choice. This 2023 Proposal, and the measures that would implement it with the distinct in its focus on reproductive rights thus cannot be seen as a resubmission of NCPPR's proposal.

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[10] Citizens United, 558 U.S. 310 (2010).

The Company further claims that the "most logical explanation" to explain the difference in shareholder support between Tara Health's 2021 Proposal and NCPPR's 2022 Proposal is that "shareholders became less concerned about this topic following Pfizer's responsive actions to the vote on the 2021 proposal." We are skeptical that the "responsive actions" referenced by the Company were the basis for the low vote in 2022. The congruency analysis of trade associations activities provided little evidence that the board found any incongruities with trade Association activities, instead it seemed at best an effort to rationalize different positions by referencing the idea that the trade associations in some instances had policies on issues on which the company had given little focus.

While we cannot be certain as to why there was a decline in shareholder support, it is at least equally likely that the decline was due to the emphasis of the 2022 proposal's background statement on discrimination against white men and promotion of an antiabortion agenda. Unlike the current Proposal, NCPPR's 2022 proposal noted that Pfizer "supports many candidates who oppose even minimal, **common-sense pro-life policies** to protect society's most vulnerable members." (Emphasis added).

The Company's shareholders were prudent enough to grasp this material difference in the focus of the proposals and the votes reflect that. To reiterate, Tara Health's 2021 proposal received 47.2% of the vote, while NCPPR's 2022 proposal received only 10.41%.

In 2022 NCPPR used nearly an identical resolved clause as Tara Health had applied the year before, but with opposing objectives, and a resultant low vote. It is as if NCPPR were gaming the system – filing a proposal that may have indeed had the intent of repelling votes and blocking a resubmission. In recognition of the outcome of the tactic used by NCPPR, Tara Health withdrew its 2022 proposal and amended it for presentation in 2023 with a resolved clause intended to refocus on issues neglected in the 2022 proposal: Pfizer's political contribution incongruence with its own stated goal to "end discrimination against women, ensure equal opportunities for leadership and access to reproductive health." This goal is not referenced in the previous proposals.

Allowing exclusion of this Proposal as a result of NCPPR's unpopular tactic last year to use Tara Health's successful resolved clause, with a materially different focus, would not serve the purpose of the resubmission rule of preventing shareholders from voting on an issue that has already been effectively deliberated upon by the shareholders. The current proposal with its focus on women's economic and reproductive right was not voted upon in 2022 and it is appropriate for shareholders to consider the proposal in 2023.

CONCLUSION

Because the Company has not met its burden in the No-Action Request nor the Supplemental Letter to prove that the Proposal is excludable under Rule 14a-8(i)(10) or Rule 14a-8(i)(12), we request that the Staff inform the Company that the SEC proxy rules require denial of the Company's no-action request. Please call me at (413) 549-7333 with respect to any questions in connection with this matter, or if the Staff wishes any further information.

Sincerely,

Sanford Lewis

Brittany Blanchard Goad

cc: Margaret M. Madden